NOTICE OF PROJECT CHANGE

December 14, 2023

South Weymouth Naval Air Station Redevelopment Project

Abington, Rockland, Weymouth, Massachusetts

Submitted to:
Energy and Environmental Affairs
MEPA Office
100 Cambridge St., Suite 900
Boston, MA 02114

Submitted by:
BPD Union Point LLC
c/o New England Development
75 Park Plaza
Boston, MA 02116

EEA No: 11085R

Prepared by:
Tetra Tech, Inc.
100 Nickerson Road, Suite 200
Marlborough, MA 01752

In Association with:
DumontJanks
Goulston & Storrs PC
ILEX Environmental, Inc.
Tech Environmental
Vanasse & Associates, Inc.

TETRA TECH

goulston&storrs thinkresults

Brookfield Properties

NEW ENGLAND DEVELOPMENT

BPD Union Point LLC
c/o New England Development
75 Park Plaza
Boston, MA 02116

December 14, 2023

Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Rebecca Tepper, Secretary
Attn: Tori Kim, Director of MEPA Office

Subject: Notice of Project Change and Supplementary Filing
Redevelopment of South Weymouth Naval Air Station (SWNAS) (EOEEA No. 11085R)

Dear Secretary Tepper and Director Kim:

We are pleased to submit the enclosed Notice of Project Change (NPC) and supplementary filing in connection with the proposed redevelopment of SWNAS in Weymouth, Abington and Rockland, Massachusetts (the "Site") into a mixed-use, master planned community including, without limitation, a combination of residential, retail, office, commercial, life-science, hospitality, recreational, warehouse and restaurant uses supported by an extensive open space network.

Project Summary

Master plan redevelopment of the approximately 1,440-acre Site (the "Project", or "Base") has been in process, to varying degrees, since closure of SWNAS in the late 1990's. For 25 years, the Project has been characterized by starts and stops, failures and defaults, shifting development plans, and unfulfilled promises. In part, past failures were due to prior zoning with very rigid development parameters. To date, only approximately 1,274 homes and 73,000 square feet of commercial uses have been developed at the Base.

The enclosed NPC and supplementary filing describes the currently proposed development program for future development at SWNAS (referred to therein as the "2023 Modified Development Program"). While the currently proposed 2023 Modified Development Program maintains the total of approximately 13,000,000 sf of development last proposed in the 2017 NPC, it reflects current market conditions and proposes an updated mix of housing and commercial development – i.e., 6,000 residential units and 2,000,000 sf of commercial space (in addition to the existing conditions at SWNAS). Prior development proposals outlined a total commercial square footage that well exceeded the demands of the marketplace, BPD Union Point LLC, a joint venture between Brookfield Properties and New England Development (NED) (the "Proponent"), has designed the current proposal to result in housing opportunities, as well as a robust, but realistic, commercial component.

Key benefits of the 2023 Modified Development Program for the Project include the following:

- Ongoing consultation with the Natural Heritage & Endangered Species Program (NHESP) and the Towns to create an **open space plan that results in a total of approximately 885 acres of open**

space on the Base, including **removal of the 12 acres of debris piles** still existing on the Base and the provision of approximately **519 acres of protected open space areas** and significant acreage of contiguous, high-quality grassland habitat.

- Provision of **much needed housing (including ownership and rental homes)**.
- Presentation of two options (with possible additional permutations) to finally ensure a **permanent water solution to SWNAS**.
- Determination of **solutions to establish wastewater capacity in each Town** sufficient to accept the flow generated on the areas of SWNAS in each respective Town.
- Completion of a comprehensive Traffic Impact Assessment (TIA), attached as Appendix D, prepared in coordination with the Towns, which identifies **necessary transportation improvements** to be implemented to mitigate for any potential impacts from the project including delivery of mitigation measures from prior master developers that were never realized.
- Establishment of **net property tax revenue benefits to the Towns in the range of a total of $20-$23.5 million dollars at full-build**, plus creation of ongoing state revenues to repay Commonwealth bonds, currently in default.
- **Creation of hundreds of construction jobs** over the 12- to 15-year buildout period, **as well as permanent jobs** associated with the program's commercial component.

As noted throughout the enclosed filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within the enclosed filing and the supporting studies, the amount of proposed residential and commercial development may fluctuate (depending on market demand and conditions) provided that the infrastructure is sufficient to support such development.

The 2023 Modified Development Program for the Project limits its impact on the environment by focusing future development within previously disturbed areas of the Base, incorporating best practices for sustainable design and implementing comprehensive transportation improvements and a robust TDM Program (e.g., to encourage non-SOV modes of travel).

MEPA History and Engagement

MEPA review of the Project has a long history dating back to the late 1990's. Since issuance of the initial FEIR Secretary's Certificate for the Project dated July 18, 2007, and commencement of construction at SWNAS, engagement with MEPA and construction at SWNAS has been ongoing and continues today. In accordance with the terms set forth in the most recent NPC Secretary's Certificate for the Project, this NPC and supplementary filing also responds to outstanding Scope items from the 2017 NPC Secretary's Certificate dated April 28, 2017 and material comments contained in the comment letters attached to same, each if and to the extent they remain relevant to the 2023 Modified Development Program.

Due to the extensive and continuous MEPA history at the Site and ongoing nature of construction, along with the comprehensive and responsive nature of this filing, the Proponent respectfully requests the issuance of a certificate on this NPC allowing a Final Supplemental Report (with appropriate responses to questions) focused solely on any new impacts related to the 2023 Modified Development Program detailed throughout this filing.

We respectfully request that you publish notice of availability of the EENF for public review in the December 22, 2023 edition of *The Environmental Monitor*. Requests for copies of the filing should be directed to Jason Hellendrung at (508) 786-2220 or via email at Jason.Hellendrung@tetratech.com.

We look forward to your review of this Project. Please contact me at (617) 243-7070 or jtwohig@nedevelopment.com if you have any questions. Thank you.

Very truly yours,

BPD Union Point LLC

By: _____

John E. Twohig, Duly Authorized

Cc: *See Appendix A – NPC Circulation List*

NPC Form

Commonwealth of Massachusetts

Executive Office of Energy and Environmental Affairs ■ MEPA Office

Notice of Project Change

The information requested on this form must be completed to begin MEPA Review of a NPC in accordance with the provisions of the Massachusetts Environmental Policy Act and its implementing regulations (see 301 CMR 11.10(1)).

EEA # 11085R		
Project Name: South Weymouth Naval Air Station Redevelopment Project		
Street Address: 26 Memorial Grove Avenue, Weymouth		
Municipality: Abington, Rockland, and Weymouth	Watershed: Weymouth & Weir, North & South Rivers, and Taunton	
Universal Transverse Mercator Coordinates:	Latitude: 42.20625 Longitude: 70.94510	
Estimated commencement date: 2025	Estimated completion date: 2040	
Project Type: mixed-use redevelopment	Status of project design: 15 %complete	
Proponent: BPD Union Point LLC c/o New England Development		
Street Address: 75 Park Plaza		
Municipality: Boston	State: MA	Zip Code: 02116
Name of Contact Person: Jason S. Hellendrung, ASLA, PLA		
Firm/Agency: Tetra Tech, Inc.	Street Address: 100 Nickerson Road	
Municipality: Marlborough	State: MA	Zip Code: 01752
Phone: (508) 786-2200	Fax: (508) 786-2201	E-mail: jason.hellendrung@tetratech.com

With this Notice of Project Change, are you requesting:

a Single EIR? (see 301 CMR 11.06(8)) ☐Yes ☒No

a Special Review Procedure? (see 301CMR 11.09) ☐Yes ☒No

a Waiver of mandatory EIR? (see 301 CMR 11.11) ☐Yes ☒No

a Phase I Waiver? (see 301 CMR 11.11) ☐Yes ☒No

Which MEPA review threshold(s) does the revised project meet or exceed (see 301 CMR 11.03)? Identify any new or modified review threshold(s) associated with the project change.

- 11.03(1)(a)(1) Direct alteration of 50 or more acres of land;
- 11.03(1)(a)(2) Creation of ten or more acres of impervious area;
- 11.03(2)(b)(2) Greater than two acres of disturbance of designated priority habitat;
- 11.03(3)(b)(1)(d) Alteration of 5,000 or more sf of bordering or isolated vegetated wetlands;
- 11.03(4)(b)(3) Construction of one or more new water mains five or more miles in length;
- 11.03(5)(b)(4)(a) New discharge or Expansion in discharge to a sewer system of 100,000 or more gpd of sewage, industrial wastewater, or untreated stormwater;
- 11.03(6)(a)(6) Generation of 3,000 or more New adt on roadways providing access to a single location; and
- 11.03(6)(a)(7) Construction of 1,000 or more new parking spaces at a single location

Which Agency Permits does the revised project require?

- Massachusetts Department of Environmental Protection – Water Quality Certification (if

necessary), and such related water and sewer permits to service the Project.

- Massachusetts Water Resources Commission – Interbasin Transfer Act, as needed to serve the Project, to be obtained by others.
- Massachusetts Department of Transportation – Highway Access Permit
- Natural Heritage and Endangered Species Program - Conservation and Management Permit

Identify any financial assistance or land transfer from an Agency of the Commonwealth for the revised project, including the Agency name and the amount of funding or land area in acres:

The Project received financial assistance from the Commonwealth for construction of Bill Delahunt Parkway. Further, the Proponent intends to seek financial support and other tax and related relief from the Commonwealth and the surrounding communities, as appropriate, as the design of the Project is refined.

PROJECT INFORMATION

In 25 words or less, what is the project change? The project change involves recalibrating the 13,000,000 sf of proposed development to reflect market conditions and proposes a mix of housing and commercial development.

See full project change description beginning on page 5.

Date of publication of availability of the ENF in the Environmental Monitor: (Date: July 25, 2000)

Was an EIR required?	☒Yes	☐No; if yes,
was a Draft EIR filed?	☒Yes (Date: October 16, 2006)	☐No
was a Final EIR filed?	☒Yes (Date: May 31, 2007)	☐No
was a Single EIR filed?	☐Yes (Date:)	☒No

Have other NPCs been filed? ☒Yes ☐No
(Dates: December 15, 2005, February 29, 2008, and February 28, 2017)

If this is an NPC solely for lapse of time (see 301 CMR 11.10(2)) proceed directly to **ATTACHMENTS & SIGNATURES**.

PERMITS / FINANCIAL ASSISTANCE / LAND TRANSFER

List or describe all new or modified Agency permits, financial assistance, or land transfers not previously reviewed: **include list of Agency Actions (e.g., Agency Project, Financial Assistance, Land Transfer, List of Permits)** None.

Are you requesting a determination that this project change is insignificant such that an EIR should not be required (***note that the Proponent may also seek an advisory ruling under 301 CMR 11.10(6)***)? A change in a Project is ordinarily insignificant if it results solely in an increase in square footage, linear footage, height, depth or other relevant measures of the physical dimensions of the Project of less than 10% over estimates previously reviewed, provided the increase does not meet or exceed any review thresholds. A change in a Project is also ordinarily insignificant if it results solely in an increase in

impacts of less than 25% of the level specified in any review threshold, provided that cumulative impacts of the Project do not meet or exceed any review thresholds that were not previously met or exceeded. (see 301 CMR 11.10(6))

☐**Yes** ☒**No; if yes, provide an explanation of this request in the Project Change Description below.**

FOR PROJECTS SUBJECT TO AN EIR

If the project requires the submission of an EIR, are you requesting that a Scope in a previously issued Certificate be rescinded?
☐**Yes** ☒**No; if yes, provide an explanation of this request**_____.

If the project requires the submission of an EIR, are you requesting a change to a Scope in a previously issued Certificate?
☐**Yes** ☒**No; if yes, provide an explanation of this request**_____.

SUMMARY OF PROJECT CHANGE PARAMETERS AND IMPACTS

Summary of Project Size & Environmental Impacts	Previously Reviewed (2017 NPC)	Net Change	Currently Proposed
LAND			
Total site acreage	1,462	-22	1,440
Acres of land altered	663	-108	555
Acres of impervious area[1]	425	-25	400
Square feet of bordering vegetated wetlands alteration[2]	10,790	--	--
Square feet of other wetland alteration[2]	10,658	--	--
Acres of non-water dependent use of tidelands or waterways	0	0	0
STRUCTURES			
Gross square footage	8,000,000 (commercial)	-6,000,000 (commercial)	2,000,000 (commercial)
Number of housing units[3]	3,855	+3,419	7,274
Maximum height (in feet)	120	+5	125
TRANSPORTATION			
Vehicle trips per day	79,000	-25,562	53,438
Parking spaces	19,500 – 43,900	-8,450 – -23,400	11,050 – 20,500

WATER/WASTEWATER			
Gallons/day (GPD) of water use	2,700,000	-900,000	1,800,000
GPD water withdrawal	90,000	-90,000	0
GPD wastewater generation/ treatment	2,300,000	-700,000	1,600,000
Length of water/sewer mains (in miles) On-site water On-site sewer Off-site water	 Approx. 6 Approx. 6 Approx. 6 -15	 0	 Approx. 6 Approx. 6 Approx. 6 -15

1. Calculation of the previously reviewed acreage of impervious area cannot be confirmed.
2. Anticipated impacts are limited to work allowed under the WPA limited project provisions for roadway improvements pursuant to 310 CMR 10.53(3)e.
3. Upon completion of construction of the 2023 Modified Development Program, there will be a total of 7,274 units. Unless otherwise noted, impacts summarized in this table and throughout this filing for the 2023 Modified Development Program are based on the impacts from the newly proposed 6,000 units and 2,000,000 sf commercial component. Impacts from the existing 1,274 units and 73,000 sf commercial were identified as the baseline condition from which the impacts of such program were studied.

Does the project change involve any new or modified:

1. conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97? ☐**Yes** ☒**No**

2. release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction? ☐**Yes** ☒**No**

3. impacts on Rare Species**?** ☐**Yes** ☒**No**

4. demolition of all or part of any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth? ☐**Yes** ☒**No**

5. impact upon an Area of Critical Environmental Concern? ☐**Yes** ☒**No**

If you answered 'Yes' to any of these 5 questions, explain below:

PROJECT CHANGE DESCRIPTION (attach additional pages as necessary). The project change description should include:

(a) a brief description of the project as most recently reviewed,
(b) a description of material changes to the project as previously reviewed,
(c) if applicable, the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and
(d) measures that the project is taking to avoid Damage to the Environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any prior mitigation commitments or previously issued Section 61 Finding, include a description of any such changes and a draft of the modified Section 61 Finding (or it will be required in Supplemental EIR).

The project change description should include a comprehensive description of the proposed project change, including a description of any work or activities associated with the original project that have occurred to date. At the discretion of the MEPA Office, an alternatives analysis for the changed component(s) of the project may be required, including a summary of alternatives

considered and associated environmental impacts at a level of detail commensurate with the scope and scale of the proposed change. In addition to the required attachments, the filing should include supporting technical data (e.g., a Traffic Impact and Access Study, Stormwater Report, etc.) as appropriate. It should include a full list of mitigation commitments that remain unchanged from the previously reviewed project.

The 2023 Modified Development Program maintains the total of approximately 13,000,000 sf of development last proposed in the 2017 NPC, it recalibrates to reflect market conditions and proposes a mix of housing and commercial development – i.e., 6,000 residential units and 2,000,000 sf of commercial space. As noted throughout this filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within this filing and the supporting studies, depending on market demand and conditions, the amount of proposed residential and commercial development may fluctuate provided that the infrastructure is sufficient to support such development.

This comprehensive NPC filing sets forth the proposed changes to the Project to reflect the 2023 Modified Development Program, with supporting information to fully explain such changes and the related impacts. As detailed throughout this filing the proposed changes include:

- Concentrating development within previously disturbed areas;
- Vastly improving the open space network through the creation of extensive north-south greenways that connect the proposed perimeter open space area;
- Increasing protections for onsite wildlife habitat and rare species populations;
- Providing much needed housing (including ownership and rental units) at a scale to support complementary commercial uses; and
- Providing interim- and long-term infrastructure solutions to support future buildout at SWNAS and the surrounding communities.

ATTACHMENTS & SIGNATURES

Attachments:

1. Secretary's most recent Certificate on this project ***(see Appendix F)***
2. Plan showing most recent previously reviewed proposed build condition ***(see Appendix F)***
3. Plan showing currently proposed build condition ***(see Figure 1-4)***
4. Original U.S.G.S. map or good quality color copy (8-1/2 x 11 inches or larger) indicating the project location and boundaries ***(see Figure 1-1)***
5. List of all agencies and persons to whom the proponent circulated the NPC, in accordance with 301 CMR 11.10(7) ***(see Appendix A)***

Signatures:

12/14/23 — Date — Signature of Responsible Officer or Proponent

12/14/23 — Date — Signature of person preparing NPC (if different from above)

John E. Twohig	Jason S. Hellendrung
Name (print or type)	Name (print or type)
New England Development	Tetra Tech
Firm/Agency	Firm/Agency
75 Park Plaza	100 Nickerson Road
Street	Street
Boston, MA 02116	Marlborough, MA 01752
Municipality/State/Zip	Municipality/State/Zip
(617) 243-7070	(508) 786-2200
Phone	Phone

Executive Summary

EXECUTIVE SUMMARY

South Weymouth Naval Air Station: The Past (1940-1997)

Before World War II, the land that would ultimately become the South Weymouth Naval Air Station (SWNAS) was a typical New England forest and associated farm land. The land, approximately 15 miles south of Boston, is situated between two of the primary north-south transportation corridors of the area: Main Street (Route 18) and Route 228/Route 3.

Following the Naval Expansion Act of 1940, the United States Navy acquired the land. The forest was cleared and the land was flattened, originally for the Navy's non-rigid airships (blimps) used to patrol the coast in search of submarines during WWII. With the end of WWII, the Base was used primarily for storage until 1953, when training facilities from Squantum Naval Air Station were transferred to South Weymouth and the Base was expanded for runway construction for the increased use of jet aircraft. Ultimately, the Base grew to over 1,400 acres, of which approximately 900 acres were cleared and flattened to support the Base.

SWNAS was one of nearly 100 military bases across the country listed as surplus as a result of the Base Realignment and Closure (BRAC) Act by Congress and was recommended for closure in 1995. In response to the Department of Defense's (DOD) decision to close SWNAS, the Towns of Abington, Rockland and Weymouth (the "Towns") requested that the Governor establish the Naval Air Station Planning Committee (NASPC). The NASPC adopted the first reuse plan on January 27, 1998, to govern reuse of the Base. Subsequently, the Legislature enacted Chapter 301 of the Acts of 1998, to establish a Local Redevelopment Authority (LRA), to succeed NASPC as the sole entity responsible for pursuing the acquisition and redevelopment of SWNAS. As described in the 1998 Act, the purpose was *"to promote the expeditious and orderly conversion and redevelopment of NAS South Weymouth for nonmilitary purposes, including, but not limited to, commercial, housing, industrial, institutional, educational, governmental, recreational, conservation, or manufacturing uses in order to prevent blight, economic dislocation and additional unemployment, and to aid and strengthen the local economy, the regional economy and the economy of the Commonwealth."*

South Weymouth Naval Air Station: The Initial Redevelopment (1998-2020)

For 25 years, redevelopment of SWNAS (the "Project") has been characterized by starts and stops, failures and defaults, multiple development plans, and unfulfilled promises. From 2002-2007, a previously proposed development program for SWNAS referred to as "Southfield", which centered around a golf course development, went through MEPA review. From 2014-2019, the development was re-named "Union Point", which eliminated the golf course and proposed a total of 3,855 housing units and 8,000,000 square feet of commercial space including Life Sciences, Manufacturing, Office, Retail, Hotel, Conference Center, Fitness/Wellness Center, a Sports Stadium, and a hockey rink. The related Union Point zoning for SWNAS set very specific allowed uses by areas and phases, dividing the Base into over 30 zoning districts and overlay districts. The rigidity and complexity of these zoning controls contributed to the failure of earlier redevelopment plans, particularly in changing economic markets over the years (e.g., the Recession in 2008-11).

The delivery of key infrastructure – water, wastewater and transportation improvements to support the Base buildout – has always been central to each of the proposed redevelopment plans, as well as designating land as open space. None of the above-described earlier plans fulfilled these obligations. While some transportation improvements have been implemented, (many were completed at the expense of the Commonwealth). Plans to bring water supply or create wastewater capacity to serve the Base have not been finalized to date. Prior development plans focused on piecemeal, incremental improvements, to allow a small phase of development to be completed, without ever determining a viable, long-term solution, to support full buildout at the Base in the future. A substantial portion of Base remains covered by the remains of former Navy facilities, broken runways and taxiways,

aircraft stands, old roads, buildings and demolished foundations. These abandoned areas limit user friendly open space and recreation. The plan going forward remedies that by building around newly created active open spaces.

South Weymouth Naval Air Station: The Future

Since selection in 2020, the Proponent has created a new vision to guide the Project, which is informed by feedback from the Towns and onsite community. This vision is referred to in this filing as the 2023 Modified Development Program. Open Space drives this new program and provides a framework for converting the pattern of paved runways and taxiways to beneficial greenways. The new greenways create north-south open space connections that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base, while also maintaining a perimeter open space buffer to adjacent properties. In total, approximately 885 acres of the Base will remain or will be programmed as open space.

The 2023 Modified Development Program focuses new development within the areas of the Base that were previously developed as Navy facilities, much of which were already cleared and paved. Such new development will be organized around a system of open space greenways, which forms the spine connecting large open spaces and around which new commercial and residential areas and the long-promised town center will be built. This vision will transform the currently underutilized Base to an attractive destination where people can live, work and shop. With proximity to the South Weymouth Commuter Rail Station, the new development will utilize the existing transportation infrastructure along the Parkway and Memorial Grove Avenue, supplemented by a new system of streets, sidewalks, bike paths, and trails to be built to support the growth of commercial and residential areas at the Base. The 2023 Modified Development Program will finally achieve the smart growth, sustainable, transit-oriented brownfield redevelopment that has long been promised but never delivered at the Base.

The 2023 Modified Development Program maintains the total of approximately 13,000,000 square feet of mixed-use development at the Base that was proposed in prior development programs. However, unlike prior programs, and as detailed throughout this filing, the currently proposed program allows for reallocation of commercial and residential uses to respond to market conditions, ensuring the long-term viability of the SWNAS master planned community. This filing, and the supporting studies attached as Appendices evaluate the impacts of the currently projected future buildout of 6,000 homes and 2,000,000 square feet of commercial development. As noted above, such allocation of uses may shift over the projected 12–15-year buildout period in order to respond to then-current market demand.

Key features of the 2023 Modified Development Program include the following:

- Ongoing consultation with the Natural Heritage & Endangered Species Program (NHESP) and the Towns to create an **open space plan** that results in a total of approximately 885 acres of open space on the Base, including removal of the 12 acres of debris piles dumped in prime grassland habitat by prior developers still existing on the Base and the provision of approximately 519 acres of protected open space areas with significant acreage of contiguous, high-quality grassland habitat.
- Provision of much needed **housing** (including ownership and rental units) at a scale to support complementary commercial uses.
- Presentation of two options (with possible additional permutations) to finally ensure a **permanent water solution** for the Base.
- Determination of solutions to establish **wastewater capacity** in each Town sufficient to accept the flow generated on the areas of the Base in each respective Town.
- Completion of a **comprehensive Traffic Impact Assessment (TIA)**, attached as Appendix D, prepared in coordination with the Towns, which identifies necessary transportation improvements to be implemented to mitigate any potential impacts from the project including delivery of mitigation measures from prior master developers that were never realized.

- Establishment of a Project which can provide net **property tax revenue benefits** to the Towns in the range of a total of $20-$23.5 million dollars, plus creation of ongoing state revenues to repay existing bonds currently in default.
- Creation of **hundreds of construction jobs** over the 12- to 15-year buildout period, as well as **permanent jobs** associated with the program's residential and commercial components.

When completed, the Project will finally realize the master plan goals for Base redevelopment dating back to the 1998 Act to promote the "conversion and redevelopment of NAS South Weymouth… to commercial, housing, industrial, institutional, educational, governmental, recreational, conservation, or manufacturing uses in order to prevent blight, economic dislocation and additional unemployment, and to aid and strengthen the local economy, the regional economy and the economy of the commonwealth". **Implementation of the 2023 Modified Development Program for the Project is critical** in order to realize such goals and transform the Base into the dynamic, transit-oriented community it was always envisioned to become, ultimately centered in smart growth principles and positioned for long-term success.

Project Narrative

Table of Contents

List of Tables

List of Figures

List of Appendices

Acronym	Meaning
ADD	Average Daily Demand
ARJWB	Abington Rockland Joint Water Board
ASCT	Adaptive Signal Control Technologies
ASHP	Air Source Heat Pumps
AUL	Activity and Use Limitation
BMP	Best Management Practice
Base	Former South Weymouth Naval Air Station
BRAC	Base Realignment and Closure
CAC	Citizens Advisory Committee
CO2	Carbon Dioxide
CMP	Construction Management Permit
DAR	Massachusetts Department of Agricultural Resources
DCR	Massachusetts Department of Conservation and Recreation
DEIR	Draft Environmental Impact Report
DOD	Department of Defense
EEM	Energy Efficient Measure
EENF	Expanded Environmental Notification Form
EIR	Environmental Impact Report
EJ	Environmental Justice
EOEEA	Executive Office of Energy and Environmental Affairs
ENF	Environmental Notification Form
EPA	United States Environmental Protection Agency
EPD	Environmental Product Declarations
ERV	Energy Recovery Ventilation
ETC	Employee Transportation Coordinator
FEIR	Final Environmental Impact Report
FIRM	FEMA Flood Insurance Rate Map
FOST	Finding of Suitability for Transfer
GFA	Gross Floor Area
GHG	Greenhouse Gas
gpd	Gallon per day
GWSA	Global Warming Solutions Act

Acronym	Meaning
HVAC	heating, ventilation and air conditioning
I/I	Infiltration/Inflow
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	level of service
LRA	LOCAL REDEVELOPMENT AUTHORITY
LUC	Land Use Controls
MA WPA	Massachusetts Wetlands Protection Act
MassDEP	Massachusetts Department of Environmental Protection
MassGIS	Massachusetts Geographical Information Systems
MCP	Massachusetts Contingency Plan
MDP	Modified Development Program
MEPA	Massachusetts Environmental Policy Act
MHC	Massachusetts Historical Commission
mgd	million gallons per day
MS4	Municipal Separate Storm Sewer Systems
MWRA	Massachusetts Water Resources Authority
MUDD	Mixed Use Development District
MVP	Municipal Vulnerability Preparedness
NASPC	Naval Air Station Planning Committee
NHESP	Massachusetts Division of Fisheries & Wildlife-Natural Heritage & Endangered Species Program
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NOx	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
ORW	Outstanding Resource Water
OSD	Open Space District
PFAS	perfluorooctane sulfanate and/or perfluorooctanoic acid
PHIUS	Passive House Institute US
PMD	Personal Mobility Device
RGP	Remediation General Permit

Acronym	Meaning
RTN	Release Tracking Number
SCS	Soil Conservation Service
SEIR	Single Environmental Impact Report
SF	Square foot
SOV	Single Occupancy Vehicle
SRA	Southfield Redevelopment Authority
SRP	Special Review Procedure
SMP	Stormwater Master Plan
SSO	Sanitary Sewer Overflow
SWNAS	South Weymouth Naval Air Station
TIAs	Traffic Impact Assessments
TDM	Transportation Demand Management
TMDL	Total Maximum Daily Load
TSM	Transportation Systems Management
USACE	US Army Corps of Engineers
USDA	United States Department of Agriculture
VOC	volatile organic compound
vpd	vehicles per day
vph	vehicles per hour
VRF	Variable Refrigerant Flow

EXECUTIVE SUMMARY

South Weymouth Naval Air Station: The Past (1940-1997)

Before World War II, the land that would ultimately become the South Weymouth Naval Air Station (SWNAS) was a typical New England forest and associated farm land. The land, approximately 15 miles south of Boston, is situated between two of the primary north-south transportation corridors of the area: Main Street (Route 18) and Route 228/Route 3.

Following the Naval Expansion Act of 1940, the United States Navy acquired the land. The forest was cleared and the land was flattened, originally for the Navy's non-rigid airships (blimps) used to patrol the coast in search of submarines during WWII. With the end of WWII, the Base was used primarily for storage until 1953, when training facilities from Squantum Naval Air Station were transferred to South Weymouth and the Base was expanded for runway construction for the increased use of jet aircraft. Ultimately, the Base grew to over 1,400 acres, of which approximately 900 acres were cleared and flattened to support the Base.

SWNAS was one of nearly 100 military bases across the country listed as surplus as a result of the Base Realignment and Closure (BRAC) Act by Congress and was recommended for closure in 1995. In response to the Department of Defense's (DOD) decision to close SWNAS, the Towns of Abington, Rockland and Weymouth (the "Towns") requested that the Governor establish the Naval Air Station Planning Committee (NASPC). The NASPC adopted the first reuse plan on January 27, 1998, to govern reuse of the Base. Subsequently, the Legislature enacted Chapter 301 of the Acts of 1998, to establish a Local Redevelopment Authority (LRA), to succeed NASPC as the sole entity responsible for pursuing the acquisition and redevelopment of SWNAS. As described in the 1998 Act, the purpose was *"to promote the expeditious and orderly conversion and redevelopment of NAS South Weymouth for nonmilitary purposes, including, but not limited to, commercial, housing, industrial, institutional, educational, governmental, recreational, conservation, or manufacturing uses in order to prevent blight, economic dislocation and additional unemployment, and to aid and strengthen the local economy, the regional economy and the economy of the Commonwealth."*

South Weymouth Naval Air Station: The Initial Redevelopment (1998-2020)

For 25 years, redevelopment of SWNAS (the "Project") has been characterized by starts and stops, failures and defaults, multiple development plans, and unfulfilled promises. From 2002-2007, a previously proposed development program for SWNAS referred to as "Southfield", which centered around a golf course development, went through MEPA review. From 2014-2019, the development was re-named "Union Point", which eliminated the golf course and proposed a total of 3,855 housing units and 8,000,000 square feet of commercial space including Life Sciences, Manufacturing, Office, Retail, Hotel, Conference Center, Fitness/Wellness Center, a Sports Stadium, and a hockey rink. The related Union Point zoning for SWNAS set very specific allowed uses by areas and phases, dividing the Base into over 30 zoning districts and overlay districts. The rigidity and complexity of these zoning controls contributed to the failure of earlier redevelopment plans, particularly in changing economic markets over the years (e.g., the Recession in 2008-11).

The delivery of key infrastructure – water, wastewater and transportation improvements to support the Base buildout – has always been central to each of the proposed redevelopment plans, as well as designating land as open space. None of the above-described earlier plans fulfilled these obligations. While some transportation improvements have been implemented, (many were completed at the expense of the Commonwealth). Plans to bring water supply or create wastewater capacity to serve the Base have not been finalized to date. Prior development plans focused on piecemeal, incremental improvements, to allow a small phase of development to be completed, without ever determining a viable, long-term solution, to support full buildout at the Base in the future. A substantial portion of Base remains covered by the remains of former Navy facilities, broken runways and taxiways,

aircraft stands, old roads, buildings and demolished foundations. These abandoned areas limit user friendly open space and recreation. The plan going forward remedies that by building around newly created active open spaces.

South Weymouth Naval Air Station: The Future

Since selection in 2020, the Proponent has created a new vision to guide the Project, which is informed by feedback from the Towns and onsite community. This vision is referred to in this filing as the 2023 Modified Development Program. Open Space drives this new program and provides a framework for converting the pattern of paved runways and taxiways to beneficial greenways. The new greenways create north-south open space connections that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base, while also maintaining a perimeter open space buffer to adjacent properties. In total, approximately 885 acres of the Base will remain or will be programmed as open space.

The 2023 Modified Development Program focuses new development within the areas of the Base that were previously developed as Navy facilities, much of which were already cleared and paved. Such new development will be organized around a system of open space greenways, which forms the spine connecting large open spaces and around which new commercial and residential areas and the long-promised town center will be built. This vision will transform the currently underutilized Base to an attractive destination where people can live, work and shop. With proximity to the South Weymouth Commuter Rail Station, the new development will utilize the existing transportation infrastructure along the Parkway and Memorial Grove Avenue, supplemented by a new system of streets, sidewalks, bike paths, and trails to be built to support the growth of commercial and residential areas at the Base. The 2023 Modified Development Program will finally achieve the smart growth, sustainable, transit-oriented brownfield redevelopment that has long been promised but never delivered at the Base.

The 2023 Modified Development Program maintains the total of approximately 13,000,000 square feet of mixed-use development at the Base that was proposed in prior development programs. However, unlike prior programs, and as detailed throughout this filing, the currently proposed program allows for reallocation of commercial and residential uses to respond to market conditions, ensuring the long-term viability of the SWNAS master planned community. This filing, and the supporting studies attached as Appendices evaluate the impacts of the currently projected future buildout of 6,000 homes and 2,000,000 square feet of commercial development. As noted above, such allocation of uses may shift over the projected 12–15-year buildout period in order to respond to then-current market demand.

Key features of the 2023 Modified Development Program include the following:

- Ongoing consultation with the Natural Heritage & Endangered Species Program (NHESP) and the Towns to create an **open space plan** that results in a total of approximately 885 acres of open space on the Base, including removal of the 12 acres of debris piles dumped in prime grassland habitat by prior developers still existing on the Base and the provision of approximately 519 acres of protected open space areas with significant acreage of contiguous, high-quality grassland habitat.
- Provision of much needed **housing** (including ownership and rental units) at a scale to support complementary commercial uses.
- Presentation of two options (with possible additional permutations) to finally ensure a **permanent water solution** for the Base.
- Determination of solutions to establish **wastewater capacity** in each Town sufficient to accept the flow generated on the areas of the Base in each respective Town.
- Completion of a **comprehensive Traffic Impact Assessment (TIA)**, attached as Appendix D, prepared in coordination with the Towns, which identifies necessary transportation improvements to be implemented to mitigate any potential impacts from the project including delivery of mitigation measures from prior master developers that were never realized.

- Establishment of a Project which can provide net **property tax revenue benefits** to the Towns in the range of a total of $20-$23.5 million dollars, plus creation of ongoing state revenues to repay existing bonds currently in default.
- Creation of **hundreds of construction jobs** over the 12- to 15-year buildout period, as well as **permanent jobs** associated with the program's residential and commercial components.

When completed, the Project will finally realize the master plan goals for Base redevelopment dating back to the 1998 Act to promote the "conversion and redevelopment of NAS South Weymouth… to commercial, housing, industrial, institutional, educational, governmental, recreational, conservation, or manufacturing uses in order to prevent blight, economic dislocation and additional unemployment, and to aid and strengthen the local economy, the regional economy and the economy of the commonwealth". **Implementation of the 2023 Modified Development Program for the Project is critical** in order to realize such goals and transform the Base into the dynamic, transit-oriented community it was always envisioned to become, ultimately centered in smart growth principles and positioned for long-term success.

1.0 INTRODUCTION

As detailed in Sections 1.2 and 1.3 below, master plan redevelopment of the approximately 1,440-acre South Weymouth Naval Air Station (SWNAS) in Abington, Rockland, and Weymouth, Massachusetts (the "Project") has been in process, to varying degrees, since closure of SWNAS in the late 1990s. The initial Massachusetts Environmental Policy Act (MEPA) FEIR Secretary's Certificate related to the Project was issued in 2007, and was modified by Notices of Project Change (NPCs) through 2017 reflecting variations to previously proposed development programs. This document is an NPC and supplementary filing being submitted to MEPA to describe the currently proposed development program for future development at SWNAS (referred to herein as the "2023 Modified Development Program"), and as more fully set forth below, is responsive to the 2017 NPC Secretary's Certificate (as defined below). This filing is being submitted by BPD Union Point LLC, a joint venture between Brookfield Properties and New England Development (NED).

This comprehensive NPC and supplementary filing sets forth the proposed changes to the Project to reflect the 2023 Modified Development Program, with supporting information to fully explain such changes and the related impacts. As detailed throughout this filing and shown on Figure 1-4, the proposed changes include:

- Concentrating development within previously disturbed areas;
- Vastly improving the open space network through the creation of extensive north-south greenways that connect the proposed perimeter open space area;
- Increasing protections for onsite wildlife habitat and rare species populations;
- Providing much needed housing (ownership and rental opportunities) at a scale to support complementary commercial uses; and
- Providing interim- and long-term infrastructure solutions to support future buildout at the Base with benefits to the surrounding communities.

In accordance with the terms set forth in the NPC Certificate dated April 28, 2017 (the "2017 NPC Secretary's Certificate"), this filing also responds to outstanding Scope items from the 2017 NPC Secretary's Certificate and material comments contained in the comment letters attached to the 2017 NPC Secretary's Certificate, each if and to the extent they remain relevant to the 2023 Modified Development Program.

1.1 PROPONENT INFORMATION

Project Name: South Weymouth Naval Air Station (SWNAS) Redevelopment Project

EOEEA No.: 11085R

Project Location: Abington, Rockland, Weymouth, Massachusetts

Project Proponent: BPD Union Point LLC

1.1.1 Development Team

Proponent:
BPD Union Point LLC
c/o New England Development
75 Park Plaza
Boston, MA 02116
Contact: John E. Twohig, Esq.
Telephone: 617-243-7070

Attorney:
Goulston & Storrs PC
400 Atlantic Avenue
Boston, MA 02110
Contact: Timothy W. Sullivan

Master Planner:
DumontJanks
129 Kingston Street, Ground Floor
Boston, MA 02111
Contact: Ricardo Dumont

Civil Engineer:
Tetra Tech, Inc.
100 Nickerson Road, Suite 200
Marlborough, MA 01752
Contact: Jason S. Hellendrung, ASLA, PLA

Traffic Engineer:
Vanasse & Associates, Inc.
35 New England Business Center Drive, Suite 140
Andover, MA 01810
Contact: Jeffrey S. Dirk, P.E., PTOE, FITE

Greenhouse Gas/Air/Noise:
Tech Environmental
303 Wyman Street, Suite 295
Waltham, MA 02451
Contact: Marc C. Wallace, QEP, INCE

Wetland Scientist:
ILEX Environmental, Inc.
35 Vernon Street
Plymouth, MA 02360
Contact: Kathryn Barnicle, PWS

1.2 PROJECT BACKGROUND

SWNAS (also referred to herein as the "Site" and the "Base) was one of nearly 100 military bases across the country listed as surplus as a result of the Base Realignment and Closure (BRAC) Act by Congress, and was ultimately decommissioned by the Department of Defense (DOD) on September 30, 1997. In response to DOD's decision to close SWNAS, the Towns of Abington, Rockland and Weymouth (Towns) requested that the Governor establish the Naval Air Station Planning Committee (NASPC), which was accomplished with the issuance of Executive Order 378 of 1995. The NASPC adopted a first reuse plan on January 27, 1998, to govern reuse of SWNAS (the "1998 Reuse Plan"). Subsequently, Chapter 301 of the Acts of 1998 (the "1998 Act"), as amended by Section 37 Chapter 303 of the Acts of 2008, was enacted to establish a Local Redevelopment Authority (LRA), the South Shore Tri-Town Development Corporation (SSTTDC), to succeed NASPC as the sole entity responsible for pursuing the acquisition and redevelopment of SWNAS.

In October 2002, LNR South Shore LLC (LNR) was selected by the SSTTDC as the Master Developer to develop SWNAS on SSTTDC's behalf in accordance with the 1998 Reuse Plan. LNR created a master plan for SWNAS (the "Village Center Master Plan") and developed a new reuse plan that was adopted by the Towns on May 5, 2005 (the "2005 Reuse Plan").

In 2007, construction commenced on the initial infrastructure to serve the northwest section of SWNAS. This included upgrades to Shea Memorial Drive and the construction of Memorial Grove Avenue and Parkview Street along with related utility systems.

In 2011, housing construction at SWNAS had commenced and the first residents began to move in. By the end of 2011, the Navy had transferred nearly ninety percent (90%) of the developable property at SWNAS to SSTTDC.

In 2014, SSTTDC was reconstituted and reorganized as the Southfield Redevelopment Authority (SRA) pursuant to Chapter 291 of the Acts of 2014 (the "2014 Act"). The 2014 Act rescinded the 2005 Reuse Plan and accompanying Village Center Master Plan. Accordingly, a new 2014 Redevelopment Plan was approved on December 30, 2014 and a new 2014 Revised Master Plan created.

Since the passage of the 2014 Act and the approval of the 2014 Redevelopment Plan, the following changes have occurred:

- In May 2015, the SRA consented to the transfer of the responsibilities and obligations of Master Developer from LNR to LStar Southfield LLC (LStar), as evidenced by a prior Disposition and Development Agreement (DDA).
- LStar defaulted on its obligations as Master Developer under the terms of the prior DDA and, after receipt of notice of the same from the SRA, LStar failed to timely cure such defaults; therefore, the SRA delivered notice to LStar terminating the prior DDA and LStar's role as the Master Developer.
- The SRA issued a Request for Proposal for Real Estate Development Services for Union Point (the "RFP") on September 25, 2019, to which multiple parties responded.
- BPD Union Point LLC (Proponent) was selected by the SRA through a competitive process to enter into exclusive negotiations with the SRA to become the Master Developer for the remaining land to be developed at SWNAS under a new DDA.
- As shown on Figure 1-2, to date, approximately 1,274 homes, approximately 73,000 sf of commercial space, the East-West Parkway, a 25-acre sports and recreation facility, the MBTA parking area and three community entrances have been developed at SWNAS.

Since selection at the end of 2019, the Proponent has:

- **Created a new vision** to guide development and support regulatory requirements for SWNAS. As detailed throughout this filing and shown on Figure 1-4, the vision for the 2023 Modified Development Program focuses development within previously disturbed areas, vastly improves the open space network through the creation of extensive north-south greenways that connect the perimeter open space areas, and provides much needed housing and complementary commercial uses.
- **Updated the Redevelopment Plan**, adopted by the SRA on March 15, 2023 (2023 Redevelopment Plan), which superseded and replaced any prior Reuse or Redevelopment Plans. The Master Developer and the SRA intend to modify the 2014 Act, working with the State delegation, to reflect the above-described 2023 Redevelopment Plan, which informed the 2023 Modified Development Program described in this filing.
- **Updated the SWNAS zoning-bylaw**, which was **approved by all required local legislative parties**, as follows: (i) the SRA on March 29, 2023; (ii) Weymouth Council on June 26, 2023; (iii) Abington Town Meeting on October 14, 2023; and (iv) Rockland Town Meeting on November 7, 2023.
- Supported the SRA and **worked with the towns** of Weymouth, Abington, and Rockland to develop **water, wastewater, and transportation** infrastructure solutions to support buildout of the Project, without negatively impacting the development within the Towns.
- As detailed in Section 6.3, worked with the Natural Heritage & Endangered Species Program (NHESP) to develop parameters for an **updated Conservation and Management Permit** (CMP) to replace the current permit, which is in default.

Following issuance of the 2007 FEIR Secretary's Certificate for the Project (detailed below) and the commencement of construction at SWNAS, construction at the Site has been ongoing and continues today.

As demonstrated by this filing and the supporting materials, the Proponent's 2023 Modified Development Program is designed to enable SWNAS to reach its full potential, including through fulfillment of the guiding legislation for redevelopment at the Base (i.e., the 2014 Act) *"to promote the expeditious and orderly conversion and redevelopment of NAS South Weymouth for nonmilitary purposes, including, but not limited to, commercial, housing, industrial, institutional, educational, governmental, recreational, conservation, or manufacturing uses in order to prevent blight, economic dislocation and additional unemployment, and to aid and strengthen the local economy, the regional economy and the economy of the commonwealth."*

1.3 MEPA HISTORY

1.3.1 Redevelopment of SWNAS

As summarized in Table 1-1 below, MEPA review of the Project has a long history dating back to the late 1990s. Since issuance of the 2007 FEIR Secretary's Certificate and commencement of construction at SWNAS, engagement with MEPA and construction at SWNAS has been ongoing and continues today. As proposed development programs changed over time (see Section 1.2 above and descriptions in Table 1-1 below), prior Master Developers filed NPCs to reflect appropriate modifications. This comprehensive NPC filing sets forth the proposed changes to the Project to reflect the 2023 Modified Development Program with supporting information to fully explain such changes and the related impacts.

In accordance with the terms set forth in the 2017 NPC Certificate (as referred to in the most recent December 2017 NPC Secretary's Certificate, see below), this filing also responds to outstanding Scope items from the 2017 NPC Secretary's Certificate and material comments contained in the comment letters attached to the 2017 NPC Secretary's Certificate, each if and to the extent they remain relevant to the 2023 Modified Development Program.

Table 1-1 MEPA Review History

Date	Action
1997	ENF submitted and withdrawn.
2000 (July)	ENF and Request for Special Review Procedure (SRP) submitted.
2000 (Oct.)	2000 ENF Secretary's Certificate issued, finding that an EIR was required and establishing an SRP (including for phased development of the Project, coordinated MEPA/NEPA review of the transportation elements, and identification of a Phase 1 Area[1] for which a filing/report could be submitted prior to a full EIR filing).
2002 (May)	Phase 1 Report submitted, including description of proposed East-West Parkway that would traverse SWNAS and connect Route 3 in Hingham with Route 18 in Weymouth.
2002 (Aug.)	2002 Secretary's Certificate for Phase 1 Report, allowing for development of the Phase 1 Area prior to submittal of an EIR.
2003 (June)	Phase 1 Status Update submitted.
2005 (Dec.)	NPC #1 for Village Center Master Plan submitted.
2006 (Feb.)	2006 NPC #1 Secretary's Certificate, finding that an EIR was required and that sufficient information was provided to grant the Phase 1 Waiver pursuant to the SRP.
2006 (Nov.)	DEIR for Village Center Master Plan submitted.
2006 (Dec.)	2006 DEIR Secretary's Certificate issued, finding that an FEIR was required.
2007 (May)	FEIR for Village Center Master Plan submitted.

[1] The Phase 1 Area can be described as the northwest quadrant of the SWNAS site, bounded by Shea Memorial Drive on the north and east, Trotter Road on the south, and the western property line of SWNAS.

Date	Action
2007 (July)	2007 FEIR Secretary's Certificate issued, finding that: (i) the FEIR adequately and properly complied with MEPA and that 2,855 residential units and approximately 2,000,000 sf of commercial space were proposed; (ii) the East-West Parkway had been realigned, resulting in a significant decrease in wetlands impacts; and (iii) under the SRP, the CAC concluded its service.
2008 (Feb.)	NPC #2 for interim water supply and wastewater treatment options submitted.
2008 (Apr.)	2008 NPC #2 Secretary's Certificate issued, finding that no SEIR was required.
2015	Request for Advisory Opinion re: status of East-West Parkway review submitted.
2015 (June)	Advisory Opinion issued, finding that no additional review of the East-West Parkway was necessary since the Project was sufficiently studied and consistent with the 2007 FEIR.
2017 (Feb.)	NPC #3 submitted for 2014 Revised Master Plan, including proposed development of up to approximately 8,000,000 square feet of commercial space and 3,855 residential units resulting in a total of approximately 13,000,000 square feet of development.
2017 (Apr.)	April 2017 NPC #3 Secretary's Certificate issued, finding that a DSEIR was required.
2017 (Oct.)	NPC #4 for changes in the phasing of the development and the timing of the implementation of mitigation measures submitted.
2017 (Dec.)	December 2017 NPC #4 Secretary's Certificate issued, finding that residential construction could proceed without linkage to commercial development and that the terms of the April 2017 NPC Secretary's Certificate otherwise still applied, thereby requiring a DSEIR.

1.3.2 Route 18 Widening

In addition to the SWNAS-specific MEPA history summarized above, the environmental impacts of the Route 18 widening, which in part accommodates proposed traffic impacts for redevelopment at SWNAS, were reviewed and addressed in separate MEPA filings. The MEPA Advisory Opinion issued in February 2010 confirmed that for permitting purposes, the SWNAS redevelopment project and the Route 18 widening project are separate projects and not dependent on the MEPA review of each other In 2012, MassDOT filed an SEIR for the widening of Route 18 to support the redevelopment of SWNAS. A Secretary's Certificate was issued in September 2012, concluding that the SEIR adequately and properly complied with MEPA. The Route 18 widening project was completed in 2022.

1.4 PROPOSED 2023 MODIFIED DEVELOPMENT PROGRAM (PROJECT CHANGE)

For 25 years, the redevelopment of SWNAS has been characterized by starts and stops, failures and defaults, shifting development plans, and unfulfilled promises. In part, past failures were due to prior proposals including very rigid development programs. For example, under prior programs, only very specific uses could be developed in certain areas and residential development was tied to the construction of a certain square footage of commercial uses, making it impossible for the prior proposals to timely respond to market conditions (e.g., the 2008 recession, the pandemic driven impacts on commercial demands and the current housing crisis). These evolving conditions have resulted in a change in the constituent components of the previously proposed development program, but not the mixed-use focus that best serves the existing development at SWNAS as well as the surrounding regions.

While the currently proposed 2023 Modified Development Program maintains the total of approximately 13,000,000 sf of development last proposed in the 2017 NPC, it reflects current market conditions and proposes an updated mix of housing and commercial development – i.e., 6,000 residential units and 2,000,000 sf of commercial space (in addition to the existing conditions shown on Figures 1-2 and 1-3). Where prior development proposals proposed a total commercial square

footage that well exceeded the needs of the marketplace, the current proposal results in additional housing opportunities, including rental and homeownership options, of a scale to support the reduced commercial component of the development proposed at SWNAS. As described above, the evolving market conditions have resulted in a change in the constituent components of the previously proposed development program, but not the mixed-use focus.

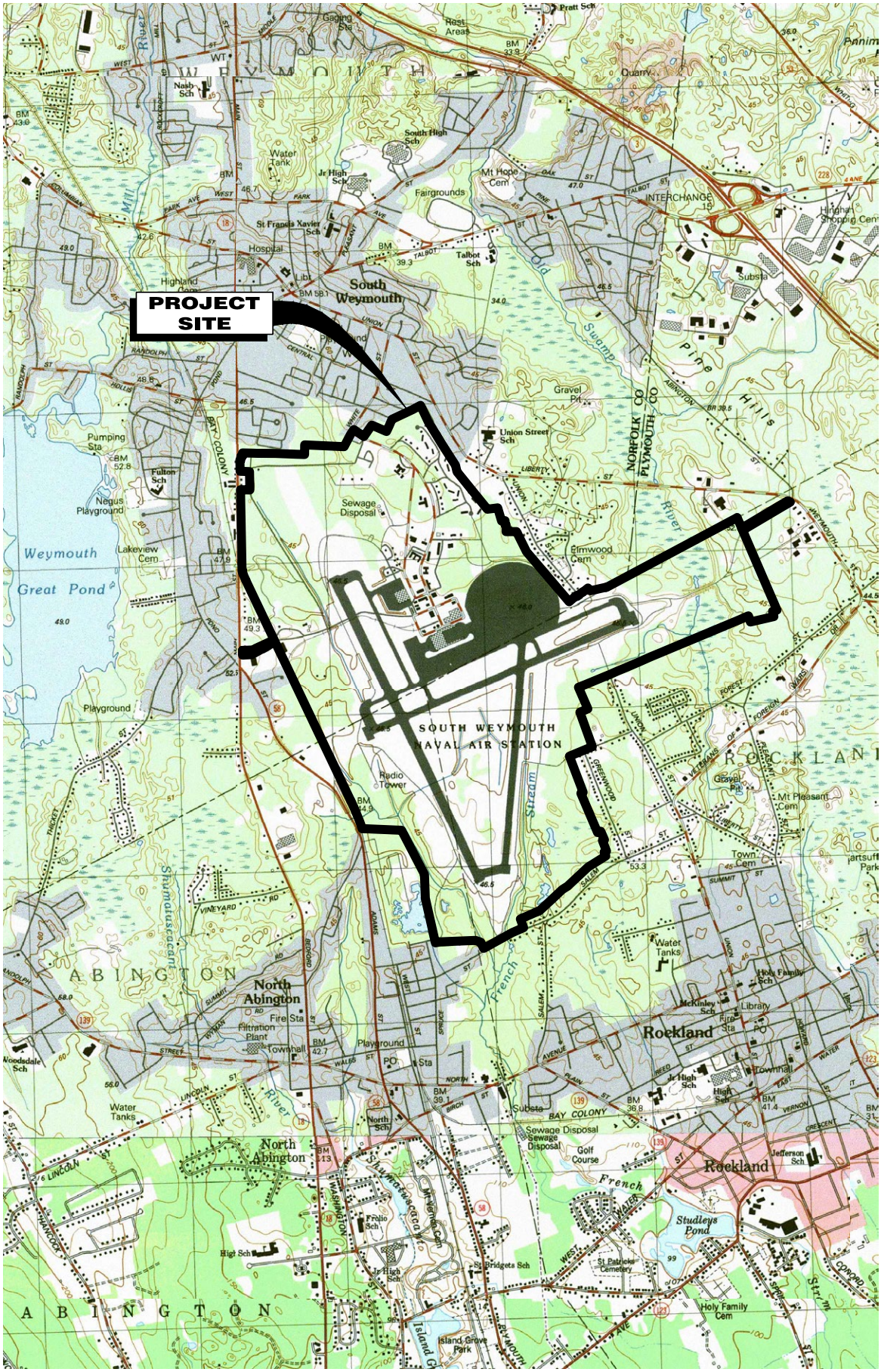
As noted throughout this filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within this filing and the supporting studies, depending on market demand and conditions, the amount of proposed residential and commercial development may fluctuate provided that the infrastructure is sufficient to support such development. For example, in order to respond to market demands, the Proponent could implement an increase/decrease in the proportions of residential and commercial uses within the 2023 Modified Development Program (e.g., a 1,300,000 square foot increase in commercial space may be offset by a decrease of 1,000 residential homes).

As described above, the current proposal for future development of the Project allows for the development of an economically viable master planned, smart-growth community that will grow and change over time. As detailed throughout this filing and shown on the Site Plan attached as Figure 1-4, new development will be concentrated on the previously developed areas of the Base, much of which were cleared and paved, with new neighborhoods growing from the existing neighborhoods and the long-desired town center coming to fruition. The 2023 Modified Development Program will incorporate pedestrian-friendly design with a broad mix of homes, shops and businesses, restaurants, industrial and office space, all organized in relation to recreation and green spaces. This design will be informed by thoughtful site planning, allowing for a mix of traditional neighborhoods supported by complementary commercial uses connected by significant open space (both undisturbed to preserve natural resources and improved to allow for passive and active recreation).

In total, the 2023 Modified Development Program proposes to maintain approximately 885 acres of the 1,440-acre Base as open space. As shown on Figure 6-1, the proposed open space framework includes a perimeter open space buffer area, which will be complemented by north-south greenways that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base. Most prominently, the 2023 Modified Development Program is based on this framework for converting the pattern of paved north/south runways and taxiways into new 100 to 200-foot-wide greenways comprised of long linear green blocks. These green areas will contain control points at the roadway crossings that provide the ability to induce flood storage in the landscaped greenways. Thus, the new linear green area provides not only walking/passive recreation in fair weather but also stormwater storage and treatment (sedimentation, nutrient uptake, infiltration) in storms. The Proponent acknowledges that significant improvements will be needed to area stormwater, water and wastewater infrastructure in order to accommodate the Project at full buildout and has been diligently studying interim- and long-term solutions as detailed in Section 7.1 through 7.3 of this filing.

As detailed in Section 8.0 of this filing, the mixed-use focus of the 2023 Modified Development Program achieves trip reduction by providing residential, retail and employment opportunities in a centralized area that is supported by an interconnected network of roadways, sidewalks, and bicycle facilities. The current proposal will implement significant transportation mitigation measures as detailed in Section 8.0, while also utilizing the existing transportation infrastructure along the East-West Parkway and Memorial Grove Avenue and benefiting from SWNAS's proximity to the South Weymouth Commuter Rail Station.

Recognizing SWNAS's significance to the surrounding region, the 2023 Modified Development Program allows the Proponent to advance future development in a manner that maximizes the opportunity for generating "net positive revenue" while also providing flexibility to address market changes and other challenges that may arise over the course of a multi-year redevelopment.



TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

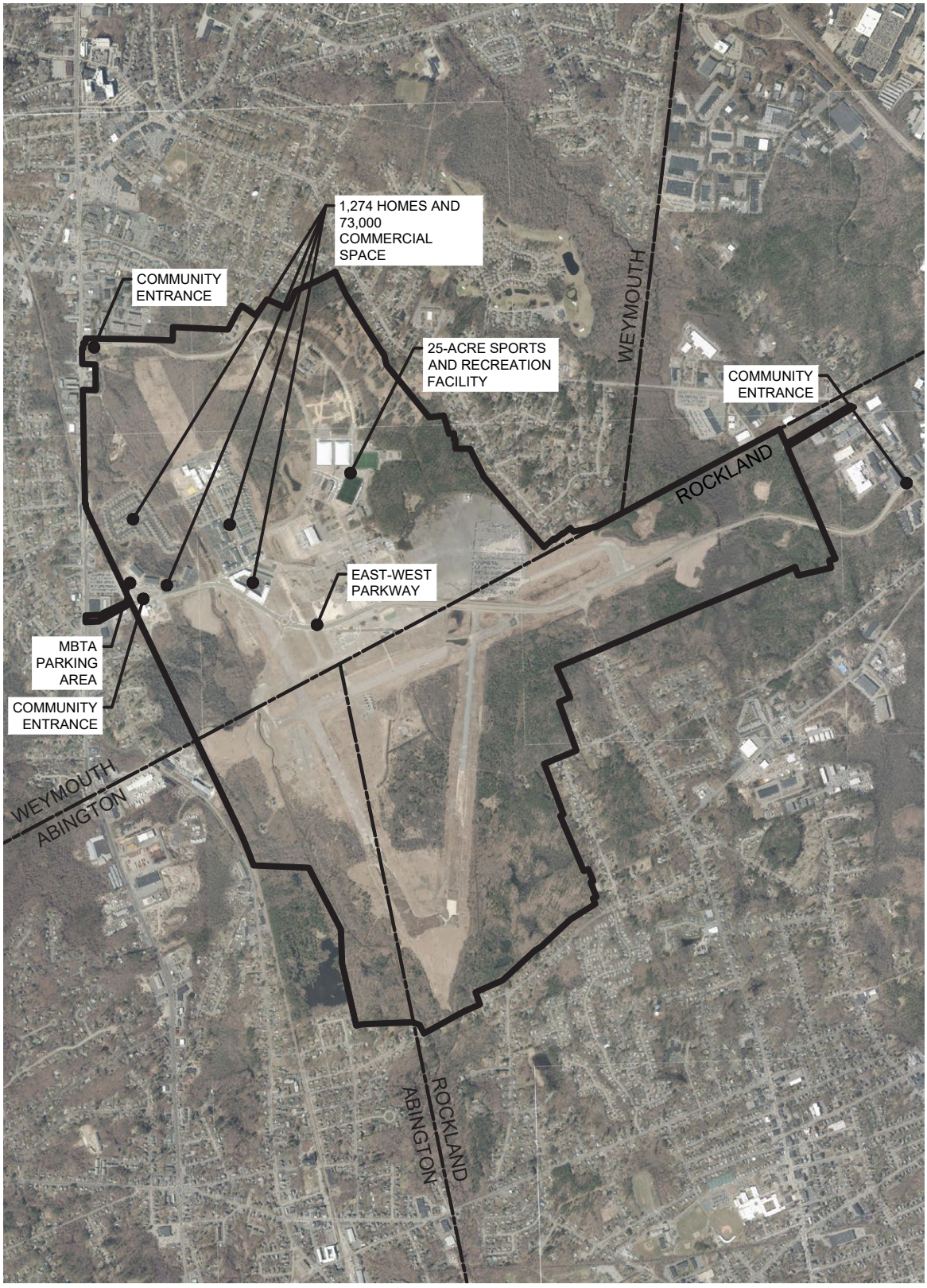
South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

USGS Locus Map

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

Figure 1-1

12/11/2023 12:33:36 PM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - USGS LOCUS MAP.DWG - BOOTHBY, THOMAS



LEGEND

SITE BOUNDARY

TOWN BOUNDARY

0 750' 1500'

SCALE: 1"=1500'

N

TETRA TECH

www.tetratech.com

100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

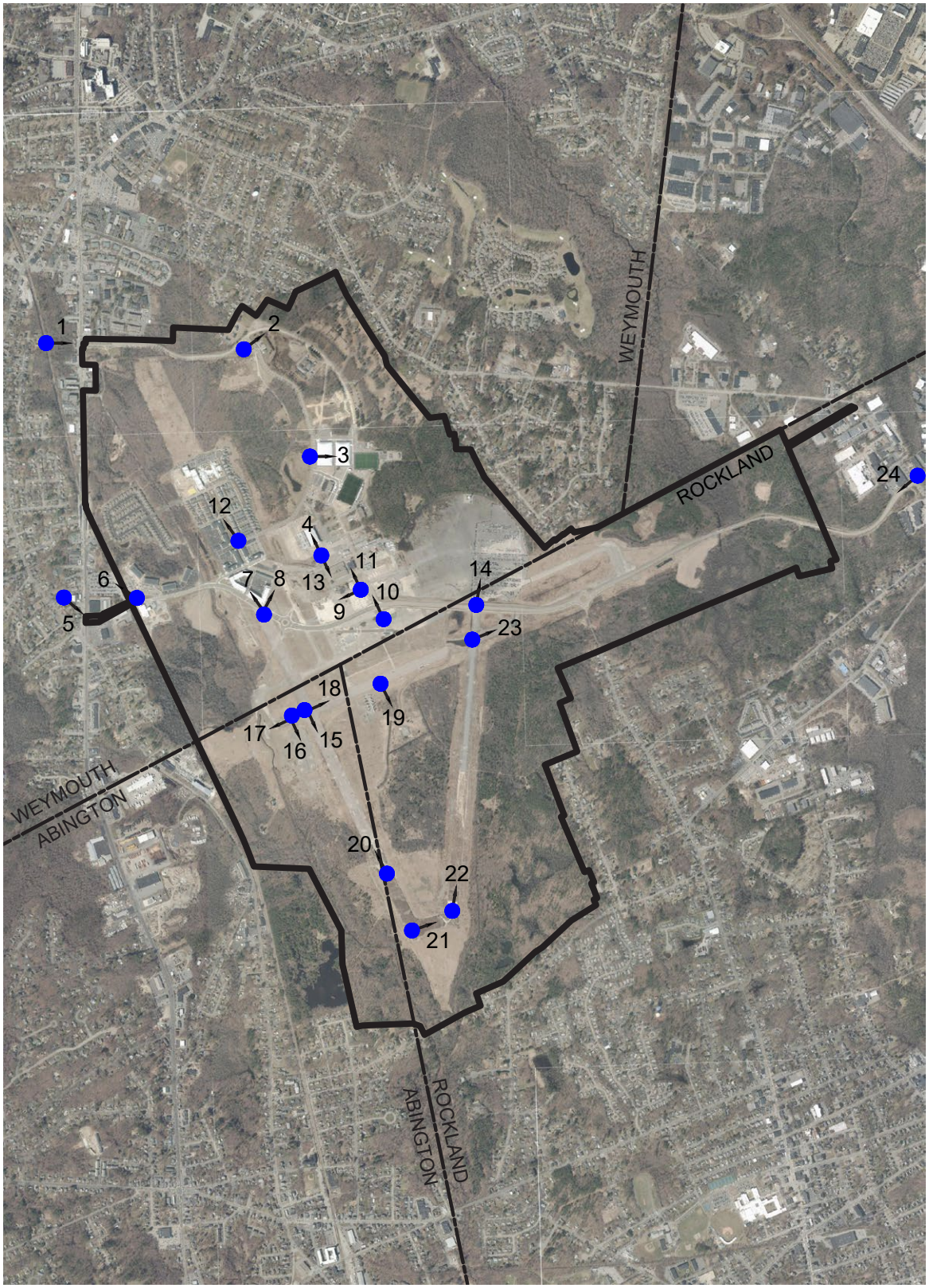
South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Existing Conditions Plan

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

Figure 1-2

12/11/2023 3:58:18 PM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - SITE AERIAL MAP.DWG - BOOTHBY, THOMAS



LEGEND

- SITE BOUNDARY
- TOWN BOUNDARY
- PHOTO LOCATION

0 750' 1500'
SCALE: 1"=1500'

N

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Existing Conditions Photo Key Plan

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

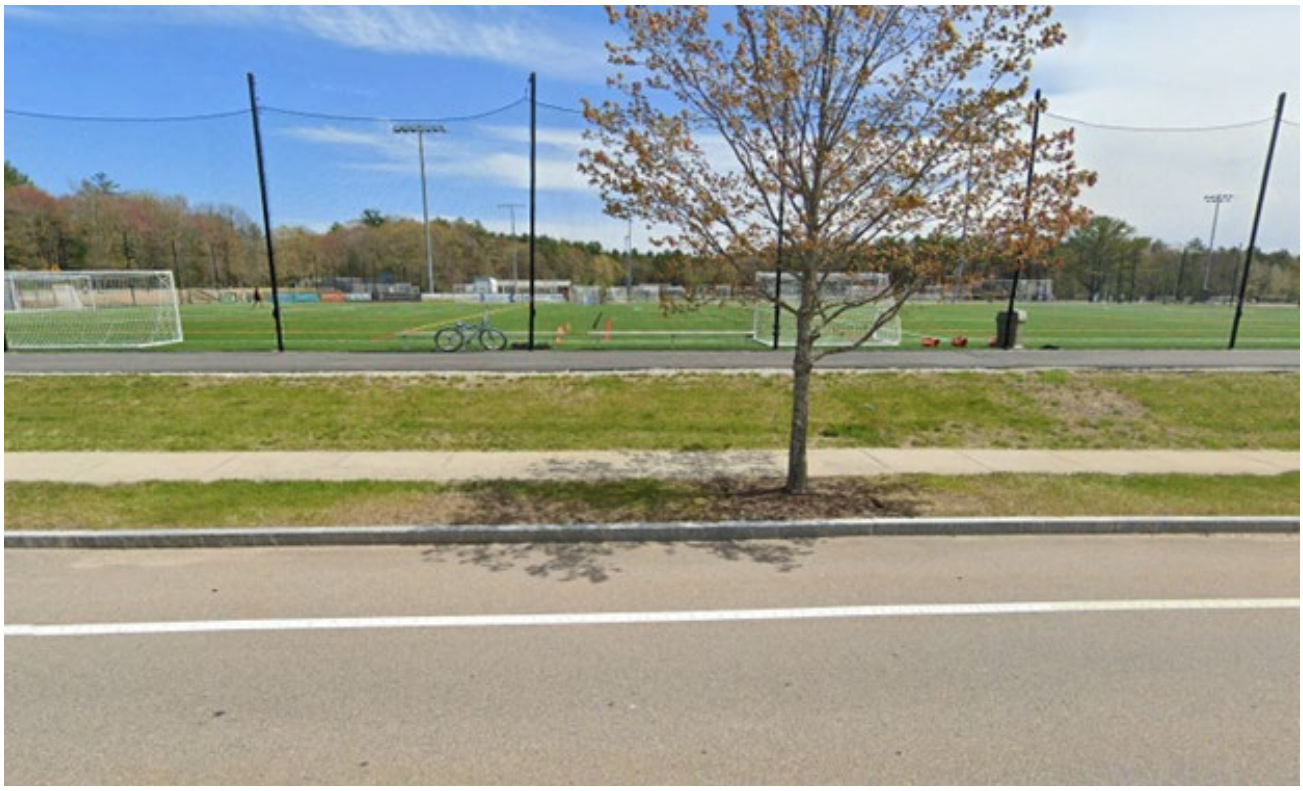
Figure 1-3

12/11/2023 4:00:01 PM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - SITE AERIAL MAP.DWG - BOOTHBY, THOMAS

Photograph 1

Photograph 2

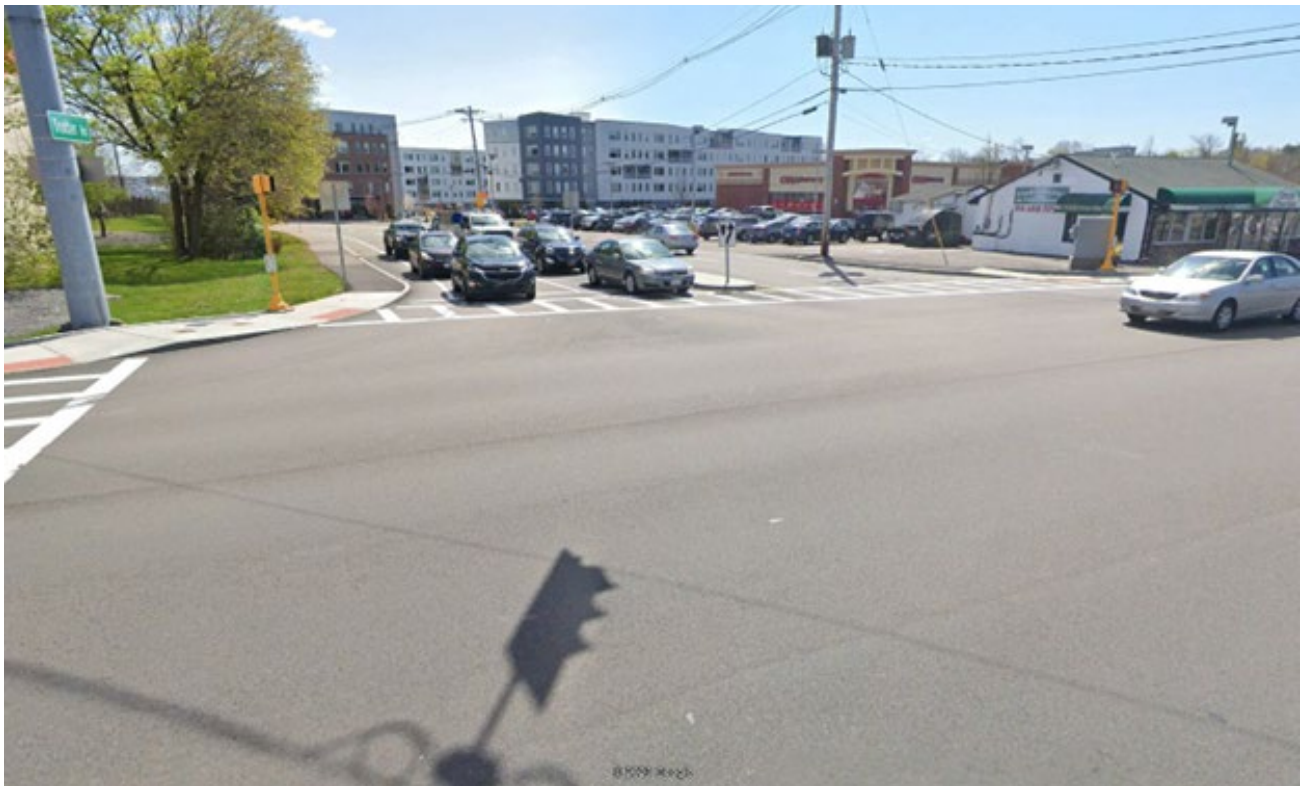
Photograph 3



Photograph 4

Figure 1-3b

Photograph 5



Photograph 6

Figure 1-3c

Photograph 7

Photograph 8

Photograph 9

Photograph 10

Photograph 11

Photograph 12

Figure 1-3f

Photograph 13

Photograph 14

Photograph 15

Photograph 16

Photograph 17

Photograph 18

Photograph 19

Photograph 20

Photograph 21

Photograph 22

Photograph 23

Photograph 24

FIGURE 1-4. SOUTH WEYMOUTH NAVAL AIR STATION REDEVELOPMENT

PROPOSED 2023 MODIFIED DEVELOPMENT PROGRAM

2.0 EXISTING CONDITIONS

SWNAS is comprised of approximately 1,440 acres in total. As shown on the Existing Conditions Plan attached as Figure 1-2, to date, SWNAS has been developed to include 1,274 homes, 73,000 sf of commercial space, the East-West Parkway, a 25-acre sports and recreation facility, the MBTA parking area and three community entrances. The existing homes include a variety of attached and detached single family as well as townhomes, condominiums and age restricted choices. There is a mix of for sale and for rent homes and approximately 10% of the homes qualify as 'affordable' or 'workforce.'

The existing commercial space is comprised of approximately 33,000 sf of ground floor retail, and 40,000 sf of general commercial (e.g., nursing facilities, communal living and dining spaces) located in Fairing Way, a senior living facility.

2.1 REDEVELOPMENT PLAN AND REZONING

As noted above, the SRA, working with the Proponent, unanimously adopted a new Redevelopment Plan for the Base on March 15, 2023. To implement the vision set forth in the Redevelopment Plan and to promote development of the 2023 Modified Development Program, the SRA, in cooperation with the Master Developer, developed updated zoning for the Base, which consists of a new zoning map and an amended and restated bylaw. Pursuant to the Enabling Legislation, which will be amended to reflect the current development proposal, the updated zoning must be approved by each of the Towns with land within the Base. Accordingly, (i) Weymouth Town Council unanimously approved the map and bylaw on June 26, 2023, (ii) Abington approved the map and bylaw on October 14, 2023 by way of a two-thirds majority vote at Town Meeting and (iii) Rockland approved the map and bylaw on November 7, 2023 by way of a two-thirds majority vote at Town Meeting.

The recently adopted zoning map and bylaw retain existing zoning districts where development has occurred at the Base, delineates one consolidated Open Space District (OSD) on the perimeter of the Base and creates one new Mixed Use Development District (MUDD) over all undeveloped areas. The MUDD encourages development of a mix of uses at the undeveloped areas at the Base, including various commercial and residential uses (including a 10% affordability requirement), all as detailed throughout this filing. The MUDD also promotes open space connections throughout the Base. Finally, development within the MUDD is required to meet certain dimensional, design and performance standards (for example, regarding sustainable development). Consistent with the zoning, and as detailed throughout this filing, the 2023 Modified Development Program includes a mix of complementary uses, surrounded and connected by desirable open space and amenities.

2.2 REGULATORY APPROVALS AND FINANCING

This section addresses the anticipated permits and approvals, as well as the local planning and regulatory controls applicable to the Project. Table 2-1 below presents a preliminary list of governmental reviews and approvals that the Project may need to undergo or obtain, depending on its final design. As the design of the Project evolves, it may be determined that certain reviews and approvals listed below do not apply to the Project, or that certain additional reviews and approvals not listed below will apply to the Project. Additionally, the Proponent intends to seek financial support and other tax and related relief from the Commonwealth and the surrounding communities, as appropriate, as the design of the Project is refined.

Table 2-1 Anticipated Project Permits and Approvals

Issuing Authority	Permit	Status of Filing
Federal		
Environmental Protection Agency	National Pollutant Discharge Elimination System (NPDES) Construction General Permit	To be obtained by phases
Environmental Protection Agency	National Pollutant Discharge Elimination System (NPDES) Dewatering General Permit*	To be obtained
State		
Executive Office of Energy and Environmental Affairs	Massachusetts Environmental Policy Act (MEPA) Review	In progress
Massachusetts Department of Environmental Protection (MassDEP)	Water Quality Certification	To be obtained (if necessary)
Massachusetts Department of Transportation (MassDOT)	Highway Access Permit	To be obtained
Natural Heritage and Endangered Species Program	Conservation and Management Permit	In progress
Massachusetts Water Resources Commission	Interbasin Transfer Act	To be obtained by others (See Section 7.0)
Local		
Southfield Redevelopment Authority (SRA)	Redevelopment Plan	Approval March 15, 2023
Southfield Redevelopment Authority (SRA)	Proposed Zoning Bylaw and Map	Approval March 29, 2023
Town of Weymouth	Proposed Zoning Bylaw and Map	Approval June 26, 2023
Town of Abington	Proposed Zoning Bylaw and Map	Approval October 14, 2023
Town of Rockland	Proposed Zoning Bylaw and Map	Approval November 7, 2023
Southfield Redevelopment Authority (SRA)	Project Development Review	To be obtained
Local Conservation Commission	Order of Resource Area Delineation (ORAD) and/or Order of Conditions	To be obtained (if necessary)
Department of Public Works, Building Department and Other Local Agencies	Anticipated demolition, building, occupancy and any other permits needed from the SRA and Towns, as needed***	To be obtained

*This permit is related to construction and operation of the construction dewatering plant described in Section 9.2 of this filing.

**Additional state permits and approvals may be necessary to allow for legislative, financial or other state actions deemed appropriate or necessary as the design of the Project progresses.

***Additional local permits and approvals may be necessary to allow implementation of water, wastewater, and transportation improvements. It is anticipated that these improvements will be temporary in nature, to allow construction, but are primarily, if not all, in public rights-of-way. Some of these may be in state-designated routes and will continue to be reviewed with MassDOT and/or the MBTA. Given the proposed water route alignments, wastewater and transportation improvements, these may occur in, and require approval from, Weymouth, Abington, Rockland, Quincy, Braintree, Whitman, and/or Brockton.

2.3 EXISTING SITE CONDITIONS

A summary of the existing infrastructure, open space, rare species and wetland resources at the Base is outlined below, and detailed in the corresponding technical sections of this filing.

2.3.1 Water

As detailed in Section 7.1, the existing development at the Base has been supplied water from the Weymouth system and the Town of Weymouth has actual water meter readings. Actual recent water meter readings for the existing development average 116,000 gpd. The present demand on the Weymouth system averages 4.25 mgd of the permitted 5.0 mgd capacity.

2.3.2 Wastewater

As detailed in Section 7.2, all sanitary wastewater generated at the Base from existing development since the Base was closed has been discharged to the Weymouth collection system and then conveyed to MWRA's Deer Island treatment facility for treatment and disposal.

In October 2022, the SRA gained control of the water and sewer infrastructure built and owned by LStar (a prior Master Developer at the Base) through an eminent domain action. After such taking, the SRA repaired a long-known problem at the existing sewage pumping station on the Base. The metered water consumption at the Base averaged about 116,000 gpd, yet the sewage pumping station averaged slightly above 300,000 gpd, which indicated extraordinary inflow or infiltration. The source of this extraneous flow was a poorly constructed, groundwater leaking wet well at the pump station. The SRA repair sealed the wet well, thereby reducing the sewer flows to between 85,000 – 100,000 gpd (i.e., well below the estimated 267,318 gpd existing Title 5 flows described in Section 7.1). That extraneous flow from the Base had been continuously discharged into the Weymouth system and on into the MWRA South, SDA 4 tributary area. Effectively, this repair creates 200,000 gpd of additional wastewater capacity at the Base.

2.3.3 Stormwater

The constructed projects at the Base (listed below) have been designed to meet the current MassDEP Stormwater standards, except for the Phase 1A Definitive Subdivision Plan which was approved in 2007:

- Phase 1A Definitive Subdivision Plan;
- Brookfield Village (Pulte Residential Development);
- Woodstone Crossing (Pulte Residential Development);
- Fairing Way;
- Bill Delahunt Parkway;
- Sports Center; and
- Stonebridge at Union Point.

Each of these projects includes a stormwater management system designed to mitigate any associated impacts.

Existing topography at the Base is generally flat with slightly rolling terrain located along the perimeter. Ground elevations range from approximately elevation 150 to 155 across most of the Base. As detailed in Section 7.3, the Base is comprised of four main watersheds identified as Tactical Air Control and Navigation (TACAN) Outfall Basin, French's Stream West Branch, French's Stream East Branch, and the Old Swamp River. Refer to Figure 7-5, Existing Drainage Patterns.

2.3.4 Private Utilities

Electric service to the Base is currently provided by National Grid. Based on existing survey information, electric duct banks located in Trotter Road and Memorial Grove Avenue provide service to the existing development.

Gas service to the Base is also provided by National Grid. Based on existing survey information, gas is supplied via two gas mains, one located in Trotter Road and the other located in Memorial Grove Avenue.

Communication services, fed via duct banks located in Trotter Road and Memorial Grove Avenue, are provided by Verizon, Comcast and Crown Castle.

2.3.5 Transportation

As detailed in Section 8.0 and the TIA attached as Appendix D, within the study area utilized in the TIA to evaluate existing traffic conditions:

- Route 18 was found to accommodate between 21,335 and 30,650 vehicles on an average weekday and between 19,825 to 28,510 vehicles on a Saturday (two way, 24-hour volumes), with between 1,349 to 2,254 vehicles per hour (vph) during the weekday morning peak-hour, between 1,739 to 2,362 vph during the weekday evening peak-hour and between 1,624 to 2,604 vph during the Saturday midday peak-hour.
- Hingham Street was found to accommodate between 23,710 to 27,585 vehicles on an average weekday and between 16,785 to 19,370 vehicles on a Saturday, with between 2,068 to 2,156 vph during the weekday morning peak-hour, between 2,316 to 2,370 vph during the weekday evening peak-hour and between 1,573 to 1,687 vph during the Saturday midday peak-hour.
- Within the Site, Bill Delahunt Parkway was found to accommodate approximately 4,920 vehicles on an average weekday and approximately 3,610 vehicles on a Saturday, with approximately 351 vph during the weekday morning peak-hour, 436 vph during the weekday evening peak-hour and 357 vph during the Saturday midday peak-hour.
- Shea Memorial Drive was found to accommodate approximately 2,410 vehicles on an average weekday and approximately 2,360 vehicles on a Saturday, with approximately 171 vph during the weekday morning peak-hour, 193 vph during weekday evening peak-hour and 212 vph during the Saturday midday peak-hour.
- Trotter Road was found to accommodate approximately 6,620 vehicles on an average weekday and approximately 5,195 vehicles on a Saturday, with approximately 420 vph during the weekday morning peak-hour, 651 vph during weekday evening peak-hour and 571 vph during the Saturday midday peak-hour.

Marked bicycle facilities are not provided on a continuous basis within the study area under existing conditions. A combination of on-street bicycle lanes and "sharrow" pavement markings will be provided along certain roadway segments within the study area.

Public transportation services are provided within the study area by the MBTA (Commuter Rail and fixed-route bus service) and are accessible to residents and employees at the Base. South Weymouth Station on the Kingston Line of the MBTA Commuter Rail system is located at 89 Trotter Road, adjacent and connected by existing parking and pedestrian pathways within the Site. MBTA bus Route 226 provides fixed-route bus service along Route 18 with a stop at the Route 18/Pleasant Street intersection approximately one-half mile north of the Site. The Route 226 bus provides service to Braintree Station on the MBTA Red Line rapid transit system and the Middleborough/Lakeville and Kingston Lines of

the MBTA Commuter Rail system, where connections can also be made to other MBTA bus routes. In addition, the MBTA provides The RIDE paratransit services to eligible persons who cannot use fixed-route transit (bus, subway, trolley) due to a physical, cognitive or mental disability in compliance with Americans with Disabilities Act (ADA) requirements.

2.3.6 Open Space

In total, approximately 900 acres of the Base were disturbed to construct SWNAS. A substantial portion of those acres remain paved today, with much of the pavement left from former runways, taxiways, blimp tie down areas and hangar areas.

While prior development plans proposed a combination of passive and active space as centerpieces of the Project's open space plan, limited components of these prior plans have been executed at SWNAS. For example, prior development plans included the removal of approximately 12 acres of debris piles containing excavated peat and demolished concrete and asphalt roads, runways, and rubble. Today, the debris piles remain, bisecting and fragmenting the onsite grasslands into smaller, low quality sub-areas that do not provide a desirable contiguous habitat for onsite rare species.

The following open space components from prior plans have been incorporated at SWNAS to date:

- The Union Point Sports Complex, a 25-acre private facility for soccer, lacrosse, and rugby; and
- The Twin Ponds Trail network, consisting of 1.9 miles of trails, created by the Wildlands Trust.

As noted above, with the exception of the above-listed open space features, none of the other previously proposed components of the open space system at SWNAS have come to fruition.

2.3.7 Wildlife Habitat and Rare Species

To date, there have been 14.5 acres of impacts to grasslands identified as rare species habitat at SWNAS as a result of existing development (including construction of the East-West Parkway). Grassland restoration proposed under prior development plans has not occurred. Grassland maintenance through a mowing program has occurred throughout the Site.

As detailed in Section 6.3, rare species known to use the Site have been identified as the following: Eastern Box Turtle *(Terrapene carolina*), a Species of Special Concern; Grasshopper Sparrow *(Ammodramus savannarum)*, a State-listed Endangered species; and Upland Sandpiper *(Bartramia longicauda)*, a State-listed Threatened species.

The Base is mapped for Priority Habitats of Rare Species (PH 937) (for the grasslands associated with the two State-listed birds) and Estimated Habitats of Rare Wildlife (EH 718) (for the Eastern Box Turtle).

The following measures have been implemented to date at the Base to protect the Eastern Box Turtle:

- Permanent barriers were constructed along the Parkway to keep turtles from accessing the Parkway and allow for turtles to move safely between habitat patches
- Five turtle nesting habitat areas totaling 17.9 acres were constructed; four in the eastern portion of the Site and one along former Taxiway C
- Payments were made to an escrow account for off-site protection and maintenance of grassland habitat (partial payments made).

2.3.8 Wetland Resources

As detailed in Section 6.4, approximately 27% of the Site is comprised of various wetland habitats including woodlands, scrub-shrub wetlands, wet meadows, water bodies, and waterways. In total, wetland impacts occurring to date include 11,650 sf of wetland filling for roadway construction pursuant to the limited project provisions and 6,535 sf of isolated wetlands (federal jurisdiction only). The existing Wetland Impact Areas (WIA) are shown on Figure 6-3. The wetland mitigation areas shown

on Figure 6-3 have been constructed to date as mitigation for the above-described existing wetland impacts. A total of 14,305 sf of wetland replication areas have been constructed to date and include the following, which compensate for a total wetland filling of 20,360 s.f. (shown in Table 6-1):

- Removal of culverts at Old Swamp River bridge crossing, 1,515 s.f. of replicated wetland, 2,570 s.f. of river bottom, and 340 l.f. of river bank;
- Construction of Wetland Replication Area #2 (WRA-2) south of the Old Swamp River bridge crossing, 4,580 s.f. of replicated wetland;
- Daylighting of 800 l.f. of the West Branch of French's Stream returning the stream to a more natural, meandering condition; and
- Construction of a portion of Wetland Replication Area #1 (WRA-1) west of the West Branch of French's Stream, 8,210 s.f. of replicated wetland.

2.4 HISTORIC & ARCHAEOLOGICAL RESOURCES

The Base has been listed on the Inventory of Historic and Archaeological Assets of the Commonwealth since the early 1990s. The Massachusetts Historical Commission (MHC) submitted a comment letter in response to the 2007 FEIR, to which the then Master Developer sufficiently responded, as to the entire Base, as summarized below.

According to the 2007 FEIR, as required by the Massachusetts Historical Commission (MHC), reconnaissance archaeological surveys were conducted for the Trotter Road corridor between the Base and Route 18 and four alternative Parkway alignments located on the east side of the Base. Research and field investigations of the Trotter Road corridor revealed that the area has low archaeological sensitivity because of prior disturbance associated with development of the area into a military base. The archaeologist's report concluded that subsurface archaeological investigations were not warranted.

The east side survey revealed that the majority of each Parkway alignment alternative traversed areas of low archaeological sensitivity because of existing environmental and topographic setting, prior disturbance associated with development of the military base, or both. The then-preferred alternative for the East-West Parkway (which remains the preferred alternative in this 2023 filing) did not impact any pre-contact archaeological sites. MHC's April 14, 2008 letter to the MEPA Office indicated that the 2007 FEIR was responsive to MHC's comments and that no further MHC review of the Project was required. Accordingly, MHC did not submit a comment letter on the 2017 NPC filing.

3.0 PROJECT UPDATE: 2023 MODIFIED DEVELOPMENT PROGRAM

As detailed in Section 2.0 above, existing development at the Base consists of 1,274 homes, 73,000 sf of commercial space, the East-West Parkway, a 25-acre sports and recreation facility, an MBTA parking area and three community entrances. The most recently proposed development program, outlined in the 2017 NPC, proposed up to approximately 8,000,000 sf of commercial space and 3,855 residential units, resulting in a total of approximately 13,000,000 sf of development, including life sciences uses, manufacturing uses, office space, retail uses, a hotel, a stadium, and a hockey rink. Under this prior program, specific uses could be developed in certain areas and residential development was tied to the construction of a certain square footage of commercial uses.

While the currently proposed 2023 Modified Development Program maintains the total of approximately 13,000,000 sf of development last proposed in the 2017 NPC, it reflects current market conditions and proposes an updated mix of housing and commercial development – i.e., 6,000 residential units and 2,000,000 sf of commercial space (in addition to the existing conditions shown on Figure 1-2). Where the 2017 NPC proposed a total commercial square footage that well exceeded the needs of the marketplace, the current proposal results in additional housing opportunities, including rental and homeownership options, of a scale to support the reduced commercial component of the development proposed at SWNAS. As described above, the evolving market conditions have resulted in a change in the constituent components of the previously proposed development program, but not the mixed-use focus.

As noted throughout this filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within this filing and the supporting studies, depending on market demand and conditions, the amount of proposed residential and commercial development may fluctuate provided that the infrastructure is sufficient to support such development. For example, in order to address market demands, the Proponent could implement an increase/decrease in the proportions of residential and commercial uses within the 2023 Modified Development Program (e.g., a 1,300,000 square foot decrease in commercial space may be offset by an increase of 1,000 residential homes).

As described above, the 2023 Modified Development Program for the Project allows for the development of an economically viable master planned, smart-growth community that will grow and change over time. As detailed throughout this filing and shown on the Site Plan attached as Figure 1-4, new development will be concentrated on the previously developed areas of the Base, much of which were cleared and paved, with new neighborhoods growing from the existing neighborhoods and the long-desired town center coming to fruition. The 2023 Modified Development Program will incorporate pedestrian-friendly design with a broad mix of homes, shops and businesses, restaurants, industrial and office space, all organized in relation to recreation and green spaces. This design will be

informed by thoughtful site planning, allowing for a mix of traditional neighborhoods supported by complementary commercial uses and connected by significant open space (both undisturbed to preserve natural resource conservation and improved to allow for passive and active recreation onsite).

In total, the 2023 Modified Development Program proposes to maintain approximately 885 acres of the 1,440-acre Base as open space. As shown on Figure 6-1, the proposed open space framework includes a perimeter open space buffer area, which will be complemented by north-south greenways that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base. Most prominently, the 2023 Modified Development Program is based on this framework for converting the pattern of paved north/south runways and taxiways into new 100 to 200-foot-wide greenways comprised of long linear green blocks. These green areas will contain control points at the roadway crossings that provide the ability to induce flood storage in the landscaped greenways. Thus, the new linear area provides not only walking/passive recreation in fair weather but also stormwater storage and treatment (sedimentation, nutrient uptake, infiltration) in storms. The current proposal will also implement significant water, wastewater, stormwater and transportation improvements as detailed in Sections 7.1 through 7.3 and 8.0 of this filing.

Recognizing SWNAS's significance to the surrounding region, the 2023 Modified Development Program allows the Proponent to advance future development in a manner that maximizes the opportunity for each Town to generate net new revenues while also providing flexibility to address market changes and other challenges that may arise over the course of a multi-year redevelopment.

4.0 ALTERNATIVES ANALYSIS (DEVELOPMENT OPTIONS)

4.1 OBJECTIVES

Since its initial redevelopment proposal when the Base was initially closed, SWNAS has been intended to be a master planned, smart-growth community that will grow and change over time. In order to withstand the tests of time, when complete, SWNAS should be pedestrian-friendly with a broad mix of homes, shops, restaurants and businesses, all organized in relation to recreation and green spaces. Accordingly, the design for any redevelopment of SWNAS should promote thoughtful site planning, traditional neighborhoods, natural resource conservation and environmental protection through retention or creation and connection of significant undisturbed or improved open space.

The following are key goals, objectives, and elements of the long-envisioned redevelopment at SWNAS:

Ensure Smart Growth and Sustainable Development. Redevelopment at SWNAS should incorporate smart growth principles with a mix of housing and commercial development, and transportation choices. Uses will be designed to be located within walking distance of each other, or even in the same building. Sustainable and environmentally friendly development should be integrated into the redevelopment with water conservation and building designs that comply with generally accepted "green" design standards. Redevelopment should incorporate green building technologies into aspects of its infrastructure design, construction, and operation, and promote the use of green building technologies by its vertical residential and commercial builders as well.

Residential. Housing has been recognized as an essential component of a healthy economy in the Commonwealth. SWNAS, with its adjacent transit station and access to the region is particularly well located to accommodate some of the oncoming path of growth. Redevelopment at SWNAS should provide a mix of housing, for different lifestyles, such as single-family homes, townhouses, condominiums, traditional apartments, and senior housing.

Create Jobs and Encourage Commercial and Retail Businesses. Redevelopment at SWNAS should help create jobs and boost the tax base to enhance the economic health of the Towns. In addition to smaller local businesses, the redevelopment should allow for a broad range of commercial businesses, including progressive industries (such as high technology, biotechnology and pharmaceutical), as well as local start-up businesses and incubator programs.

Open Space. Open space at SWNAS should provide a framework for the developable area at SWNAS by first prioritizing protection of important habitat and species, while also providing access to the public via a network of nature trails for walking and bicycling. Numerous recreational facilities and common areas (both indoor and outdoor) should be installed to serve individual neighborhoods. In addition to the existing sports center and athletic fields, bike/walking paths, picnic areas and nature trails should be integrated into the redevelopment. Redevelopment at SWNAS should also include sidewalks, trails, and new parks in the public realm as green connectors to perimeter open spaces to create destination and desire for home and business ownership. Redevelopment should encourage the integration of the open space with the developable area (for example, incorporating drainage features into the fabric of the open space).

Reduce Traffic by Offering Transportation Choices On-Site. Redevelopment at SWNAS should incorporate a number of options for on-site transportation, including a network of pedestrian and bike paths and a shuttle service to the adjacent commuter rail station and possibly other transportation options on the South Shore.

Infrastructure. Redevelopment at SWNAS should provide viable interim- and long-term infrastructure solutions (e.g., water, wastewater and stormwater) to support multi-year full buildout of the Base.

Generate Fiscal Benefits. Redevelopment at SWNAS is an opportunity to stimulate growth and generate net new revenues for the Towns and the Commonwealth.

4.2 ALTERNATIVES

The Alternatives include (i) the Existing Development (constructed to date); (ii) the 2017 Proposed Plan, a mixed-use development described in the 2017 NPC; and (iii) the 2023 Modified Development Program, the subject of this NPC, which has evolved to reflect market conditions and regional and local housing needs. As demonstrated below, the 2023 Modified Development Program is the Preferred Alternative.

In developing alternatives for the SWNAS redevelopment, the Proponent considered the unique history of the Base, including the most recent NPC in 2017, the multiple past plans and their failures, and the associated support each plan had garnered with the community at the time of their formation. This complex history makes project delivery challenging. Further, its success is interwoven in the clean-up and transfer of Navy property, the requirements of state legislation, infrastructure completed like the Route 18 widening and construction of the Parkway, but also the major infrastructure challenges remaining, including delivery of water and wastewater solutions for the Base and their host communities. As described below, these unique conditions constrain potential alternatives.

4.2.1 No-Build - Existing Development (Constructed to Date)

To date, SWNAS has been developed to include approximately 1,274 homes, 73,000 square feet of commercial space, the East-West Parkway, a 25-acre sports and recreation facility, the MBTA parking area, and three community entrances. The existing homes include a variety of attached and detached single family as well as townhomes, condominiums and age restricted residences. There is a mix of for sale and for rent homes and approximately 10% of the homes qualify as 'affordable' or 'workforce.'

The existing commercial space is comprised of approximately 33,000 sf of ground floor retail, and 40,000 sf of general commercial (e.g., nursing facilities, communal living and dining spaces) located in Fairing Way, A senior living facility. There is a 25-acre sports and recreation facility in operation, which was built in 2018.

In order to address the ongoing housing crisis in the Commonwealth, a substantial number of new housing options need to be constructed. SWNAS has not achieved its potential with respect to housing opportunities. Additionally, SWNAS falls short of its potential with respect to commercial development as the existing commercial component is very limited (and mostly empty), resulting in few new jobs. Although there are net tax revenues currently enjoyed by Weymouth, the overall revenue is at a level substantially below the Base's potential. Finally, the existing development failed to deliver on a vast majority of the open space improvements that are a critical component of the goals for redevelopment at the Base. Instead, the Base remains primarily taxiways, runways and debris piles. Further, the viability of the SRA and the ability to pay the Commonwealth's bonds, are significantly in question in the "no-build" scenario.

4.2.2 2017 NPC Development Alternative (2017 Proposed Plan)

The 2017 Proposed Plan is based on the plan proposed in the 2017 NPC and consists of a mixed-use development comprised of a Town Center District, a Discovery District (office, biotech, light manufacturing space) and a Neighborhood District (housing and recreation), along with areas of open space and wetlands. The 2017 NPC Development Alternative would comprise 2,581 residential units for a total of 3,855 units at SWNAS, and 7,927,000 sf of commercial space, for a total of 8,000,000 sf at SWNAS. This proposed commercial space would include life sciences, manufacturing, office, retail, hotel, conference center, fitness/wellness center, a sports stadium, and a hockey rink.

The 2017 Proposed Plan would provide more housing units than the existing development constructed to date; however, this plan still falls short of meeting current housing demands given the extreme need for all levels of housing in the Commonwealth today. Additionally, while the proposed substantial commercial square footage would theoretically create a large number of new jobs, the current market does not support such a buildout, and therefore large-scale job creation and increased tax revenues

would never be realized. The 2017 Proposed Plan would provide for a perimeter open space buffer at SWNAS, however, the regimented location of certain uses and residential/commercial square footage throughout the developable area would make it very difficult to provide large contiguous open space areas or north-south connectors to allow for actual public benefit and programming within the perimeter open space areas.

4.2.3 Preferred Alternative (2023 Modified Development Program)

The 2023 Modified Development Program proposes a mix of uses that reflects market conditions and proposes a mix of housing (ownership and rental) and commercial development – i.e., 6,000 residential units and 2,000,000 sf of commercial space. Proposed commercial uses include retail, restaurant, office, research and development (including technology and biotechnology) and warehouse.

New development will be concentrated on the previously developed areas of the Base, much of which were cleared and paved, with new neighborhoods expanding from the existing neighborhoods and will include the long-desired town center coming to fruition. The 2023 Modified Development Program will incorporate pedestrian-friendly design with a broad mix of homes, shops and businesses, restaurants, industrial and office space, all organized in relation to recreation and green spaces. This design will be informed by thoughtful site planning, allowing for a mix of traditional neighborhoods supported by complementary commercial uses and connected by significant open space (both undisturbed to preserve natural resource conservation and improved to allow for passive and active recreation onsite). In total, the 2023 Modified Development Program proposes to maintain approximately 885 acres of the 1,440-acre Base as open space. As shown on Figure 6-1, the proposed open space framework includes a perimeter open space buffer area, which will be complemented by north-south greenways that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base.

The 2023 Modified Development Program provides much needed housing, including rental and ownership options, at a scale to support onsite complementary commercial uses. It is anticipated that development will include commercial uses on the ground floor of residential buildings to promote smart growth and connectivity. Future residential and commercial development constructed pursuant to the 2023 Modified Development Program will incorporate the extensive sustainable measures identified in Section 6.1 to ensure the long-term resiliency of the master-planned development at the Site.

The currently proposed development program includes an extensive onsite pedestrian and bicycle network to encourage alternative modes of transportation, while also incorporating the robust transportation mitigation package outlined in Section 8.0 that includes both on- and off-site transportation improvements. As shown on Figure 6-1, the proposed open space framework includes a perimeter open space buffer area, which will be complemented by north-south greenways that link the forested open space on the north side of the Base to open space and proposed conservation land on the south side of the Base. Most prominently, the 2023 Modified Development Program is based on this framework for converting the pattern of paved north/south runaways and taxiways into new 100 to 200-foot-wide greenways comprised of linear green blocks. These green areas will contain control points at the roadway crossings that provide the ability to induce flood storage in the landscaped greenways.

Where prior development programs proposed implementation of infrastructure improvements on a piecemeal, incremental basis that could not support full buildout of the Project at the Base, the 2023 Modified Development Program proposes viable interim- and long-term infrastructure solutions that will be refined in coordination with the SRA and the Towns. Finally, the construction of commercial uses at the Site at a scale that can be supported long-term by the currently proposed residential development will help to create jobs and the tax base necessary to enhance the economic health of the Towns. The 2023 Modified Development Program maximizes the opportunity for generating revenue to exceed each Towns' municipal services expenses while also providing flexibility to address market changes and other challenges that may arise over the course of a multi-year redevelopment.

4.3 COMPARISON OF ALTERNATIVES

Table 4-1 provides a summary of the Comparison of Impacts between the Alternatives.

Table 4-1 Comparison of Impacts*

	Alternative (Development Option)		
Comparison of Impacts	**2023 Existing Condition (No Build)**	**2017 NPC Development Alternative**	**2023 Modified Development Program (Preferred Alternative)**
Residential Units	1,274 Units	3,855 Units**	7,274 Units***
Commercial Development (sf)	73,000 sf	8,000,000 sf	2,000,000 sf
Traffic (ADT) Weekday Morning Peak Hour Weekday Evening Peak Hour	No new trips	79,000 4,984 7,227	53,438 4,148 4,835
Parking (spaces)	2,525 (approx.)	19,500 – 43,900	11,050 – 20,500
Water Use	116,000 gpd (actual)	2.7 mgd	1.8 mgd
Wastewater Demand	100,000 gpd (actual)	2.3 mgd	1.6 mgd
Site Acreage	1,440 Acres	1,462 Acres	1,440 Acres
Land Alteration	131 Acres	663 Acres	555 Acres
Restricted Open Space	• 438 acres of restricted open space • Debris piles have not been removed, resulting in low quality, fragmented grasslands	• 360 acres of restricted open space • Debris piles were not removed, resulting in low quality, fragmented grasslands	• 519 acres of restricted open space • Debris piles to be removed
Rare Species	• 16.5 acres of Eastern Box Turtle and grassland habitat impacted • No grassland restoration constructed	• 185 acres of Eastern Box Turtle and grassland habitat impacts proposed in total • 56 acres of grassland restoration proposed	• 156 acres of Eastern Box Turtle and grassland habitat impacts proposed in total • 104 acres of grassland restoration proposed

	Alternative (Development Option)		
Comparison of Impacts	**2023 Existing Condition (No Build)**	**2017 NPC Development Alternative**	**2023 Modified Development Program (Preferred Alternative)**
Economic Impact	• Net fiscal benefit on an annual basis to Weymouth: $3.2MM • Net fiscal benefit on an annual basis to Abington: Minimal real estate taxes • Net fiscal benefit on an annual basis to Rockland: Minimal real estate taxes	Not projected by the 2017 NPC	• Net fiscal benefit on an annual basis to Weymouth: $11.7MM - $12.6MM • Net fiscal benefit on an annual basis to Abington: $4.2MM - $5.4MM • Net fiscal benefit on an annual basis to Rockland: $4.1MM - $5.5MM • TOTAL net fiscal benefit on an annual basis: $20.0MM - $23.5MM

* Numbers included in Table 4-1 are approximations.

** Impacts summarized in this table are based on the unit count included in the 2017 NPC, which included the then-anticipated impacts from the now-built 1,274 units.

*** Upon completion of construction of the 2023 Modified Development Program, there will be a total of 7,274 units. Unless otherwise noted, impacts summarized in this table and throughout this filing for the 2023 Modified Development Program are based on the impacts from the newly proposed 6,000 units and 2,000,000 sf commercial component. Impacts from the existing 1,274 units and 73,000 sf commercial were identified included in the baseline condition from which the impacts of such program were studied.

5.0 ENVIRONMENTAL JUSTICE AND PUBLIC INVOLVEMENT

5.1 ENVIRONMENTAL JUSTICE

On January 1, 2022, MEPA's updated regulations for Environmental Justice (EJ) Populations pursuant to Chapter 8 of the Acts of 2021, An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, became effective for all new projects undergoing MEPA review. While this filing is not technically subject to these protocols (e.g., as a result of its continuous MEPA engagement and ongoing construction at the Site since 2011), consistent with the pre-filing meeting held with the MEPA Office on September 19, 2023, the Proponent is including here an analysis of EJ communities near the Site and the extensive outreach conducted by the team in alignment with the protocols.

This section demonstrates Project consistency with the EJ Regulations, including proposed measures to promote public involvement by nearby EJ populations prior to filing the Project with the MEPA Office, as well as any additional steps the Proponent intends to take during the course of the MEPA review process for the NPC.

5.1.1 Environmental Justice Populations

EEA maintains a policy of Environmental Justice to better serve the environmental needs of the Commonwealth's most vulnerable residents. Environmental Justice (EJ) is based on the principle that all people have a right to be protected from environmental pollution, and to live in and enjoy a clean and healthful environment. EJ is the equal protection and meaningful involvement of all people with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies and the equitable distribution of environmental benefits. The EJ Policy builds upon Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which *"directs federal agencies to identify and address the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations, to the greatest extent practicable and permitted by law."*

As detailed in the EJ Policy, the identification of EJ populations is based on census data indicating block groups with households who meet one or more of the following EEA Policy criteria: income; minority; English language isolation; and minority + income. Additionally, the Secretary can designate a geographic portion of a neighborhood as an EJ population.

5.1.1.1 EJ Populations within the Project Vicinity

The Project team identified an area that extends one mile from the Project area in accordance with the EEA Policy criteria. U.S Census block group data, via the Massachusetts 2020 Environmental Justice Populations mapping program and data, along with the current published EEA maps, indicate there are EJ populations within the Project area and within this one-mile Designated Geographic Area (see Figure 5-1). The 2020 block groups that fall within the Designated Geographic Area include populations with the minority and English isolation, minority, and income criteria. The block groups within the Project area and the Project's current Designated Geographic Area are:

Within Project Area

- Weymouth Block Group 1, Census Tract 4222.01 (minority and English isolation); a minority population of 38.5 percent, a median household income of $117,283, and 35.7 percent of households with language isolation
- Weymouth Block Group 3, Census Tract 4222.02 (minority); a minority population of 38.6 percent, a median household income of $64,158, and 9.2 percent of households with language isolation

Within One-mile Designated Geographic Area

- Weymouth Block Group 4, Census Tract 4221 (minority); a minority population of 25.9 percent, a median household income of $81,629, and 5.0 percent of households with language isolation
- Rockland Block Group 2, Census Tract 5022 (income); a minority population of 13.3 percent, a median household income of $53,327, and 10.2 percent of households with language isolation
- Rockland Block Group 4, Census Tract 5021.01 (minority); a minority population of 27.5 percent, a median household income of $58,725, and 6.4 percent of households with language isolation
- Rockland Block Group 2, Census Tract 5021.01 (minority); a minority population of 26.7 percent, a median household income of $116,979, and 0.0 percent of households with language isolation

Throughout the recently concluded planning and rezoning process, the Proponent has invited stakeholders and the public to engage with the robust development and design effort for the Project. As demonstrated by Section 5.2 below, the Proponent has conducted robust public outreach to date, including numerous informal meetings (often providing transportation) and televised recordings to expand public access to, and input on, the planning and design of the 2023 Modified Development Program for the Project.

5.2 MEASURES TO PROMOTE PUBLIC INVOLVEMENT

The Proponent recognizes that public involvement is an integral component of reaching traditionally underserved populations, as well as the overall development of this Project. As noted above, while this filing is not technically subject to the newly-adopted EJ Policy (e.g., as a result of its long MEPA history and ongoing construction at the Site since 2011), the Proponent is including an outline below of the extensive outreach conducted by the development team in alignment with the protocols and consistent with the EJ Policy.

As detailed in Section 1.2, SWNAS has a long history of robust public engagement informing proposed redevelopment, beginning with formation of the Naval Air Station Planning Committee (NASPC) in 1995 when SWNAS was recommended for closure. The NASPC included representatives from Abington, Rockland, and Weymouth, as well as community groups and Non-Government Organizations (NGOs), to guide the redevelopment of SWNAS following its closure. Following the work and guidance of the NASPC, former and current Master Developers have made significant community outreach efforts and will continue to do so throughout redevelopment of SWNAS.

Since selection as Master Developer, the current Proponent has participated in an extraordinary number of formal and informal meetings with groups to be impacted by the Project, including the residents of the existing homes built to date at SWNAS, as well as employees and patrons at commercial businesses existing at SWNAS today. The 2023 Modified Development Program detailed throughout this filing was informed by feedback received at informal meetings with community members held since the Proponent was appointed as Master Developer.

As mentioned above, numerous community information meetings have been hosted in the past year; additional meeting, advertised through the SRA and Towns of Abington, Rockland, and Weymouth and televised on local cable television, starting with the introduction of the current development framework at a community information meeting hosted at Weymouth High School on October 27, 2022. At that meeting, a new Project website was launched, Reimagine the Base (https://reimaginethebase.com/), with presentations and information from prior community meetings, as well as an email address to reach the Proponent team to ask questions and request or receive information on the plan. Similar community information meetings have taken place in the spring, summer, and fall of 2023, as detailed below: Further, all documents have been made available on the SRA's website, including zoning, infrastructure reports and presentations.

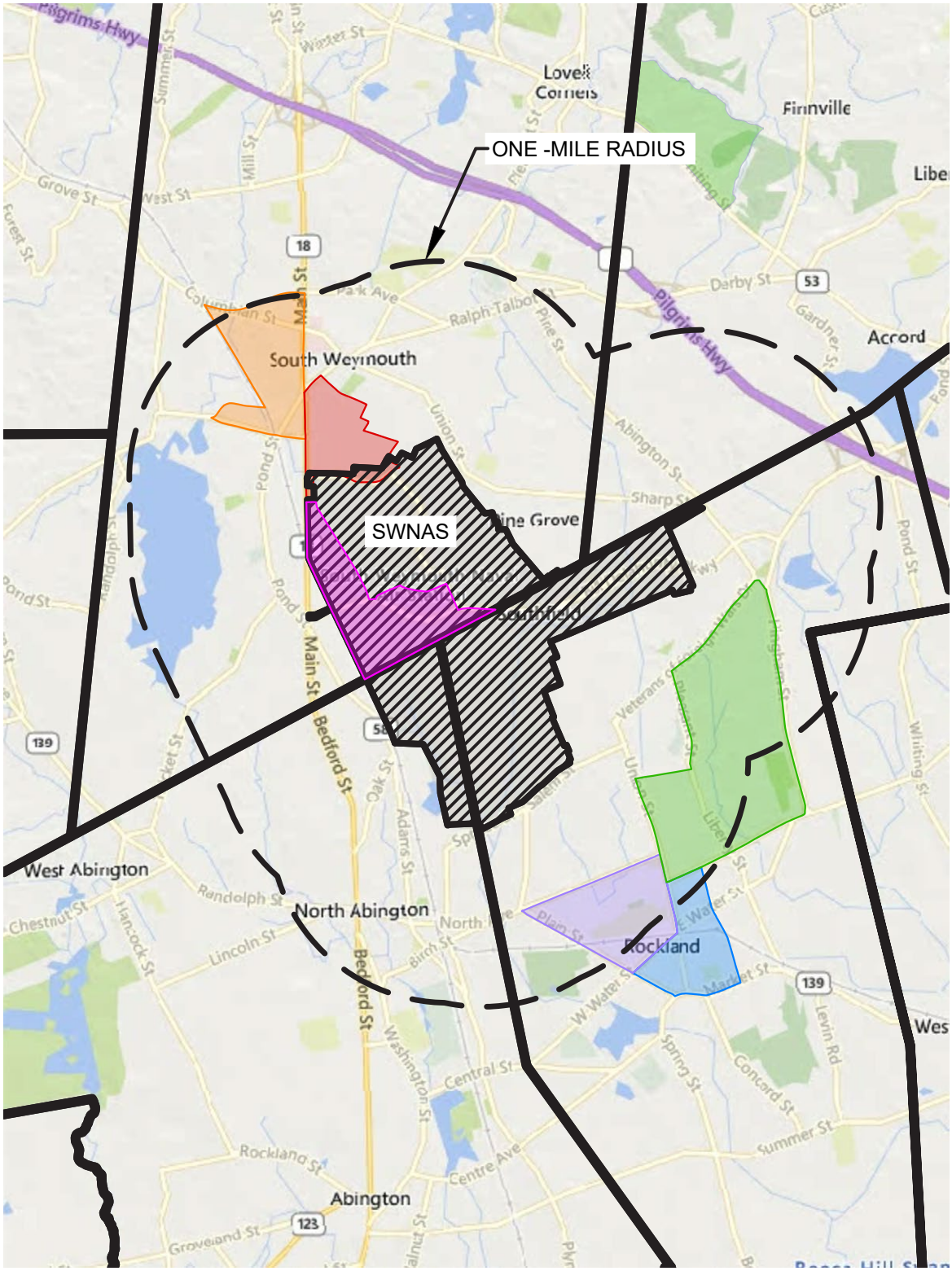
Community Meetings / Engagement

- January 15, 2020: Master Developer selection and meeting with residents at Faring Way
- Summer/fall, 2021: 19 group tours and meetings with residents, SRA Board members, Southfield Neighborhood Association, Southfield Residents Associations, Southfield Landowners and Homeowners Associations
- Biweekly water coordination meeting with Weymouth officials since September 2021 (with City Mayoral Staff, Planning Director, and Water Department)
- Monthly SRA Staff and Board Chair and Vice Chair Monthly Update meetings at SRA offices since 2022
- October 27, 2022: SWNAS community information meeting at Weymouth High School
- November 22, 2022: Introductory meeting to the Town of Abington
- November 22, 2022: Introductory meeting to Town of Rockland
- January 18, 2023: Rockland Town leadership update meeting
- March 15, 2023: SWNAS Redevelopment Plan presentation and approval at Fairing Way
- March 29, 2023: SWNAS Zoning By-Law and Map presentation, approval and referral to Weymouth at Fairing Way
- April 3, 2023: Weymouth Town Council acceptance of Zoning referral from SRA and referral to Ordinance Committee
- April 19, 2023: Weymouth Planning Department Head Review Meeting
- April 25, 2023: Community Update Meeting at Weymouth High School
- May 1, 2023: Weymouth Town Council public hearing on SWNAS Zoning
- May 2, 2023: Weymouth Town Council Ordinance Committee
- May 9, 2023: Joint Weymouth Planning Board/SRA Board Public Hearing
- May 15, 2023: Speaker Mariano and MWRA Presentation to Weymouth Town Council
- May 16, 2023: Weymouth Town Council Ordinance Committee
- May 23, 2023: Weymouth Planning Board vote to approve Zoning
- May 30, 2023: Weymouth Town Council Ordinance Committee
- June 15, 2023: Weymouth Town Council Ordinance Committee
- June 20, 2023: Abington Town leadership overview/approval of approach
- June 22, 2023: Weymouth Town Council Ordinance Committee
- June 26, 2023: Weymouth Town Council Vote and Approval of Zoning
- July 10, 2023: Project Introduction to Abington Planning Board
- July 11, 2023: Rockland Department Heads Review Meeting
- July 11, 2023: Project introduction to Rockland Board of Selectmen
- July 25, 2023: Project Introduction to Rockland Planning Board
- August 1, 2023: Department Heads Review Meeting in Abington
- August 8, 2023: Project presentation at Abington Council on Aging
- August 8, 2023: Zoning presentation at Rockland Board of Selectmen
- August 8, 2023: Project presentation at Rockland Council on Aging
- August 9, 2023: Abington Board of Selectmen Vote to accept SRA Zoning referral
- August 14, 2023: Project presentation at Rockland Open Space Committee (OSC)
- August 16, 2023: Abington OSC
- September 5, 2023: Rockland Board of Selectmen accept Zoning and referral from SRA

- September 11, 2023: Abington OSC Site Walk
- September 15, 2023: Project update at Rockland OSC
- September 18, 2023: Joint Abington Planning Board and SRA Public Hearing
- September 19, 2023: Project presentation at Abington Council on Aging
- September 21, 2023: Abington Planning Board vote to approve Zoning
- September 25, 2023: Abington Board of Selectmen Vote to approve Zoning Town Meeting articles
- September 25, 2023: Rockland OSC deliberations
- September 26, 2023: Joint Rockland Planning Board and SRA Public Hearing and Rockland Planning Board vote
- October 3, 12, 24 and 30, 2023: Rockland OSC deliberations
- October 3, 2023: Project presentation to Abington School Department
- October 10, 2023: Project presentation at Abington Council on Aging
- October 14, 2023: Abington Town Meeting Zoning approval
- October 17, 2023: Rockland Board of Selectmen approve Town Meeting articles for Zoning
- October 18, 2023: Rockland Finance Committee Vote to approve Town Meeting Zoning articles
- October 23, 2023: Project presentation at Rockland School Department
- October 23, 2023: Project presentation at Rockland Community Meeting
- October 30, 2023: Project update at Rockland Council on Aging
- November 2, 2023: Project presentation at Rockland Leisurewoods Neighborhood Meeting
- November 2 and 7, 2023: Rockland OSC deliberations
- November 7, 2023: Rockland Town Meeting approval of Zoning
- Multiple Town Department Meetings in Weymouth, Abington, Rockland and Brockton, including with Planning, Zoning, Public Works, Transportation, Sewer Commission, Police, Fire, Assessor's, Parks & Rec, Conservation Commission
- Reimagine the Base website, with presentations and information from prior community meetings, as well as an email address to reach the Proponent team to ask questions and request or receive information on the plan

State Agency Meetings

- MEPA (February 2022, September 2023)
- NHESP (December 2022, January 2023, May 2023, June 2023, August 2023, November 2023, December 2023)
- MassDOT (October 2023)
- MWRA (multiple between 2022 and 2023)



LEGEND

- TOWN BOUNDARY
- SITE BOUNDARY
- WEYMOUTH BLOCK GROUP 1, CENSUS TRACT 4222.01 (MINORITY AND ENGLISH ISOLATION)
- WEYMOUTH BLOCK GROUP 3, CENSUS TRACT 4222.02 (MINORITY)
- WEYMOUTH BLOCK GROUP 4, CENSUS TRACT 4221 (MINORITY)
- ROCKLAND BLOCK GROUP 2, CENSUS TRACT 5022 (INCOME)
- ROCKLAND BLOCK GROUP 4, CENSUS TRACT 5021.01 (MINORITY)
- ROCKLAND BLOCK GROUP 2, CENSUS TRACT 5021.01 (MINORITY)

0 1500' 3000'
SCALE: 1"=3000'

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Environmental Justice (EJ) Populations

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

Figure 5-1

6.0 ENVIRONMENTAL

6.1 SUSTAINABILITY, RESILIENCE & CLIMATE CHANGE

Sustainability is the principle that construction, operation and maintenance of buildings and places can meet the needs of present users without compromising the interests of adjacent or future users regarding natural resources and the environment. The 2023 Modified Development Program employs a comprehensive design approach to align with the sustainability and resiliency initiatives of the Commonwealth and communities which involves leadership and best practices in establishing a vibrant, sustainable, smart-growth, transit-oriented development.

6.1.1 Summary of Sustainability Program & Initiatives

The Proponent is utilizing the LEED (Leadership in Energy and Environmental Design) version 4 for Neighborhood Development (LEED-ND) as a framework to evaluate sustainability initiatives for the 2023 Modified Development Program. The LEED rating system was started in 1993 through the US Green Building Council as a rating system to measure and incorporate green building technologies in building design. The rating system has evolved and expanded over the past 30 years, including LEED ND, a system for evaluating larger scale neighborhoods and districts. Given the size and scale of the 1440-acre SWNAS, LEED ND was selected by the team as the appropriate framework to evaluate the Project's sustainability. Points are achieved for meeting thresholds under the following categories in the LEED ND system:

- Smart Location & Linkage
- Neighborhood Pattern & Design
- Green Infrastructure & Buildings
- Innovation & Design Process
- Regional Priority Credits

Based on the current assessment, the 2023 Modified Development Program for the Project could achieve a range of approximately 65 to 70 potential points and could achieve a LEED-ND Gold rating.

The Project team created the following Sustainability Initiatives to guide and prioritize redevelopment through the 2023 Modified Development Program for the Project moving forward with the Guidelines and this evaluation of LEED-ND:

6.1.1.1 SUSTAINABLE SITE PLANNING

Intent: The aim of the roadway system is to provide an efficient, safe, multi-modal network of public streets that accommodates vehicular, pedestrian, and bicycle traffic and encourages transit ridership via the following:

- **Multi-Modal Transportation Opportunities**
- **Parking Demand Management**
- **Pedestrian and Bicycling Facilities**, including sidewalks, trails, and bicycle facilities.
- **Green Streets**, including sustainable stormwater and planting practices to limit irrigation needs
- **Pedestrian Access to Open Space**, all buildings will be located within one-half (½) mile of a public Open Space.

6.1.1.2 NATURAL RESOURCE CONSERVATION AND ENVIRONMENTAL PROTECTION

The intent of the following Sustainability Initiatives for redevelopment at SWNAS is to conserve the energy, water and material resources that will be used in such redevelopment and by its future occupants, as well as to protect environmental quality and human and ecosystem health by avoiding or limiting adverse environmental impacts associated with the development. Initiatives include,

Construction Waste Management, all applicants will develop a Construction Waste Management Plan which quantifies material diversion goals and methods to recycle and/or salvage construction and demolition materials.

Materials Reuse and Recycled Materials, topsoil removed or disturbed during site preparation and development will be stockpiled for re-use and common sitework (such as roads, sidewalks, sub-base, etc.) should utilize recycled or reclaimed materials.

Water Use Reduction, all buildings will significantly reduce indoor potable water use from the calculated baseline indoor water use.

Air Quality Protection, emission controls will be installed on heavy construction equipment to reduce diesel pollutants.

Heat Island Reduction, initiatives to reduce heat island will be incorporated, such as by maximizing tree canopy to paving ratio and using light-colored and reflective materials on outdoor surfaces.

Impervious Surfaces and Stormwater Runoff, efforts will be made to minimize impervious paving and to capture stormwater runoff.

6.1.1.3 GREEN BUILDING DESIGN

The intent of the Green Building Design Sustainability Initiatives is to encourage the construction and operation of high-performance, sustainable buildings at SWNAS. These Initiatives are patterned in part on the LEED standards. These Sustainability Initiatives do not require that LEED certification for either buildings or entire developments be obtained, but instead are designed to ensure that developments can obtain needed points under the LEED scoring system if a developer voluntarily chooses to obtain such certification. Initiatives include:

Energy Efficiency, by achieving superior energy efficiency (such as Energy Star recognition), enhanced insulation, incorporation of natural daylight, and/or white/green roofs for flat roof surfaces.

Sustainable Materials, including the following:

- Building materials that utilize recycled or reclaimed materials
- Utilizing products that disclose their lifecycle impacts through Environmental Product Declarations (EPD)
- Utilizing products that inventory their chemical material composition
- Specifying low or no VOC materials for products including, but not limited to, adhesives, sealants, paints, coatings, carpet, and composite wood products
- Provision of spaces in buildings/complexes dedicated to the collection of recyclables separate from trash collection

LEED Design, buildings should be designed and constructed in such manner that they may qualify for certification under the current applicable version of LEED or comparable standard.

In addition to these measures under 6.1.1.3, Section 6.6, Energy and Greenhouse Gas Analysis, outlines the building design and operational energy efficiency measures (EEMs) to reduce GHG emissions that will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the EEA "Greenhouse Gas Emissions Policy and Protocol" (May 5, 2010). The full analysis and energy model is provided in the GHG report (Appendix B).

6.1.2 Summary of Resiliency Initiatives

In 2017, the Commonwealth of Massachusetts inaugurated the Municipal Vulnerability Preparedness (MVP) program to assist municipalities in planning for and implementing strategies to adapt to predicted changes in our warming climate. The predicted changes include both increased flooding from large rain events and a greater likelihood of drought, increased extreme heat days and heat waves, and increased flooding from sea level rise. Between 2018-20, Weymouth, Rockland, and Abington each developed their own MVP Plans to evaluate the potential hazards to their respective communities and initiatives to address these threats, which are summarized below. As described below, to the extent applicable and appropriate, the 2023 Modified Development Program for the Project aligns with the Resiliency Initiatives identified below.

6.1.2.1 Weymouth Resiliency Initiatives

Weymouth participated in the MVP program to develop an MVP Plan in 2018. The top four natural hazards identified by the community are:

- coastal flooding and sea level rise;
- extreme storms causing inland flooding;
- more days of extreme heat; and
- extended droughts in the autumn.

Much of the focus in Weymouth is to improve resiliency to these hazards with the highest priority on restoring and expanding aging coastal protection, such as sea walls, with this warranting further study of the level of protection, flood potential, and coastal land use. Secondary areas of focus are assessing threatened infrastructure in relation to storms and sea level rise, including sewage pump stations, evacuation routes, storm gates, and low-lying roadways. Neither of these areas are of concern at SWNAS due to the Base's inland location at the headwaters of the two streams located onsite.

Other areas of concern in Weymouth include investing in improved stormwater management and addressing areas with poor drainage; improving communications plans for raising awareness about the hazards on a sub-community level combined with emergency communication; and protecting the public water supply and critical environmental resources through conservation tools.

The 2023 Modified Development Program for the Project aligns well to help support these initiatives in Weymouth. As outlined in Section 7.3, the stormwater management plan demonstrates that the Project compliance with MassDEP Stormwater Standards will significantly reduce the future fully developed runoff in major storms by approximately 20% from existing peak runoff rates. Also, as outlined in Section 7.1, the SRA is a co-applicant with the Town in applying to become a Massachusetts Water Resources Authority (MWRA) Water community to provide a more stable, resilient drinking water source for the entire community.

6.1.2.2 Rockland Resiliency Initiatives

Rockland developed their Town MVP Plan in 2019. Considering town demographics, the team identified the following top hazards:

- Flooding
- Severe Storms (wind, snow, ice)
- Drought
- Heat Wave

A few priorities of the Rockland MVP plan include:

- **Upgrade the wastewater treatment plant:** Extended and extreme rain periods cause the plant to exceed its permitted outflow limits. This has detrimental impacts on downstream water quality and strains the capacity of the pump systems.

- **Stormwater management:** Future development at Union Point (SWNAS) combined with existing impervious surfaces will exacerbate stormwater runoff. Stormwater management will be needed to address the potential for additional flooding.

The 2023 Modified Development Program for the Project aligns well to help support these initiatives in Rockland. The Proponent has been working with officials in Rockland to understand Rockland's inflow/infiltration (I/I) improvements issues impacting the Town system and how the Base could create capacity at the wastewater treatment plant. Similarly, as noted above, the Base plan will significantly reduce the future fully developed runoff in major storms from the Base by approximately 20% from existing peak runoff rates.

6.1.2.3 Abington Resiliency Initiatives

Abington participated in the MVP program to develop an MVP Plan in 2020. Similar to the other communities, Abington identified the following top hazards:

- Flooding
- Strong Storms and Extreme Weather (including winter storms and heavy rainfall)
- Drought and Extreme Temperatures

The primary vulnerabilities identified in Town include

- Impacts to their infrastructure system due to increased stormwater flooding, including aging pipes, dam maintenance, bridge repairs, and impacts to their water supply
- Impacts to their senior housing centers and school facilities

The 2023 Modified Development Program for the Project will not exacerbate any of these vulnerabilities. Additionally, it will provide additional tax revenue to support the Town in addressing these areas in the future.

6.2 OPEN SPACE PROGRAM

The creation of open space and recreation amenities at SWNAS has always been envisioned as an integral element of any proposed redevelopment at the Base, as summarized by the following key goals for future development: (i) protect open spaces; (ii) manage and connect open spaces for purposes of conservation, recreation, or environmental protection; and (iii) improve public access to open spaces.

In furtherance of the above goals, redevelopment at the Base should encourage the creation and preservation of designated open space and recreation areas, including through the following:

- Incorporating a variety of open space areas, including parks, parklands, playgrounds, wetlands (including waterways and water bodies) and associated buffer zones, uplands, rare species habitat, and similar areas that could allow for a combination of active and passive recreation, as appropriate;
- Providing parks and landscaped and natural open space common areas within neighborhoods to encourage utilization by residents and convenient access to same;
- Implementing diverse recreation areas (both passive or active), such as outdoor recreation facilities (e.g., outdoor hockey rinks, basketball courts or ball fields, outdoor pools, dog parks, playgrounds), indoor sports facilities (e.g., indoor sport and training venues and wellness facilities), walking trails, and associated supporting areas (e.g., food facilities within recreation areas, parking and stormwater management and community or neighborhood recreation buildings); and
- Designing buffer areas between developed areas and surrounding neighborhoods within SWNAS and in the adjacent towns.

The development of larger "core" open space areas, linked by physical connections and corridors to allow for the pedestrian and bicycle movement, as well as the movement of onsite wildlife as detailed in Section 6.3 below, would enhance the quality of open space that currently exists at SWNAS today.

In order to support resilient, smart growth development, flood mitigation, environmental remediation and stormwater management activities, structures and features (e.g., detention ponds, grass swales, associated piping, etc.) may be located in the open space areas provided such activities, and/or structures shall not degrade the open space or recreation areas.

6.2.1 Summary of Prior Proposals

A prior Master Developer obtained a Conservation and Management Permit (the "2009 CMP") from the Natural Heritage and Endangered Species Program (NHESP) and granted restrictions that intended to protect a portion of the on-site open space (referred to as the East End Parcels restriction and the Golf Course Restricted Area Boundary (GCRAB) restriction). As amended to date, the restrictions apply to approximately 354 acres. The 2009 CMP, as amended, was never properly implemented and, as such, is currently in default.

The proposed open space plan for the 2023 Modified Development Program for the Project builds off prior open space initiatives, which were never implemented, and improves the proposed open space at SWNAS. As detailed below, the Proponent has been working diligently with NHESP to determine terms for an amended CMP that reflects the 2023 Modified Development Program and intends to enter into proper title restrictions to protect approximately 519 acres of open space, including a much improved, contiguous grassland area (as detailed in this filing).

6.2.2 2023 Modified Development Program Approach

As shown on Figure 6-1, the proposed open space framework for the 2023 Modified Development Program for the Project is extensive, including a perimeter open space buffer area that will be complemented by north-south greenways that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base. Most prominently, the 2023 Modified Development Program is based on this framework for converting the pattern of paved north/south runways and taxiways into new 100 to 200-foot-wide greenways comprised of linear green blocks. These green areas will contain control points at the roadway crossings that provide the ability to induce flood storage in the landscaped greenways. Thus, the new linear areas provide not only walking/passive recreation in fair weather but also stormwater storage and treatment (sedimentation, nutrient uptake, infiltration) in storms. In addition to the above-described greenways, the 2023 Modified Development Program also proposes the incorporation of active and passive recreational uses accessible to the public, including recreational facilities and common areas to serve not only onsite residents and employees, but also visitors from the surrounding communities.

In total, the open space plan proposed in the 2023 Modified Development Program proposes 885 acres of open space. The Proponent has presented and is working closely with NHESP to amend and restate the 2009 CMP to protect 519 acres, 85 acres more than the 2009 CMP, which amendment will protect nearly all of the Eastern Box Turtle habitat. The updated CMP will be finalized upon completion of MEPA review. While some of the land at the Base is subject to existing restrictions that contemplate open space, this land is not currently Article 97 land. Specifically, a majority of the land within the GCRAB restriction was to be developed as a private golf course facility and otherwise not held out to the public for its benefit or recreational use. The Proponent intends to reconfigure the GCRAB restriction to remove a portion of the land that was to be developed for a private golf course facility and expand the restricted area to include habitat and other open space areas that will be available for recreation following completion of the above-described NHESP process.

6.3 WILDLIFE HABITAT AND RARE SPECIES

The Massachusetts Endangered Species Act (MGL c. 131A) (MESA) and regulations (321 CMR 10.00) were promulgated to protect rare species and associated habitats. Rare species are identified in Massachusetts (from highest level of concern) as either Endangered, Threatened, or Species of Special Concern. Rare species known to use the Site have been identified as the following:

- Eastern Box Turtle *(Terrapene carolina)*, a Species of Special Concern which utilizes both upland and wetland forests, scrub-shrub habitats, and vegetated wetlands. Eastern Box Turtles have been documented to nest and hibernate along the south edge of a wetland within the eastern portion of the Base.
- Grasshopper Sparrow *(Ammodramus savannarum)*, a State-listed Endangered species, which utilizes upland grassland habitat. Between zero to four grasshopper sparrow individuals were observed each year studies were performed. Even though breeding pairs were never observed, and individuals have only been observed in small numbers, NHESP has determined that the grasslands on the Site are assumed to support a breeding population of Grasshopper Sparrows.
- Upland Sandpiper *(Bartramia longicauda)*, a State-listed Threatened species, which utilizes upland grassland habitat. Various surveys for Upland Sandpipers have been performed within the Base and have documented occasional upland sandpipers which suggests that this species was not breeding based on the lack of distress or alarm behaviors and the non-detection of juveniles. Even though breeding pairs were never observed, and individuals have only been observed in small numbers, NHESP has determined that the grasslands on the Site are assumed to support a breeding population of Upland Sandpipers.

SWNAS is mapped for Priority Habitats of Rare Species (PH 937) (for the grasslands associated with the two State-listed birds) and Estimated Habitats of Rare Wildlife (EH 718) (for the Eastern Box Turtle). Based on the Proponent's review of all rare species information developed to date, it was evident that the Eastern Box Turtle population on the Site has a significant metapopulation that has been monitored with over 20 years of data, making it one of the longest studied populations in Massachusetts.

6.3.1 Existing Conditions

As described above, NHESP previously issued the 2009 CMP. The 2009 CMP contained specific requirements and protocols for rare species protection during construction and long-term monitoring and mitigation measures. As detailed in Section 6.2.2 above, the 2009 CMP is currently in default. As such, the Proponent has presented and is working closely with NHESP to amend and restate the 2009 CMP to protect 519 acres, 85 acres more than the 2009 CMP.

The 2017 NPC confirmed that the following mitigation measures required by the 2009 CMP have been implemented at the Site:

- Permanent barriers were constructed along the East-West Parkway to keep turtles from accessing the Parkway and allow for turtles to move safely between habitat patches;
- Five turtle nesting habitat areas totaling 17.9 acres were constructed (four in the eastern portion of the Site and one along former Taxiway C); and
- Partial payments were made to an escrow account for off-site protection and maintenance of grassland habitat.

The following mitigation measures were never implemented:

- Restoration of grassland habitat (56 acres)

6.3.2 Prior Proposal and 2023 Modified Development Program Approach

The 2017 NPC proposed a total of 185 acres of Eastern Box Turtle and grassland habitat impacts. The NHESP comment letter dated April 22, 2017 to the 2017 NPC indicated that a CMP amendment to the 2009 CMP would need to be obtained in order to reflect impacts of the above-described 2017 NPC development program. This amended CMP was never formally requested or issued. Therefore, the 2009 CMP is still the applicable approval from NHESP.

While prior development proposals included impacts to the Eastern Box Turtle habitat at the Base, the currently proposed 2023 Modified Development Program does not propose any impacts to the Eastern Box Turtle habitat, thereby ensuring the continuation of this viable and diverse population. As detailed in Section 6.3.1 above, there are current mitigation measures related to the impacts to the Eastern Box Turtle habitat from the completed East-West Parkway construction. The Proponent has been working diligently with NHESP to determine appropriate ongoing protections for the rare species onsite, including the Eastern Box Turtles, which protections will be included in the amended CMP once finalized after the MEPA process is completed.

While the currently proposed Project will result in approximately 156 acres of grassland impacts, a robust grassland mitigation plan is proposed for these impacts to the grassland habitat as a result of the 2023 Modified Development Program. As noted above, some of the onsite grassland areas have become isolated due to existing debris piles that cover over 12 acres and overgrowth of woody shrub and tree vegetation, resulting in lower quality habitat values for the rare species known to use the Site. The Proponent proposes to process these debris piles, as needed, remove or spread material, as appropriate, and create grassland in the runway and taxiway areas. In order to restore and maintain high-quality habitat as once existed at the Base, the 2023 Modified Development Program grassland mitigation proposal includes the following:

- As shown on Figure 6-2, creation of a minimum of 104 acres of high-quality grassland habitat through various renovation, creation, restoration, and long-term maintenance activities;
- Provision of one large contiguous area of grassland in order to provide for optimal high-quality acreage that will be used by not only the Grasshopper Sparrow but also the Upland Sandpiper that requires more acreage for breeding habitat; and
- Management and maintenance of the grassland mitigation areas in perpetuity to permanently preserve the onsite grassland habitat.

In compliance with applicable regulations and in coordination with NHESP, offsite mitigation for grassland habitat impacts will be in the form of escrow funds similar to what was required in the 2009 CMP. The escrow funds are calculated based on numerous factors including level of concern (i.e., Endangered, etc.), on-site mitigation proposed, and mitigation ratio required.

To date, the Proponent has met with NHESP multiple times including four online presentations, three in-person meetings at NHESP headquarters, and a site inspection. The Proponent will continue to work with NHESP to determine Project impacts on rare species habitat and mitigation strategies and to finalize the amended CMP after completion of the MEPA process.

6.4 WETLAND RESOURCES

The US Army Corps of Engineers (USACE) has jurisdiction over federal Waters of the US pursuant to the federal Clean Water Act (33 USC ss. 1251 et. seq.) Most state jurisdictional wetlands (i.e., bordering vegetated wetlands) are also defined as federal waters of the US. Approvals for work in federal waters are issued by the USACE (for this Site, by the New England Division of the USACE) and the Massachusetts General Permit (GP) program. Every five years, the GP program is updated.

MassDEP has jurisdiction over both federal and state wetlands pursuant to the Section 401 Water Quality Certification (WQC) program under the Massachusetts Clean Water Act (MGL c. 21, ss. 26-53) and associated regulations (314 CMR 9.00) and Section 401 of the federal Clean Water Act (33 USC s. 1251 et. seq.) Certain work proposed in wetlands that requires filling or dredging may require a WQC including work in Outstanding Resource Waters (ORWs).

State wetlands jurisdiction falls primarily under the Massachusetts Wetlands Protection Act (MGL c. 131, s. 40) (WPA) and associated regulations (310 CMR 10.00). Permits (called Orders of Conditions) issued under the WPA for work in wetland resource areas and/or within the 100-foot jurisdictional buffer zone, are issued by the local conservation commissions (and, at the Base, the SRA) and are considered local permits, not state permits.

The wetlands on the Site subject to the WPA include the following:

- Inland bank (naturally occurring) (310 CMR 10.54)
- Bordering vegetated wetlands (310 CMR 10.55)
- Land under water bodies and waterways (310 CMR 10.56)
- Bordering land subject to flooding (310 CMR 10.57(2)(a))
- Isolated land subject to flooding (310 CMR 10.57(2)(b))
- Riverfront area (310 CMR 10.58)
- Estimated habitats of rare wildlife (for inland wetlands) (310 CMR 10.59)
- Isolated vegetated wetlands (federal jurisdiction only)

Vernal pools are confined basin depressions which, at least in most years, hold water for a minimum of two continuous months during the spring and/or summer, and which are free of adult fish populations. Vernal pools are subject to protection under the WPA if the pool meets the criteria of a vernal pool and is located within a jurisdictional wetland resources area. Vernal pools are certified by NHESP. Based on the most recent vernal pool layer on MassMapper, there are 16 certified vernal pools (CVPs) and 15 potential vernal pools (PVPs) identified on the Site.

6.4.1 Existing Conditions

Approximately 27% of the Site is comprised of various wetland habitats including woodlands, scrub-shrub wetlands, wet meadows, water bodies, and waterways.

Permits had been obtained for the below-described work in wetlands associated with existing development at the Base, including numerous Orders of Conditions from the SRA and local conservation commissions, USACE, and MassDEP.

The existing Wetland Impact Areas (WIA) at SWNAS are shown on Figure 6-3. To date, work in wetland areas as a result of development and transportation improvements has occurred as highlighted below and summarized in Table 6-1, with locations noted on Figure 6-3:

- Development work (resulting in 6,535 sf of impact to isolated vegetated wetlands subject only to federal wetlands jurisdiction)
- Transportation improvements (resulting in 11,650 sf of impact to bordering vegetated wetlands) including the construction of the Parkway (impacts occurred in the eastern portion of the Site) and Stonehaven Drive. These impacts are allowed under the WPA limited project provisions for roadway improvements pursuant to 310 CMR 10.53(3)e.

Table 6-1 Existing Wetlands Impacts To-Date (sf)

Wetland Impact Area	Activity	Bordering Vegetated Wetlands	Isolated Vegetated Wetlands
WIA-C	Development		4,350
WIA-D	Development		350
WIA-E	Development		1,835
WIA-I	Access**	9,330	
WIA-K	East-West Parkway **	1,016	
WIA-L*	East-West Parkway **	1,304	
Total		**11,650**	**6,535**

* WIA-L is located off-site to the east of the Base

** Limited project provisions pursuant to 310 CMR 10.53(3)

As shown in table 6-1, 11,650 sf of bordering vegetated wetland impact occurred as a result of roadway construction pursuant to the limited project provisions of the WPA. As a limited project, these impacts would not count towards impact calculations to determine if a Variance from the WPA would be required. A total of 14,305 sf of wetland replication areas have been constructed as more fully described below.

The above-described work resulting in wetland impacts did not impact any vernal pool habitat.

There are no Federal Emergency Management Agency (FEMA) mapped floodplain boundaries for the Site. The FEMA Flood Insurance Rate Maps (FIRM) for Weymouth, Rockland and Abington exclude the Base and depict the property as “Area Not Included.” Therefore, no FEMA 100-year and 500-year floodplain boundaries have been delineated for the Base.

6.4.2 Prior Proposal and 2023 Modified Development Program Approach

The development program described in the 2017 NPC included some revisions to previously proposed wetland impacts, including the reduction of certain impacts (i.e., regarding the East-West Parkway and elimination of the golf course) increase in other impacts due to a re-delineation (i.e., resulting in 9,190 sf more impacts for the Stonehaven Drive crossing). In total, wetland impacts occurring to date include 11,650 sf of wetland filling for roadway construction pursuant to the limited project provisions and 6,535 sf of isolated wetlands (federal jurisdiction only).

The 2023 Modified Development Program for the Project may include minimal work within regulated wetland resource areas, as described below, all of which work is allowed under the limited project provisions pursuant to 310 CMR 10.53(3).

The stormwater management system will include the use of the TACAN basin, in part, an older created wetland, built by the Navy as part of its drainage systems, and as shown on Figure 7-5. Work in Riverfront Area that may be proposed in association with the proposed stormwater system improvements described in Section 7.3 and will meet the Riverfront Area regulations. Such work has been designed to meet MassDEP Stormwater Management Standards, along with limited project roadway crossings designed to meet the State’s stream crossing guidelines. Much of the redevelopment is proposed to be located in former previously developed Navy facilities.

While some work associated with the 2023 Modified Development Program may be proposed within buffer zones to wetland areas, except as noted above with respect to limited projects, impacts to resource areas are not proposed at this time. Work associated with the off-site infrastructure (i.e., utilities and roadway improvements) will likely occur within existing roadway and right-of-way alignments and not in wetland resource areas. The grassland restoration work associated with rare species mitigation described in Section 6.3 hereof is designed to avoid impacts to any wetlands. The 2023 Modified Development Program for the Project would have no direct impacts to vernal pools. In light of the above, it is not anticipated that a variance from the Wetlands Protection Act will be required.

Future wetland mitigation for the 2023 Modified Development Program will be provided in accordance with applicable regulations. Such mitigation measures will depend on the amount of work proposed that will impact wetlands, including if the work is temporary or permanent, where the work is proposed (i.e., off-site roadway improvements, etc.) and what type of wetland is being impacted. There is ample land at the Base to create and/or restore wetlands as much of the land has already been disturbed. Future wetland mitigation may include the replication of bordering vegetated wetlands, the restoration of streams, banks, and associated flood plains or some combination of the foregoing, as appropriate. For example, the proposed greenway/flow-ways channel bottoms may see sufficient stormwater to develop a wetland or facultative wetland fringe. The developed vegetation reduces erosion, and enhances sediment capture, deposition, and nutrient uptake. We have identified this area as a potential area that may be used to replicate wetlands as needed, i.e., Wetland Replication Area 3 (WRA-3) on Figure 6-3).

6.5 AGRICULTURAL SOILS

Based on the current Natural Resources Conservation Service (NRCS) soil surveys for Norfolk and Suffolk Counties, Massachusetts and Plymouth County Massachusetts, there are approximately 170 acres on-site that contain prime, state, or local importance farmland soils in scattered pockets.

The 2023 Modified Development Program only impacts agricultural soils by approximately 1.0 acre, a reduction of approximately 50 acres. None of the agricultural soils on-site are in agricultural use.

6.6 ENERGY & GREENHOUSE GAS ANALYSIS

The Global Warming Solutions Act (GWSA) was enacted in August 2008, which requires a 25% reduction of GHG emissions from 1990 levels by 2020 and an 80% reduction from 1990 levels by 2050. The Final Revised MEPA GHG Emissions Policy and Protocol dated May 5, 2010 (GHG Policy) directive was developed in accordance with the GWSA. The GWSA specifically amended the MEPA statute to provide that: *In considering and issuing permits, licenses, and other administrative approvals and decisions, the respective agency, department, board, commission, or authority shall also consider reasonably foreseeable climate change impacts, including additional GHG emissions, and effects, such as predicted sea level rise. See M.G.L. c. 30, §61. The MEPA GHG Policy was introduced and is being applied through MEPA review to address the Commonwealth's obligations under the GWSA.*

Under the GHG Policy, projects undergoing review by the MEPA Office must quantify their GHG emissions and identify measures to avoid, minimize, or mitigate such emissions. In addition to quantifying project related GHG emissions, the GHG Policy also requires proponents to evaluate project alternatives that may result in lower GHG emissions and to quantify the impact of proposed mitigation in terms of emissions and energy savings.

6.6.1 Summary of Prior Studies

Prior MEPA filings on the Project predate the implementation of the MEPA Greenhouse Gas Emissions Policy and Protocol (GHG Policy). GHG analysis was not conducted for the 2007 FEIR project and no GHG analysis was performed for the 2017 NPC. As such, this filing is not technically subject to the GHG Policy (e.g., as a result of its continuous MEPA engagement and ongoing construction at the Site since 2011), the Proponent is including here an analysis of the 2023 Modified Development Program's alignment with the GHG Policy as the Proponent acknowledges the importance of such policy.

6.6.2 Prior Proposal and 2023 Modified Development Program Approach

Currently, 1,274 homes and 73,000 square feet of commercial space has been built at SWNAS. The development program for the 2017 NPC included 3,855 residential units and 8,000,000 sf of mixed-use commercial. As detailed throughout this filing, the 2023 Modified Development Program for the Project proposes 6,000 new residential units and a 2,000,000 sf mixed-use commercial component. Since the 2017 NPC, Massachusetts Building and Stretch Codes have changed. Abington, Rockland, and Weymouth are Stretch Code communities. As such, the Project must comply with the 2023 Stretch Code, which includes the 2021 IECC Commercial and Residential Codes with Massachusetts amendments. A summary of the GHG study performed for the Project is presented below. The complete GHG Report is attached as Appendix B.

6.6.3 Greenhouse Gas Analysis

An energy and CO_2 emissions GHG study was performed consistent with the MEPA GHG Policy and Protocol (May 5, 2010) and is included as Appendix B. Energy use and CO_2 emissions were calculated for three cases: the App. G Baseline, a building code-compliant Base Case, and the Proposed Design Case. Both direct and indirect emissions will be included for building energy use (fuel and electricity).

As noted throughout this filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within this filing and the supporting studies, depending on market demand and conditions, the amount of proposed residential and commercial development may fluctuate provided that the infrastructure is sufficient to support such development.

6.6.3.1 Methodology and Application to 2023 Modified Development Program

For this GHG study, the following breakdown was modelled consistent with the overall program of 6,000 new homes and 2,000,000 square feet of commercial development, and consists of:

- SF detached homes 1,427 units
- SF attached townhouse 1,495 units
- MF residential 3,078 units
- Life science R&D building 300,000 sf
- Warehouses 800,000 sf
- Offices 800,000 sf
- Retail 100,000 sf

The new buildings will be designed as all-electric, with Air Source Heat Pumps (ASHPs) providing heating and cooling, except for the warehouses, for which the warehouse space portion will be heated using a Hybrid 25/100 ASHP/Gas heating system sized to 25% of peak heating demand, and the associated office space portion will use 100% ASHPs. Section 4.6 in Appendix B provides a draft outline of the Tenant Manual for commercial and industrial building tenants.

For the commercial buildings, which include the multi-family residential buildings, the following building design and operational energy efficiency measures (EEMs) to reduce GHG emissions will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the EEA "Greenhouse Gas Emissions Policy and Protocol" (May 5, 2010). See Section 4.0 in Appendix B for details.

- Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope.
- Higher efficiency than Code heating and cooling systems.
- VRF Air Source Heat Pumps (ASHPs) with simultaneous heating and cooling in the office portion of the warehouse, life science R&D, office, multi-family residential, and retail buildings.
- Energy Recovery Ventilation (ERV) for the warehouses, life science R&D building, the office buildings, and the retail buildings with an enthalpy recovery ratio of 70% at heating and cooling design conditions. ERV for the multi-family residential buildings with an enthalpy recovery ratio of 75% at heating and cooling design conditions.
- Reduced wall air infiltration rate not exceeding 0.25 cfm/sf at 75 Pa test pressure in the five warehouses. Stretch code infiltration rate of 0.35 cfm/sf for the other commercial buildings.
- Reduced solar gain via low-SHGC window glass and external shades on west and south facing windows.
- High efficiency electric hot water systems with heat pump hot water heaters in the warehouses, life science R&D building, office buildings, and retail buildings, and electric resistance hot water systems for the multi-family residential buildings.
- Interior and exterior LED lighting systems with light power density (LPD) lower than Code.
- Twenty percent (20%) of passenger vehicle parking spaces will be EV-ready for the multi-family residential buildings, and ten percent (10%) of passenger vehicle parking spaces will be EV-ready for the other commercial buildings.
- Solar-ready space on commercial building roofs equals 80% of available flat roof area, and on single-family homes and townhouses 50% of pitched roof area.

The GHG Policy requires a project to quantify CO_2 emissions and identify measures to avoid, minimize or mitigate such emissions, quantifying the effect in terms of energy savings and emissions reduction. Abington, Rockland, and Weymouth are Stretch Code communities. CO_2 emissions for the commercial buildings were quantified for: (1) the Base Case corresponding to the 10th Edition of the Massachusetts Building Code that includes the 2021 IECC Commercial Code with Massachusetts amendments and the 2023 Stretch Code, and (2) the Proposed Design, which includes all energy saving measures, detailed in Section 4.3 in Appendix B.

Compliance with the 2023 Stretch Code uses the Relative Performance Pathway[2] that follows the ASHRAE 90.1-2019 Section 4.2 Appendix G pathway with Massachusetts amendments. The compliance method compares a building's site energy use for the App. G Baseline Case (ASHRAE 90.1-2004) to the energy use of the Proposed Design. TEDI indices are presented in Table 6-6 of Appendix B.

The following provisions of the 2023 Stretch Code apply to the commercial buildings in the Project, and each item provides the location of compliance information:

- C402.1.5, see wall assembly U values in Tables 9A through 9D in Appendix B.
- C402.3, see PV commitment listed above.
- C402.4, see fenestration U values in Tables 9A through 9D in Appendix B.
- C402.5, see air infiltration rate commitment listed above and in Tables 9A through 9D in Appendix B.
- C402.7, see thermal bridging commitments in section 4.3.

[2] Average ventilation at full occupancy is assumed to be 2.00 cfm/sf for the R&D laboratory space and 0.80 cfm/sf for the office space in the life science building, and 0.60 cfm/sf for office buildings. The minimum ventilation rates are less. Reference: ASHRAE 62.1 "Ventilation for Acceptable Indoor Air Quality."

- C403.7, see ERV commitment listed above and in Tables 9A through 9D in Appendix B.
- C405.13, see EV-ready commitments listed above.
- C406.1, energy efficiency credits (see Tables 9A through 9D) in Appendix B:
- For office space in the warehouses, the life science R&D building, multi-family residential buildings, office buildings, and the retail buildings: C406.2.3 renewable space heating, as shown in Appendix B.
- For the warehouse space in the warehouses (Table C406.1(5), Other Occupancies): C406.2.4 10% cooling efficiency improvement, C406.3 reduced LPD, and C406.9 air infiltration, as shown in Appendix B.
- C407.2, PEI compliance is demonstrated in Table 12 in Appendix B, and proposed building improvement over code is detailed in Table 13 in Appendix B.

For the single-family homes and townhouse units, the following building design and operational energy efficiency measures (EEMs) to reduce GHG emissions will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the GHG Policy and as outlined in the GHG report (Appendix B), including:

- Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope.
- Higher efficiency than Code ASHPs for heating and cooling.
- ERV with a sensible heat recovery of 65% at 32F.
- Electric resistance hot water systems.
- Interior and exterior LED lighting with LPD lower than Code.
- One EV-ready space for each single-family home and townhouse unit.
- Solar ready space on the roof of each single-family home and townhouse unit.

CO_2 emissions for the single-family homes and single-family townhouse units were quantified for: (1) the Base Case corresponding to the 10th Edition of the Massachusetts Building Code that includes the 2021 IECC Residential Code with Massachusetts amendments and the 2023 Stretch Code, and (2) the Proposed Design, which includes all energy saving measures, detailed in Section 4.3 in Appendix B. Compliance with the 2023 Stretch Code uses the HERS Pathway.

The Proposed Design includes the following design elements to satisfy the HERS Pathway and the 2023 Stretch Code:[3]

1. HERS index maximum of 55 for an all-electric building (Section R406.5). The single-family homes and townhouse units target a value of HERS 52.[4]
2. Balanced mechanical ventilation system verified with a blower-door test and ERV with sensible heat recovery efficiency 65% at 32F (Section R403.6).
3. Each single-family home and townhouse unit will have a 50A garage circuit to provide for Level II EV charging. (Section R404.4).
4. Solar ready roofs (Appendix RB).
5. Energy rating index compliance section (Table R406.2) that requires high-efficacy interior lighting fixtures (Section R404.1), interior lighting dimmers or occupancy sensors in rooms excluding bathrooms and hallways (Section R404.2), and a building thermal envelope greater than or equal to the levels of efficiency and SHGC in Table R402.1.2 and Table R402.1.4 of the 2015 IECC Residential Code (see Table 6E in Appendix B).

[3] DOER, 2023 Technical Guidance, Massachusetts Stretch Energy Codes, page 64.

[4] South Shore Energy Raters, RESNET modeling of a similar residential design assuming ASHPs rated HSPF 11.0 and SEER 20.0 with ERV and electric resistance hot water achieved HERS 52 rating, August 18, 2022.

6.6.3.2 Summary of Results for the GHG Analysis

The Proponent commits to the CO_2 reduction presented below but retains the flexibility to achieve this goal using energy efficiency measures that may be refined at the stage of detailed design for the Project. As noted throughout this filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within this filing and the supporting studies, depending on market demand and conditions, the amount of proposed residential and commercial development may fluctuate provided that the infrastructure is sufficient to support such development. Table 6-6 in Appendix B reveals that the Proposed Design will reduce CO_2 emissions (for stationary sources) by 15.4% compared to the Base Case. As discussed in Section 2.4 of Appendix B, Transportation Demand Management (TDM) measures for the Project will reduce Project-related motor vehicle CO_2 emissions by 2%. The net reduction of the Project's total CO_2 emissions (stationary sources plus transportation) is 10.6% compared to the Base Case.

At the completion of construction, the Proponent will provide a certification to the MEPA Office, signed by an appropriate professional. The certification will identify either of the following: 1) all of the energy efficiency mitigation measures adopted by the Project as part of the Mitigation Alternative have been implemented; or 2) an equivalent set of energy efficiency mitigation measures, which together are designed to achieve the same percentage reduction in CO_2 emissions as the Mitigation Alternative, when compared to the Base Case, based on the same modeling assumptions in this report, have been adopted.

6.7 AIR QUALITY

Air quality is regulated at the national level by the Clean Air Act of 1970, as amended in 1977 and 1990. The Act regulates emissions through the National Ambient Air Quality Standards (NAAQS) and Hazardous Air Pollutant (HAP) programs, which includes mobile source air toxics (MSATs). EPA has set primary (health) and secondary (environment and property) limits for the NAAQS criteria pollutants, which are intended to protect public health and general welfare.

Massachusetts also regulates air quality through the Massachusetts ambient air quality standards (MAAQS). The MAAQS were first adopted in 1974 and have been amended several times to maintain alignment with the NAAQS. There is also the Massachusetts Clean Air Act (MG.L. Chapter 111, Section 142A through 142M) to prevent pollution or contamination of the atmosphere under the following Massachusetts Air Pollution Control Regulations:

- 310 CMR 6.00: Ambient Air Quality Standards
- 310 CMR 7.00: Air Pollution Control
- 310 CMR 8.00: Prevention & Abatement of Air Pollution Control Episodes & Emergencies
- 310 CMR 60.00: Air Pollution Control for Mobile Sources
- 310 CMR 70.00: Environmental Results Program (ERP) Certification

Under 301 CMR 11.03 (8) Air (a) Mandatory ENF and EIR requires an air quality analysis if:

1. Construction of a New Stationary Source with federal potential emissions, after construction and the imposition of required controls, of: 250 tons per year (tpy) of any criteria air pollutant; 40 tpy of any HAP; 100 tpy of any combination of HAPs; or 100,000 tpy of GHGs based on CO_2 Equivalent.

   Modification of an existing Stationary Source with federal potential emissions that collectively will result, after construction and the imposition of required controls, of 75,000 tpy of GHGs based on CO_2 Equivalent.

Under 301 CMR 11.03 (8) Air (b) ENF and Other MEPA Review if the Secretary So Requires, needs an air quality analysis if:

1. Construction of a New Stationary Source with federal potential emissions, after construction and the imposition of required controls, of: 100 tpy of PM_{10}, $PM_{2.5}$, CO, lead or SO_2; 50 tpy of VOC or NO_x; 10 tpy of any HAP; or 25 tpy of any combination of HAPs.

   Modification of an existing Stationary Source resulting in a "significant net increase" in actual emissions, provided that the stationary source or facility is major for the pollutant. For purposes of this threshold, a "significant net increase" in actual emissions shall mean an increase in emissions of: 15 tpy of PM_{10}; 10 tpy of $PM_{2.5}$; 100 tpy of CO; 40 tpy of SO_2; 25 tpy of VOC or NO_x; 0.6 tpy of lead.

6.7.1 Summary of Prior Studies

According to the 2017 NPC, the Draft Environmental Impact Report submitted on October 16, 2006 presented mesoscale and microscale analyses for the then-proposed development program, and the Secretary's Certificate on the DEIR did not require that additional air quality analysis be included in the subsequent 2007 FEIR. Following the filing of the DEIR, however, the previously analyzed Parkway alignment was changed and the Project's traffic characteristics changed, as well. Because of these changes, the 2007 FEIR presented updated microscale analysis. The project's trip generation characteristics, however, did not change, so it was not necessary to update the mesoscale analysis for the 2007 FEIR.

The analyses showed that there would not be adverse air quality impacts as a result of increased traffic in the area and that increases in emissions resulting from Project traffic would be mitigated by the proposed transportation-related mitigation measures.

In addition, a microscale analysis was conducted to evaluate the potential air quality impacts of carbon monoxide (CO) emissions resulting from traffic flow around the project area. The impacts were added to monitored background values and compared to the federal National Ambient Air Quality Standards (NAAQS), which were developed by EPA to protect human health. The modeling methodology was developed in accordance with MassDEP guidelines. An air quality modeling protocol was submitted to MassDEP for review. The microscale analysis results showed that CO concentrations at the sensitive receptors studied were well under NAAQS thresholds.

This filing details updated mesoscale and microscale analyses performed to reflect the 2023 Modified Development Program for the Project.

6.7.2 Prior Proposal and 2023 Modified Development Program Approach

Currently, 1,274 homes and 73,000 square feet of commercial space has been built at SWNAS. The development program for the 2017 NPC included 3,855 residential units and 8,000,000 sf of mixed-use commercial. As detailed throughout this filing, the 2023 Modified Development Program for the Project proposes 6,000 new residential units and a 2,000,000 sf mixed-use commercial component.

The Project will not be constructing new stationary sources that will exceed the air quality and GHG emissions thresholds; thus, an air quality analysis for stationary sources is not included in this document.

The TIA for the Project prepared by Vanasse & Associates, Inc. (VAI) and attached hereto as Appendix D shows a significant reduction of weekday vehicle trips as compared to the 2017 NPC development program. Thus, the 2023 Modified Development Program will provide an air quality benefit compared to the 2017 NPC development program. Since the Project will generate more than 3,000 new average daily trips (adt) on roadways providing access to a single location, an air quality mesoscale analysis is required to assess potential mobile source air quality impacts from the Project. An air quality mesoscale analysis was performed based on the procedures presented in the Massachusetts Department of Environmental Protection Division of Air Quality Control, *Guidelines for Performing Mesoscale Analysis of Indirect Sources*, May 1991, and is summarized in the sections below.

6.7.3 Air Quality Analysis

A mesoscale air quality analysis for nitrogen oxides (NO_x), volatile organic compounds (VOCs) and carbon dioxide (CO_2) for the Existing 2023 and 2043 No-Build, 2043 Build and 2043 Build with Mitigation was performed for those roadways within Weymouth, Abington and Rockland based on the attached VAI TIA. Emissions were calculated using the EPA-approved MOVES3.1 model and input files provided by DEP for 2022 and 2043 for Norfolk and Plymouth Counties.

To be consistent with previous analyses for the Project, a qualitative microscale analysis for those intersections that are Level of Service (LOS) E and F or degrade to LOS E or F for those intersections in the Weymouth, Abington and Rockland based on the VAI TIA was conducted. The results of the above-described studies are detailed in Appendix B.

As noted throughout this filing, the 2023 Modified Development Program is being analyzed to determine impacts of the Project's preferred build condition. However, so long as impacts from the Project remain within those analyzed within this filing and the supporting studies, depending on market demand and conditions, the amount of proposed residential and commercial development may fluctuate provided that the infrastructure is sufficient to support such development.

6.7.3.1 Air Quality Mesoscale Analysis

The mesoscale study area included twenty-four (24) major roadways with the towns of Weymouth, Rockland and Abington. Eleven (11) of the roadways are located in Weymouth, eight (8) are located in Rockland, and five (5) are located in Abington.

The mesoscale analysis results (presented in full in Appendix B) show that the VOC emissions for the Project 2043 Build case are predicted to be 11.7 kg/day higher than those for the 2043 No-Build case. Compared to 2020 Plymouth County VOC emissions of approximately 160,467 kg/summer day, this represents an insignificant area-wide increase of approximately 0.007%. NO_x emissions for the Project 2043 Build case are predicted to be 8.4 kg/day higher than those for the 2043 No-Build case. Compared to 2020 Plymouth County NO_x emissions of approximately 48,352 kg/summer day, this likewise represents an insignificant area-wide increase of approximately 0.019%. The Project will implement reasonable and feasible mitigation measures to reduce traffic-related air quality impacts, discussed in Section 6.7.3.2 below.

6.7.3.2 Qualitative Microscale Analysis

The microscale study area included fifty-four (54) major intersections within the towns of Weymouth, Rockland, and Abington. The Weymouth portion of the study consisted of twenty-nine (29) intersections, the Rockland portion consisted of sixteen (16) intersections, and the Abington portion consisted of nine (9) intersections.

The average vehicle delay, traffic volume and LOS were evaluated for each scenario for both the morning and afternoon peak traffic periods. After determining the LOS for each intersection in the 2022 Existing, 2043 No-Build, and Project 2043 Build scenarios, twenty-one (21) intersections were selected for further analysis using the criteria described above. Of the twenty-one (21) selected intersections fifteen (15) are located in Weymouth, five (5) are located in Rockland, and one (1) is located in Abington. The predicted increase to the average vehicle delays at these intersections range from 12.8 seconds per vehicle (s/veh) to 5,535.4 s/veh. Most of the predicted delays were less than 150 s/veh.

The Proponent is involved in implementing a Transportation Improvement Program detailed in the TIA attached as Appendix D, which includes improvements to intersections and roadways that will reduce congestion in the study area. Some of the improvements will be the responsibility of the Proponent, while others will be the responsibility of MassDOT or the respective town.

Of the fifty-four (54) intersections in the microscale study area, twenty-eight (28) were evaluated in the VAI traffic study to predict the intersection benefits from the Transportation Improvement Program. Of the twenty-one (21) intersections that warranted further analysis in the microscale analysis, seventeen (17) were included in the twenty-eight (28) that were evaluated for mitigation benefits in the traffic analysis.

Eight (8) of the seventeen (17) intersections show a decrease in average vehicle delay, by as much as 414.6 s/veh, when compared to the 2043 No-Build scenario. This indicates that the Proponent's Transportation Improvement Program will help relieve congestion in the portions of the study area. Of the remaining nine (9) intersections that do not indicate a decrease in average vehicle delays relative to the 2043 No-Build condition, the increase in average vehicle delay compared is predominantly less than 70 s/veh. When compared to the Project 2043 Build scenario, all the seventeen (17) intersections evaluated show a decrease in the average vehicle delay. In total the average vehicle delay at all of the twenty-one (21) intersections are predicted to decrease by 71% due to the Transportation Improvement Program measures, when compared to the Project 2043 Build scenario.

Through the proposed Transportation Improvement Program, the Proponent will significantly decrease the air quality impacts at intersections in the Project 2043 Build scenario, and in several cases the air quality around intersections will likely improve due to decreases to the average vehicle delays when compared to the 2043 No-Build scenario. Furthermore, the area is well within attainment of the CO NAAQS; therefore, the air quality impacts at intersections within the microscale study area are expected to be safely below the CO NAAQS.

6.7.3.3 Stationary Sources Emissions and Permitting

Sizable combustion equipment (e.g., emergency generators and boilers) can have the potential to emit air pollutants at the Project and may be subject to air permitting under 310 CMR 7.00. MassDEP has established the Environmental Results Program (ERP) to streamline the certification process of smaller combustion equipment, subject to permitting regulations.

The exact sizes, makes, and models of equipment to be used by the Project are still to be determined and will be determined throughout the design process. It is anticipated that the majority or all the heating and cooling for residential and commercial buildings will be electric; thus, minimizing air quality impacts. However, if there is proposed equipment that is likely to use fossil fuels for the Project, such as boilers or emergency generators, they may be subject to permitting regulations. If any such equipment is used, the Proponent will submit the appropriate self-certification forms under the ERP process in a timely manner. Should the ERP process apply, the stationary sources will be required to show compliance with all applicable air quality regulations, including the NAAQS, to ensure public health and safety.

6.7.4 Construction Air Quality

Construction and demolition activities may generate fugitive dust, which will result in a localized increase of airborne particle levels. The construction contractor will need to prepare an emissions control plan that will address the areas of fugitive dust, construction equipment and vehicle exhaust, and potential traffic disruption and congestion. To reduce the emission of fugitive dust and minimize impacts on the local environment the construction contractor will adhere to a number of strictly enforceable mitigation measures. These measures may include:

- Using wetting agents to control and suppress dust from construction debris;
- Ensuring that all trucks traveling to and from the Project Site will be fully covered;
- Removing construction debris regularly;
- Using vacuum-powered street sweepers to remove dirt tracked onto streets;
- Monitoring construction practices closely to ensure any emissions of dust are negligible;

- Cleaning streets and sidewalks to minimize dust and dirt accumulation;
- Monitoring construction activities by the job site superintendent and safety officer;
- Wheel-washing trucks before they leave the Project Site during the excavation phase;
- Complying with MassDEP's Diesel Retrofit Program (MDRP);
- Complying with the State's Low Sulfur Diesel standards (301 CMR 7.05);
- Complying with 310 CMR 7.11 (1) (b) which requires that engines idle for no more than five minutes;
- Maintaining and repairing all equipment to minimize exhaust emissions, including odors, and
- Establishing and maintaining records of the routine maintenance programs for internal combustion engine-powered vehicles and equipment used for the project as part of the emissions control plan.

Similar methods as those mentioned above for air quality impact reduction would also effectively reduce GHG emissions. The above mitigation measures would all effectively reduce the GHG emissions associated with the construction phase of the Project. The Proponent will continue to evaluate which mitigation measures will be feasible for the Project.

6.8 NOISE

A noise study was performed for the Project and is attached as Appendix E. As detailed in the attached study, the 2023 Modified Development Program, as compared to the previously studied 2017 NPC development program, will have a lesser impact on future conditions at the Site. The results of the CadnaA noise evaluation model show a small aerial change in sound levels, which is consistent with the predicted small changes in sound levels calculated for each roadway. Figure 1 (Appendix E) shows the predicted 45-dBA noise contours for the 2017 NPC Project and the Project. Additionally, while construction of the Project will require the use of equipment that may be audible during peak construction activities, the Project will incorporate the mitigation measures recommended in the attached study to mitigate any such temporary impacts.

6.9 SOLID WASTE

6.9.1 Solid Waste Management - Commercial Uses

The Project will generate solid waste typical of office, retail, and restaurant uses. Solid waste is expected to include wastepaper, cardboard, glass bottles and food. Recyclable materials management will be implemented through programs developed by building and facilities management groups.

With the exception of wastes typical of commercial uses (e.g., cleaning fluids) or other wastes generated by specialized commercial uses of future tenants, the Project will not involve the generation, use, transportation, storage, release, or disposal of potentially hazardous materials. Specialized waste management services for future commercial uses will be coordinated by those commercial tenants in accordance with applicable federal, state, and local regulations. The Proponent will encourage facilities' managers to coordinate waste management services among specific projects.

6.9.2 Solid Waste Management - Residential Uses

The Project will generate solid waste typical of residential developments. Solid waste generated by residents will be collected and disposed of off-site by a licensed contractor. The Proponent will implement a recycling program throughout the Project, and residents will be encouraged to recycle.

With the exception of household hazardous wastes typical of residential developments (e.g., cleaning fluids), residential development at the Project will not involve the generation, use, transportation, storage, release, or disposal of potentially hazardous materials. It is anticipated that residential waste collection will be coordinated with contracted service providers to deliver residential recyclable materials to material recovery facilities.

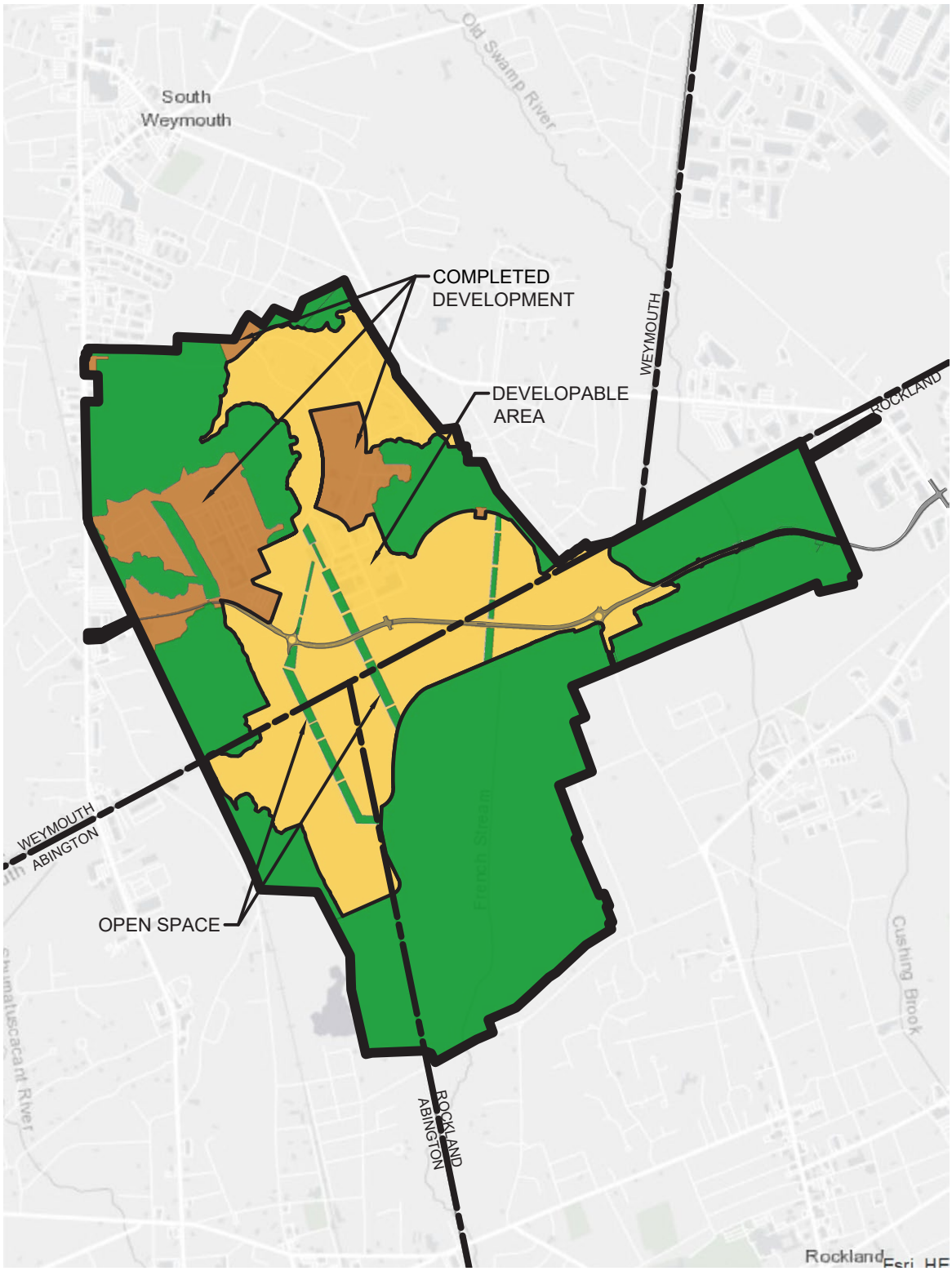
Recycled materials are expected to include newspaper, plastics, glass, cardboard, cans, and bottles. The residential recycling collection program will be implemented to minimize the waste generated by residents that is hauled to and disposed of in landfills. The Project recycling efforts, for example, may include providing recycling containers either adjacent to or integrated into the design of other receptacles in publicly accessible areas, and the availability of a drop-off point, available to all residents, for potentially hazardous household wastes. The Proponent will encourage individual construction projects to also follow LEED standards for solid waste management.

6.10 HAZARDOUS WASTE CLEANUP

SWNAS has undergone decades of environmental investigation and cleanup conducted by the U.S. Navy and, pursuant to CERCLA, supervised by EPA and MassDEP. The Navy assesses the need for, develops, and implements remedies that are protective of human health and the environment. The Navy has completed assessments and remedial actions (as needed) across much of the Base.

The majority of the land at SWNAS has been transferred to, or is in the process of being transferred to, the SRA through the Finding of Suitability for Transfer (FOST) process. These transfers occur only after the Navy is satisfied that the assessment and/or remediation of hazardous substances in soil or groundwater at a particular parcel is such that it may be conveyed out for reuse. As needed, Land Use Controls (LUCs), often in the form of a Notice of Activity and Use Limitation (AUL) recorded in title, are implemented prior to or as part of the FOST process. EPA and MassDEP concur with these FOST transfers. An LUC has been implemented across much of SWNAS to manage groundwater that contains perfluorooctane sulfanate and/or perfluorooctanoic acid (PFAS). A list of portions of the Base where Navy assessment and/or remediation is planned, as well as a list of AULs, is included in Section 13, under Hazardous Materials Comments. The Navy retains responsibility for any further assessment or remediation of hazardous substances (including post-FOST) associated with SWNAS, as well as for monitoring compliance with LUCs.

The Project will comply with all LUCs, AULs, and applicable laws governing the release of hazardous substances, including, without limitation, CERCLA, the Massachusetts Contingency Plan, and laws regulating landfills. In addition, the Proponent has coordinated, and will continue to coordinate, with Navy, EPA, and MassDEP with respect to PFAS and hazardous substances, all as regulated by all applicable environmental laws, LUCs, and AULs.



LEGEND

- SITE BOUNDARY
- TOWN BOUNDARY
- COMPLETED DEVELOPMENT
- DEVELOPABLE AREA
- OPEN SPACE

0 750' 1500'
SCALE: 1"=1500'

N

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

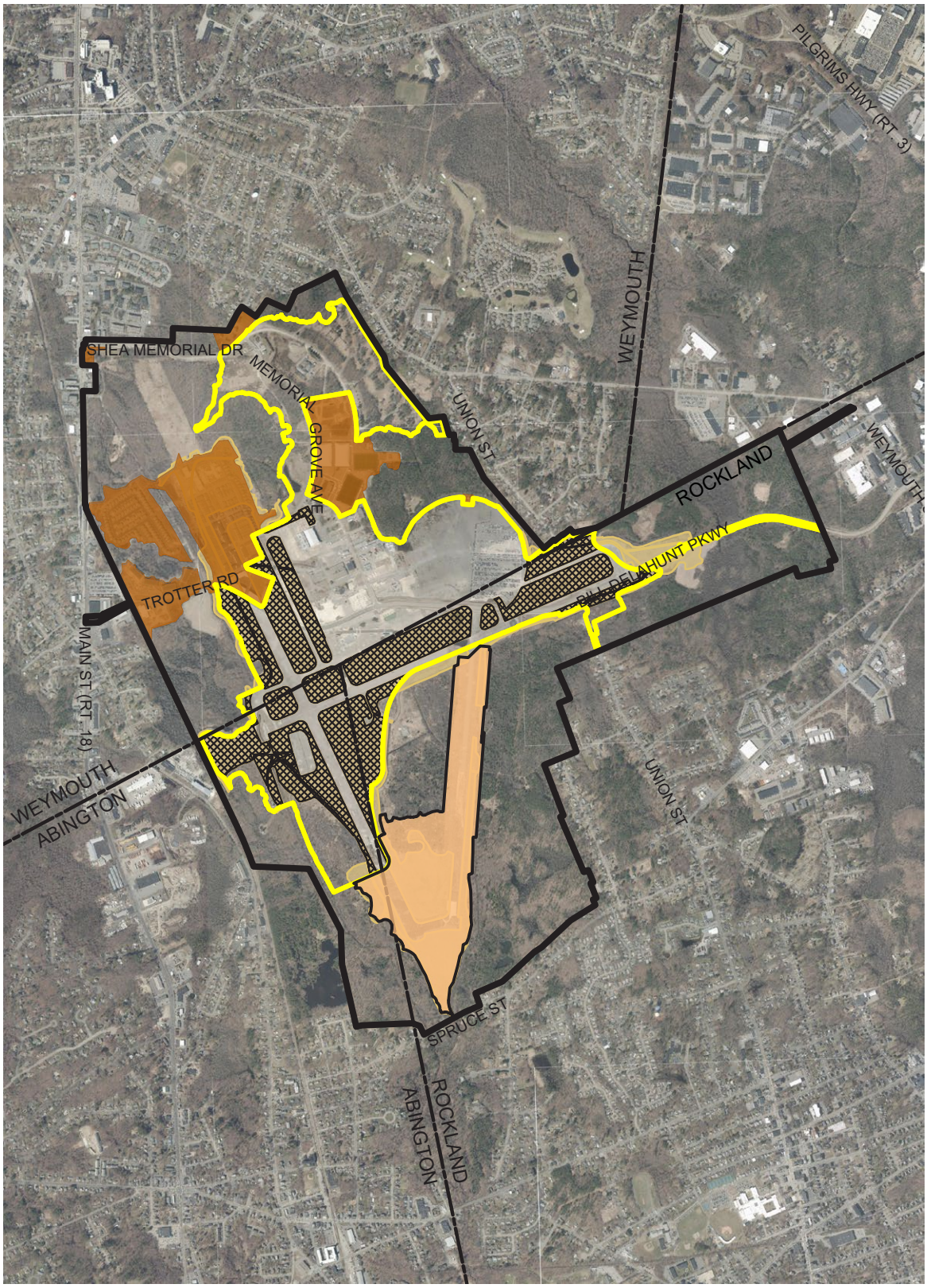
South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Proposed Open Space Plan

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

Figure 6-1

12/11/2023 4:17:03 PM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - PROPOSED OPEN SPACE PLAN.DWG - BOOTHBY, THOMAS



LEGEND

- SITE BOUNDARY
- TOWN BOUNDARY
- DEVELOPABLE AREA
- EXISTING DEVELOPMENT
- GRASSLAND
- GRASSLAND IMPACTS = 156 ACRES
- PROPOSED GRASSLAND MITIGATION AREA = 104 ACRES

0 750' 1500'
SCALE: 1"=1500'

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

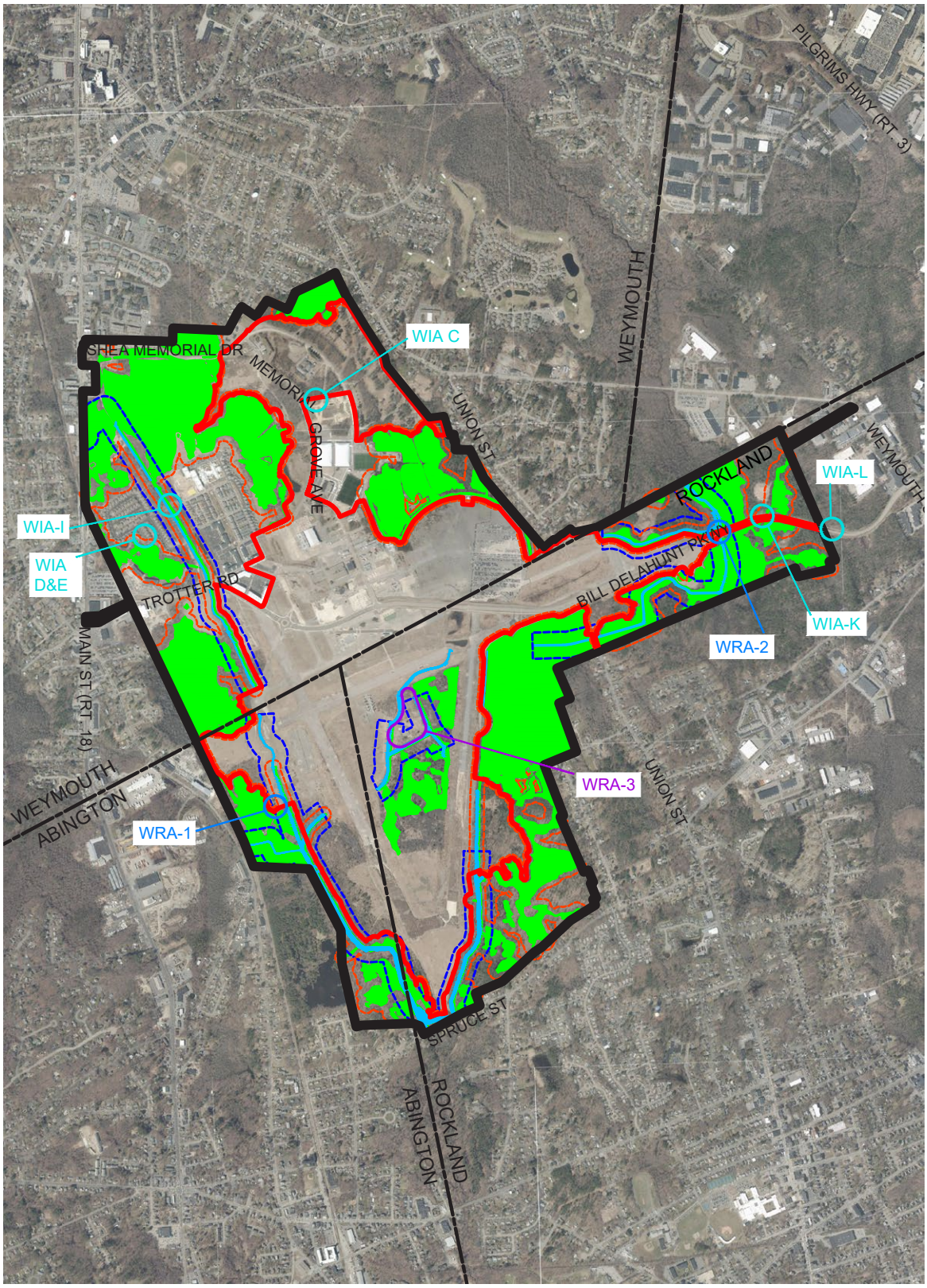
South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Grassland Impacts and Mitigation

Project No.: 143-33244-21001
Date: December 2023
Designed By: TAB

Figure 6-2

12/11/2023 4:29:38 PM - P:\33244\143-33244-21001\CAD\SHEETFILES\NHESP FIGURES\SWNAS - 2023 GRASSLAND IMPACTS AND MITIGATION TO DATE.DWG - BOOTHBY, THOMAS



LEGEND

- SITE BOUNDARY
- TOWN BOUNDARY
- MIXED USE DEVELOPMENT DISTRICT (MUDD)
- BORDERING VEGETATED WETLANDS
- 100 FT WETLAND OFFSET
- 200 FT RIVERFRONT AREA
- WIA - WETLAND IMPACT AREA (EXISTING)
- WRA - WETLAND REPLICATION AREA (EXISTING)
- WRA - WETLAND REPLICATION AREA (PROPOSED)

0 750' 1500'
SCALE: 1"=1500'

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Wetland Impacts and Mitigation

Project No.: 143-33244-21001
Date: December 2023
Designed By: TAB

Figure 6-3

12/12/2023 10:47:55 AM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - WETLAND RESOURCE AREAS.DWG - BOOTHBY, THOMAS

7.0 PROPOSED UTILITIES AND INFRASTRUCTURE

7.1 WATER

As required by MEPA, the water supply options and alternatives are described in this section. However, the Town of Weymouth, with the SRA as co-applicant, has already acted on an anticipated water supply shortage and is in the process of joining the MWRA Water System. The plan is to continue having Weymouth serve the full Base redevelopment as well as its future needs. While the Proponent and the SRA support and are funding an equal share of the Weymouth/SRA/MWRA application, alternatives have been evaluated, as described herein, that could be implemented should a subsequent Town of Weymouth administration decide not to join the MWRA or if delays in getting this MWRA connection built and in service would result in delays or interrupt the Base redevelopment.

None of the three towns in which SWNAS is located currently has sufficient water capacity to meet the respective Town's future needs and supply the Base for the 2023 Modified Development Program mix of uses as described herein. At full buildout, it is anticipated that the development at SWNAS (including the existing development) could require approximately 2.1 million gallons of water per day (mgd). Several options (and permutations of those options) for securing a reliable, affordable, permanent long-term water supply for SWNAS have been explored under the prior filings and studies, and include the following:

i. continued service from the Weymouth system;
ii. expanded service from the Weymouth system once it has joined the MWRA;
iii. the SRA joining the MWRA independent of Weymouth joining;
iv. the SRA buying water from the Aquaria desalination plant or the City of Brockton; and
v. on-site wells.

This Section 7.1 details not only certain of these permanent options that are most viable to serve the existing development and full buildout of the 2023 Modified Development Program in light of current and anticipated demands, but also the options to provide interim water supply while a permanent solution is being implemented.

7.1.1 Estimated Demand Flows

In order to develop water solutions for the Base, the Proponent must first understand the water demand that will be needed to accommodate full buildout of the Base (i.e., the existing development as supplemented by the 2023 Modified Development Program).

In accordance with MassDEP regulations and MEPA policy, the Project water demand has been developed using Title 5 estimated wastewater flows and adding 10% for the daily water demand. As shown in Tables 7-1 and 7-2 below, the existing and proposed wastewater flows have been calculated based upon 310 CMR 15.203 Title 5 System Sewage Flow Design Criteria. The projected water demand detailed in this section is conservative. The existing development at the Base has an actual demand of approximately 100,000 gpd on a consistent basis, which is considerably less than the Title 5 estimates identified below. However, under Title 5 or any reasonable estimate of actual demand, the future Town of Weymouth demand, with or without the buildout of the 2023 Modified Development Program will exceed Weymouth's supply safe yield. Thus, a new supply is necessary.

Table 7-1 Existing Wastewater Flow Estimate

Type of Establishment	Area (sf)	Number of Bedrooms	Generation Rate	Flow (gpd)
family dwelling (1,063 units)[1]		2,126	110 gpd per bedroom	233,860
housing for the elderly (211 units)[1]	40,000	422	150 gpd per 2 bedroom/ unit[2]	31,650
office (Sports Complex)	2,100	--	75 gpd per 1,000 sf	158
retail	33,000		50 gpd per 1,000 sf	1,650
Total	**75,100**	**2,548**		**267,318**

[1] Approximately 1,274 existing units located on-site (1,063 units family dwelling and 211 units elderly housing). Assumed all family dwelling and elderly housing units are 2-bedroom units.

[2] One bedroom unit housing for the elderly, and units with more than two bedrooms, shall be designed based on 110 gallons per day per bedroom. Two-bedroom units shall be designed based on 150 gallons per day per unit.

Table 7-2 Proposed Wastewater Flow Estimate

Type of Establishment	Area (sf)	Number of Bedrooms	Number of Seats	Number of Persons	Generation Rate	Flow (gpd)
family dwelling (6,000 Units)[1]	--	12,450			110 gpd per bedroom	1,369,500
office	800,000	--			75 gpd per 1,000 sf	60,000
life science/biopharma	300,000	--			432 gpd per 1,000 sf[2]	129,600
restaurant	10,000	--	500		35 gpd per seat	17,500
retail	90,000	--			50 gpd per 1,000 sf	4,500
warehouse (with cafeteria)	800,000	--		200	20 gpd per person	4,000
Total	**2,000,000**	**12,450**	**500**	**200**		**1,585,100**

[1] Proposed development includes 6,000 additional units (3,000 rental and 3,000 for sale). Flow for the rental units assume 45% of units are 1 bedroom, 45% of units are 2 bedrooms, and 10% of units are 3 bedrooms. Flow for the for sale units assume 10% of units are 1 bedroom, 40% of units are 2 bedrooms, 40% of units are 3 bedrooms, and 10% of units are 4 bedrooms.

[2] Generation rate for Life Science/Biopharma taken from the 2017 NPC. Title 5 does not have a rate for Life Science/Biopharma; as such, this rate was utilized as it is a typical rate for the use.

The total estimated wastewater flow for SWNAS at full buildout (including existing development) is 1,852,418 gpd. In this filing, the value of 1.9 mgd will be used for the full build wastewater flow. Applying the DEP standard estimate of average day water demand, using Title 5 flows, we have added 10% for an ADD (average daily demand) of 2,037,660 gpd for full buildout water demand or 2.1 mgd.

For the existing development at the Base, the Town of Weymouth has actual water meter readings and also has recent and ongoing monitoring in the Base sewer system pumping station. After recent repairs at the pumping station by the SRA, the sewer flows have been averaging 85,000 to 100,000 gpd (i.e., well below the estimated 267,318 gpd exsitng Title 5 flows above). Actual recent water meter readings for the existing development average 116,000 gpd. The full buildout (existing, and the 2023 Modified Building Program) water demand of 2.1mgd is shown for comparison purposes with prior MEPA filings. The design flows for the 2023 Modified Building Program are 1.8mgd water and 1.6mgd wastewater. The existing development on the Weymouth systems are included in the Town's average from metered flows.

These differences between estimated and actual demands will become important in phasing and timing during the interim period when growth continues on existing resources while future solutions are being implemented. While Title 5 derived values, with appropriate peaking factors, will be used for design of new facilities, the actual consumption is the appropriate indicator of the demand on existing capacities.

7.1.2 Water Supply

Once the Proponent determined the Project's anticipated demand (1.8 mgd), several supply options were evaluated that could meet that demand. As discussed below, there is a deficit between the demand of the Project at full buildout and the current available supplies of water. Accordingly, the Proponent needs to develop solutions that utilize the currently available supplies on an interim basis while the long-term water supply solutions are implemented. This section 7.1.2 details the interim and permanent water solutions that the Proponent has considered for the 12 to 15 year buildout of the Project.

As described below, the existing redevelopment of SWNAS has been supplied water from the Weymouth system. The Proponent is working with the Town of Weymouth to advance their applications to join the MWRA and to implement measures to extend available supply by reducing unaccounted for water. The present demand on the Weymouth system averages 4.25 mgd of the permitted 5.0 mgd capacity.

The full buildout comparison is more than a 20% reduction from the project demand of 2.7 mgd in the 2017 NPC program; however, as noted above, there will still be a future deficit from current available sources. As described below, much has changed since 2017 regarding the possibilities to overcome that deficit and supply the future redevelopment needs of the Base on a permanent basis.

In prior MEPA filings, it has always been assumed that the Base redevelopment authority, now the SRA, would be a water authority. Under that approach, the SRA would acquire a supply, "buying" water from either the Town of Weymouth, the City of Brockton, the Aquaria Water Company or joining the MWRA itself. However, for the existing development to date, all within the Weymouth portion of the Base, the Town of Weymouth supplies water under an intermunicipal agreement with the SRA and bills Weymouth customers directly. While the SRA still has the authority to be a water supplier (and remains an option), having direct municipal supply has simplified water service for existing residents on the Base and the SRA.

The water supply shortfalls of the South Shore Communities, including Weymouth and the redevelopment of the Base, are not new or unstudied issues. The prior MEPA findings for the Base redevelopment required future studies. In addition to the studies in this filing, the following agency studies have recently been completed:

- In November of 2022 the Town of Weymouth and the SRA, as informed by the Town's independent consultant, published a comprehensive report described below as the "EPG Final Report."
- The Town of Weymouth has just completed and published in December, 2023, a new water audit report, including a leak detection survey to try to find and reduce their current 22% unaccounted water.
- In October 2022, the MWRA published their report "MWRA Water and Wastewater System Expansion Evaluation to South Shore Communities" (the "MWRA October 2022 Report").

The Weymouth/SRA MWRA application and MEPA filing will include the ITA permit effects of adding Weymouth's future maximum day demand (including the Base buildout) to the MWRA Ware River supply system. Regarding the transfer implications on the wastewater side of the ITA equation, the effects of transferring a portion of that water through the Abington/Brockton collection/treatment system to the upper Taunton River Basin would be covered by a determination of insignificance under a separate ITA ruling. The same would apply to flows from the Rockland portion of the Base transferred through the Rockland treatment works to the upper North and South River Basin. From a purely ITA volume transfer perspective those flows each under 350,000 gpd would have positive effects (adding base flow) on the receiving basins.

7.1.2.1 Potential Interim Solutions

While the schedule, costs and effects of permanent alternative water supplies will be evaluated in this comprehensive MEPA filing for the redevelopment of SWNAS, it seems clear that putting in place such a supply will take longer than securing the approvals for the Project. In the interim period, between when (i) the necessary transmission main connection is built and the long-term supply is operational and (ii) the early construction period of the 2023 Modified Development Program, there are several viable interim water supply options. These include the following:

- Extending the life of the available Weymouth supply by implementing existing system leak repairs and new construction sustainable water saving fixtures;
- Working with the City of Brockton and the Abington Rockland Joint Water Board (ARJWB) on an interim interconnection;
- Working with the MWRA and the City of Quincy on utilizing an existing connection under the Fore River for interim public water supply;
- Seeking DEP approval for short-term interim relief from its 5 mgd withdrawal permit in Weymouth.

Extension of Existing Weymouth Supply

Presently the Town of Weymouth has approximately a 700,000 gpd average available supply to meet new demands. In order to assess the ability of that available supply to meet the demands of the 2023 Modified Development Program, the following analyses assumed 600,000 gpd (the allotted demand in the Weymouth/SRA memorandum of agreement) would be consumed by the redevelopment at the Base. The interim water condition exists because of the likely difference between the time required to obtain all the necessary approvals to construct the future development components at SWNAS and the time required before a new water supply for Weymouth and the Base are operational. This interim utilities agreement recognizes both the potential time differential and also the work Weymouth has been doing to preserve their current surplus water supply capacity.

As one can see from the existing water meter readings at the Base, there is a significant difference between the Title 5 estimated consumption of 294,050 gpd (267,318 gpd x 1.1, Table 7-1) and the actual metered consumption of 116,000 gpd. While actually being about 40% of estimated demand may be an unusual variation due to the specific mix of units and the unit occupancy at the quarterly observation, it is evident that Title 5 derived flows overstate demand when applied to large scale

projects. It is the actual demand that consumes the available surplus capacity. The difference between estimated and actual demand could be a significant determination of how long Project construction could continue if the new MWRA/Weymouth transmission main delivery was delayed.

Assuming the initial development for the 2023 Modified Development Program would be primarily residential, and using the programmed 2.1 bedrooms/dwelling unit (BR/du) and the Title 5 estimated flow of 110 gpd/bedroom, one of the proposed dwellings could generate 231 gpd of wastewater and use 254 gpd of water. If the permit and approvals to build were in hand by year 2025, occupancy could begin in 2027.

The Proponent evaluated two development scenarios: (1) buildout in 12 years (2026-2038) and (2) buildout in 15 years (2026-2041). The evaluation estimated the length of time an assumed interim 600,000 gpd allocation would last under both scenarios; under "design" (Title 5) demand versus under "actual" demand assumptions. The existing SWNAS demand is roughly 40% of projected Title 5 flows. For the evaluation, we approximately doubled that actual flow estimate to 180 gpd/du vs the design flow of 254 gpd/du.

The evaluation matrix considered that the initial market demand will be primarily residential with estimated buildout of 12 years and 15 years. Under these two scenarios, 500 and 400 homes could be built and occupied each year, respectively. At design demand estimates, these estimates would be 127,000 g/yr and 101,600 g/yr, respectively. At "actual" demand estimates, these estimates would be 90,000 g/yr and 72,000 g/yr, respectively. By example, if 600,000 gpd were available as an interim supply, water could last for the periods shown in Table 7-3 under the two build-out scenarios.

Table 7-3 Water Consumption Scenarios

	Design Demand	Actual Demand
12-year buildout (2026 – 2038)	4.7 yrs (2031)	6.7 yrs (2033)
15-year buildout (2026 – 2041)	5.9 yrs (2032)	8.3 yrs (2034)

It is anticipated that the time required for the Town of Weymouth to join MWRA Water, obtain MEPA and Section 61 permit approvals, design, permit, build, and place in operation a connection to the MWRA system would be 8-10 years from their commencement this year. With continued support, the Weymouth MWRA connection could become operational in the 2031-2033 time period. Depending upon market conditions and the mix of development, the Proponent could build and occupy approximately 400-500 homes per year. While 600,000 gpd would not allow full buildout of the 2023 Modified Development Program, as described above, it would allow some continuous redevelopment progress at the Base while the MWRA connection is brought in service.

Thus, at Title 5 demand assumptions and the most aggressive buildout assumptions, the redevelopment pace would exceed the water available in the interim water supply in roughly 5 years, or in 2031 (2026 start of building unit delivery with 5 additional years). But under the optimistic MWRA/ Weymouth connection scenario, the pipeline could be operational then. Even under the 10-year pipeline assumption and reasonable demand assumptions, Base redevelopment could occur without exceeding the interim supply. Therefore, with Weymouth's continuing progress on development of the MWRA connection, the available interim water supply will allow continued redevelopment of SWNAS.

The Project will include installing new, pressure-tested, and inspected water mains to minimize leaks and installing sustainable water saving fixtures in the buildings, all reducing demand and extending Weymouth's available capacity. In addition to continuing to support Weymouth's leak repair efforts,

the SRA, with the Proponent's support, will perform a water audit of its system, just as it has recently done on the wastewater system (all as part of extending Weymouth's existing capacity under its DEP 5.0 mgd withdrawal limit).

City of Brockton / ARJWB
Should the Weymouth/MWRA water transmission main not be fully operational and the 5.0 mgd withdrawal limit begin being exceeded, it may be possible to implement an interim variant of the City of Brockton alternate supply. Instead of building a pipeline to supply the whole Base, metered connections could be made between the adjacent Brockton and Abington systems under an intermunicipal agreement among the SRA, ARJWB and the City of Brockton to supply the Abington portion of the Base from their system. Depending upon the length of the transmission main delay, the rate of development on the Base, and the resulting water demand this option could require some Abington system upgrades. These would be supported by the Proponent as interim supply mitigation.

City of Quincy / Fore River
As part of the EPG Final Report, an existing water main from the Quincy system to the former Boston Edison Edgar Power Plant was considered briefly as a potential Quincy/MWRA connection. It is privately owned by the present power plant and exists in a tunnel under the Fore River from the former Quincy Shipyard. It was dropped from consideration as a permanent solution because, on its own, it lacked capacity to meet full future demand.

However, if the following situations developed some ten years from now where Weymouth had completed its MEPA review, joined the MWRA, had all its permits, and was building the transmission main to the MWRA meter but found its daily demand exceeded its 5.0 mgd authorized withdrawal, perhaps on an interim basis MWRA water could be wheeled (metered) through the Quincy system. This would likely require improvements in Howard Street on the Quincy side of the tunnel and would certainly require improvements in local streets near the power plant on the Weymouth side to have the Low Service Zone (on a temporary basis) served by MWRA water from the Quincy system. The demand in the Low Service Zone is approximately 800,000 gpd. If that demand were to be met from Quincy, it would free that volume from the Town's facilities and allow Great Pond to meet continuing growth demand.

When the permanent connection to the MWRA was ultimately made, the temporary tunnel water main use could end this supply alternative could remain as a supplemental emergency source (e.g., for drought relief wheeled through Weymouth to the neighboring Hingham/Hull system).

Expansion of Weymouth's DEP 5.0 mgd Limit
With the progress in Weymouth joining the MWRA Water system and Weymouth's work to reduce unaccounted for water, DEP could expand Weymouth's licensed withdrawal limit to allow Weymouth to meet its growing demand during the interim period needed for the design and construction of the transmission main connection to the MWRA. Weymouth's current DEP withdrawal limit for the system is 5.0 mgd. The past 5-year average demand has been 4.25 mgd, ADD (average day demand) and 5.23 mgd, MDD (maximum day demand). The Weymouth system contains a protected surface water supply (Great Pond), a supplemental surface supply (Whitman's Pond), and five wells. The surface supplies and well supplies are treated by water treatment plants (the Great Pond water treatment plant and the Arthur J. Bilodeau water treatment plant for the wells). The combined safe yield of these supplies is 6.27 mgd. The individual treatment capacities of the two treatment plants are 8.0 mgd and 4.0 mgd, respectively. The current maximum operational capacity of the combined system is 10.18 mgd. Thus, on an interim basis, some temporary relief from DEP could be allowed in the total withdrawal limit without breaching safe yields or output capacities. However, for the immediate future Weymouth can continue to supply the Base from the current surplus capacity without relief from the withdrawal limit.

One of the results of the Proponent, SRA, and the Town of Weymouth's cooperation has been the publication of "Town of Weymouth Water and Sewer Capacity Analysis, Final Report," November 2022 by Environmental Partners (the "EPG Final Report"). It is evident from the EPG Final Report that an

additional supply will be required even for Weymouth's projected growth without construction of the 2023 Modified Development Program. The EPG Final Report estimates Weymouth's growth alone would require a 2040 ADD of 5.28 mgd, exceeding its current withdrawal limit. The Town and MWRA reports estimated the Base buildout would require 2.3 mgd, resulting in an assumption that future Weymouth growth with the Base at full buildout in 2040 would need 7.58 mgd ADD and 9.34 mgd, MDD. The 2023 Modified Development Program would reduce those future demands to approximately 7.4 mgd and 9.1 mgd respectively.

7.1.3 Potential Permanent Solutions

The best water supply solution to meet (i) Weymouth's future water needs, (ii) the demands of the long-delayed redevelopment of SWNAS (i.e., the 2023 Modified Development Program) and (iii) an emergency supply relief for immediate South Shore communities is for Weymouth to make a full capacity connection to the MWRA South Water System. Once the new transmission main is operational, the MWRA's available 10 mgd from the Quincy meter is more than enough to supply the combined demand resulting from the Weymouth 2040 growth demand and the entire Base full buildout (i.e., combined total demands of 7.4 mgd, ADD and 9.1 mgd, MDD). Alternative routes for the MWRA transmission main connection have been studied previously and were studied in detail again this past year. The EPG Final Report concluded two feasible routes, which are depicted on Figure 7-1:

a. The Quincy South, Washington Street Connection to Weymouth in their intermediate pressure zone (ISZ), or

b. Braintree, Columbia Street connection to Weymouth in their high pressure zone (HSZ).

Each alternative has a different set of in-system improvements to bring comparable service throughout Weymouth and to serve SWNAS at full buildout; however, both are feasible and, in both instances, pipeline construction would take place almost entirely in public ways.

In addition to the above two routes, Weymouth in their MWRA Water application and MEPA filing is an additional previously studied route, so called, "Quincy North". That route would cross the Fore River in the general area of Route 3A and connect to Weymouth in their low pressure zone (LSZ). In each of these routes, the plan is to build a transmission main connection capable of conveying 15.6 mgd, the future capacity of the MWRA SHS South High System when the MWRA converts the Blue Hill storage facility to flow-through tanks, riding on the SHS System.

The current planning for the Weymouth system, once the MWRA connection is operational, is to abandon the Town's five-well groundwater system located in the Old Swamp River valley and Route 3 corridor. These existing wells cannot meet current DEP Zone I protection requirements. With the abandonment of the groundwater supply, the Bilodeau Water Treatment Plant (WTP) would also be closed. However, the Washington Street pumping station, Whitman's Pond Cove, and Great Pond surface supplies would remain in service with the Great Pond WTP.

This approach maximizes both MWRA's expanded capacity to Weymouth and Weymouth's own surface supply and treatment capacity. It also provides redundancy for the Weymouth system for having both the full capacity connection to the MWRA and the capacity of the Great Pond system.

The water chemistry and quality of the potential mixed services will be addressed in the Weymouth/SRA MEPA filing.

7.1.3.1 MWRA/SRA Supply

This option could be executed if Weymouth were to change course and decide not to join the MWRA. Another MWRA-based alternative involves the SRA, under its legislative authority, acting as a municipal water authority, to petition the MWRA to join (which is the same authority under which the SRA is applying to join with the Town of Weymouth as described above). This was one of the prior MEPA alternatives. Under this alternative rather than working cooperatively (as they are) with Weymouth for

cost sharing and mutual benefits, the SRA would supply the entire Base redevelopment from its own connection to the Quincy meter. In planning a main to service just SWNAS, a scenario where Weymouth changes its course and subsequently votes not to join the MWRA water system was considered. In that scenario it was assumed the existing customers at the Base would stay on the Weymouth system and not connect to MWRA water. For the remainder of the currently proposed Base redevelopment, the SRA would be the "consecutive water supplier" and operate the water system. The water demand at full buildout for those new customers would be 1.8 mgd, ADD and 2.7 mgd, MDD.

Again, multiple routes were studied and the two MWRA routes described above would still be the preferred options. However, there would be no joint usage for the Weymouth system and the pipelines would have to continue independently of the Weymouth system, in the same streets, directly to SWNAS. The terminus at the Base would be a receiving tank and booster pumping station, which would feed the currently proposed Base redevelopment. Figure 7-1 shows the proposed routes.

Unlike the cooperative joint application as described above, where Weymouth is preparing the EIR, an MWRA OP.10 Admission of New Community to the MWRA Water System application and obtaining the ITA approval, in this alternative the SRA would prepare, make and obtain all such approvals, as well as obtain DEP's approval for becoming a "consecutive water supply system," under 310 CMR 22.00. This alternative is not mutually exclusive of the co-application with Weymouth; i.e., while Weymouth currently has support to join the MWRA as a Water Community, in the unlikely event that changes prior to the MWRA Board vote being finalized, the SRA would apply to the MWRA for itself under this alternative.

7.1.3.2 Aquaria/Brockton/SRA Supply

Just as the SRA could use its authority to join the MWRA, it could also use that authority to enter into a contract to purchase water from Aquaria, a privately owned and operated water company, or from the City of Brockton, who currently is the only customer of the Aquaria Dighton Desalination Plant (the "Plant") on the Taunton River (tidal).

Water service to SWNAS and/or to the Abington Rockland Joint Water Board (ARJWB) from Aquaria/Brockton has significant potential, not only as a water supply but for providing potential mutual benefits that might result from such agreements. As part of the redevelopment planning, the Proponent team has spent significant time exploring the potential service agreements involving the City of Brockton, the SRA and Aquaria. Brockton, under its existing contract, can wheel water through its system if Aquaria obtains another customer near the Brockton system.

Brockton's single customer status and contract has placed the City in the unusual situation of underwriting much of the cost of the Plant, while currently utilizing little of the water capacity of the Plant. Such under-utilization resulted from Brockton's good water management. The City needs a supplemental supply to Silver Lake in Pembroke, its primary supply, which caused the City to originally enter into the water contract with Aquaria. In the interim period while the Plant was being designed, permitted, built and placed in operation, Brockton implemented leak detection and repairs, meter upgrades and other water saving measures to reduce its unaccounted water and thereby reduced demand. Brockton now uses output of the Plant only to supplement high summertime demands and for covering system maintenance, such as when water tanks are taken out of service.

As part of designing the Project, the Proponent has reviewed operating data of the Plant as well as made Plant visits. The facility, while 10+ years old, is in very good condition. For long periods of the year, the Plant is operated on low output only to flush the 20-inch transmission main from Dighton to Brockton. The existing DEP/WRC permit for the Plant allows the withdrawal of 10 mgd from the Taunton River; the production of 5 mgd of finished water; and sets controls on the quality of discharge waters to the river.

The Plant's essential components are capable of operating within the existing DEP/WRC permit limits. All of the main facility piping and pumping systems are in place and only additional filters and membrane units need to be installed. However, since it only has a single customer, Aquaria installed the filtering and ion-exchange equipment to meet only Brockton's contract requirements. As configured today, the Plant can produce 3.3 mgd of finished water. The transmission main was designed for a booster pumping station to deliver the 5 mgd permit limit. That booster station has not been, but can be, installed if and as demand arises.

Brockton has been, over several years, in ongoing discussions with Aquaria about possible acquisition of the Plant and its transmission main. Whether SWNAS contracts directly with Aquaria and the water is wheeled through the Brockton system or contracts with Brockton directly to connect to the very same system, certain updated permits would be required: modification of the plant DEP/WRC permit to add a new customer; and a MEPA filing and an ITA permit to serve a customer outside of the Taunton River Basin. Upgrading the Plant to its full 10 mgd raw and 5 mgd finished water status is within the Plant's existing DEP/WRC permit. The construction of a new 4-5-mile water transmission main from the Brockton system to SWNAS, providing over a million gallons per day, would also require a DEP/WRC permit and a MEPA filing.

Prior MEPA filings examined various routes for connecting SWNAS to the Brockton system. The Proponent's team, working with the City of Brockton, used the City's system model to examine flows and resulting water pressures in the system as if the Silver Lake water treatment plant and Aquaria water treatment plant were both operating at full capacity and SWNAS (at full buildout) took its maximum day flow. In all alternatives, the transmission mains have been planned to deliver maximum day demand to the Base. Hourly peaks and fire flows would come from on-site storage and pumping capacity.

As shown on Figure 7-2, the preferred route for the SRA/Brockton alternative is a connection to the 36-inch supply line at Route 18 in Whitman, near the local landmark, Peaceful Meadows Ice Cream Shop. Figure 7-3 is a schematic drawing of a proposed pumped storage facility on the 36-inch supply line feeding the 20-inch transmission main to SWNAS.

The preferred Aquaria Plant route stays completely in public ways through Whitman and Abington, primarily running in Bedford Street, Route 18. At just over four (4) miles, the transmission main would turn onto North Avenue in North Abington and then turn onto Spruce Street, which directly abuts SWNAS near the Abington/Rockland town line.

7.1.3.3 On-Site/SRA Supply

This alternative was considered for completeness but ultimately rejected because it cannot supply any meaningful volume. There has been extensive hydrogeologic field explorations and modeling of the Base as part of the Navy's Base closure and cleanup plus due diligence by the Proponent. Based upon that work, it is estimated that the best case groundwater supply would be approximately 150,000 gpd, which as described above, is insufficient to meet the needs of the currently proposed redevelopment at the Base.

7.2 WASTEWATER

At full buildout, it is anticipated that construction of the 2023 Modified Development Program at SWNAS could generate an average daily wastewater flow of up to approximately 1.6 mgd . Weymouth is currently an MWRA sewer community, and its portion of the Base could produce a buildout wastewater design flow of 0.8 to 0.9 mgd depending on the ultimate mix of uses within its borders. The Proponent and the SRA have been working closely with the Town of Weymouth to analyze the sewerage system's capacities to meet future demands. The SRA has also funded the design and construction of the first of the needed improvements, the up-sized main crossing under the newly constructed Route 18 to meet the westerly Mill River trunk line flowing north.

Unlike prior proposals for wastewater disposal at the Base, the current proposal has a three-town approach. Each portion of the Base will utilize a community solution.

- Development on the Base located within Weymouth will continue discharging to the Weymouth system and ultimately to the MWRA South System.
- Development on the Base located within Abington will discharge to its collection system and ultimately to the City of Brockton wastewater treatment plant via the existing connection.
- Development on the Base located within Rockland will discharge to its collection system, which discharges to their municipal wastewater treatment plant.

Each of these solutions requires system improvements to (i) increase capacity for these new flows (ii) eliminate I/I and make hydraulic capacity to offset these new flows. At least in Rockland, the increased flow will need to address issues at their treatment terminus, but as described below these issues have or will have solutions that the Proponent will contribute to over the buildout period.

7.2.1 Weymouth System

All sanitary wastewater generated at SWNAS from existing redevelopment since the Base was closed has been discharged to the Weymouth collection system and then conveyed to MWRA's Deer Island treatment facility for treatment and disposal. Consistent with the other aspects of the 2023 Modified Development Program detailed throughout this filing, the ultimate solution will implement an environmentally sustainable approach that uses existing infrastructure to the extent possible and proposes efficient improvements. These principles will contribute to the overall goal of improved environmental and ecological conditions at SWNAS.

In October 2022, the SRA gained control of the infrastructure built by LStar (a prior Master Developer at the Base) through an eminent domain action. After such taking, the SRA repaired a long-known problem at the existing sewage pumping station on the Base. The metered water consumption at the Base averaged about 116,000 gpd and the sewage pumping station averaged slightly above 300,000 gpd, which indicated extraordinary inflow or infiltration. The source of this extraneous flow was a poorly built wet well at the pumping station admitting groundwater. The SRA repair sealed the wet well reducing the pumping station flows to just under 100,000 gpd.

That extraneous flow from the Base had been continuously discharged into the Weymouth system and on into the MWRA South, SDA 4 tributary area. In the regulations for the Base redevelopment the Proponent will incorporate the Town of Weymouth standards for infrastructure to assure a consistent and compatible infrastructure system. As discussed above, in addition to improving development regulations, the Proponent worked closely with Weymouth DPW officials and the Town's consultant in producing the EPG Final Report.

The resulting plan for the wastewater disposal for the currently proposed Base redevelopment, integrated into the plan for the Weymouth section of the Base, is to discharge to each of the two major trunk sewers (i.e., the Mill River trunk, and Old Swamp River trunk to the east). These two trunk sewers discharge into a major interceptor sewer, the Lower Central, which discharges into the MWRA system primarily to the 2007 replacement Braintree/Weymouth pumping station. That pumping station then discharges into an existing large trunk sewer in Hough's Neck which connects to the Nut Island Headworks and from there through a cross harbor rock tunnel to Deer Island Wastewater Treatment Facility.

In addition, in 2005 the MWRA constructed a relief pumping station, which is the Intermediate Pumping Station off of Route 3A, Bridge Street at King's Cove. It discharges into the new deep rock tunnel under the Weymouth Fore River and Town River and Hough's Neck to the Nut Island Headworks.

The capacities of these existing systems from the downstream end at Nut Island Headworks to the Weymouth Lower Interceptor are the following: the Nut Island Facility has an average daily flow 100 mgd, peak capacity 360 mgd plus 2.7 mgd of available storage. The MWRA October 2022 Report found "documented sanitary sewer overflows (SSOs) at the facility are rare." The 2007 Braintree-Weymouth pumping station receives most of the Weymouth flows, serves SDA 4 and has an average flow of 6 mgd and a peak capacity of 25 mgd. The intermediate pump station average flow is 12 mgd and a peak capacity of 45 mgd. The MWRA has an ITA approval for a combined system transfer of 73 mgd.

Capacity issues in the MWRA south system are all related to wet weather peaks. The MWRA October 2022 Report cited 33 documented SSOs in the systems tributary to these pumping stations, primarily in the Weymouth landing area, the East Braintree siphon, Smelt Brook and in the Braintree Randolph interceptor along the Monatiquot River. SWNAS and the majority of Weymouth are not discharging to those sewers but rather into the Lower Central Interceptor connecting to the MWRA system via the Mill Cove siphon under the Fore River, and then into the Braintree/Weymouth pumping station. The MWRA report stated in Table 7-2 and Figure 7-3 that the Braintree/Weymouth pumping station did not exceed its capacity in the storm period June 30-July 14, 2021, with 9 inches of rainfall. It reported this was due in part to "the supplemental pumps currently being used at the station." Weymouth and the other tributary municipal systems are all implementing I/I removal measures to reduce wet weather peak flows. With continued I/I removal in the Weymouth system and all new tight construction at the Base, the Braintree-Weymouth pumping station as presently configured should have capacity for Weymouth and the Base buildout in the year 2040.

The November, 2022 Weymouth report found that segments of the 30-inch Lower Central Interceptor (LCI) between Commercial Street and the MBTA crossing, Washington Street and Essex Street, were undersized and surcharging the system in the 5-year, 24-hour storm. However, the modeling found that the surcharging did not result in an SSO and thus meets the DEP standards. The average flow is 7.41 mgd. During the spring of 2021 (March through June), during the high groundwater season, in the LCI during dry weather, the flow was measured as 9.07 mgd. These measurements and observations were based upon flow meter readings in the system and rainfall monitoring. These measurements indicate high infiltration in this low-lying sewer. Groundwater was also monitored during this period and calibrated against the USGS Groundwater Gauge MA-D4W 79R in Duxbury.

The report assumed that the entire Base at full build out would be connected to the Weymouth sewer system with a projected daily flow at buildout of 2.2 mgd[5]. Since then, two changes will dramatically reduce flows from that assumption: (i) the program has been revised, reducing total daily flows to 1.6 mgd; and (ii), only the Weymouth portion of the Base will discharge to the Weymouth/MWRA system reducing the flow to 0.8 to 0.9 mgd depending upon the resulting development mix in Weymouth.

Based upon the assumptions that by 2040 Weymouth's growth outside the Base would add 0.46 mgd and the 2023 Modified Development Program at the Base at full buildout would add 2.2 mgd, the following Table 7-4 of improvements for sewers at more than 80% capacity was developed by the Town of Weymouth. The report overstates the currently planned Base future flows by about 1 mgd.

While Table 7-4 overstates the future flows from the Base by about a million gallons per day at buildout, the recommended upgrades below were all driven by existing flows and the two tests of hydraulic capacity used by the Town: (a) the future flow with a 5-yr/24-hr storm resulting in no SSO, and (b) the future flow with a 1-yr/6-hr storm resulting in 20% remaining reserve capacity. It is not the sanitary flow from the Base which creates the need for these improvements, but the reality of the extraneous flow conditions in the system itself. The SRA and the Proponent are working with the Town of Weymouth in underwriting the master plan study, grant, and loan application and appropriate local share mitigation funding to address the extraneous flow conditions.

Table 7-4 Sewers > 80% Capacity with Proposed SWNAS Flows

Scenario	SWNAS Sewer ADF (mgd)	Upgrade Location	Upgrade Length (lf)	Existing Sewer Diameter
Existing Conditions	0.090	LCI – Tide Mill Brook Marsh (Commercial Street to MBTA)	1,150	30-inch
		LCI – Essex Steet	2,600	30-inch
		Liberty & Union Streets	3,750	8-inch
SWNAS 25% Buildout	0.540	-	-	-
SWNAS 38% Buildout	0.810	Main Street Easement	500	8-inch
SWNAS 50% Buildout	1.080	-	-	-
SWNAS 67% Buildout	1,440	Mill Street / Easement to Columbian Street (3A)	5,850	21-inch
		Easement – Columbian Street / Main Street (3B)	5,600	15-inch / 21-inch
SWNAS 83% Buildout	1,800	-	-	-
SWNAS Full Buildout	2,160	-	-	-

Source: Table 5-6 from Town of Weymouth Water and Sewer Capacity Analysis, November 2022 (EPG Final Report).

In many instances the currently proposed Base redevelopment is not the driver of the above-described improvements, but rather the systems' present incapacity. Regardless of the driving impetus for sewer improvements, the SRA has already acted to make improvements. As mentioned above, once the SRA had control, it repaired the Base pumping station reducing the flow towards the cited Union Street and Liberty Street 8-inch sewers from 300,000 gpd to approximately 100,000 gpd. The SRA also replaced a 900-foot length of sewer in Main Street (Route 18) near the Base entrance prior to final paving of the reconstructed Route 18. That 24-inch sewer serves the redeveloping corridor along the south end of Route 18 and will serve the future split in flows from the future development at SWNAS to each of the main trunk sewers.

[5] Town of Weymouth Water and Sewer Capacity Analysis, November 2022 (EPG Final Report).

As part of the initial system improvements and to provide the required I/I reduction offset for adding flows to the Weymouth MWRA system, the Proponent, working with the Town of Weymouth, will replace two sections of the 30-inch LCI Tide Mill Brook and Essex Street sewers with new 42-inch sewers with raised watertight structures where required. This work will eliminate an existing capacity issue and heavy wet weather SSO risks. Many of the proposed upgrades are to address existing conditions by the Town of Weymouth. The Proponent will work with Weymouth on a fair-share contribution to the needed improvements over the proposed buildout period.

All of the existing development at the Base discharges to the Old South River Trunk via the Union Street and Liberty Street Sewers. With dramatically reduced flows from the pumping station repairs, as well as projected flows from the currently proposed redevelopment at the Base being approximately half of what was originally projected, the various above-described improvements likely will not be necessary until later in buildout of the currently proposed Project when significant growth (and increase in flows) has occurred. It is likely that with full buildout, an additional pumping station would be constructed to connect the additional growth to the Mill River trunk sewer via the new 24-inch. At that point, the short piece of 8-inch sewer between the new 24-inch sewer in Route 18 and the Mill River trunk would be replaced. The second pumping station allows balancing of the flows between the two major trunk sewers and reduces surcharging.

From the comprehensive system review, in the initial stages of construction of the currently proposed Project, the SRA, Proponent and the Town of Weymouth should replace the two lower interceptor improvements that are currently undersized. All of the flow from the large portion of Weymouth and SWNAS use that sewer before the MWRA. This improvement is almost 5,000 feet of 42-inch sewer with an anticipated cost of $22-23 million. Importantly, portions of that sewer are located along Mill Brook near Mill Cove on the Fore River, which is an area of high groundwater and likely infiltration that can be dramatically reduced with a new sewer and watertight manholes.

With the completion of the replacement sewer crossing in Route 18 in 2021, which has capacity for the currently proposed buildout of SWNAS, and the design and pending construction of some immediate downstream replacement sewer enlargement, there will be new increased sewer capacity from SWNAS to the Town of Weymouth Mill Brook Trunk Sewer. Those improvements, combined with the recently completed I/I removal work at the existing Base pumping station and resulting reduction in flows to the Town's other large sewer, (the Swamp River Trunk system), will provide sufficient capacity in the Weymouth sewer system to allow continued redevelopment of SWNAS. There is, in place, a planned program of system upgrades to the two Weymouth trunk sewers and downstream connections to the MWRA South System that will be implemented as needed as a result of increased wastewater demands from the Town's growth and buildout of the currently proposed Project.

7.2.2 Abington System

Abington recently expanded the wastewater allotment in its intermunicipal agreement with the City of Brockton to 1.5 mgd. Its current average daily flow is approximately 1.1 mgd. On a design basis, the estimated future flow from the Abington portion of the Base is 350,000 – 400,000 gpd with an actual flow range of 245,000 – 280,000 gpd. Abington has improved its connection to Brockton, but adding the Base flow into the North Abington system will require some local small diameter sewer (6-in., 8-in.) increases to connect to the main capacity in the system.

The Abington portions of the Base can proceed into development using its local sewer systems. Like in the Weymouth system, new discharges to this system will require some capacity improvements. The Proponent has already begun meeting with the Town's public works officials. Most of the Abington sewer collection system discharges to the Brockton regional wastewater treatment plant. That plant has been upgraded and has capacity.

7.2.3 Rockland System

The Rockland sewer system origins go back to its shoe manufacturing days with the Union Street commercial center, factories and central core area connected into a combined sewer system with no treatment works. Much separation work has been accomplished on the old system, but today's system still runs through high groundwater conditions and has high I/I. Rockland's sewer system is connected to a conventional secondary treatment Wastewater Treatment Plan (WWTP) discharging into a canal connected to French's Stream.

The WWTP capacity is 2.50 mgd. The 2022 average flow was 2.67 mgd, with max. and min. daily flows of 5.75 mgd and 1.82 mgd, respectively. That range illustrates the I/I problem in the system. From our continuing discussions with the Town and reviewing the just published system analysis by the Town's consultants, it is estimated the system infiltration is 1.22 mgd (almost 45% of the average flow) and the 5-yr/24-hr storm inflow is 1.89 mgd. It appears from the recent study that it is economically feasible to remove a significant portion of the infiltration.

Currently, there is a moratorium in place on new sewer connections over 440 mgd. The moratorium is part of the Town's action plan to respond to DEP/EPA orders to reduce extraneous flows and upgrade/expand the WWTP. While the Base does not now discharge to the Rockland system, it is the long-term plan of the Proponent to do so.

The developable area in Rockland is similar in size to Abington and is estimated to have a future design flow of 400,000 gpd or about 280,000 gpd (actual) ADF at buildout.

Development will start in Weymouth, with development in Rockland starting around the 2031-32 time frame. There is time for the SRA and the Proponent to work with Rockland to eliminate enough of these excess system flows to allow the Rockland portions of the Base to be redeveloped without over burdening the municipal system. There is also the possibility that if Brockton entered into an agreement with the SRA and the ARJWB for a mutually beneficial water solution that the Town's portions of the Base could go through the Abington system to Brockton's WWTP where there is capacity.

7.3 STORMWATER

This Stormwater Master Plan (SMP) has been prepared to analyze the impact of the proposed SWNAS Redevelopment Project on stormwater and to define areas where stormwater detention will be provided to mitigate the effects of the increase in impervious area. The SMP sets forth the guidelines for future phased development projects to adhere to, so that the individual development projects are consistent with the overall existing and proposed hydrology. The SMP has also been prepared to demonstrate how overall compliance with the Massachusetts Stormwater Management Standards in accordance with the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.00) will generally be achieved.

7.3.1 Prior MEPA Stormwater Modeling Review

As part of the prior MEPA review, stormwater runoff hydrologic modeling was conducted for both the existing and the proposed conditions. The existing conditions hydrologic analysis was provided in the 2006 DEIR and the proposed conditions (full build-out master plan) hydrologic analysis was provided in the 2007 FEIR.

Since the hydrologic analysis included in the prior project's 2006 DEIR and 2007 FEIR were prepared, several site-specific projects have been constructed. Each project includes a stormwater management system designed to mitigate the impacts resulting from the developments. The Site-specific projects constructed to date include the following:

- Phase 1A Definitive Subdivision Plan
- Brookfield Village (Pulte Residential Development)
- Woodstone Crossing (Pulte Residential Development)
- Fairing Way (Senior Housing Development)

- Bill Delahunt Parkway
- Sports Center
- Stonebridge at Union Point (Residential Development)

Since there have been several projects constructed since the 2006 DEIR and 2007 FEIR, the Proponent has prepared a new existing conditions hydrologic analysis that incorporates the constructed projects listed above. In addition, a new proposed conditions hydrologic analysis has been prepared to demonstrate how the SMP is designed to mitigate the impacts resulting from the 2023 Modified Development Program for the Project.

7.3.2 Changes in Regulations/Policies

The stormwater analyses included in the previous MEPA submittals were developed in 2006 and 2007. Since then, there have been several changes in stormwater regulations/policies applicable to the Site.

- Stormwater Management Standards were incorporated into 310 CMR 10.00 and 314 CMR 9.00:
  - On January 2, 2008, MassDEP released updates to the Stormwater Management Standards and issued a revised Massachusetts Stormwater Management Handbook. The updated standards included enhanced groundwater recharge and water quality treatment requirements with an emphasis on the implementation of low impact design (LID) techniques to manage stormwater.

All of the constructed projects at SWNAS have been designed to meet the current MassDEP Stormwater standards, except for the Phase 1A Definitive Subdivision Plan which was approved in 2007.

As described herein, the SWNAS SMP has been prepared to demonstrate overall compliance with current MassDEP Stormwater standards.

- Updated United States Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Soils Mapping:
  - Since the 2007 FEIR was prepared the USDA NRCS soils mapping has been updated. The updated soils maps upgraded the Hydrologic Soil Group (HSG) classification mostly for the areas between the runways of the former airfield. When the Base was constructed, much of it was filled with sandy material to develop a level airfield. The updated soils mapping reflects the fill material used to construct the airfield.

As described in Section 7.3.3.2 below, the Proponent has used the most recent USDA NRCS soils mapping for the stormwater analysis.

- Published Rainfall Depth and Intensity Increases:
  - The National Oceanic and Atmospheric Administration (NOAA) released NOAA Atlas 14, Precipitation-Frequency Atlas of the United States, Volume 10 Version 3.0 in April 2019. The precipitation frequency estimates included in NOAA Atlas 14 Volume 10 Version 3.0 supersede the estimates from the NOAA Technical Memorandum NWS HYDRO-35 and the Weather Bureau Technical Papers No. 40 and No. 49. The updated precipitation estimates were used throughout the hydrologic analysis.

The NOAA Atlas 14 higher intensity rainfall values (Table 7-5 below) provide better climate change preparedness as compared to the Technical Paper No. 40 (TP-40) rainfall data that is often utilized for stormwater analysis.

As described in Table 7-6 below, the Proponent has used the precipitation amounts from the most recent data from NOAA Atlas 14 for the stormwater analysis.

7.3.3 Method of Calculations

The hydrologic model created to analyze the hydrology of the Site was developed using the Soil Conservation Service (SCS) Technical Release No. 20 (SCS unit hydrograph procedures) and SCS Technical Release No. 55 (for Times of Concentration and Runoff Curve Numbers).

The hydrologic model was created and calculated with HydroCAD, Version 10.0 software, developed by Applied Microcomputer Systems. The stormwater facilities were modeled using the Dynamic Routing Method. The runoff from the sub-drainage areas (HydroCAD subcatchments) is calculated based on rainfall and the watershed characteristics, and a runoff hydrograph (a runoff rate versus time curve) is developed. The stage-storage-discharge curve for a specific detention area (i.e., an infiltration basin) is used to compute an outflow hydrograph by hydraulically routing an inflow hydrograph through the detention facilities. This procedure calculates the relationship of the inflow hydrograph with the characteristics of the detention basin systems to determine the outflow, stage, and storage capacity of the detention systems for a given time during the specified storm event.

7.3.3.1 Precipitation Amounts

In accordance with the MassDEP Stormwater Management Standards the 2, 10, 25, and 100-year 24-hour storm events were analyzed. The precipitation amounts summarized in Table 7-5 represent the most recent data from NOAA Atlas 14 for the Site.

Table 7-5 Precipitation Amounts

Storm Event (years)	Duration (hours)	Rainfall Depth (inches)
2	24	3.4
10	24	5.1
25	24	6.2
100	24	7.9

7.3.3.2 Soil Conditions

The MassGIS NRCS SSURGO-Certified Soils data layer was used to determine the hydrologic soil groups within the Site, refer to Figure 7-4, NRCS Soils Map. This data has been "SSURGO-certified," which means they have been reviewed and approved by the NRCS and meet all standards and requirements for inclusion in the national release of county-level digital soils data. For areas which had a compound classification (i.e., were classified C/D, B/C, etc.) the most conservative soil type was used and for soils without a soil group classification, such as urban land, hydrologic soil group C was used.

The feasibility and applicability of certain Best Management Practices (BMPs) to treat stormwater runoff, especially for the purpose of infiltration and recharge, will be dependent on several critical design factors including the suitability of soils, permeability of the soil, depth to seasonal high groundwater, presence or absence of oil and hazardous material, and the limiting layer (clay/bedrock). The selection of practices for future project phases to treat runoff and meet water quality standards will be determined by field investigations to understand the influence of the critical design factors. Detailed infiltration evaluations will be completed after test-pits are performed in locations where infiltration BMPs are proposed. The results of this information will identify maximum water table fluctuations, hydraulic conductivities, and site-specific geologic information that will be used to evaluate the long-term hydrogeologic effects.

7.3.3.3 Time of Concentration

The time of concentration (Tc) is defined as the time required for runoff to travel from the most hydrologically distant point of a subcatchment to the point of collection. The time of concentration is determined by summing the travel time for each consecutive flow segment along the subcatchment's hydraulic path. The subcatchment's hydraulic paths and characteristics for each flow segment were determined by utilizing the Project's survey and U.S. Geological Survey topographic maps (USGS Maps). Per TR-55 methodology, a minimum Tc value of six (6) minutes was used.

7.3.3.4 Runoff Curve Number

The SCS curve number is an index value for a watershed area and is based on the area's hydrologic soil group, antecedent moisture condition, and the land use. These factors along with the precipitation data provide the basis of determining the amount of runoff volume for a given storm event. A high curve number (i.e., 98 for pavement) indicates low retention and high runoff, while a low curve number (i.e., 30 for wooded areas) indicates high retention and low runoff.

While individual Project components have not been designed, an overall program has been developed allowing the estimation of a runoff value for the resulting proposed development areas. A conservative "dense-suburban" curve number value of 88 was used for the stormwater calculations. That runoff curve number was used for the proposed development areas within each of the five main subbasins.

7.3.4 Existing Conditions

The Site is currently occupied by many former SWNAS components including office, maintenance, and hanger type buildings. There are also significant impervious areas that include former runways, taxiways, and blimp tie down areas. The Site is also occupied by several new developments that include Bill Delahunt Parkway, improvements to Memorial Grove Avenue and Parkview Street (a.k.a. Phase 1A Definitive Subdivision Plan), the 25 acre Sports Complex and Residential Developments. Each of these new developments include stormwater management systems that provide peak rate attenuation and water quality treatment and have been analyzed as part of the Existing Conditions HydroCAD model.

7.3.4.1 Topography

Topography on the Base is generally flat with slightly rolling terrain located along the Site's perimeter. The flat nature of the Site is a key element in the stormwater analysis. Elevations on the Base range from approximately elevation 150 to 155 across most of the Site, with the southern portions of the stream networks at approximate elevations of 130 to 140.

7.3.4.2 Hydrologic Information

The Site is comprised of four main watersheds identified as the Tactical Air Control and Navigation (TACAN) Outfall Basin, French's Stream West Branch, French's Stream East Branch, and the Old Swamp River. Refer to Figure 7-5, Existing Drainage Patterns.

TACAN Outfall Basin

The TACAN Outfall Basin is located within the triangular area between the runway sections at the southern side of the Site. The TACAN is a large, excavated area containing connected ditches that collect and carry runoff from the developed portions of the site. It was built by the Navy when the original naval air station was constructed over 80 years ago. It receives runoff from the former Base through the drainage system the Navy built and from a large portion of the Parkway through a new ditch constructed at the time of the Parkway.

The original excavated basin and ditch system has long ago revegetated itself and now contains open water in deep ditches, shrub wetland areas and forested upland areas, each cover type responsive to the frequency and amount of storm inundation. Except for work necessary to enhance flood control, make new drainage connections or to perform habitat restoration, the existing vegetation will remain.

The TACAN ultimately discharges to French's Stream West Branch via twin 60-inch culverts. The area tributary to the TACAN has been analyzed as part of the HydroCAD model and the outlet from the TACAN is modeled as Design Point 1 (DP-1). As further described in Section 7.3.5, the TACAN will continue to be utilized for stormwater control under the 2023 Modified Development Program.

French's Stream West Branch
The west branch of French's Stream is approximately 11,300 feet long and flows in a southerly direction. The stream is located adjacent to the westerly runway area and receives stormwater runoff from the westerly side of the Site in addition to the TACAN, described above. The west branch of French's Stream ultimately discharges via twin 72-inch culverts located under Spruce Street where it converges with the east branch south of Spruce Street and forms French's Stream. The area from the Site tributary to the west branch of French's Stream has been analyzed as part of the HydroCAD model. The first downstream culvert crossing below all proposed development tributary to French's Stream West Branch is modeled as Design Point 2 (DP-2).

French's Stream East Branch
The east branch of French's Stream is approximately 5,900 feet long and also flows in a southerly direction. The stream is located adjacent to the easterly taxiway area and receives stormwater runoff from the easterly side of the Site. The east branch of French's Stream ultimately discharges via twin 36-inch culverts located under Spruce Street where it converges with the west branch south of Spruce Street and forms French's Stream. The area from the Site tributary to the east branch of French's Stream has been analyzed as part of the HydroCAD model. Similar to the West Branch the first downstream culvert crossing below all proposed development tributary to French's Stream East Branch is modeled as Design Point 3 (DP-3).

Old Swamp River
The Old Swamp River, which is identified as an ORW (outstanding resource water) is located on the eastern side of the Site and flows in a northeasterly direction. The area tributary to the Old Swamp River from the Site has been analyzed as part of the HydroCAD model and is modeled as two design points, Design Point 4 (DP-4), Old Swamp River Upstream and Design Point 5 (DP-5), Old Swamp River Downstream. Those tributary areas are divided by the Parkway.

7.3.5 2023 Modified Development Program Approach

The overall SMP design has been developed to maintain existing drainage patterns to the maximum extent possible. The SMP focuses on the major stormwater infrastructure components that will provide quantity control and conveyances to adequately control runoff from the proposed redevelopment. The 2023 Modified Development Program will implement stormwater runoff quality and quantity control measures such as street sweeping, deep sump and hooded catch basins, water quality units, infiltration basins and wet basins/created wetlands to protect the surrounding natural resources from potential stormwater runoff impacts. Each Project component will implement individual BMPs, as appropriate, specifically designed for the development type and location. Refer to Figure 7-6, Proposed Drainage Patterns.

Initial development at the Project is anticipated to include development located north of Bill Delahunt Parkway and the area west of existing Hanger No. 2 up against the existing development. During this development, the existing upper tributary area that discharges to the TACAN via existing twin 48-inch culverts would be diverted to a proposed basin located along French's Stream West Branch between the two existing parkway basins. This development would also includes improvements to the TACAN that include, removing the existing jeep road ditch crossing and its 2-24" culverts, constructing an outlet control structure upstream of the twin 60-inch runway culverts and removing the existing pavement area within the TACAN basin to create additional storage volume.

The above-described stormwater improvements have two primary benefits: the diversion of the upper tributary area (i) creates additional storage capacity in the TACAN and (ii) opens the reuse of the existing twin 48-inch drains tributary to the TACAN. They can be used for later development at the Site until they are replaced and abandoned for lot development. These stormwater improvements will allow the tributary areas north and adjacent to the Parkway to be developed without building any additional stormwater basins.

A large portion of the TACAN is located within the Eastern Box Turtle core habitat area. For the purpose of the SMP, it is assumed that the Eastern Box Turtles have adapted to existing level and frequency of flooding within the TACAN. Accordingly, the SMP is designed to have no adverse hydrologic impacts on the Eastern Box Turtle core habitat area. As shown in Table 7-6 below, future development peak flood elevations will not exceed existing conditions peak flood elevations for each storm event at the TACAN outfall basin.

Table 7-6 TACAN Outfall Peak Elevations

24-hour Storm Event	Peak Elevation (feet)		
	Existing Conditions	Future Development	Δ
2-year	143.29	142.92	-0.37
10-year	145.05	144.68	-0.37
25-year	145.81	145.36	-0.45
100-year	146.54	146.12	-0.42

After the above-described stormwater improvements are implemented the remainder of the proposed stormwater improvements will be constructed on a development-by-development basis. As shown on Figure 7-6, Proposed Drainage Patterns, these improvements include several stormwater basins including the proposed greenways located south of the Parkway for stormwater conveyance and storage.

One of the organizing features of the proposed developed areas is to convert the old Navy runways to greenway open spaces. The conversion of prior developed areas continues south of the Parkway where the greenways are developed as open channel flow-ways and provides mitigation to the TACAN, DP-1.

These flow-ways are shown on Figure 7-6 as long linear basins. In a functional landscape form, they are landscaped open spaces containing pathways bordering a normally dry channel. During storm events those channels would carry runoff. That runoff would be controlled by culvert hydraulics at each crossroad. Hydraulically, each of those flow-way segments controlled by their downstream culvert would act as flood storage area reducing the peak discharges.

The flow-ways are part of the system that discharges into the TACAN which again buffers peak discharges into the TACAN, DP-1. All these successive stormwater controls within developed areas will allow the development to occur without disrupting the large continuous green space buffers along the southern end of the Base. Collectively they result in smaller future peak discharges than in existing conditions.

In order to provide additional protection to the Old Swamp River ORW and reduce downstream flooding, mitigation basin (DP5) is planned to capture, treat and recharge the first inch of precipitation. The basin is outside of the Navy's proposed groundwater treatment area and has favorable underlying soils. It would discharge to the Old Swamp Rover downstream of the Parkway. As shown in Table 7-7, peak flows are reduced by 62%-49% and discharged volumes reduced by 10%. In the 100-year event Basin DP5 would capture, treat and recharge 6,004 ac-ft, i.e., almost remove 2 million gallons from the flood water in the river.

7.3.6 Conformance with MassDEP Stormwater Standards

The ten (10) MassDEP Stormwater Management Standards provided in the Stormwater Management Policy and Massachusetts Wetlands Protection Act relate to the protection of wetlands and water bodies, control of water quantity, recharge to groundwater, water quality and protection of critical areas, erosion/sedimentation control and stormwater maintenance. The following sections summarize how the Project will comply with the Stormwater Management Standards.

7.3.6.1 Standard No. 1 – Untreated Stormwater

Standard 1 requires that no new stormwater conveyances (i.e., outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth. No new untreated stormwater conveyances are proposed for the Project. The Stormwater Master Plan has been designed so that future phased development projects comply with Standard 1. As development projects are permitted and constructed, water quality measures will be implemented to comply with Standard 1 and specific calculations will be provided on a development-by-development basis.

7.3.6.2 Standard No. 2 – Post-development Peak Discharge Rates

Standard 2 requires stormwater management systems be designed so that the future peak discharge rates do not exceed existing conditions peak discharge rates for the 2, 10, 25, and 100-year 24-hour storm events. The Project's stormwater management systems are designed so that future peak discharge rates do not exceed existing conditions discharge rates for the 2-year and 10-year, 25-year, and 100-year 24-hour storm events. To determine the peak rate of discharge for existing and proposed conditions, runoff hydrographs were generated for the storm events using the SCS TR-20 method. To reduce peak discharge rates, the proposed stormwater management plan for the Project includes a total of approximately 119 acre-feet (5,164,794 cubic feet) of storage that is spread across 8 (eight) proposed stormwater basins and six (6) greenway/flow-ways. Refer to Appendix C for HydroCAD input/output data for existing and future conditions.

Tables 7-7 and 7-8 summarize the existing and future conditions peak runoff discharge rates determined in the hydrologic/hydraulic analyses performed for the Project site and are based on the precipitation data provided in Table 7-5. As shown in Tables 7-7 and 7-8 below, future peak runoff rates for the Project are less than existing conditions for each storm event. Full compliance with this standard will be achieved.

Table 7-7 Comparison of Peak Runoff Rates (2-, 10-year 24-hour Storm Events)

Point of Analysis	Peak Runoff Rates (cfs)					
	2-year, 24-hour Storm Event			10-year, 24-hour Storm Event		
	Existing	Future	Δ	Existing	Future	Δ
DP-1	64.99	54.18	-10.81	77.14	62.29	-14.85
DP-2	177.44	175.24	-2.20	293.61	266.28	-27.33
DP-3	76.28	76.28	0.00	153.44	153.44	0.00
DP-4	18.83	18.07	-0.76	43.18	40.55	-2.63
DP-5	69.24	26.62	-42.62	150.54	60.95	-89.59

* cfs = cubic feet per second

Table 7-8 Comparison of Peak Runoff Rates (25-, 100-year 24-hour Storm Events)

Point of Analysis	Peak Runoff Rates (cfs)					
	25-year, 24-hour Storm Event			100-year, 24-hour Storm Event		
	Existing	Future	Δ	Existing	Future	Δ
DP-1	95.85	77.39	-18.46	170.79	121.54	-49.25
DP-2	363.68	316.61	-47.07	458.06	392.51	-65.55
DP-3	222.14	222.14	0.00	314.32	314.32	0.00
DP-4	62.23	58.70	-3.56	92.99	87.52	-5.47
DP-5	207.66	94.55	-113.11	300.11	154.24	-145.87

* cfs = cubic feet per second

7.3.6.3 Standard No. 3 – Recharge to Groundwater

Standard 3 requires that the loss of annual recharge to groundwater be eliminated or minimized through the use of environmentally sensitive site design, low impact development techniques, stormwater best management practices, and good operation and maintenance. At a minimum, the annual recharge from the future conditions shall approximate the annual recharge from existing conditions based on soil type. This standard is met when the stormwater management system is designed to infiltrate the required recharge volume as determined in accordance with the Massachusetts Stormwater Handbook.

The groundwater recharge requirement will vary throughout the Site, due to the varying soil conditions. Recharge will be analyzed and documented as phased development projects are permitted and constructed. Infiltrating BMPs will be located in soils capable of absorbing the recharge volume within 72 hours and where there is a minimum two-foot separation between the bottom of the infiltration BMP and the seasonal high groundwater table.

In order to be conservative in the basin sizing and to avoid implying recharge in a way that would complicate the Navy's continuing Base clean-up and proposed groundwater treatment program, the calculations in the SMP do not assume groundwater recharge (i.e., exfiltration) for the proposed stormwater basins in the French's Stream or TACAN sub-basins. However, in order to increase protection of the ORW along the Old Swamp River and reduce downstream flooding, the Stormwater management basin for the Old Swamp River subbasin discharging downstream of the Parkway will be an infiltration basin planned to significantly reduce peak discharges and increase groundwater recharge. For each future basin, site specific soil capacity and conditions will be assessed as future development proposals are permitted and constructed.

7.3.6.4 Standard No. 4 – TSS Removal

Standard 4 requires that stormwater management systems be designed to remove 80% of the average annual post-construction load of Total Suspended Solids (TSS). This standard is met when:

- Suitable practices for source control and pollution prevention are identified in a long-term pollution prevention plan and thereafter are implemented and maintained.
- Structural stormwater best management practices are sized to capture the required water quality volume determined in accordance with the Massachusetts Stormwater Handbook; and
- Pretreatment is provided in accordance with the Massachusetts Stormwater Handbook.

Full compliance with this standard will be achieved. The incorporation of the following stormwater BMPs will achieve a cumulative TSS removal rate greater than 80%.

Street Sweeping
The proposed design incorporates street sweeping as a BMP to control the amount of sediment that enters the stormwater management system. Street sweeping will be conducted on a quarterly basis. In accordance with MassDEP Standards, a 5% TSS removal rate is credited for this BMP.

Deep Sump/Hooded Catch Basins
All proposed catch basins will be deep sump/hooded catch basins, which will serve to trap sediment and floatables before entering the stormwater pipe network. Sumps will be four feet deep. In accordance with MassDEP Standards, a 25% TSS removal rate is credited for this BMP.

Water Quality Swales
Water quality swales may be incorporated into the stormwater management system to provide stormwater conveyance and treatment. Water quality swales are designed to treat the required water quality volume, and when incorporated with pretreatment devices such as sediment forebays with check dams, provide a 70% TSS removal rate.

Sediment Forebays
Sediment forebays are required as a pretreatment device before stormwater runoff is discharged to an extended dry detention basin, wet basin, constructed stormwater wetland or infiltration basin. No separate TSS removal credit is given for the sediment forebay when constructed for the BMPs listed above, however when they provide pretreatment for other BMPs, sediment forebays are credited a 25% TSS removal rate.

Water Quality Treatment Units
The stormwater management system will incorporate water quality treatment units (i.e., Contech CDS hydrodynamic separators, Stormceptors) prior to discharging to the infiltration basins. All units will be sized to treat the water quality flow rate derived from the required water quality volume and will achieve TSS removal rates exceeding the minimum requirement of 80%.

Infiltration Basins
Infiltration basins may be incorporated into the stormwater management system to provide groundwater recharge and to treat runoff prior to discharging into the adjacent wetland systems. Runoff from paved areas is directed through deep sump/hooded catch basins water quality treatment units, and sediment forebays prior to discharging into the infiltration basin. The final location of infiltration basins will depend on the soil conditions as infiltrating BMPs need to be located in soils capable of absorbing the recharge volume within 72 hours and where there is a minimum two-foot separation between the bottom of the infiltration BMP and the seasonal high groundwater table. In accordance with MassDEP Standards, an 80% TSS removal rate is credited for this BMP provided that adequate pretreatment has been provided.

Wet Basins/Created Wetlands
The stormwater management system will, of course, include the use of the TACAN, in part, which is an older created wetland. Similarly, the greenway/flow-ways channel bottoms may see sufficient stormwater to develop a wetland or facultative wetland fringe. The developed vegetation reduces erosion, and enhances sediment capture, deposition, and nutrient uptake.

Site-specific TSS removal calculations will be developed and submitted as future development projects are permitted and constructed.

7.3.6.5 Standard No. 5 – Higher Potential Pollutant Loads

tandard 5 requires source control and pollution prevention be implemented to eliminate or reduce the discharge of stormwater runoff from land uses with higher potential pollutant loads (LUHPPL) to the maximum extent practicable. The Project will generate more than 1,000 vehicle trips per day and therefore may be considered a higher pollutant load generator.

Stormwater runoff in contact with potential pollutants will be routed through BMPs identified in Table LUHPPL of the MassDEP Stormwater Handbook (i.e., deep sump/hooded catch basins, water quality units, and infiltration basins) prior to discharge. Full compliance with this standard will be achieved. Site-specific water quality calculations will be developed and submitted as future development projects are permitted and constructed.

7.3.6.6 Standard No. 6 – Protection of Critical Areas

The Site is located within the contributing watershed to the Old Swamp River, an Outstanding Resource Water (ORW), and therefore considered a critical area. Stormwater discharges within a critical area require the use of a treatment train that provides 80% TSS removal prior to discharge and at least 44% TSS removal prior to discharge to an infiltration BMP. In addition, treatment BMPs must be designed to treat the required water quality volume, a volume equal to one-inch times the total impervious surfaces of the post-development site. Full compliance with this standard will be achieved. Stormwater runoff in contact with potential pollutants will be routed to deep sump/hooded catch basins, water quality units, and infiltration basins prior to discharging into the Old Swamp River. Site-specific water quality calculations will be developed and submitted as future development projects are permitted and constructed.

7.3.6.7 Standard No. 7 – Redevelopment Projects

Redevelopment projects include development, rehabilitation, expansion, and phased projects on previously developed sites, provided the redevelopment results in no net increase in impervious area. Redevelopment projects are required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural stormwater best management practice requirements of Standards 4, 5, and 6. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.

The proposed SMP has been developed so that future development projects at the Site fully comply with the Stormwater Management Standards. Based on the significant amount of existing impervious surfaces, certain portions of the future development projects may result in no net increase in impervious area and therefore may be considered a redevelopment project. However, the Project will attempt to comply fully with the standards.

7.3.6.8 Standard No. 8 – Erosion and Sediment Control

Standard 8 requires a plan to control construction-related impacts, including erosion, sedimentation, and other pollutant sources during construction and land disturbance activities (construction period erosion, sedimentation, and pollution prevention plan). In addition, projects that disturb greater than one (1) acre of land are required to obtain coverage under the U.S. EPA National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Construction Activities (CGP). Full compliance with this standard will be achieved. In support of coverage, a project-specific Storm Water Pollution Prevention Plan (SWPPP) and a Notice of Intent will be submitted to the EPA as future development projects are permitted and constructed.

7.3.6.9 Standard No. 9 – Operation and Maintenance Plan

Standard 9 requires a Long -Term Operation and Maintenance (O&M) Plan be developed and implemented to ensure that stormwater management systems function as designed. The O&M Plan also identifies best management practices for implementing maintenance activities in a manner that minimizes impacts to wetland resource areas. Full compliance with this standard will be achieved. A site-specific O&M Plan will be prepared and submitted as phased development projects are permitted and constructed.

7.3.6.10 Standard No. 10 – Illicit Discharge

Illicit discharges to the stormwater management system are discharges that are not entirely comprised of stormwater. To the best of the Proponent's, no illicit discharges currently exist on Site and no illicit discharges will be incorporated as part of the Project into the proposed stormwater management system. Full compliance with this standard will be achieved. An Illicit Discharge Compliance Statement will be prepared and submitted as future development projects are permitted and constructed.

7.3.7 Summary of Compliance

As summarized here and further detailed in Appendix C, the SMP sets the general framework for the Project to comply with the Massachusetts Stormwater Management Standards in accordance with the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.00).

The proposed stormwater management system incorporated into the 2023 Modified Development Program utilizes existing drainage infrastructure to the maximum extent practicable. Mitigation measures that were put in place in prior developments were left in place to only address their respective tributary areas and, with the exception of the TACAN, new development areas were not added to those areas.

As further discussed in Section 10.0, increases in impervious area resulting from the 2023 Modified Development Program will be mitigated with the implementation of stormwater management/ detention basins. The SMP provides the basic stormwater management protocols and patterns for drainage. As one can see from the above summaries and the supporting calculations, this management approach will significantly reduce the future fully developed runoff in major storms. The French's Stream basin will see a 10% reduction and the Old Swamp River basin, an almost 50% reduction.

A specific review process has been developed by which individual development projects will be reviewed in the future for consistency with the SMP. Through this process, future individual projects will implement the SMP designed for the 2023 Modified Development Program.

7.4 PRIVATE UTILITIES

This section provides an understanding of the private utility capacities within the area of the Project. This includes the major utilities, electric, gas, telephone, and cable (communications). A majority of these utilities are found adjacent to the site on Route 18, which was recently reconstructed by MassDOT.

7.4.1 Electric

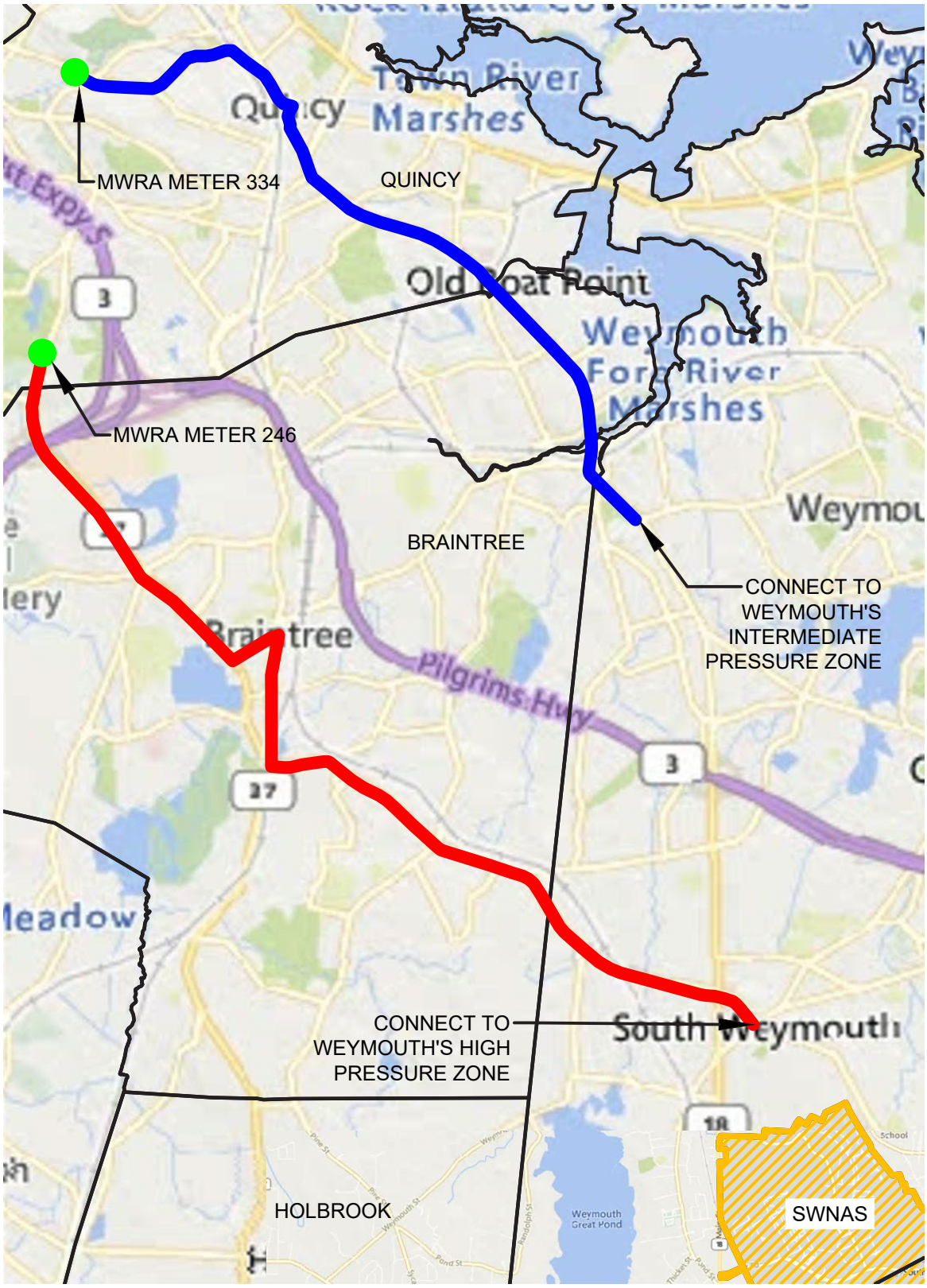
Electric service to the Site is currently provided by National Grid. Based on existing survey information, electric duct banks located in Trotter Road and Memorial Grove Avenue provide service to the existing development. To serve the Project at full buildout, a secondary electric feed through an existing corridor near the SRA office needs to be completed. Electric service will continue as currently provided and will continue to be served through the program development and build out. The Proponent will continue to coordinate on provision and capacity as the 2023 Modified Development Program is further refined.

7.4.2 Gas

Gas service to the Site is also provided by National Grid. Based on existing survey information, gas is currently supplied to the Site by two gas mains, one located in Trotter Road and the other located in Memorial Grove Avenue. Gas service will continue as currently provided and will continue to be served through the program development and build out. The Proponent will continue to coordinate on provision and capacity as the 2023 Modified Development Program is further refined.

7.4.3 Communication

Communications services currently serving the Base are provided by Verizon, Comcast and Crown Castle via communication duct banks located in Trotter Road and Memorial Grove Avenue. Communications services will continue as currently provided and will continue to be served through the program development and build out. The Proponent will continue to coordinate on provision and capacity as the 2023 Modified Development Program is further refined.



LEGEND

- TOWN BOUNDARY
- SITE BOUNDARY
- QUINCY SOUTH, WASHINGTON STREET CONNECTION (INTERMEDIATE PRESSURE ZONE)
- BRAINTREE, COLUMBIA STREET CONNECTION (HIGH PRESSURE ZONE)

0 1500' 3000'
SCALE: 1"=3000'

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

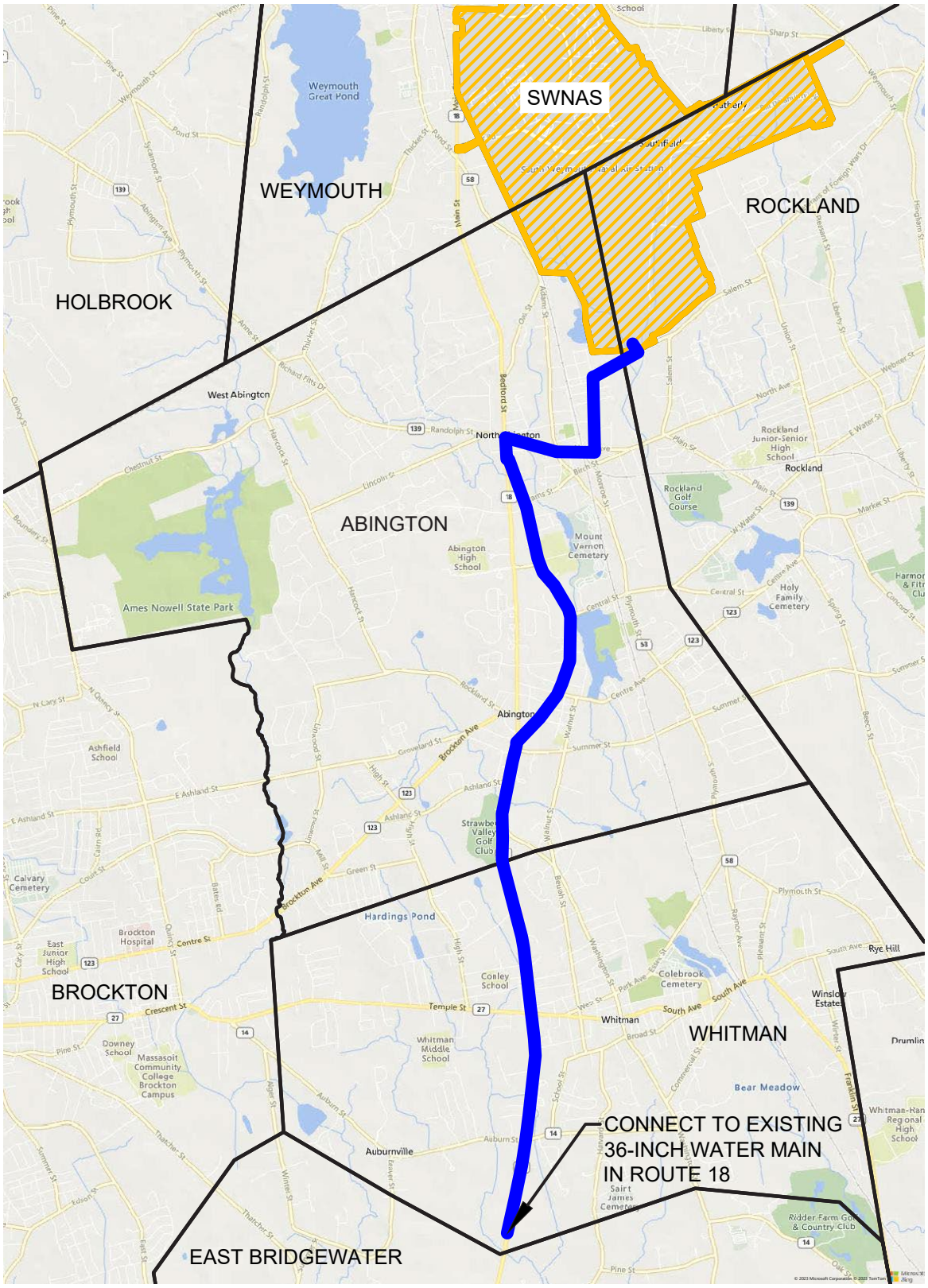
Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

MWRA Water Supply Routes

Project No.: 143-33244-21001
Date: December 2023
Designed By: SJW

Figure 7-1



LEGEND

- TOWN BOUNDARY
- SITE BOUNDARY
- PEACEFUL MEADOWS ROUTE

SCALE: 1"=3000'

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

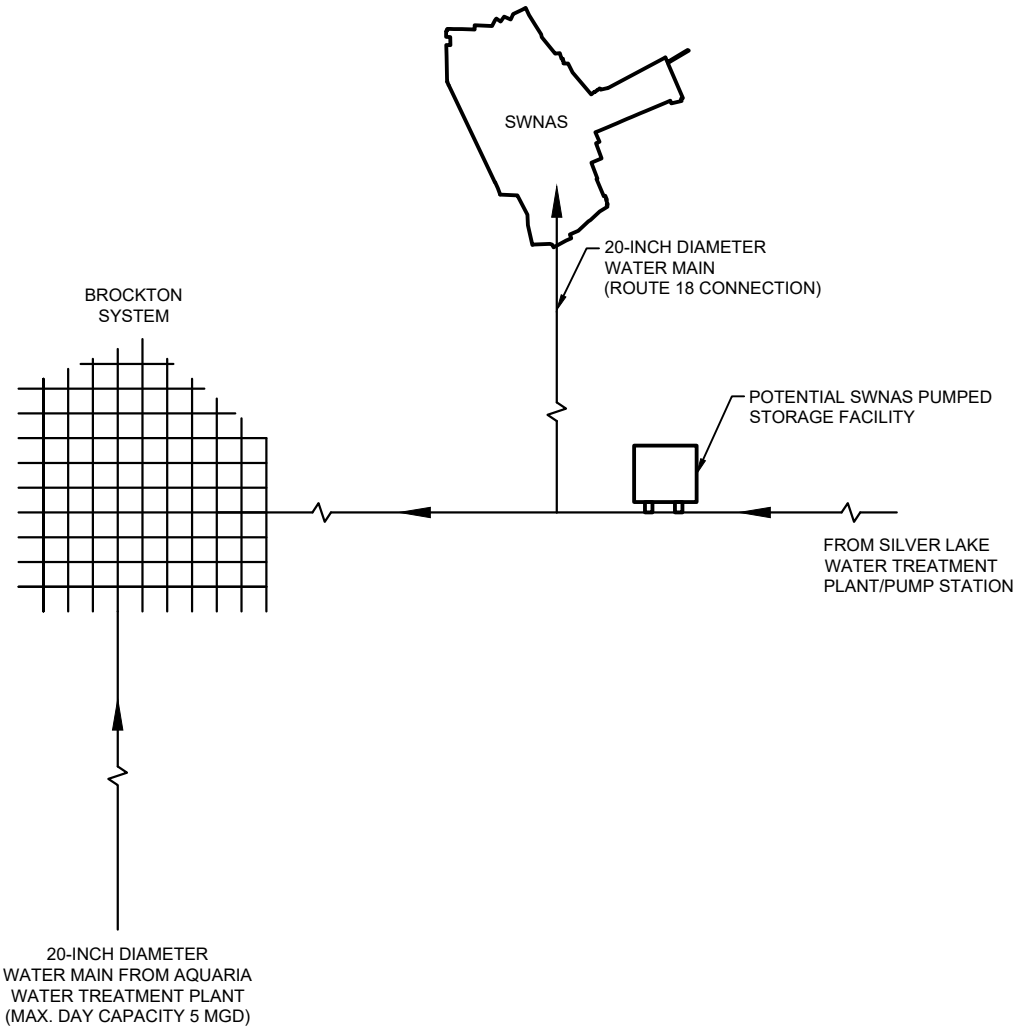
South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Aquaria/Brockton/SRA
Water Supply Route

Project No.: 143-33244-21001
Date: December 2023
Designed By: SJW

Figure 7-2

12/11/2023 5:11:13 PM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - AQUARIA WATER ALTERNATIVES.DWG - BOOTHBY, THOMAS



NOT TO SCALE

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

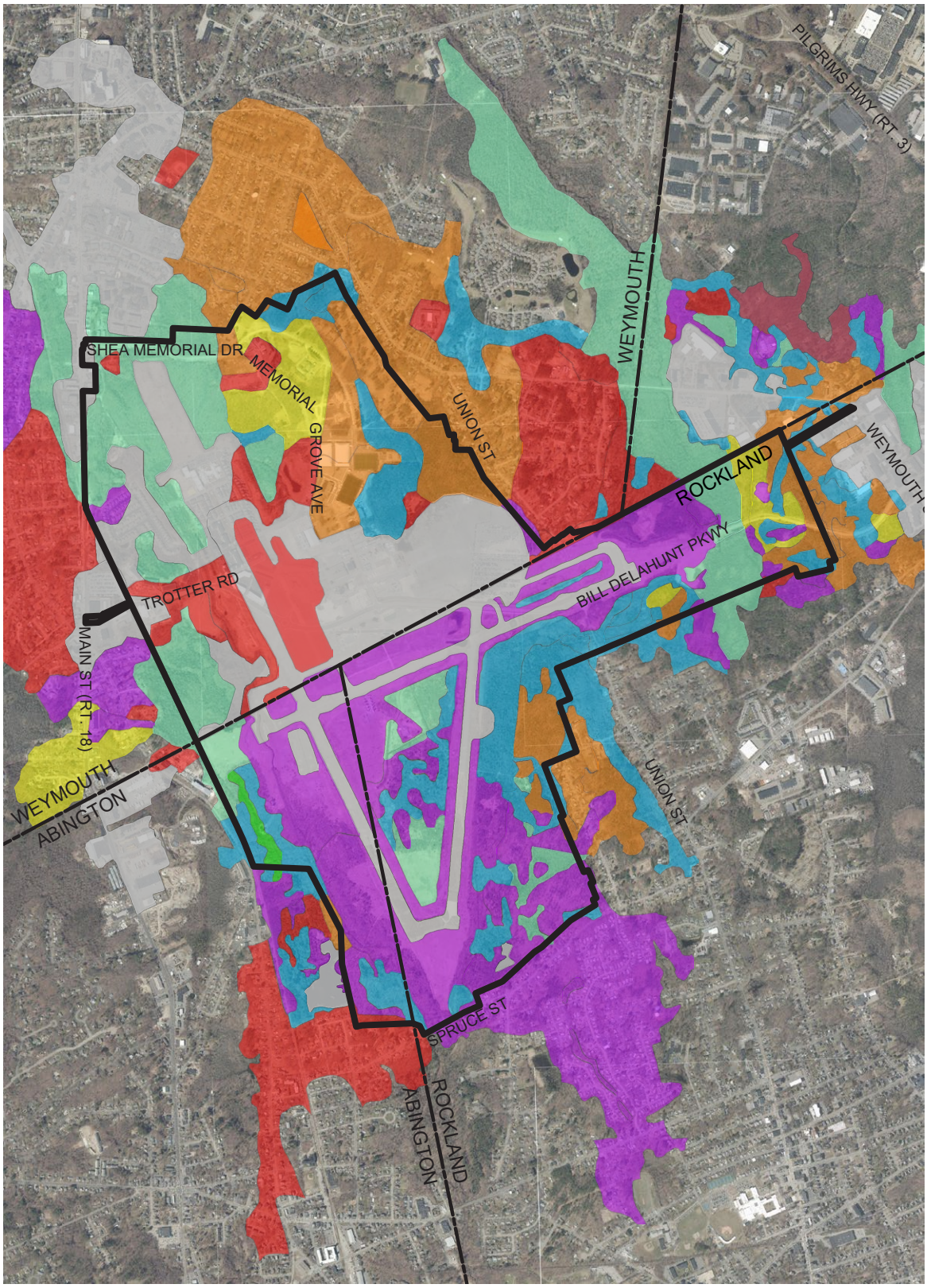
Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Aquaria/Brockton Proposed Pump Storage
Facility Schematic

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

Figure 7-3



LEGEND

- SITE BOUNDARY
- TOWN BOUNDARY
- HSG A
- HSG A/D
- HSG B
- HSG B/D
- HSG C
- HSG C/D
- HSG D
- NOT RATED

0 750' 1500'
SCALE: 1"=1500'

N

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

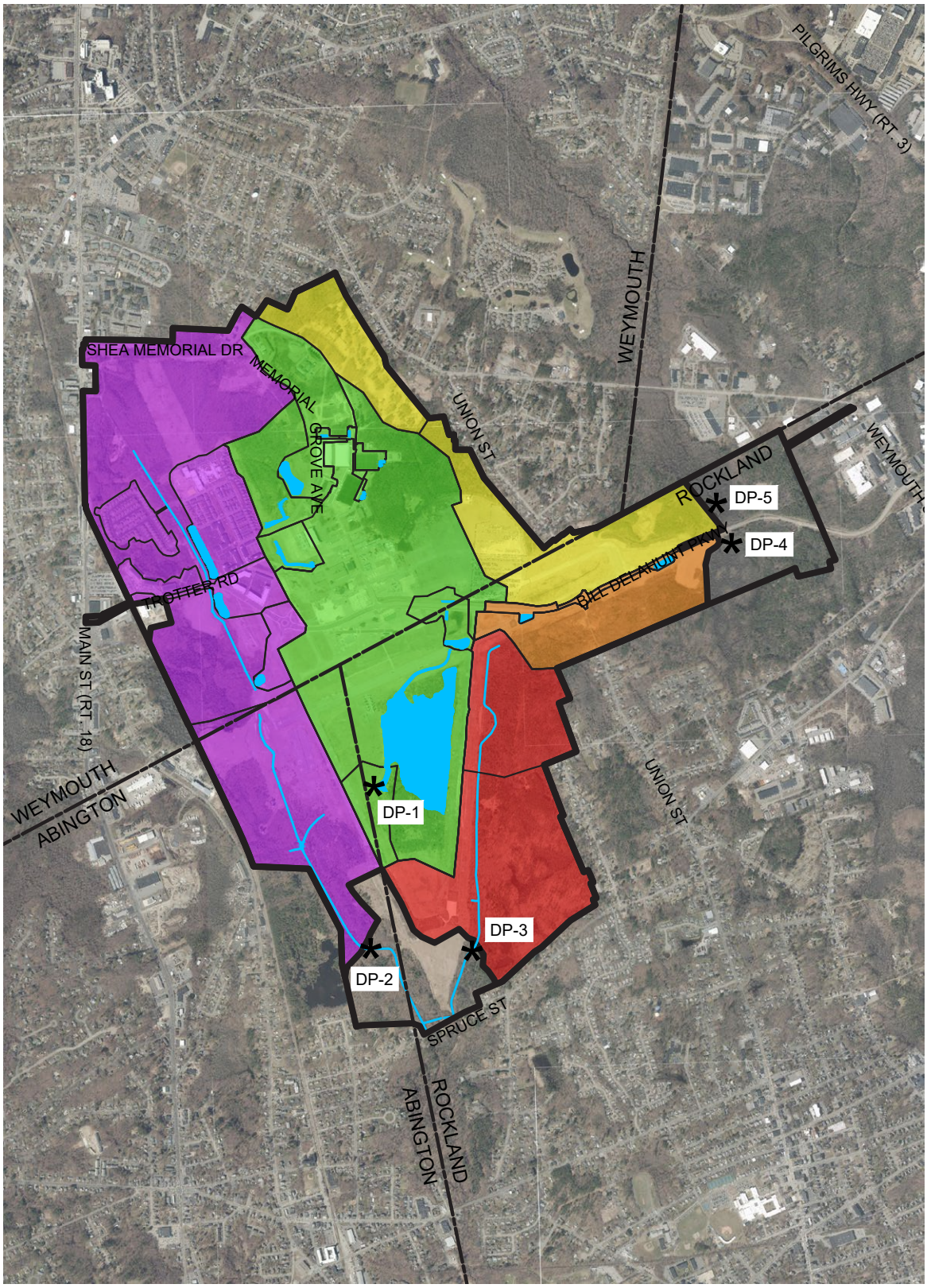
South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

NRCS Soils Map

Project No.:	143-33244-21001
Date:	December 2023
Designed By:	SJW

Figure 7-4

12/12/2023 9:18:52 AM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - NRCS SOILS MAP.DWG - BOOTHBY, THOMAS



12/12/2023 9:42:48 AM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - EXISTING DRAINAGE PATTERNS.DWG - BOOTHBY, THOMAS

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

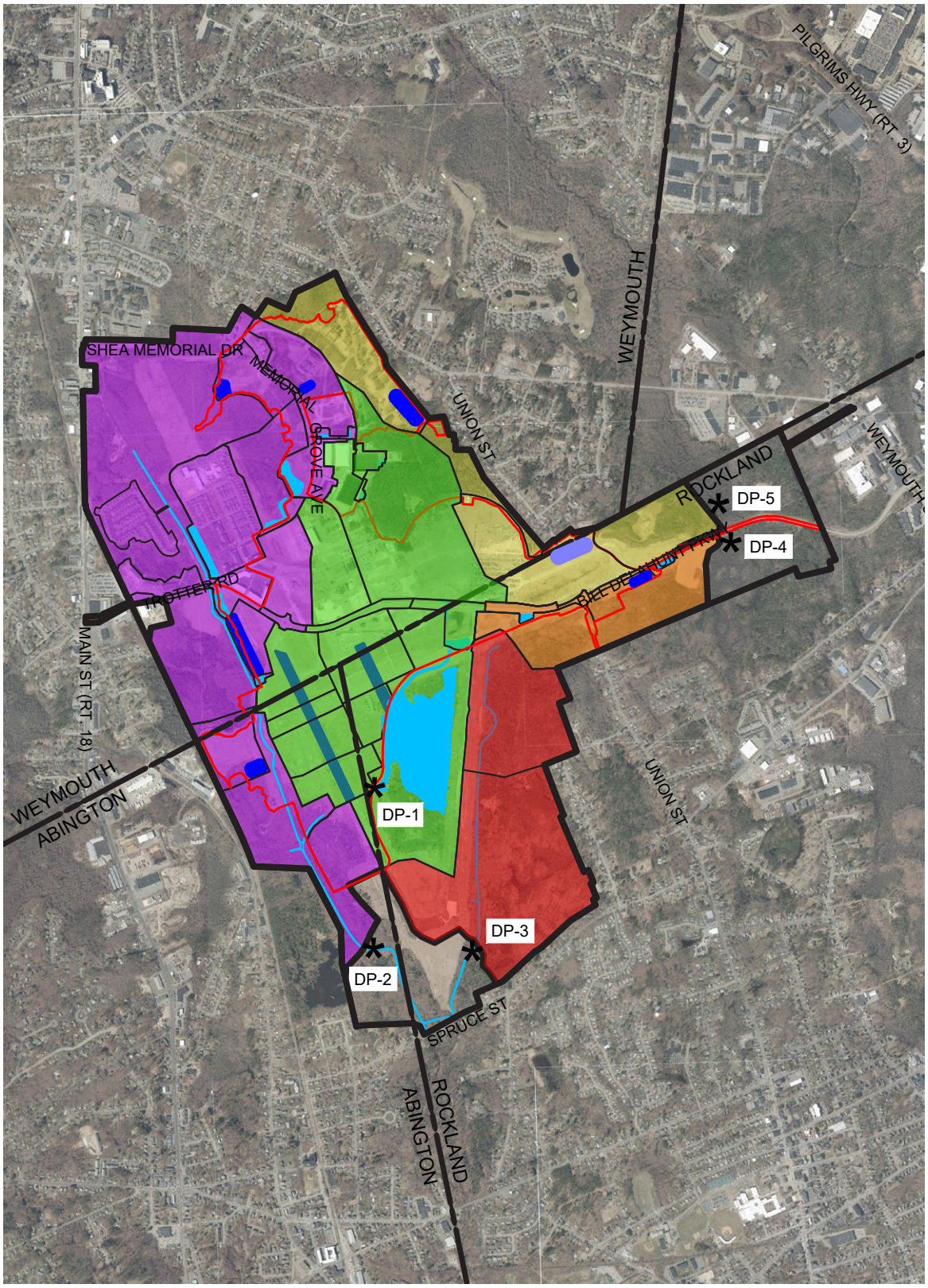
Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Existing Drainage Patterns

Project No.: 143-33244-21001
Date: December 2023
Designed By: SJW

Figure 7-5



LEGEND

- SITE BOUNDARY
- TOWN BOUNDARY
- PROPOSED DEVELOPMENT AREA
- HYDROLOGIC STUDY AREA (1,285± ACRES)
- * DESIGN POINT (DP)
- TACAN OUTFALL (DP-1)
- FRENCH'S STREAM WEST BRANCH (DP-2)
- FRENCH'S STREAM EAST BRANCH (DP-3)
- OLD SWAMP RIVER UPSTREAM (DP-4)
- OLD SWAMP RIVER DOWNSTREAM (DP-5)
- EXISTING DRAINAGE BASIN/STREAM
- PROPOSED DRAINAGE BASIN
- PROPOSED INFILTRATION BASIN

0 750' 1500'
SCALE: 1"=1500'

N

TETRA TECH
www.tetratech.com
100 Nickerson Road
Marlborough, MA 01752
PHONE: (508) 786-2200 FAX: (508) 786-2201

Client: Brookfield Properties / New England Development

South Weymouth Naval Air Station
Weymouth, Abington and Rockland, Massachusetts

Proposed Drainage Patterns

Project No.: 143-33244-21001
Date: December 2023
Designed By: SJW

Figure 7-6

12/12/2023 10:01:05 AM - P:\33244\143-33244-21001\CAD\SHEETFILES\SWNAS - PROPOSED DRAINAGE PATTERNS-REVISED.DWG - BOOTHBY, THOMAS

8.0 TRANSPORTATION

This section summarizes the Conclusions and Recommendations of the TIA set forth in its entirety as Appendix D.

8.1 TRANSPORTATION IMPACT ASSESSMENT CONCLUSIONS

The TIA concluded the following with respect to the Project (as measured by analyzing the 2023 Modified Development Program) and the study area roadways and intersections:

1. Using trip-generation statistics published by the ITE[6] and inclusive of diverted-link trips, the 2023 Modified Development Program is expected to generate approximately 53,438 vehicle trips on an average weekday and 47,476 vehicle trips on a Saturday (both two-way volume over the operational day of the Project), with approximately 4,148 vehicle trips expected during the weekday morning peak-hour, 4,835 vehicle trips expected during the weekday evening peak-hour and 3,963 vehicle trips expected during the Saturday midday peak-hour. While Saturday midday peak hour vehicle trips were not studied in the 2017 NPC filing, the 2023 Modified Development Program is expected to generate fewer average weekday and Saturday vehicle trips than the 2017 NPC development program;
2. The 2023 Modified Development Program will not result in a significant impact (increase) on motorist delays or vehicle queuing over Existing or anticipated future conditions without the Project (No-Build conditions), with 51 of the 73 study area intersections predicted to continue to operate at an overall level of service (LOS) D or better during all three the peak hours with the addition of 2023 Modified Development Program-related traffic, where an LOS of "D" or better is generally defined as "acceptable" operating conditions, and 16 of the 73 intersections shown to drop to a level of service below LOS D during one or more peak hour as a result of the addition of 2023 Modified Development Program related traffic. Specific improvements have been identified for these intersections that are intended to reduce motorist delays and vehicle queuing, and off-set the predicted impact of the 2023 Modified Development Program (discussion follows);
3. Independent of the 2023 Modified Development Program, 25 of the study area intersections were found to have a motor vehicle crash rate that is above the MassDOT average crash rates and/or were identified as high crash locations for the 2017-2019 reporting period and Highway Safety Improvement Program (HSIP) eligible. Road Safety Audits (RSA) were conducted at 21 of the study area intersections between June 2011 and February 2022, with the majority of the improvements recommended therein since completed. Specific recommendations have been provided to advance safety related improvements at six (6) of the 25 study area intersections where safety enhancements have not yet been advanced (discussion follows); and
4. Lines of sight at the Project access gateway intersections of Route 18 at Shea Memorial Drive, Route 18 at Trotter Road and Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive intersections were found to exceed the recommended minimum distances for safe and efficient operation based on the appropriate approach speeds.

In consideration of the above, it has been concluded that the Project can be accommodated within the confines of the existing transportation infrastructure in a safe and efficient manner with implementation of the recommendations that follow.

[6] Trip Generation, 11th Edition; Institute of Transportation Engineers; Washington, DC; 2021.

8.2 TRANSPORTATION IMPACT ASSESSMENT RECOMMENDATIONS

A detailed transportation improvement program has been developed that is designed to provide safe and efficient access to the Site and address any deficiencies identified at off-site locations evaluated in conjunction with this study. The recommended improvement measures have been classified into four categories: 1) Site Access; 2) Off-Site Improvements; 3) Transportation Demand Management (TDM); and 4) Traffic Monitoring; and, where applicable, will be completed in conjunction with the Project subject to receipt of all necessary licenses, permits, and approvals.

Site Access

Vehicular access to the Site is and will continue to be provided by three primary gateways: Shea Memorial Drive (via Route 18); Bill Delahunt Parkway (via Route 228 to Route 3); and Patriot Parkway (via Trotter Road to Route 18). Access to the individual development areas within the Site will be provided by way of roadways and driveways located within the Site. The design and location of the specific driveways and roadways will be advanced with the development of the final development plans. The following general recommendations will be used to guide the design plans for the development areas within the Site:

- Roadways and driveways within the Site will be designed with consideration of Complete Streets design principles and the following design guidelines based on functional class:
  - ***Major Collectors*** *(Gateway Streets conveying trips to Route 18 and Hingham Street)*: Four (4) travel lanes (two lanes per direction) separated by a raised median with separate turn lanes provided at major intersections.
  - ***Minor Collectors*** *(Roadways that convey trips from the individual development areas to the Major Collectors)*: Two (2) travel lanes separated by a double-yellow centerline or raised median with separate turn lanes provided at major intersections.
  - ***Local Roadways*** *(Roadways that serve development areas)*: Two (2) travel lanes separated by a double-yellow centerline.
  - ***Driveways*** *(Driveways serve individual building areas or a collection of building areas)*: Driveways should generally be a minimum of 20-feet in width for minor traffic generators and 24-feet in width for major traffic generators, and should be designed with appropriate corner radii to accommodate turning maneuvers for delivery trucks and emergency vehicles.
- Circulating drives within individual development sites will be a minimum of 24-feet in width where perpendicular parking is proposed adjacent to the drive aisle.
- Intersection spacing should follow the guidelines set forth in the MassDOT *Project Development & Design Guide*.[7]
- Intersections should be placed under STOP-sign control where necessary to regulate traffic or to assign the vehicular right-of-way pursuant to the guidance provided in the *Manual on Uniform Traffic Control Devices* (MUTCD).[8] Modern roundabouts should be considered in lieu of the installation of traffic control signals at major intersections where the installation of a traffic control signal is found to be warranted based on the criteria established in the MUTCD.
- All signs and pavement markings to be installed within the Site shall conform to the applicable standards of the MUTCD.
- Americans with Disabilities Act (ADA) compliant wheelchair ramps should be provided at all pedestrian crossings where sidewalks are present, with driveways designed such that the sidewalk is flush with (i.e., crosses) the driveway.

[7] Project Development & Design Guide; Massachusetts Highway Department; January, 2006.

[8] Manual on Uniform Traffic Control Devices (MUTCD); Federal Highway Administration; Washington, D.C.; 2009.

- Signs and landscaping to be installed within intersection sight triangle areas should be designed and maintained so as not to restrict lines of sight.
- Snow accumulation (windrows) within the sight triangle areas should be promptly removed where such accumulations would impede sightlines.

Off Site Improvements

The recommended off-site improvements have been developed to: i) address existing and predicted future capacity constraints; ii) to off-set the predicted impact of the Project; and iii) to enhance safety at intersections identified as high crash locations. The recommended improvements have been structured to build-upon or expand the improvements that were identified for the Project as a part of the 2007 FEIR,[9] with additional improvements identified where necessary to address the impacts of the 2023 Modified Development Program.

Table 7-12, of the TIA attached as Appendix D, summarizes the elements of the transportation improvement program for the Project, the schedule for implementation and the responsible party, as well as indicating if the improvement measure was defined in the 2007 FEIR. The schedule for implementation was aggregated into five (5) tiers to coincide with the anticipated build-out of the Project:

- ***Tier 1*** – To be completed prior to the issuance of a Certificate of Occupancy for any new development associated with the 2023 Modified Development Program;
- ***Tier 2*** – To be completed prior to the issuance of a Certificate of Occupancy for any new commercial building that alone or in aggregate exceeds 500,000 sf, or for new residential development that alone or in aggregate exceeds 1,500 dwelling units associated with the 2023 Modified Development Program;
- ***Tier 3*** – To be completed prior to the issuance of a Certificate of Occupancy for any new commercial building that alone or in aggregate exceeds 1,000,000 sf, or for new residential development that alone or in aggregate exceeds 3,000 dwelling units associated with the 2023 Modified Development Program;
- ***Tier 4*** – To be completed prior to the issuance of a Certificate of Occupancy for any new commercial building that alone or in aggregate exceeds 2,000,000 sf, or for new residential development that alone or in aggregate exceeds 6,000 dwelling units associated with the 2023 Modified Development Program; and
- ***Tier 5*** – To be completed if and when warranted based on the results of the annual Traffic Monitoring and Reporting Program associated with the 2023 Modified Development Program (discussion follows)

The following provides additional detail on the improvements that have been recommended as a part of the TIA.

Traffic Operations

Traffic Signal Installation

The addition of future Project-related traffic to the following intersections was shown to result in a change in operating conditions that may necessitate the implementation of specific traffic control improvements, including the installation of a traffic control signal:

- *Columbian Street at Forest Street* (Intersection 11)
- *Columbian Street at Park Avenue West* (Intersection 12)
- *Weymouth Street at Sharp Street and Abington Street* (Intersection 40)
- *Randolph Street at Forest Street* (Intersection 41)

[9] Epsilon, et al; op. cit. 7-1 June 17, 2007.

- *Trotter Road at Patriot Parkway* (Intersection 51)
- *Memorial Grove Avenue at Snow Bird Avenue* (Intersection 52)
- *Route 139 at Chestnut Street and Old Randolph Street* (Intersection 55)

At the present time, the subject intersections do not appear to meet the necessary warrants as defined in the MUTCD for the installation of a traffic signal. As such, the Proponent will monitor traffic volumes, operating conditions and motor vehicle crash data at these intersections as a part of the annual Traffic Monitoring and Reporting Program (discussion follows). If and to the extent that the installation of a traffic signal is found to be warranted and the installation is desirable by the community within which the intersection is located, the Proponent will design and construct a traffic control signal at the intersection pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D) to the extent that the improvements can be completed within the public right-of-way and subject to receipt of all necessary licenses, permits and approvals.

With the installation of a traffic control signal and associated geometric improvements (where necessary) at the subject intersections, overall intersection operations were shown to be improved to LOS D or better during the peak hours at six (6) of the seven (7) intersections identified above. Even with these improvements, the Trotter Road/Patriot Parkway intersection was shown to operate at an overall LOS F during the weekday morning and evening peak-hours, and at LOS E during the Saturday midday peak-hours. That being said, as the final plans are advanced for the development areas within the Site, the access points can be located in a manner to disperse trips within the Site and lessen impacts at the Trotter Road/Patriot Parkway intersection.

Geometric Improvements

As detailed more fully in Appendix D, in an effort to improve traffic operations and off-set the predicted impact of the Project, the Proponent will design and construct the following geometric improvements at the identified intersections, according to the suggested schedule of implementation defined in Table 7-12 (Appendix D):

Roadway Segments

- *Hingham Street* – Widen Hingham Street to provide a general four-lane cross section between the Route 3 southbound ramps and Reservoir Park Drive. These improvements are being funded through a MassWorks grant to the Town of Rockland.
- *Bill Delahunt Parkway* – Improve the roadway cross-section, if necessary, based on the measured traffic volumes and to facilitate the addition or expansion of pedestrian and bicycle accommodations.
- *Shea Memorial Drive* – Improve the roadway cross-section, if necessary, based on the measured traffic volumes and to facilitate the addition or expansion of pedestrian and bicycle accommodations.
- *Reservoir Park Drive* – Widen Reservoir Park Drive to provide a four-lane cross-section. Outside of the limits of the Hingham Street/Reservoir Park Drive intersection improvements that are being advanced as a part of the Hingham Street MassWorks grant, improve the roadway cross-section, if necessary, based on the measured traffic volumes and to facilitate the addition or expansion of pedestrian and bicycle accommodations.

Intersections

- *Pleasant Street at Pine Street* (Intersection 18) – Widen the Pine Street westbound approach to provide a left-turn lane and a right-turn lane.
- *Pine Street at Ralph Talbot Street* (Intersection 20) – Widen the Pine Street northbound approach to provide a left-turn/through lane and a right-turn lane, and the Ralph Talbot Street westbound approach to provide a left-turn lane and a through/right-turn lane.

- *Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive* (Intersection 39) – Widen the Bill Delahunt Parkway northeastbound and Reservoir Park Drive southwestbound approaches to provide a left-turn lane, two through lanes and a channelized right-turn lane.
- *Route 18 at Shea Memorial Drive* (Intersection 45) – Widen the Route 18 southbound approach to provide two left-turn lanes and two through lanes, and the Shea Memorial Drive westbound approach to provide a left-turn lane and two right-turn lanes.
- *Shea Memorial Drive at Memorial Grove Avenue* (Intersection 46) – Realign the Shea Memorial Drive/Memorial Grove Avenue intersection to be located to the south of Shea Field Memorial Grove in order to reflect the primary flow of traffic within the Site.
- *Pond Street at Thicket Street* (Intersection 48) – Widen the Thicket Street northeastbound approach to provide a left-turn lane and a right-turn lane.
- *Route 18 at Trotter Road* (Intersection 49) – Widen the Route 18 northbound approach to provide two through lanes and a right-turn lane, and the Trotter Road westbound approach to provide a left-turn lane and two right-turn lanes.
- *Trotter Road at Patriot Parkway* (Intersection 51) – Widen the Trotter Road eastbound approach to provide a left-turn lane and a through lane, the Trotter Road southbound approach to provide a left-turn lane and a right-turn lane, and the Patriot Parkway westbound approach to provide a through lane and a channelized right-turn lane.
- *Memorial Grove Avenue at Snow Bird Avenue* (Intersection 52) – Widen the Memorial Grove Avenue westbound approach to provide a left-turn lane and a through/right-turn lane, and the Snow Bird Avenue northbound approach to provide a left-turn/through lane and a right-turn lane. In addition, the intersection should be placed under all-way STOP-sign control subject to meeting the necessary warrants as specified in the MUTCD.
- *Shea Memorial Drive at Patriot Parkway and Bill Delahunt Parkway* (Intersection 53) – Widen the Shea Memorial Drive northbound approach to provide a left-turn lane, a left turn/through lane and a right-turn lane, and the Shea Memorial Drive southbound approach to provide a left-turn/through lane and two right-turn lanes.
- *Route 139 at Lincoln Street* (Intersection 56) – Widen the Lincoln Street northeastbound approach to provide a left-turn lane a right-turn lane.
- *Route 18 at Route 123* (Intersection 71) – Widen the Route 18 northbound approach to provide a left-turn lane, a through lane and a through/right-turn lane, the Route 18 southbound approach to provide a through/left-turn lane, a through lane and a right-turn lane, and the Route 123 eastbound approach to provide a left turn lane, a through lane and a through/right-turn lane.
  - *Future Traffic Signal Control*: In conjunction with the installation of traffic control signals at the previously mentioned intersections, if and when warranted, geometric improvements should be advanced at the following three (3) intersections, subject to receipt of all necessary licenses, permits and approvals:

- *Columbian Street at Forest Street* (Intersection 11) – Widen the Columbian Street eastbound approach to provide a left-turn/through lane and a right-turn lane and the westbound approach to provide a left-turn lane and a through/right-turn lane.
- *Columbian Street at Park Avenue West* (Intersection 12) – Widen the Columbian Street eastbound approach to provide a left-turn/through lane and a right-turn lane.
- *Route 139 at Chestnut Street and Old Randolph Street* (Intersection 55) – Widen the Route 139 northbound approach to provide a left-turn lane and a through/right turn lane.

With the implementation of the suggested geometric changes, 11 of these 15 intersections were shown to operate at an overall LOS D or better during the peak hours. Of the four (4) intersections that do not achieve this level of service, with the suggested geometric changes: i)the Weymouth Street/ Bill Delahunt Parkway/Reservoir Park Drive intersection was shown to improve from an overall LOS F to LOS D during the weekday morning peak hour; from LOS F to LOS E during the weekday evening

peak hour; and from LOS E to a LOS C during the Saturday midday peak-hour; and ii) the Route 18/ Trotter Road, Trotter Road/Patriot Parkway and Patriot Parkway/Shea Memorial Drive/Bill Delahunt Parkway intersections were shown to operate at an overall LOS F during the peak hours; however, vehicle queuing and average motorist delays were shown to be generally reduced.

Traffic Signal Timing Improvements

As detailed more fully in Appendix D, in an effort to improve traffic operations and off-set the predicted impact of the Project, the Proponent will, subject to receipt of all necessary licenses, permits and approvals, design and implement an optimal traffic signal timing and phasing plan for the following intersections that were identified to be operating at or over capacity pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D):

- *Route 53 at Middle Street* (Intersection 2)
- *Middle Street at Winter Street* (Intersection 3)
- *Liberty Street at Grove Street* (Intersection 9)
- *Route 18 at West Street and Middle Street* (Intersection 13)
- *Route 18 at Columbian Street* (Intersection 14)
- *Pleasant Street at Park Avenue* (Intersection 16)
- *Pine Street at Ralph Talbot Street* (Intersection 20)
- *Route 53 at Derby Street and Gardner Street* (Intersection 28)
- *Route 228 at Pond Street* (Intersection 35)
- *Route 228 at Hingham Street and the Route 3 Southbound Ramps* (Intersection 36)
- *Hingham Street at Reservoir Park Drive* (Intersection 38)
- *Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive* (Intersection 39)
- *Pond Street at Hollis Street and Derby Street* (Intersection 42)
- *Route 18 at Pond Street and Pleasant Street* (Intersection 43)
- *Route 18 at Shea Memorial Drive* (Intersection 45)
- *Route 18 at Trotter Road* (Intersection 49)
- *Route 18 at Pond Street* (Intersection 50)
- *Shea Memorial Drive at Patriot Parkway and Bill Delahunt Parkway* (Intersection 53)
- *Route 18 at Route 139* (Intersection 57)
- *Route 58 at Route 139* (Intersection 58)
- *Route 123 at Route 58* (Intersection 69)
- *Route 58 at Summer Street* (Intersection 70)
- *Route 18 at Route 123* (Intersection 71)

The subject intersections will be monitored as a part of the annual Traffic Monitoring and Reporting Program (discussion follows). To the extent that the monitoring program indicates that additional traffic signal timing optimizations are necessary, the Proponent will implement the optimizations, again, subject to receipt of all necessary licenses, permits and approvals.

With the implementation of an optimal traffic signal timing plan, operating conditions at eight (8) of the 15 subject intersections were shown to improve to an overall LOS D or better during the peak hours, with four (4) of the intersections improving to an overall LOS D or better for one or more peak hours, and all intersections predicted to have a reduction in overall motorist delay and vehicle queueing.

Safety

Independent of the Project the following intersections were identified to have a motor vehicle crash rate that exceed the MassDOT average crash rates for similar intersections and/or were designated as HSIP eligible by MassDOT, and have not previously been the subject of a Road Safety Audit (RSA):

- *Middle Street at Winter Street* (Intersection 3)
- *Pleasant Street at Park Avenue* (Intersection 16)
- *Route 53 at Route 228* (Intersection 31)
- *VFW Drive at Pleasant Street and West Pleasant Street* (Intersection 62)
- *Route 58 at Summer Street* (Intersection 70)

In an effort to identify and advance safety improvements at these intersections, the Proponent will: i) facilitate the completion of a RSA for the intersections; and ii) design and construct the short-term, low-cost improvements that are suggested as an outcome of the RSA. The RSAs are currently underway and the construction of the short-term, low-cost improvements will be designed and constructed pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D) to the extent that the improvements can be completed within the public right-of-way and subject to receipt of all necessary licenses, permits and approvals.

The Pleasant Street/Columbian Street/Union Street intersection (Intersection 15) was found to have a motor vehicle crash rate that exceeds the MassDOT average crash rate for an unsignalized intersection and was designated as a top 200 crash cluster location. This intersection is currently being reconstructed as a part of an intersection improvement project that is being advanced by the Town of Weymouth. No additional improvements are required at this intersection to accommodate the Project.

In addition, the remaining short-term, low-cost improvements identified in the RSAs for the following intersections that have not yet been implemented will be completed:

- *Route 18 at Route 53* (Intersection No. 1)
- *Route 53 at Middle Street* (Intersection No. 2)
- *Route 18 at Winter Street* (Intersection No. 4)
- *Route 18 at West Street and Middle Street* (Intersection No. 7)
- *Route 18 at Park Avenue and Park Avenue West* (Intersection No. 13)
- *Route 18 at Columbian Street* (Intersection No. 14)
- *Derby Street at the Route 3 Southbound Ramps* (Intersection No. 22)
- *Derby Street at the Route 3 Northbound Ramps* (Intersection No. 23)
- *Route 53 at Derby Street and Gardner Street* (Intersection No. 28)
- *Route 228 at Pond Street* (Intersection No. 35)
- *Route 18 at Pond Street and Pleasant Street* (Intersection No. 43)
- *Route 18 at Pond Street* (Intersection No. 50)
- *Route 139 at Hancock Street and Old Hancock Street* (Intersection No. 54)
- *Route 139 at Chestnut Street and Old Randolph Street* (Intersection No. 55)
- *Route 18 at Route 139* (Intersection No. 57)
- *Route 123 at Union Street* (Intersection No. 67)
- *Route 58 at Central Street* (Intersection No. 68)
- *Route 123 at Route 58* (Intersection No. 69)
- *Route 18 at Route 123* (Intersection No. 71)
- *Route 18 at Route 27* (Intersection No. 72)
- *Route 18 at Route 14* (Intersection No. 73)

The short-term, low-cost safety-related improvements that have not yet been implemented will be completed pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D) to the extent that the improvements can be completed within the public right-of-way and subject to receipt of all necessary licenses, permits and approvals.

With implementation of the aforementioned recommendations, safe and efficient access will be provided to the Site and the Project can be accommodated within the confines of the existing and improved transportation system.

Transportation Demand Management (TDM)

The Proponent is committed to advancing the Project in a manner that reduces impacts on the transportation infrastructure. This commitment starts with a design that has been purposely configured to facilitate trips between development areas and recreational opportunities within the Site by non-motorized modes of transportation. In order to reduce single-occupancy (SOV) trips external to the Site and enhance mobility within the development, the Proponent will develop and implement a comprehensive TDM program, a principal component of which will be providing initial funding to establish a Tri-Town Transportation Management Association (the "Tri-Town TMA") to serve development at the Base.

The following details the framework of the TDM program for the Project.

TDM Program Management

A full-time Transportation Demand Management Coordinator (TDMC) (who may also have other duties and responsibilities) will be employed to serve as the single point of contact for residents, employees and the Tri-Town TMA, and to lead the TDM program and associated marketing and outreach activities. The TDMC will, as part of the overall TDM program, establish and implement quality control procedures and performance measures to ensure a high level of service, appropriate implementation of alternative transportation incentive programs, and effectiveness of those programs. The email address and phone number of the TDMC will be made available to residents and employees. The TDMC will work with the Tri-Town TMA to compile and distribute up-to-date information concerning available commuting options and the incentive programs available to residents and employees that use alternative commuting modes to SOVs. This information will be included in a "welcome packet" that will be made available to all new residents and employees, and will include the following information:

- MBTA maps, schedules and fare information, including the service schedule and fare information for Commuter Rail service from South Weymouth Station
- Tri-Town TMA shuttle service routes, stops and hours of operation, when established
- Location of bicycle parking areas
- Location of bikeshare stations
- Map of local and regional bicycle and pedestrian routes
- Location and contact information for carsharing services
- Details of any Emergency Ride Home (ERH) offered through the Tri-Town TMA

In addition, the TDMC will coordinate with the Tri-Town TMA to host an annual transportation fair that will focus on the transportation alternatives and incentive programs that are available to residents and employees of the businesses that are located within the Site, and will include programs focused on pedestrian and bicycle safety.

Tri-Town TMA Shuttle Service

A shuttle service will be operated by the Tri-Town TMA, as demand warrants, that will connect the development areas within the Site with continued service to the MBTA South Weymouth Commuter Rail Station. Initial funding for this service will be provided by the Proponent and will be offered at no ($0) cost to residents and employees of businesses that are located within the Site for the first year of

operation. The service may be expanded to include other destinations and routes outside of the Site as membership in the Tri-Town TMA increases and as demand warrants, and will be funded through the dues assessment to members of the TMA as a means of subsidizing the service.

Promotional and Incentive Programs

The Site is situated adjacent to South Weymouth Station on the Kingston Line of the MBTA Commuter Rail system, which is located at 89 Trotter Road, and is connected to the Site by way of Trotter Road and Patriot Parkway, and the interconnected network of sidewalks, bicycle accommodations and pathways within the Site. The Project has also been designed to promote walking and bicycling, with sidewalks provided along one or both sides of the roadways within the development, pedestrian paths to connect development areas and recreational amenities, and bicycle accommodations that include both on- and off-road facilities. This network of pedestrian and bicycle accommodations will be extended as a part of the Project along the gateway roadways (Shea Memorial Drive, Bill Delahunt Parkway and Patriot Parkway/Trotter Road) to connect to Route 18, Weymouth Street and Hingham Street (via Reservoir Park Drive). The TDMC will promote the use of alternative modes of transportation to SOVs through promotional and public awareness programs that will be developed in conjunction with the Tri-Town TMA and will focus on the following factors/programs to incentivize travel mode changes:

Cost Savings

Ridesharing can reduce transportation costs; employees can typically deduct use of public transit from pre-tax or post-tax income; car insurance companies may offer discounts to employees that use public transportation as their primary commuting mode directly or through an annual mileage discount; and employers may have incentive programs that provide employees with rewards for use of non-SOV modes. Increased fuel prices can be avoided or minimized by increasing the use of non-motorized modes.

Public Transportation

The following services will be provided to encourage the use of public transportation and will be managed by the TDMC:

- Information on MBTA schedules and fares, and the schedule for the Tri-Town TMA shuttle, when established, will be made available to residents and employees, included in resident and employee informational packets and marketing information, and provided on the website for the Project.
- Commercial tenant(s) will be encouraged to allow employees to set aside pre-tax funds as allowable under the Commuter Choice provisions of the Federal Tax Code, including the MBTA "Perq for Work" program (formerly known as the Corporate Pass Program), which provides employees the opportunity to buy MBTA passes as a pre tax exemption.
- Transit screens or other equivalent displays will be provided in the lobby areas of multifamily residential buildings and commercial buildings (as appropriate) to display real-time traffic and bus location information (similar to https://transitscreen.com/).

Public Transportation Benefit

Lease agreements with commercial tenants will require that they become a member of the Tri-Town TMA and that they offer a monthly transportation benefit, capped at the cost of an unlimited bus/subway pass (Monthly LinkPass), to all employees who commute by a non-SOV mode for a minimum of three (3) days per week and register with the TDMC. The cost of this pass is currently $90 per month, and this cap will increase with each fare increase that is initiated by the MBTA to ensure that the benefit will allow employees to purchase an unlimited bus/subway pass each month. Eligible employees will have the freedom to spend the monthly transportation benefit in any way that they prefer – on transit fares, bicycle maintenance, gas for carpools, vanpool fees, walking shoes, etc.

The Proponent will coordinate with the MBTA to endeavor to locate CharlieCard purchase/recharge kiosks or other such system for the purchase or replenishment of public transit fares at appropriate locations within the Site defined in consultation with the MBTA that are accessible to employees and the public, and that meet the MBTA's customer service standards.

Ridesharing

The TDMC will market a ridematching program to facilitate carpooling by residents and employees. Information on ridematching services will be made available to residents and employees, included in the new employee and resident "welcome packets" and provided on corporate and residential community websites. In addition, preferential parking will be reserved or provided by commercial tenants for carpools and vanpools.

Car Sharing

The Proponent will work with a car-share provider to stage car-share vehicles at accessible locations within the Site for use by residents and by employees.

Pedestrian/Bicycle Program

In order to encourage walking and the use of bicycles as an alternative to the use of SOVs by residents and employees of the Project, the Proponent will implement the following measures:

- As appropriate, the Proponent will work with a bikeshare provider to establish a bikeshare program for the Project. Access to the bikeshare program will be made available at no ($0) cost to residents and employees of commercial tenants within the Site that register with the TDMC for the first year of residency or employment. Thereafter, a bikeshare fee structure will be established by the Tri-Town TMA that will be included in the dues assessment to members of the TMA as a means of subsidizing the service.
- Secure bicycle parking will be provided at appropriate locations within individual development sites. Bicycle parking will include both interior (covered) and exterior bicycle parking. It is anticipated that a minimum of one (1) bicycle parking space per 15 vehicle parking spaces will be provided for commercial uses and one (1) bicycle parking space for every five (5) automobile parking spaces will be provided for a multifamily residential or mixed-use development. It is anticipated that a minimum of six (6) bicycle parking spaces will be provided for any individual use or development area.
- Bicycle and pedestrian commuting options will be encouraged and marketed to residents and employees by the TDMC, including making available up-to-date pedestrian and bicycle maps for local and regional facilities, and the location of bicycle parking within the Project.
- Employees that walk or bicycle to work will have access to a shower, changing area and locker located within individual buildings subject to tenant fit-out requirements or in shared amenities buildings.
- To encourage safety, commercial tenants will be encouraged to offer reflective vests at no cost to all employees who walk or bicycle to work.

Emergency Ride Home

An Emergency Ride Home (ERH) program will be provided to all employees who commute to work by a non-SOV mode at least three (3) days per week. The ERH program will be coordinated by the TDMC and offered through the Tri-Town TMA, and will allow for a maximum of four (4) ERH per year per participating employee.

Flexible Work Schedules

In order to encourage the use of public transportation, the Proponent will encourage commercial tenants to offer employee work schedules that are flexible so as to be consistent with public transportation schedules and, to the extent permitted by corporate policies, allow employees the opportunity to work from home as a way to eliminate vehicle trips to the buildings.

Traffic Monitoring and Reporting Program

The Proponent will conduct post-development traffic and parking monitoring, and an employee survey program in order to evaluate the success and to refine the elements of the TDM program, and to validate the trip projections for the Project. The monitoring program will include the following:

i. Obtaining traffic volume information over a continuous seven day, weeklong period on the gateway roadways that serve the Site (Shea Memorial Drive, Bill Delahunt Parkway, Reservoir Park Drive and Patriot Parkway/Trotter Road);

ii. Performing turning movement counts and vehicle classification counts the following intersections during the weekday morning (7:00 to 9:00 AM), weekday evening (4:00 to 6:00 PM) and Saturday midday (11:00 AM to 2:00 PM) peak periods:
   - Route 53 at Middle Street (Intersection 2)
   - Middle Street at Winter Street (Intersection 3)
   - Liberty Street at Grove Street (Intersection 9)
   - Route 18 at West Street and Middle Street (Intersection 13)
   - Route 18 at Columbian Street (Intersection 14)
   - Pleasant Street at Park Avenue (Intersection 16)
   - Pine Street at Ralph Talbot Street (Intersection 20)
   - Route 53 at Derby Street and Gardner Street (Intersection 28)
   - Route 228 at Pond Street (Intersection 35)
   - Route 228 at Hingham Street and the Route 3 Southbound Ramps (Intersection 36)
   - Hingham Street at Reservoir Park Drive (Intersection 38)
   - Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive (Intersection 39)
   - Pond Street at Hollis Street and Derby Street (Intersection 42)
   - Route 18 at Pond Street and Pleasant Street (Intersection 43)
   - Route 18 at Shea Memorial Drive (Intersection 45)
   - Route 18 at Trotter Road (Intersection 49)
   - Route 18 at Pond Street (Intersection 50)
   - Shea Memorial Drive at Patriot Parkway and Bill Delahunt Parkway (Intersection 53)
   - Route 18 at Route 139 (Intersection 57)
   - Route 58 at Route 139 (Intersection 58)
   - Route 123 at Route 58 (Intersection 69)
   - Route 58 at Summer Street (Intersection 70)
   - Route 18 at Route 123 (Intersection 71)

iii. Performing a 12-hour (7:00 AM to 7:00 PM) turning movement count and vehicle classification count on an average weekday and Traffic Signal Warrants Analysis (TSWA) at the following intersections:
   - Columbian Street at Forest Street (Intersection 11)
   - Columbian Street at Park Avenue West (Intersection 12)
   - Weymouth Street at Sharp Street and Abington Street (Intersection 40)
   - Randolph Street at Forest Street (Intersection 41)
   - Trotter Road at Patriot Parkway (Intersection 51)
   - Memorial Grove Avenue at Snow Bird Avenue (Intersection 52)
   - Route 139 at Chestnut Street and Old Randolph Street (Intersection 55)

iv. Evaluating motor vehicle crash data at the monitored intersections;

v. Performing a survey of resident and employee commuting modes; and

vi. Providing ridership information for the Tri-Town TMA shuttle service.

The traffic volume data that forms the basis of the TIA (Appendix D) will be used as the baseline for measuring changes in vehicle dependent data. The monitoring program will commence within six (6) months after the earlier to occur of completion of 1,500 new dwelling units or 500,000 sf of new commercial space at the Project and will continue on an annual basis thereafter for a period not to exceed 10-years. The results of the monitoring program will be summarized in a report to be provided to MassDOT, the Metropolitan Area Planning Council (MAPC), the Old Colony Planning Council, and the towns of Abington, Rockland and Weymouth within 2-months after the completion of the data collection effort. The report will document: i) traffic volumes associated with the constructed portions of Project; ii) traffic operations (i.e., motorist delays, vehicle queuing and LOS), crash severity and calculated crash rates at the monitored intersections; iii) the results of the TSWA for the identified intersections; iv) the elements of the TDM program that have been implemented and use of alternative modes of transportation to single-occupant vehicles by residents and employees of the Project; and v) Tri-Town TMA shuttle service utilization.

If any of the following conditions are documented as a part of the monitoring program: i) the measured traffic volumes exceed the predicted traffic volumes for the constructed land uses as defined using trip-generation data published by the ITE for the appropriate land use(s) by more than 10 percent on a regular and sustained basis during the monitoring period; ii) there is a material increase in the number of motor vehicle crashes occurring at the gateway intersections that are attributable to the Project; or iii) the overall directional distribution of Project-related traffic as measured on the gateway roadways varies by more than 10 percent from the directional distributions that form the basis of this assessment; the Proponent will identify and undertake corrective measures in conjunction with the appropriate parties and subject to receipt of all necessary licenses, permits and approvals. These measures may include without limitation:

- Traffic signal timing modifications
- Sign and pavement marking improvements
- Wayfinding sign program to disperse trips between the gateway roadways
- On-site operation and management strategies that are designed to reduce overall and peak traffic volumes and parking demands
- Providing financial incentives for employees to carpool or use alternative modes of transportation to SOVs
- Offering free or reduced fees for bikeshare membership, carshare use and/or ridership fees for the Tri-Town TMA shuttle
- Expanding the Tri-Town TMA shuttle service to include service to other commuter hubs (Braintree Station, Logan Express, etc.) and employment centers

The identified corrective measures, if any, will be documented in the transportation monitoring program report, and will identify the appropriate parties responsible for implementation (assumed to be the Proponent unless the corrective measure(s) are a part of a committed improvement project or plan that is scheduled to be implemented by others), required approvals, and the timeline for implementation. The status of implementation of the identified improvement measure(s) will be documented in the subsequent monitoring report.

As detailed throughout the attached TIA, with implementation of the aforementioned recommendations, safe and efficient access will be provided to the Site and the Project can be accommodated within the confines of the existing and improved transportation system.

9.0 CONSTRUCTION PERIOD

9.1 CONSTRUCTION PHASING

The Project is anticipated to be constructed over a 12-15 year buildout period given the Project size and scale. This buildout period will help dissipate and mitigate anticipated impacts from construction, as well as allow the Project to respond to changing market conditions over time.

Table 9-1 Project Schedule

Activity	Schedule Estimated Start/End
Zoning Approval	2023
Local & State Permitting Approvals	2024
Construction Start (Demo and Construction)	2025
Approximate Anticipated Completion	2040

9.2 POTENTIAL IMPACTS

Impacts associated with Project construction activities are temporary in nature and are typically related to truck traffic, air (dust), noise, stormwater runoff, solid waste, and vibration. For each portion of Project development, the Proponent will develop a Construction Management Plan ("CMP"), which will be informed by input from, and ultimately approved by, the SRA. The CMPs will include detailed information on construction activities, specific construction mitigation measures, and vehicle routing and staging to minimize impacts to the adjacent neighborhoods. A fully permitted, centralized dewatering system will be constructed to receive and appropriately treat dewatering influent from the majority of the primary construction sites in regulated areas.

9.3 COMMUNITY AWARENESS

Throughout the construction of the Project, development team members will regularly communicate status of the construction and associated impacts through a variety of means. The community will be informed about the on-going construction activities, schedule updates, and potential community impacts. Additionally, the Project's website will be updated with current status and construction schedules and will have a link for community input, questions, or concerns. This website will be monitored, and all inquiries will be responded to and addressed as needed.

9.4 DRAFT CONSTRUCTION MANAGEMENT PLAN (CMP)

The purpose of this Draft CMP is to outline and review the approach for proposed construction activity and minimize the impacts to the surrounding areas where possible. The following sections generally describe the potential construction-period impacts and proposed CMP elements that are subject to refinement and modification as the design of the Project progresses.

9.4.1 Material Management, Staging, and Delivery Routes

The limits of the construction zones will be fenced and secured to properly maintain safety between the construction zone and the community. Additionally, secure on-site storage will be provided for tools and equipment in an effort to minimize construction related vehicle trips to the site.

Designated truck routes will be established in coordination with the SRA and local Town departments to govern how trucks access the Site. The goal of this commitment is to have construction trucks avoid travelling through surrounding residential areas and pedestrian-oriented corridors to the extent practical.

Prior to the implementation of any planned construction activities within the public right-of-way, the contractor will prepare a traffic and pedestrian management plan for review.

9.4.2 Pedestrian and Bicycle Safety

The Project may require work zones that include impacts to roadways and sidewalks surrounding an immediate work site. Examples of how impacts to pedestrian and bicycles will be accommodated during these work zone impairments include the following:

- Gate entrances into the construction area will be established to minimize impacts on adjacent ways. Additionally, signage and temporary crosswalk will be created, if needed, to redirect pedestrian and bicycle traffic around the Site.
- Pedestrian routes will be shifted, as necessary, into existing vehicle travel lanes. In those cases, pedestrian lanes will be protected by jersey barriers and fencing, and ADA accommodations will be provided.
- Pedestrian walkways may be covered for overhead protection and if so will be illuminated.
- If bike lanes are affected, they will be shifted appropriately and striped accordingly.

9.4.3 Noise Impacts and Work Hours

Every reasonable effort to minimize noise impact from Project construction activities will be considered and implemented, including (but not limited to):

- Use of appropriate mufflers on all equipment and on-going maintenance of intake and exhaust mufflers, and alternative items of equipment when possible;
- Turning off idling equipment;
- Use of less noisy construction operations and techniques where feasible (e.g., mixing concrete off-site instead of on-site); and
- Scheduling equipment operations to keep average levels low, such as by synchronizing noisiest operations with times of highest ambient levels, and to maintain relatively uniform noise levels.

Construction work hours will be coordinated with the SRA and local Town Departments to ensure that construction activities occur during permitted hours. While the majority of Project construction will occur within the allowed construction hours, it is anticipated that there will be limited activities that may require work be done outside these timeframes for the purposes of traffic mitigation and pedestrian safety. These activities will be limited and will be appropriately permitted through the SRA and local Town Departments with proper notice provided to the community.

9.4.4 Waste Management

The general contractor for each portion of Project development will be responsible for the reprocessing and recycling of construction waste. There will be specific requirements to ensure that construction procedures allow for segregation, reprocessing, reuse, and recycling of materials. In any event, construction and demolition waste will be removed from the site via licensed waste haulers to a licensed recycling center for separation, reprocessing, and recycling. For materials that cannot be recycled, solid waste will be transported in covered trucks to an approved solid waste facility, in accordance with MassDEP Regulations for Solid Waste Facilities. All waste containers will be covered prior to exiting the Site.

The general contractor will also be required to adhere to best management practices for reducing the environmental impacts of dust generated by demolition and construction activities. For example, wetting agents will be used to keep dust at a minimum and exposed soils will be covered or treated with soil bonding agents. All trucks leaving the site will be covered and tires cleaned before entering public roads. Storage of on-site construction and demolition debris will be managed such that they are not stored on site for any duration where dust becomes an issue, and all dumpsters will be shipped off site on a regular schedule. Finally, streets and sidewalks will be cleaned on a regular basis to prevent debris and dust from leaving the Site.

Pre-demolition surveys, including asbestos surveys, will be conducted, and submitted to the corresponding Town with the building/ demolition permits. Should any asbestos containing materials be discovered during any pre-demolition surveys or during the course of demolition, they will be abated by a licensed contractor in accordance with MassDEP Asbestos regulations.

9.4.5 Sitework, Off-Road Vehicles and Emissions

Project sitework includes foundation preparation, utility construction, and landscaping/hardscaping. Should contamination be discovered during any excavation that has not been previously identified, construction will be stopped immediately and a Licensed Site Professional (LSP) will be notified. Remediation, if warranted, will be conducted in accordance the MassDEP Massachusetts Contingency Plan.

All sitework contractors will be required to ensure their equipment is not only in good working condition but is equipped with emission control devices to minimize VOCs, CO, and particulate matter. All off-road vehicles will be required to use ultra-low sulfur diesel fuels.

10.0 MITIGATION MEASURES

This section summarizes proposed mitigation measures for the Project. The proposed mitigation implementation plan in Section 10.6 identifies commitments to implement the Project's mitigation measures, the parties responsible for implementation and a schedule for the implementation of such measures. As noted throughout this filing, implementation of described mitigation measures is subject, in all events, to receipt of all necessary permits and approvals.

Some of the mitigation measures planned in the 2007 FEIR have since been constructed, including widening Route 18, other transportation improvements outlined in Table 7-12 of Appendix D, and wildlife habitat and rare species mitigation as described in Section 6.3.1,. However, the mitigation set forth in this filing covers, in its entirety, any and all mitigation required for development of the 2023 Modified Development Program notwithstanding anything that had previously been committed to in connection with the Project.

The following section presents an overview of the proposed mitigation measures to be taken by the Project to avoid, minimize, or mitigate environmental impacts and to provide public benefits, especially as related to:

- Air Quality & GHG Emissions
- Wildlife Habitat and Rare Species
- Open Space
- Utilities and Infrastructure
- Transportation

The implementation of any mitigation measures identified within this filing is subject to the receipt of all necessary federal, state and local permits and approvals. As presented further below, the benefits of the Project outweigh the impacts.

10.1 GREENHOUSE GAS & AIR QUALITY MITIGATION

The greenhouse gas (GHG) emissions assessment provided in Section 6.6 of this filing demonstrates that the Project has been designed to support the GHG reduction goals of the Project, Commonwealth and Towns of Weymouth, Abington and Rockland. This assessment also satisfied the MEPA GHG Policy because it estimates the potential Project-related GHG emissions, and incorporates reasonable and feasible mitigation measures to reduce such emissions for the 2023 Modified Development Program.

As detailed in the full GHG report (Appendix B) and Section 6.6 of this filing, the Project design includes the following building design and operational energy efficiency measures (EEMs) to mitigate potential impacts of the Project. The Baseline Code is the 10th Edition of the Massachusetts Building Code that includes the 2021 IECC Commercial Code with Massachusetts amendments and the 2023 Stretch Code:

- For the commercial buildings, which include the multi-family residential buildings, the following building design and operational energy efficiency measures (EEMs) to reduce GHG emissions will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the EEA "Greenhouse Gas Emissions Policy and Protocol" (May 5, 2010), including:
  - Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope.
  - Higher efficiency than Code heating and cooling systems.
  - VRF Air Source Heat Pumps (ASHPs) with simultaneous heating and cooling in the office portion of the warehouse, life science R&D, office, multi-family residential, and retail buildings.
  - Energy Recovery Ventilation (ERV) for the warehouses, life science R&D building, the office buildings, and the retail buildings with an enthalpy recovery ratio of 70% at heating and cooling design conditions. ERV for the multi-family residential buildings with an enthalpy recovery ratio of 75% at heating and cooling design conditions.

  - Reduced wall air infiltration rate not exceeding 0.25 cfm/sf at 75 Pa test pressure in the five warehouses. Stretch code infiltration rate of 0.35 cfm/sf for the other commercial buildings.
  - Reduced solar gain via low-SHGC window glass and external shades on west and south facing windows.
  - High efficiency electric hot water systems with heat pump hot water heaters in the warehouses, life science R&D building, office buildings, and retail buildings, and electric resistance hot water systems for the multi-family residential buildings.
  - Interior and exterior LED lighting systems with light power density (LPD) lower than Code.
  - Twenty percent (20%) of passenger vehicle parking spaces will be EV-ready for the multi-family residential buildings, and ten percent (10%) of passenger vehicle parking spaces will be EV-ready for the other commercial buildings.
  - Solar-ready space on commercial building roofs equals 80% of available flat roof area, and on single-family homes and townhouses 50% of pitched roof area

- For the single-family homes and townhouse units, the following building design and operational energy efficiency measures (EEMs) to reduce GHG emissions will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the EEA "Greenhouse Gas Emissions Policy and Protocol" (May 5, 2010) and as outlined in the GHG report (Appendix B), including:
  - Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope.
  - Higher efficiency than Code ASHPs for heating and cooling.
  - ERV with a sensible heat recovery of 65% at 32F.
  - Electric resistance hot water systems.
  - Interior and exterior LED lighting with LPD lower than Code.
  - One EV-ready space for each single-family home and townhouse unit.
  - Solar ready space on the roof of each single-family home and townhouse unit.

Table 6-6 (Appendix B) demonstrates that the 2023 Modified Development Program will reduce CO_2 emissions (for stationary sources) by 15.4% compared to the Base Case.

In addition to the above, operational mobile source air quality impacts will be minimized through the proposed Transportation Improvement Program described in Section 10.9 (e.g., bicycle storage, transit subsidies and on-site transportation coordinator). As discussed in Section 2.4 (Appendix B), Transportation Demand Management (TDM) measures for the Project will reduce Project-related motor vehicle CO_2 emissions by 2%. The net reduction of the Project's total CO_2 emissions (stationary sources plus transportation) is 10.6% compared to the Base Case.

10.2 WILDLIFE HABITAT AND RARE SPECIES MITIGATION

The design of the 2023 Modified Development Program was informed by general wildlife habitat and the specific rare species present at SWNAS. Overall, wildlife habitat corridors will be incorporated into the "runways to greenways" design as shown in the open space plan (Figure 6-1) and described below. Direct impacts to habitat have been reduced by focusing the proposed redevelopment primarily in previously developed areas of the Base, including the areas occupied by buildings, runways and taxiways, and other paved areas. Permanent protection of upland and wetland wildlife habitat will be achieved through the creation of 519 acres of restricted areas as shown on Figure 6-1.

The Proponent is proposing a robust grassland mitigation plan. For example, the Project includes processing the debris piles (currently covering over 12 acres at the Base), as needed, removing or spreading material, as appropriate, and creating grassland in the runway and taxiway areas. In order to restore and maintain the wildlife habitat that once existed at the Base, the Project includes the

creation of a minimum of 104 acres of high-quality grassland habitat through various renovation, creation, restoration, and long-term maintenance activities. These grassland mitigation areas will be managed and maintained, in perpetuity, in order to preserve the grassland habitat at SWNAS.

Off-site mitigation for grassland habitat impacts will be in the form of escrow funds similar to what was required in the 2009 CMP. The escrow funds will be calculated based on numerous factors including level of concern (i.e., Endangered, etc.), on-site mitigation proposed, and mitigation ratio required.

Acknowledging the importance of protecting the Eastern Box Turtle habitat at the Base, the Proponent has ensured that the proposed future development at the Base will have no impacts on such Eastern Box Turtle habitat. Further, the Proponent anticipates the following mitigation measures to further protect the Eastern Box Turtle:

- Construction monitoring (if work is proposed in or near turtle habitat);
- Turtle nesting mitigation plan (nesting areas or Habitat Management Areas have already been constructed);
- Long-term monitoring plan of the turtle population; and
- Habitat monitoring and management of the nesting areas.

In addition to the benefits for the Eastern Box Turtle habitat described above, the creation of one large contiguous area of grassland will provide for optimal acreage to be used by not only the Grasshopper Sparrow but also the Upland Sandpiper, which requires more acreage for optimal breeding grounds.

10.3 OPEN SPACE MITIGATION

As detailed throughout this filing, the 2023 Modified Development Program provides a framework for converting the runways to greenways, thereby transforming the existing runways into a new open space system for SWNAS. The new greenways would create north-south open space connections that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base, while also introducing a perimeter buffer to the adjacent communities. For example, the existing north/south runway (100-200 feet wide) would be transformed into new greenways/flow-ways built in its place. This new open space would constitute a long linear park of green blocks. This park would contain a continuous channel controlled at the roadway crossings forming each long block. These control points would provide the ability to treat and control runoff in the landscaped greenways.

10.4 UTILITIES AND INFRASTRUCTURE MITIGATION

The following sections summerize proposed mitigation measures related to water, wastewater and stormwater impacts associated with the Project.

10.4.1 Water

Section 7.1 describes both the permanent water supply solution of Weymouth and the SRA joining the MWRA to supply the entire Project, and the interim period solution (i.e., for the time between when the construction of the 2023 Modified Development Program Begins and when the new MWRA connection is in service). Alternatives to each are also described. The collaborative efforts of the Proponent, SRA and the Town have produced a water supply plan that not only supplies the future Base and Town demand but opens the possibility of future regional supplemental or emergency supplies. That plan is a significant departure from the approach used in all prior MEPA filings for the Project. In those filings, the Town of Weymouth only provided limited interim water while the SRA implemented a supply connection to the MWRA or Aquaria/Brockton to serve only the Base. The present Weymouth/MWRA planning is to bring a transmission main connection to Weymouth capable of delivering the future

MWRA SHS system capacity of 15.6mgd and retain Weymouth's current surface water supply and its water treatment facility. That combination of supplies opens the possibility of significant increase in additional multi-party mutual benefits.

The Proponent has contributed an equal share with the Town and the SRA to fund their MWRA application to date. The Proponent has also served and continues to serve on the Weymouth/MWRA Task Force to have Weymouth/SRA join as member communities of MWRA Water.

The Proponent will install all on-site community water and fire protection facilities to meet Town standards, inspections and testing.

The proponent will also implement native planting landscaping and install water saving, low-flow fixtures in buildings and require such fixtures in tenant documents to conserve water.

Finally, the Proponent will contribute a fair share contribution to the costs of off-site infrastructure improvements required to serve the 2023 Modified Development Program as it is built out over time.

10.4.2 Wastewater

Section 7.2 describes the three-town approach for sewerage facilities serving the Project. The Weymouth portion of the Base will continue to discharge to the Weymouth system (an existing MWRA wastewater community). Abington's portion will discharge to the Abington system and into Brockton for treatment under its existing 1.5mgd intermunicipal agreement. Rockland's portion will go to the Rockland system for treatment.

The Proponent is working cooperatively with all three communities to develop a plan for necessary system improvements to serve the 2023 Modified Development Program to be implemented over time to meet future demands. The SRA working with the Proponent and the Town of Weymouth, has already (i) funded a system capacity analyses to identify needs; and (ii) paid for and installed a new Town sewer in the recently-widened Route 18, which currently serves the off-Base development in that highway corridor, and will serve a portion of the future Base redevelopment.

The Proponent will work with the Abington DPW to implement the connection and system improvements needed to add the Abington portion of the Base.

The Proponent has agreed to participate in a facilities improvements working committee with the Rockland Sewer Commission and agreed to fund the participation of the Town's consultants on system I/I reductions, the WWTP improvements and WWTP operations.

The Proponent will contribute a fair share contribution to the costs of off-site infrastructure improvements required to serve the 2023 Modified Development Program as it is built out over time.

10.4.3 Stormwater

As described in Section 7.3, the SMP sets the general framework for the Project to comply with the Massachusetts Stormwater Management Standards in accordance with the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.00). Any increase in runoff resulting from the 2023 Modified Development Program will be mitigated with the implementation of stormwater management/ detention basins. The SMP provides the basic stormwater management protocols and patterns for drainage, this management approach will significantly reduce the future fully developed runoff in major storms by approximately 20% in peak flows leaving the Base in the French's Stream Basin and nearly 50% in the Old Swamp River Basin from existing peak runoff rates. A specific project review process has been developed by which individual future developments will be reviewed for consistency with the SMP.

10.5 TRANSPORTATION MITIGATION

As detailed in Section 8.0 of this filing and the TIA attached as Appendix D, a detailed transportation improvement program has been developed for the Project that is designed to provide safe and efficient access to the Site and address any deficiencies identified at off-site locations evaluated in conjunction with the transportation study. As detailed in the attached TIA, the recommended improvement measures have been classified into four categories: 1) Project Site Access; 2) Off-Site Improvements; 3) Transportation Demand Management (TDM); and 4) Traffic Monitoring; and, where applicable, will be completed in conjunction with the Project subject to receipt of all necessary licenses, permits, and approvals. As shown on Table 7-12 in Appendix D, the elements of the transportation improvement program will be implemented to coincide with the anticipated build-out of the Project, generally organized into the following "tiers" of development:

- **Tier 1:** To be completed prior to issuance of the first final certificate of occupancy for the 2023 Modified Development Program (i.e., those improvements focused on the "gateway" intersections to the Site);
- **Tier 2:** To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 1,500 dwelling units or 500,000 commercial square feet of the 2023 Modified Development Program;
- **Tier 3:** To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units or 1,000,000 commercial square feet of the 2023 Modified Development Program;
- **Tier 4:** To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 6,000 dwelling units or 2,000,000 commercial square feet of the 2023 Modified Development Program; and
- **Tier 5:** To be completed when warranted based on ongoing Traffic Monitoring (described below).

The Project will continue to be advanced in a manner that promotes mobility and the use of alternative modes of transportation to single-occupancy vehicles (SOVs). To complement this design approach, a Tri-Town Transportation Management Association will be established to manage and promote trip-reduction programs for the Project, and will include a shuttle service that will link the building areas within the Project site to the South Weymouth Commuter Rail Station. The annual Traffic Monitoring program that will be implemented as a part of the Project will be used to measure the success of the trip-reduction program and to allow for refinements and expansion of the program, as necessary. The Traffic Monitoring program will also be used to determine the timing and need for the specific improvement measures that are defined in the TIA based on measured conditions.

As detailed throughout the TIA, with the implementation of the recommendations defined therein, safe and efficient access will continue to be provided to the Site and the re-envisioned Project can be accommodated within the confines of the existing and improved transportation system.

10.6 PROPOSED MITIGATION IMPLEMENTATION PLAN

As detailed in this filing, the Proponent, where practicable, will mitigate or compensate for unavoidable impacts of the Project. Table 10-1 summarizes the Proponent's proposed mitigation commitments to be implemented in conjunction with the Project, as well as anticipated timing for implementation and parties responsible for such measures. As demonstrated throughout this filing and detailed on the following table, the benefits of the Project outweigh any unavoidable impacts of the Project.

Table 10-1 Proposed Mitigation Implementation Plan

Mitigation Measure	Responsible Party	Timing
TRANSPORTATION		
Signal systems and geometric improvements at the Base, including: • Realignment of the Shea Memorial Drive/Memorial Grove Avenue intersection; • Installation of traffic signal systems at certain Base intersections; and • Widening sections of Trotter Road, Patriot Parkway, Memorial Grove Avenue and Snow Bird Avenue to provide additional approach and turn lanes.	Proponent	To be completed prior to issuance of the first final certificate of occupancy for the 2023 Modified Development Program
Signal systems and geometric improvements at the Base, including: • Improvements to existing roadway cross-sections on portions of Bill Delahunt Parkway, Shea Memorial Drive and Reservoir Park Drive to facilitate the addition or expansion of pedestrian and bicycle accommodations; • Installation of traffic signal systems at the Columbian Street / Forest Street, Columbian Street / Park Street West, Weymouth Street / Sharp Street/ Abington Street and Randolph Street / Forest Street intersections; • Widening Columbian Street to provide turn lanes; and • Widening the Weymouth Street / Sharp Street/ Abington Street and Randolph Street / Forest Street intersections to provide turn lanes	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 1,500 dwelling units or 500,000 commercial square feet of the 2023 Modified Development Program
Signal systems, geometric improvements, including: • Installation of traffic calming measures at certain intersections; • Widening Pine Street to provide a turn lane; • Widening Bill Delahunt Parkway and Reservoir Park Drive to provide an additional travel lane; and • Optimization of traffic signal timing at the Weymouth Street / Bill Delahunt Parkway / Reservoir Park Drive intersection.	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units or 1,000,000 commercial square feet of the 2023 Modified Development Program
Signal systems, geometric improvements, including: • Widen Pine Street, Ralph Talbot Street, Thicket Street, Lincoln Street and portions of Route 18 and Route 123 to provide turn lanes; and • Optimization of traffic signal timing at certain intersections.	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 6,000 dwelling units or 2,000,000 commercial square feet of the 2023 Modified Development Program

Mitigation Measure	Responsible Party	Timing
Signal systems and geometric improvements at the Base, including: • Improvements to existing roadway cross-sections on portions of Bill Delahunt Parkway, Shea Memorial Drive and Reservoir Park Drive to facilitate the addition or expansion of pedestrian and bicycle accommodations; • Installation of traffic signal systems at the Columbian Street / Forest Street, Columbian Street / Park Street West, Weymouth Street / Sharp Street/ Abington Street and Randolph Street / Forest Street intersections; • Widening Columbian Street to provide turn lanes; and • Widening the Weymouth Street / Sharp Street/ Abington Street and Randolph Street / Forest Street intersections to provide turn lanes.	Proponent	To be completed if and when warranted based on results of the ongoing Traffic Monitoring Program to be implemented as part of the Project, and detailed in the attached TIA
Transportation Demand Management (TDM) measures, including:	Proponent (and Tri-Town TMA following its initial funding and establishment) / Respective Tenants or Operators of each building	
• Initial funding to establish a Tri-Town Transportation Management Association (TMA);	Proponent (and Tri-Town TMA following its initial funding and establishment) shuttle service to be based on demand	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 1,500 dwelling units or 500,000 commercial square feet of the 2023 Modified Development Program
• Designation of a full-time TDM Coordinator (TDMC);	Proponent	To be completed prior to issuance of the first final certificate of occupancy for the 2023 Modified Development Program

Mitigation Measure	Responsible Party	Timing
• Initial funding for the Tri-Town TMA shuttle service;	Proponent (and Tri-Town TMA following its initial funding and establishment)	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units or 1,000,000 commercial square feet of the 2023 Modified Development Program
• Provision of pedestrian and bicycle accommodations throughout the Base (e.g., bikeshare program and bicycle parking);	Proponent	Commencing with construction and ongoing with development of the Project
• Requirement that commercial tenants become a member of the Tri-Town TMA and offer a monthly transportation benefit; and	Proponent / Respective Tenants or Operators of each building	Commencing with construction of commercial component and ongoing with development of the Project
• Provision of carshare vehicles at the Base.	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 1,500 dwelling units or 500,000 commercial square feet of the 2023 Modified Development Program
• Traffic Monitoring and Reporting Program	Proponent	Commencing within six (6) months after the earlier to occur of completion of 1,500 new dwelling units or 500,000 sf of new commercial space of the 2023 Modified Development Program and will continue on an annual basis thereafter for a period not to exceed 10-years

Mitigation Measure	Responsible Party	Timing
AIR QUALITY AND GREENHOUSE GAS (GHG) EMISSIONS		
For the commercial buildings, which include the multi-family residential buildings, the following building design and operational energy efficiency measures (EEMs) to reduce GHG emissions will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the EEA "Greenhouse Gas Emissions Policy and Protocol" (May 5, 2010) and as outlined in the GHG report (Appendix B), including: • Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope. • Higher efficiency than Code heating and cooling systems. • VRF Air Source Heat Pumps (ASHPs) with simultaneous heating and cooling in the office portion of the warehouse, life science R&D, office, multi-family residential, and retail buildings. • Energy Recovery Ventilation (ERV) for the warehouses, life science R&D building, the office buildings, and the retail buildings with an enthalpy recovery ratio of 70% at heating and cooling design conditions. ERV for the multi-family residential buildings with an enthalpy recovery ratio of 75% at heating and cooling design conditions. • Reduced wall air infiltration rate not exceeding 0.25 cfm/sf at 75 Pa test pressure in the five warehouses. Stretch code infiltration rate of 0.35 cfm/sf for the other commercial buildings. • Reduced solar gain via low-SHGC window glass and external shades on west and south facing windows. • High efficiency electric hot water systems with heat pump hot water heaters in the warehouses, life science R&D building, office buildings, and retail buildings, and electric resistance hot water systems for the multi-family residential buildings. • Interior and exterior LED lighting systems with light power density (LPD) lower than Code. • Twenty percent (20%) of passenger vehicle parking spaces will be EV-ready for the multi-family residential buildings, and ten percent (10%) of passenger vehicle parking spaces will be EV-ready for the other commercial buildings. • Solar-ready space on commercial building roofs equals 80% of available flat roof area, and on single-family homes and townhouses 50% of pitched roof area.	Provision of carshare vehicles at the Base.	Each building to provide, to the extent applicable, at the time of construction

Mitigation Measure	Responsible Party	Timing
For the single family homes and townhouse units, the following building design and operational energy efficiency measures (EEMs) to reduce GHG emissions will be utilized, as necessary, to achieve the GHG emissions reductions consistent with the EEA "Greenhouse Gas Emissions Policy and Protocol" (May 5, 2010) and as outlined in the GHG report (Appendix B), including: • Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope. • Higher efficiency than Code ASHPs for heating and cooling. • ERV with a sensible heat recovery of 65% at 32F. • Electric resistance hot water systems. • Interior and exterior LED lighting with LPD lower than Code. • One EV-ready space for each single-family home and townhouse unit. • Solar ready space on the roof of each single-family home and townhouse unit.	Proponent / Developer or Owner of each building	Each building to provide, to the extent applicable, at the time of construction
OPEN SPACE, WILDLIFE HABITAT AND RARE SPECIES		
Measures to protect the Eastern Box Turtle habitat at the Base, including: • Construction monitoring (if work is proposed in or near turtle habitat such as grassland mitigation or stormwater improvements); • Turtle nesting mitigation plan (nesting areas or Habitat Management Areas have already been constructed); • Long-term monitoring plan of the turtle population; • Ongoing mowing and maintenance of habitat areas; and • Habitat monitoring and management of the nesting areas.	Proponent	Ongoing pursuant to the 2009 CMP as the same may be amended
Creating a new open space system at the Base that includes north-south open space connections that link the forested open space on the north side of the Base to proposed conservation land on the south side of the Base, while also introducing a perimeter buffer to the adjacent communities.	Proponent	Work to be ongoing consistent with development of the Project
Entering into title restrictions to protect approximately 519 acres at the Base for open space and public benefit uses.	Proponent	To be completed prior to issuance of the first final certificate of occupancy for the 2023 Modified Development Program

Mitigation Measure	Responsible Party	Timing
Escrow of funds for the off-site mitigation of grassland impacts, to be calculated based on numerous factors including level of concern (i.e., Endangered, etc.), on-site mitigation proposed, and mitigation ratio required.	Proponent	To be completed prior to issuance of the first final certificate of occupancy for the 2023 Modified Development Program
Processing the existing debris piles, as needed, removing or spreading material, as appropriate, and creating grassland in the runway and taxiway areas.	Proponent	As located within the approximately 104-acre grassland restoration area, to be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units or 1,000,000 commercial square feet of the 2023 Modified Development Program As located outside of the approximately 104-acre grassland restoration area, to be completed prior to issuance of the first final certificate of occupancy following completion of construction of 6,000 dwelling units or 2,000,000 commercial square feet of the 2023 Modified Development Program
Creation of a minimum of 104 acres of high-quality grassland habitat through various renovation, creation, restoration, and long-term maintenance activities at the Base.	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units or 1,000,000 commercial square feet of the 2023 Modified Development Program

Mitigation Measure	Responsible Party	Timing
UTILITIES AND INFRASTRUCTURE		
WATER		
Install water conservation fixtures and low irrigation demand landscaping.	Proponent / Developer or Owner of each building	Each building to provide, to the extent applicable, at the time of construction
Continue to work with the Town of Weymouth and the SRA, participate in the Weymouth/MWRA task force and support, advance and assist in expediting their application to join the MWRA, including cost sharing of the application and MEPA filing preparation.	Proponent	Ongoing, until a solution is determined and implemented
Continue discussions with the City of Brockton, Aquaria Water, and the ARJWB on alternative or interim water supply for the Base and potential mutually beneficial measures, their costs and possible pro rata cost sharing.	Proponent	Ongoing, until a solution is selected and implemented
WASTEWATER[10]		
Assist the Town of Weymouth in implementing the replacement of the LCI-Tide Mill Brook Marsh and Essex Street Sewers	Proponent and Town of Weymouth	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 1,500 dwelling units and 500,000 commercial square feet of the 2023 Modified Development Program
Replace 3,750 lf of sewers in Liberty and Union Streets, Weymouth	Proponent and Town of Weymouth	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units and 1,000,000 commercial square feet of the 2023 Modified Development Program

[10] All of the above projects in Weymouth are listed as currently needed in the Town of Weymouth Water and Sewer Capacity Analysis, November 2022 (EPG Final Report).

Mitigation Measure	Responsible Party	Timing
Replace 500 lf of sewer off of Main Street, Weymouth	Proponent and Town of Weymouth	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units and 1,000,000 commercial square feet of the 2023 Modified Development Program
Replace 11,450 lf of Mill River Trunk Sewer in easements; Mill Street to Main Street, Weymouth	Proponent and Town of Weymouth	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 6,000 dwelling units and 2,000,000 commercial square feet of the 2023 Modified Development Program
Participate and support the Rockland Sewer Commission System Improvements Working Committee	Proponent	Ongoing; have funded engagement of consultants and arranged initial meetings
Upgrade portions of local sewers to accommodate new discharge from Abington portion of the Base	Proponent	To complete system upgrades as necessary and appropriate in conjunction with new development in Abington associated with the 2023 Modified Development Program
STORMWATER		
Construct of first area basin and intercept and connect twin 42” main drain to basin	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 1,500 dwelling units and 500,000 commercial square feet of the 2023 Modified Development Program
Implement TACAN basin improvements: remove existing Navy road crossing; install new outfall control structure at twin 60” culvert; remove old Navy structures.	Proponent	To be completed prior to issuance of the first final certificate of occupancy following completion of construction of 3,000 dwelling units and 1,000,000 commercial square feet of the 2023 Modified Development Program

Mitigation Measure	Responsible Party	Timing
Construct Old Swamp River basins, as described in Section 7.3	Proponent	To be completed as necessary and appropriate in conjunction with new development associated with the 2023 Modified Development Program in areas of Rockland and Weymouth tributary to the Old Swamp River
Construct the West Greenway/Floway basins as described in Section 7.3	Proponent	To be completed as necessary and appropriate in conjunction with new development associated with the 2023 Modified Development Program in areas of Rockland and Weymouth tributary to the Old Swamp River in areas of Abington tributary to the West Greenway.

11.0 DRAFT SECTION 61 FINDINGS

In accordance with M.G.L. c. 30, section 61 and regulations found at 301 CMR 11.07(6)(k), any state agency that takes Action on a project for which the Secretary requires an EIR shall determine whether a project is likely, directly or indirectly to cause damage to the environment and make a finding describing the damage to the environment and confirming that all feasible measures have been taken to avoid or minimize such damage.

The following Section 61 Findings summarize the impacts and mitigation measures for the Project. Except as otherwise noted, the Proponent will be responsible for implementing all the mitigation measures. Specifically, these draft findings pertain to the following state agency permits:

- Massachusetts Department of Transportation – Highway Access Permit
- Natural Heritage and Endangered Species Program - Conservation and Management Permit
- Executive Office of Energy and Environmental Affairs

11.1 MASSDOT

A detailed transportation improvement program has been developed that is designed to provide safe and efficient access to the Project site and address any deficiencies identified at off-site locations evaluated in conjunction with this study. The recommended improvement measures include: Off-Site Improvements; Transportation Demand Management (TDM); and Traffic Monitoring; and, where applicable, will be completed in conjunction with the Project subject to receipt of all necessary licenses, permits, and approvals.

Off Site Improvements

The recommended off-site improvements have been developed to: i) address existing and predicted future capacity constraints; ii) to off-set the predicted impact of the Project; and iii) to enhance safety at intersections identified as high crash locations. The recommended improvements have been structured to build-upon or expand the improvements that were identified for the Project as a part of the 2007 FEIR,[11] with additional improvements identified where necessary to address the impacts of the 2023 Modified Development Program.

Table 7-12, of the TIA attached as Appendix D, summarizes the elements of the transportation improvement program for the Project, the schedule for implementation and the responsible party, as well as indicating if the improvement measure was defined in the 2007 FEIR. The schedule for implementation was aggregated into five (5) tiers to coincide with the anticipated build-out of the Project:

- ***Tier 1*** – To be completed prior to the issuance of a Certificate of Occupancy for any new development associated with the 2023 Modified Development Program;
- ***Tier 2*** – To be completed prior to the issuance of a Certificate of Occupancy for any new commercial building that alone or in aggregate exceeds 500,000 sf, or for new residential development that alone or in aggregate exceeds 1,500 dwelling units associated with the 2023 Modified Development Program;
- ***Tier 3*** – To be completed prior to the issuance of a Certificate of Occupancy for any new commercial building that alone or in aggregate exceeds 1,000,000 sf, or for new residential development that alone or in aggregate exceeds 3,000 dwelling units associated with the 2023 Modified Development Program;
- ***Tier 4*** – To be completed prior to the issuance of a Certificate of Occupancy for any new commercial building that alone or in aggregate exceeds 2,000,000 sf, or for new residential

[11] Epsilon, et al; op. cit. 7-1 June 17, 2007.

development that alone or in aggregate exceeds 6,000 dwelling units associated with the 2023 Modified Development Program; and

- ***Tier 5*** – To be completed if and when warranted based on the results of the annual Traffic Monitoring and Reporting Program associated with the 2023 Modified Development Program (discussion follows)

The following provides additional detail on the improvements that have been recommended as a part of the TIA.

Traffic Operations

Traffic Signal Installation

The addition of future Project-related traffic to the following intersections was shown to result in a change in operating conditions that may necessitate the implementation of specific traffic control improvements, including the installation of a traffic control signal:

- *Columbian Street at Forest Street* (Intersection 11)
- *Columbian Street at Park Avenue West* (Intersection 12)
- *Weymouth Street at Sharp Street and Abington Street* (Intersection 40)
- *Randolph Street at Forest Street* (Intersection 41)
- *Trotter Road at Patriot Parkway* (Intersection 51)
- *Memorial Grove Avenue at Snow Bird Avenue* (Intersection 52)
- *Route 139 at Chestnut Street and Old Randolph Street* (Intersection 55)

At the present time, the subject intersections do not appear to meet the necessary warrants as defined in the MUTCD for the installation of a traffic signal. As such, the Proponent will monitor traffic volumes, operating conditions and motor vehicle crash data at these intersections as a part of the annual Traffic Monitoring and Reporting Program (discussion follows). If and to the extent that the installation of a traffic signal is found to be warranted and the installation is desirable by the community within which the intersection is located, the Proponent will design and construct a traffic control signal at the intersection pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D) to the extent that the improvements can be completed within the public right-of-way and subject to receipt of all necessary licenses, permits and approvals.

With the installation of a traffic control signal and associated geometric improvements (where necessary) at the subject intersections, overall intersection operations were shown to be improved to LOS D or better during the peak hours at six (6) of the seven (7) intersections identified above. Even with these improvements, the Trotter Road/Patriot Parkway intersection was shown to operate at an overall LOS F during the weekday morning and evening peak-hours, and at LOS E during the Saturday midday peak-hours. That being said, as the final plans are advanced for the development areas within the Site, the access points can be located in a manner to disperse trips within the Site and lessen impacts at the Trotter Road/Patriot Parkway intersection.

Geometric Improvements

As detailed more fully in Appendix D, in an effort to improve traffic operations and off-set the predicted impact of the Project, the Proponent will design and construct the following geometric improvements at the identified intersections, according to the suggested schedule of implementation defined in Table 7-12 (Appendix D):

Roadway Segments

- *Hingham Street* – Widen Hingham Street to provide a general four-lane cross section between the Route 3 southbound ramps and Reservoir Park Drive. These improvements are being funded through a MassWorks grant to the Town of Rockland.

- *Bill Delahunt Parkway* – Improve the roadway cross-section, if necessary, based on the measured traffic volumes and to facilitate the addition or expansion of pedestrian and bicycle accommodations.
- *Shea Memorial Drive* – Improve the roadway cross-section, if necessary, based on the measured traffic volumes and to facilitate the addition or expansion of pedestrian and bicycle accommodations.
- *Reservoir Park Drive* – Widen Reservoir Park Drive to provide a four-lane cross-section. Outside of the limits of the Hingham Street/Reservoir Park Drive intersection improvements that are being advanced as a part of the Hingham Street MassWorks grant, improve the roadway cross-section, if necessary, based on the measured traffic volumes and to facilitate the addition or expansion of pedestrian and bicycle accommodations.

Intersections

- *Pleasant Street at Pine Street* (Intersection 18) – Widen the Pine Street westbound approach to provide a left-turn lane and a right-turn lane.
- *Pine Street at Ralph Talbot Street* (Intersection 20) – Widen the Pine Street northbound approach to provide a left-turn/through lane and a right-turn lane, and the Ralph Talbot Street westbound approach to provide a left-turn lane and a through/right-turn lane.
- *Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive* (Intersection 39) – Widen the Bill Delahunt Parkway northeastbound and Reservoir Park Drive southwestbound approaches to provide a left-turn lane, two through lanes and a channelized right-turn lane.
- *Route 18 at Shea Memorial Drive* (Intersection 45) – Widen the Route 18 southbound approach to provide two left-turn lanes and two through lanes, and the Shea Memorial Drive westbound approach to provide a left-turn lane and two right-turn lanes.
- *Shea Memorial Drive at Memorial Grove Avenue* (Intersection 46) – Realign the Shea Memorial Drive/Memorial Grove Avenue intersection to be located to the south of Shea Field Memorial Grove in order to reflect the primary flow of traffic within the Site.
- *Pond Street at Thicket Street* (Intersection 48) – Widen the Thicket Street northeastbound approach to provide a left-turn lane and a right-turn lane.
- *Route 18 at Trotter Road* (Intersection 49) – Widen the Route 18 northbound approach to provide two through lanes and a right-turn lane, and the Trotter Road westbound approach to provide a left-turn lane and two right-turn lanes.
- *Trotter Road at Patriot Parkway* (Intersection 51) – Widen the Trotter Road eastbound approach to provide a left-turn lane and a through lane, the Trotter Road southbound approach to provide a left-turn lane and a right-turn lane, and the Patriot Parkway westbound approach to provide a through lane and a channelized right-turn lane.
- *Memorial Grove Avenue at Snow Bird Avenue* (Intersection 52) – Widen the Memorial Grove Avenue westbound approach to provide a left-turn lane and a through/right-turn lane, and the Snow Bird Avenue northbound approach to provide a left-turn/through lane and a right-turn lane. In addition, the intersection should be placed under all-way STOP-sign control subject to meeting the necessary warrants as specified in the MUTCD.
- *Shea Memorial Drive at Patriot Parkway and Bill Delahunt Parkway* (Intersection 53) – Widen the Shea Memorial Drive northbound approach to provide a left-turn lane, a left turn/through lane and a right-turn lane, and the Shea Memorial Drive southbound approach to provide a left-turn/through lane and two right-turn lanes.
- *Route 139 at Lincoln Street* (Intersection 56) – Widen the Lincoln Street northeastbound approach to provide a left-turn lane a right-turn lane.
- *Route 18 at Route 123* (Intersection 71) – Widen the Route 18 northbound approach to provide a left-turn lane, a through lane and a through/right-turn lane, the Route 18 southbound approach to provide a through/left-turn lane, a through lane and a right-turn lane, and the Route 123 eastbound approach to provide a left turn lane, a through lane and a through/right-turn lane.

— *Future Traffic Signal Control*: In conjunction with the installation of traffic control signals at the previously mentioned intersections, if and when warranted, geometric improvements should be advanced at the following three (3) intersections, subject to receipt of all necessary licenses, permits and approvals:

- *Columbian Street at Forest Street* (Intersection 11) – Widen the Columbian Street eastbound approach to provide a left-turn/through lane and a right-turn lane and the westbound approach to provide a left-turn lane and a through/right-turn lane.
- *Columbian Street at Park Avenue West* (Intersection 12) – Widen the Columbian Street eastbound approach to provide a left-turn/through lane and a right-turn lane.
- *Route 139 at Chestnut Street and Old Randolph Street* (Intersection 55) – Widen the Route 139 northbound approach to provide a left-turn lane and a through/right turn lane.

With the implementation of the suggested geometric changes, 11 of these 15 intersections were shown to operate at an overall LOS D or better during the peak hours. Of the four (4) intersections that do not achieve this level of service, with the suggested geometric changes: i)the Weymouth Street/ Bill Delahunt Parkway/Reservoir Park Drive intersection was shown to improve from an overall LOS F to LOS D during the weekday morning peak hour; from LOS F to LOS E during the weekday evening peak hour; and from LOS E to a LOS C during the Saturday midday peak-hour; and ii) the Route 18/ Trotter Road, Trotter Road/Patriot Parkway and Patriot Parkway/Shea Memorial Drive/Bill Delahunt Parkway intersections were shown to operate at an overall LOS F during the peak hours; however, vehicle queuing and average motorist delays were shown to be generally reduced.

Traffic Signal Timing Improvements

As detailed more fully in Appendix D, in an effort to improve traffic operations and off-set the predicted impact of the Project, the Proponent will, subject to receipt of all necessary licenses, permits and approvals, design and implement an optimal traffic signal timing and phasing plan for the following intersections that were identified to be operating at or over capacity pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D):

- *Route 53 at Middle Street* (Intersection 2)
- *Middle Street at Winter Street* (Intersection 3)
- *Liberty Street at Grove Street* (Intersection 9)
- *Route 18 at West Street and Middle Street* (Intersection 13)
- *Route 18 at Columbian Street* (Intersection 14)
- *Pleasant Street at Park Avenue* (Intersection 16)
- *Pine Street at Ralph Talbot Street* (Intersection 20)
- *Route 53 at Derby Street and Gardner Street* (Intersection 28)
- *Route 228 at Pond Street* (Intersection 35)
- *Route 228 at Hingham Street and the Route 3 Southbound Ramps* (Intersection 36)
- *Hingham Street at Reservoir Park Drive* (Intersection 38)
- *Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive* (Intersection 39)
- *Pond Street at Hollis Street and Derby Street* (Intersection 42)
- *Route 18 at Pond Street and Pleasant Street* (Intersection 43)
- *Route 18 at Shea Memorial Drive* (Intersection 45)
- *Route 18 at Trotter Road* (Intersection 49)
- *Route 18 at Pond Street* (Intersection 50)
- *Shea Memorial Drive at Patriot Parkway and Bill Delahunt Parkway* (Intersection 53)
- *Route 18 at Route 139* (Intersection 57)
- *Route 58 at Route 139* (Intersection 58)

- *Route 123 at Route 58* (Intersection 69)
- *Route 58 at Summer Street* (Intersection 70)
- *Route 18 at Route 123* (Intersection 71)

The subject intersections will be monitored as a part of the annual Traffic Monitoring and Reporting Program (discussion follows). To the extent that the monitoring program indicates that additional traffic signal timing optimizations are necessary, the Proponent will implement the optimizations, again, subject to receipt of all necessary licenses, permits and approvals.

With the implementation of an optimal traffic signal timing plan, operating conditions at eight (8) of the 15 subject intersections were shown to improve to an overall LOS D or better during the peak hours, with four (4) of the intersections improving to an overall LOS D or better for one or more peak hours, and all intersections predicted to have a reduction in overall motorist delay and vehicle queueing.

Safety
Independent of the Project the following intersections were identified to have a motor vehicle crash rate that exceed the MassDOT average crash rates for similar intersections and/or were designated as HSIP eligible by MassDOT, and have not previously been the subject of a Road Safety Audit (RSA):

- *Middle Street at Winter Street* (Intersection 3)
- *Pleasant Street at Park Avenue* (Intersection 16)
- *Route 53 at Route 228* (Intersection 31)
- *VFW Drive at Pleasant Street and West Pleasant Street* (Intersection 62)
- *Route 58 at Summer Street* (Intersection 70)

In an effort to identify and advance safety improvements at these intersections, the Proponent will: i) facilitate the completion of a RSA for the intersections; and ii) design and construct the short-term, low-cost improvements that are suggested as an outcome of the RSA. The RSAs are currently underway and the construction of the short-term, low-cost improvements will be designed and constructed pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D) to the extent that the improvements can be completed within the public right-of-way and subject to receipt of all necessary licenses, permits and approvals.

The Pleasant Street/Columbian Street/Union Street intersection (Intersection 15) was found to have a motor vehicle crash rate that exceeds the MassDOT average crash rate for an unsignalized intersection and was designated as a top 200 crash cluster location. This intersection is currently being reconstructed as a part of an intersection improvement project that is being advanced by the Town of Weymouth. No additional improvements are required at this intersection to accommodate the Project.

In addition, the remaining short-term, low-cost improvements identified in the RSAs for the following intersections that have not yet been implemented will be completed:

- *Route 18 at Route 53* (Intersection No. 1)
- *Route 53 at Middle Street* (Intersection No. 2)
- *Route 18 at Winter Street* (Intersection No. 4)
- *Route 18 at West Street and Middle Street* (Intersection No. 7)
- *Route 18 at Park Avenue and Park Avenue West* (Intersection No. 13)
- *Route 18 at Columbian Street* (Intersection No. 14)
- *Derby Street at the Route 3 Southbound Ramps* (Intersection No. 22)
- *Derby Street at the Route 3 Northbound Ramps* (Intersection No. 23)
- *Route 53 at Derby Street and Gardner Street* (Intersection No. 28)
- *Route 228 at Pond Street* (Intersection No. 35)
- *Route 18 at Pond Street and Pleasant Street* (Intersection No. 43)

- *Route 18 at Pond Street* (Intersection No. 50)
- *Route 139 at Hancock Street and Old Hancock Street* (Intersection No. 54)
- *Route 139 at Chestnut Street and Old Randolph Street* (Intersection No. 55)
- *Route 18 at Route 139* (Intersection No. 57)
- *Route 123 at Union Street* (Intersection No. 67)
- *Route 58 at Central Street* (Intersection No. 68)
- *Route 123 at Route 58* (Intersection No. 69)
- *Route 18 at Route 123* (Intersection No. 71)
- *Route 18 at Route 27* (Intersection No. 72)
- *Route 18 at Route 14* (Intersection No. 73)

The short-term, low-cost safety-related improvements that have not yet been implemented will be completed pursuant to the suggested schedule of implementation defined in Table 7-12 (Appendix D) to the extent that the improvements can be completed within the public right-of-way and subject to receipt of all necessary licenses, permits and approvals.

With implementation of the aforementioned recommendations, safe and efficient access will be provided to the Site and the Project can be accommodated within the confines of the existing and improved transportation system.

Transportation Demand Management (TDM)

The Proponent is committed to advancing the Project in a manner that reduces impacts on the transportation infrastructure. This commitment starts with a design that has been purposely configured to facilitate trips between development areas and recreational opportunities within the Site by non-motorized modes of transportation. In order to reduce single-occupancy (SOV) trips external to the Site and enhance mobility within the development, the Proponent will develop and implement a comprehensive TDM program, a principal component of which will be providing initial funding to establish a Tri-Town Transportation Management Association (the "Tri-Town TMA") to serve development at the Base.

The following details the framework of the TDM program for the Project.

TDM Program Management

A full-time Transportation Demand Management Coordinator (TDMC) (who may also have other duties and responsibilities) will be employed to serve as the single point of contact for residents, employees and the Tri-Town TMA, and to lead the TDM program and associated marketing and outreach activities. The TDMC will, as part of the overall TDM program, establish and implement quality control procedures and performance measures to ensure a high level of service, appropriate implementation of alternative transportation incentive programs, and effectiveness of those programs. The email address and phone number of the TDMC will be made available to residents and employees. The TDMC will work with the Tri-Town TMA to compile and distribute up-to-date information concerning available commuting options and the incentive programs available to residents and employees that use alternative commuting modes to SOVs. This information will be included in a "welcome packet" that will be made available to all new residents and employees, and will include the following information:

- MBTA maps, schedules and fare information, including the service schedule and fare information for Commuter Rail service from South Weymouth Station
- Tri-Town TMA shuttle service routes, stops and hours of operation, when established
- Location of bicycle parking areas
- Location of bikeshare stations
- Map of local and regional bicycle and pedestrian routes

- Location and contact information for carsharing services
- Details of any Emergency Ride Home (ERH) offered through the Tri-Town TMA

In addition, the TDMC will coordinate with the Tri-Town TMA to host an annual transportation fair that will focus on the transportation alternatives and incentive programs that are available to residents and employees of the businesses that are located within the Site, and will include programs focused on pedestrian and bicycle safety.

Tri-Town TMA Shuttle Service

A shuttle service will be operated by the Tri-Town TMA, as demand warrants, that will connect the development areas within the Site with continued service to the MBTA South Weymouth Commuter Rail Station. Initial funding for this service will be provided by the Proponent and will be offered at no ($0) cost to residents and employees of businesses that are located within the Site for the first year of operation. The service may be expanded to include other destinations and routes outside of the Site as membership in the Tri-Town TMA increases and as demand warrants, and will be funded through the dues assessment to members of the TMA as a means of subsidizing the service.

Promotional and Incentive Programs

The Site is situated adjacent to South Weymouth Station on the Kingston Line of the MBTA Commuter Rail system, which is located at 89 Trotter Road, and is connected to the Site by way of Trotter Road and Patriot Parkway, and the interconnected network of sidewalks, bicycle accommodations and pathways within the Site. The Project has also been designed to promote walking and bicycling, with sidewalks provided along one or both sides of the roadways within the development, pedestrian paths to connect development areas and recreational amenities, and bicycle accommodations that include both on- and off-road facilities. This network of pedestrian and bicycle accommodations will be extended as a part of the Project along the gateway roadways (Shea Memorial Drive, Bill Delahunt Parkway and Patriot Parkway/Trotter Road) to connect to Route 18, Weymouth Street and Hingham Street (via Reservoir Park Drive). The TDMC will promote the use of alternative modes of transportation to SOVs through promotional and public awareness programs that will be developed in conjunction with the Tri-Town TMA and will focus on the following factors/programs to incentivize travel mode changes:

Cost Savings

Ridesharing can reduce transportation costs; employees can typically deduct use of public transit from pre-tax or post-tax income; car insurance companies may offer discounts to employees that use public transportation as their primary commuting mode directly or through an annual mileage discount; and employers may have incentive programs that provide employees with rewards for use of non-SOV modes. Increased fuel prices can be avoided or minimized by increasing the use of non-motorized modes.

Public Transportation

The following services will be provided to encourage the use of public transportation and will be managed by the TDMC:

- Information on MBTA schedules and fares, and the schedule for the Tri-Town TMA shuttle, when established, will be made available to residents and employees, included in resident and employee informational packets and marketing information, and provided on the website for the Project.
- Commercial tenant(s) will be encouraged to allow employees to set aside pre-tax funds as allowable under the Commuter Choice provisions of the Federal Tax Code, including the MBTA "Perq for Work" program (formerly known as the Corporate Pass Program), which provides employees the opportunity to buy MBTA passes as a pre tax exemption.
- Transit screens or other equivalent displays will be provided in the lobby areas of multifamily residential buildings and commercial buildings (as appropriate) to display real-time traffic and bus location information (similar to https://transitscreen.com/).

Public Transportation Benefit

Lease agreements with commercial tenants will require that they become a member of the Tri-Town TMA and that they offer a monthly transportation benefit, capped at the cost of an unlimited bus/subway pass (Monthly LinkPass), to all employees who commute by a non-SOV mode for a minimum of three (3) days per week and register with the TDMC. The cost of this pass is currently $90 per month, and this cap will increase with each fare increase that is initiated by the MBTA to ensure that the benefit will allow employees to purchase an unlimited bus/subway pass each month. Eligible employees will have the freedom to spend the monthly transportation benefit in any way that they prefer – on transit fares, bicycle maintenance, gas for carpools, vanpool fees, walking shoes, etc.

The Proponent will coordinate with the MBTA to endeavor to locate CharlieCard purchase/recharge kiosks or other such system for the purchase or replenishment of public transit fares at appropriate locations within the Site defined in consultation with the MBTA that are accessible to employees and the public, and that meet the MBTA's customer service standards.

Ridesharing

The TDMC will market a ridematching program to facilitate carpooling by residents and employees. Information on ridematching services will be made available to residents and employees, included in the new employee and resident "welcome packets" and provided on corporate and residential community websites. In addition, preferential parking will be reserved or provided by commercial tenants for carpools and vanpools.

Car Sharing

The Proponent will work with a car-share provider to stage car-share vehicles at accessible locations within the Site for use by residents and by employees.

Pedestrian/Bicycle Program

In order to encourage walking and the use of bicycles as an alternative to the use of SOVs by residents and employees of the Project, the Proponent will implement the following measures:

- As appropriate, the Proponent will work with a bikeshare provider to establish a bikeshare program for the Project. Access to the bikeshare program will be made available at no ($0) cost to residents and employees of commercial tenants within the Site that register with the TDMC for the first year of residency or employment. Thereafter, a bikeshare fee structure will be established by the Tri-Town TMA that will be included in the dues assessment to members of the TMA as a means of subsidizing the service.
- Secure bicycle parking will be provided at appropriate locations within individual development sites. Bicycle parking will include both interior (covered) and exterior bicycle parking. It is anticipated that a minimum of one (1) bicycle parking space per 15 vehicle parking spaces will be provided for commercial uses and one (1) bicycle parking space for every five (5) automobile parking spaces will be provided for a multifamily residential or mixed-use development. It is anticipated that a minimum of six (6) bicycle parking spaces will be provided for any individual use or development area.
- Bicycle and pedestrian commuting options will be encouraged and marketed to residents and employees by the TDMC, including making available up-to-date pedestrian and bicycle maps for local and regional facilities, and the location of bicycle parking within the Project.
- Employees that walk or bicycle to work will have access to a shower, changing area and locker located within individual buildings subject to tenant fit-out requirements or in shared amenities buildings.
- To encourage safety, commercial tenants will be encouraged to offer reflective vests at no cost to all employees who walk or bicycle to work.

Emergency Ride Home

An Emergency Ride Home (ERH) program will be provided to all employees who commute to work by a non-SOV mode at least three (3) days per week. The ERH program will be coordinated by the TDMC and offered through the Tri-Town TMA, and will allow for a maximum of four (4) ERH per year per participating employee.

Flexible Work Schedules

In order to encourage the use of public transportation, the Proponent will encourage commercial tenants to offer employee work schedules that are flexible so as to be consistent with public transportation schedules and, to the extent permitted by corporate policies, allow employees the opportunity to work from home as a way to eliminate vehicle trips to the buildings.

Traffic Monitoring and Reporting Program

The Proponent will conduct post-development traffic and parking monitoring, and an employee survey program in order to evaluate the success and to refine the elements of the TDM program, and to validate the trip projections for the Project. The monitoring program will include the following:

i. Obtaining traffic volume information over a continuous seven day, weeklong period on the gateway roadways that serve the Site (Shea Memorial Drive, Bill Delahunt Parkway, Reservoir Park Drive and Patriot Parkway/Trotter Road);

ii. Performing turning movement counts and vehicle classification counts the following intersections during the weekday morning (7:00 to 9:00 AM), weekday evening (4:00 to 6:00 PM) and Saturday midday (11:00 AM to 2:00 PM) peak periods:
   - Route 53 at Middle Street (Intersection 2)
   - Middle Street at Winter Street (Intersection 3)
   - Liberty Street at Grove Street (Intersection 9)
   - Route 18 at West Street and Middle Street (Intersection 13)
   - Route 18 at Columbian Street (Intersection 14)
   - Pleasant Street at Park Avenue (Intersection 16)
   - Pine Street at Ralph Talbot Street (Intersection 20)
   - Route 53 at Derby Street and Gardner Street (Intersection 28)
   - Route 228 at Pond Street (Intersection 35)
   - Route 228 at Hingham Street and the Route 3 Southbound Ramps (Intersection 36)
   - Hingham Street at Reservoir Park Drive (Intersection 38)
   - Weymouth Street at Bill Delahunt Parkway and Reservoir Park Drive (Intersection 39)
   - Pond Street at Hollis Street and Derby Street (Intersection 42)
   - Route 18 at Pond Street and Pleasant Street (Intersection 43)
   - Route 18 at Shea Memorial Drive (Intersection 45)
   - Route 18 at Trotter Road (Intersection 49)
   - Route 18 at Pond Street (Intersection 50)
   - Shea Memorial Drive at Patriot Parkway and Bill Delahunt Parkway (Intersection 53)
   - Route 18 at Route 139 (Intersection 57)
   - Route 58 at Route 139 (Intersection 58)
   - Route 123 at Route 58 (Intersection 69)
   - Route 58 at Summer Street (Intersection 70)
   - Route 18 at Route 123 (Intersection 71)

iii. Performing a 12-hour (7:00 AM to 7:00 PM) turning movement count and vehicle classification count on an average weekday and Traffic Signal Warrants Analysis (TSWA) at the following intersections:
   - Columbian Street at Forest Street (Intersection 11)
   - Columbian Street at Park Avenue West (Intersection 12)
   - Weymouth Street at Sharp Street and Abington Street (Intersection 40)
   - Randolph Street at Forest Street (Intersection 41)
   - Trotter Road at Patriot Parkway (Intersection 51)
   - Memorial Grove Avenue at Snow Bird Avenue (Intersection 52)
   - Route 139 at Chestnut Street and Old Randolph Street (Intersection 55)

iv. Evaluating motor vehicle crash data at the monitored intersections;

v. Performing a survey of resident and employee commuting modes; and

vi. Providing ridership information for the Tri-Town TMA shuttle service.

The traffic volume data that forms the basis of this TIA will be used as the baseline for measuring changes in vehicle dependent data. The monitoring program will commence within six (6) months after the earlier to occur of completion of 1,500 new dwelling units or 500,000 sf of new commercial space at the Project and will continue on an annual basis thereafter for a period not to exceed 10-years. The results of the monitoring program will be summarized in a report to be provided to MassDOT, the Metropolitan Area Planning Council (MAPC), the Old Colony Planning Council, and the towns of Abington, Rockland and Weymouth within 2-months after the completion of the data collection effort. The report will document: i) traffic volumes associated with the constructed portions of Project; ii) traffic operations (i.e., motorist delays, vehicle queuing and LOS), crash severity and calculated crash rates at the monitored intersections; iii) the results of the TSWA for the identified intersections; iv) the elements of the TDM program that have been implemented and use of alternative modes of transportation to single-occupant vehicles by residents and employees of the Project; and v) Tri-Town TMA shuttle service utilization.

If any of the following conditions are documented as a part of the monitoring program: i) the measured traffic volumes exceed the predicted traffic volumes for the constructed land uses as defined using trip-generation data published by the ITE for the appropriate land use(s) by more than 10 percent on a regular and sustained basis during the monitoring period; ii) there is a material increase in the number of motor vehicle crashes occurring at the gateway intersections that are attributable to the Project; or iii) the overall directional distribution of Project-related traffic as measured on the gateway roadways varies by more than 10 percent from the directional distributions that form the basis of this assessment; the Proponent will identify and undertake corrective measures in conjunction with the appropriate parties and subject to receipt of all necessary licenses, permits and approvals. These measures may include without limitation:

- Traffic signal timing modifications
- Sign and pavement marking improvements
- Wayfinding sign program to disperse trips between the gateway roadways
- On-site operation and management strategies that are designed to reduce overall and peak traffic volumes and parking demands
- Providing financial incentives for employees to carpool or use alternative modes of transportation to SOVs
- Offering free or reduced fees for bikeshare membership, carshare use and/or ridership fees for the Tri-Town TMA shuttle
- Expanding the Tri-Town TMA shuttle service to include service to other commuter hubs (Braintree Station, Logan Express, etc.) and employment centers

The identified corrective measures, if any, will be documented in the transportation monitoring program report, and will identify the appropriate parties responsible for implementation (assumed to be the Proponent unless the corrective measure(s) are a part of a committed improvement project or plan that is scheduled to be implemented by others), required approvals, and the timeline for implementation. The status of implementation of the identified improvement measure(s) will be documented in the subsequent monitoring report.

As detailed throughout the attached TIA, with implementation of the aforementioned recommendations, safe and efficient access will be provided to the Site and the Project can be accommodated within the confines of the existing and improved transportation system.

11.2 NHESP

A Conservation and Management Plan for the above-listed project has been prepared in consultation with the Natural Heritage and Endangered Species Program (NHESP), in compliance with applicable performance standards of the Massachusetts Endangered Species Act (MESA) and implementing regulations. Although the project will result in a Take of the Upland Sandpiper (Bartramia longicauda) and Grasshopper Sparrow (Ammodramus savannarum), the project meets the standards for issuance of a Conservation and Management Permit, pursuant to MESA (321 CMR 10.23), and the applicant has taken all feasible measures to avoid and minimize damage to endangered species and their habitat.

The components of the Conservation and Management Permit as drafted in consultation with NHESP staff include:

- protection of +/-519 acres of open space
- restoration of +/-104 acres of grassland habitat
- long-term monitoring and management of grassland and shrubland/nesting areas;
- construction period monitoring and protection of state-listed turtles;
- post-construction monitoring of on-site state-listed turtle populations; and
- funding for acquisition, restoration, and/or management of grassland habitat for the benefit of grasshopper sparrow and upland sandpiper populations in Massachusetts.

11.3 EEA

At the completion of construction, the Proponent will provide a certification to the MEPA Office, signed by an appropriate professional. The certification will identify either of the following: 1) all of the energy efficiency mitigation measures adopted by the Project as part of the Mitigation Alternative have been implemented; or 2) an equivalent set of energy efficiency mitigation measures, which together are designed to achieve the same percentage reduction in CO_2 emissions as the Mitigation Alternative, when compared to the Base Case, based on the same modeling assumptions in this report, have been adopted.

12.0 CONCLUSION

The currently proposed 2023 Modified Development Program for the Project fulfills the promise of decades of planning by the Commonwealth, the SRA and the Towns by delivering on the goals set forth in the plans and legislation that govern redevelopment of the Base. The Project responds to current market demands and proposes a smart growth master planned community that is centered on a mix of uses, ultimately allowing for SWNAS to grow into an attractive destination for residents, employees, commercial and residential and visitors alike. The Project brings with it significant public benefits, ranging from the creation of an extraordinary amount of high-quality, onsite, open space, and wildlife habitat and the provision of long-needed permanent infrastructure solutions to serve SWNAS and the surrounding Towns. Further, it will maximize the Site's potential to generate net fiscal benefits to the Towns, along with the creation of temporary construction and permanent jobs for the surrounding communities.

As more fully described throughout this filing, key benefits of the 2023 Modified Development Program for the Project include the following:

- Ongoing consultation with the Natural Heritage & Endangered Species Program (NHESP) and the Towns to create an open space plan that results in a total of approximately 885 acres of open space on the Base, including removal of the 12 acres of debris piles still existing on the Base and the provision of approximately 519 acres of protected open space areas including significant acreage of contiguous, high-quality grassland habitat.
- Provision of much needed housing (including ownership and rental residences).
- Provision of commercial development to promote job growth.
- Presentation of two options (with possible additional permutations) to finally ensure a permanent water solution to the Base.
- Determination of solutions to establish wastewater capacity in each Town sufficient to accept the flow generated on the areas of the Base in each respective Town.
- Completion of a comprehensive Traffic Impact Assessment (TIA), attached as Appendix D, prepared in coordination with the Towns, which identifies necessary transportation improvements to be implemented to mitigate for any potential impacts from the project including delivery of mitigation measures from prior master developers that were never realized.
- Establishment of net property tax revenue benefits to the Towns in the range of a total of $20-$23.5 million dollars, at full-build, plus creation of ongoing revenues available to repay community bonds currently in default.
- Creation of hundreds of construction jobs over the 12- to 15-year buildout period, as well as permanent jobs associated with the program's commercial component.

The 2023 Modified Development Program for the Project limits its impact on the environment by focusing future development within previously disturbed areas of the Base, incorporating best practices for sustainable design and implementing comprehensive transportation improvements and a robust TDM Program (e.g., to encourage non-SOV modes of travel).

MEPA review of the Project has a long history dating back to the late 1990s. Since issuance of the 2007 FEIR Secretary's Certificate and commencement of construction at SWNAS, engagement with MEPA and construction at SWNAS has been ongoing and continues today. In accordance with the terms set forth in the most recent NPC Secretary's Certificate for the Project, this filing also responds to outstanding Scope items from the 2017 NPC Secretary's Certificate and material comments contained in the comment letters attached to same, each if and to the extent they remain relevant to the 2023 Modified Development Program.

Due to the extensive and continuous MEPA history at the Site and ongoing nature of construction, along with the comprehensive and responsive nature of this filing, the Proponent respectfully requests the issuance of a certificate on this NPC allowing a Final Supplemental Report (with appropriate responses to questions) focused solely on any new impacts related to the 2023 Modified Development Program detailed throughout this filing."]

13.0 Response to Comments

13.0 RESPONSE TO COMMENTS

13.1 INTRODUCTION

In accordance with the terms set forth in the 2017 NPC Secretary's Certificate, this filing responds to (i) outstanding Scope items from the 2017 NPC Secretary's Certificate and (ii) material comments contained in the comment letters submitted in response to the 2017 NPC and attached to the 2017 NPC Secretary's Certificate (the "Comment Letters"), each if and as they remain relevant to the 2023 Modified Development Program. Table 13-1 below provides an index for the Scope and Comment Letters. As demonstrated by the extensive comment/response matrix set forth as Table 13-2 below, all material comments in the Scope and Comment Letters have been addressed in this comprehensive filing.

Table 13-1 Index of Secretary's Certificate Scope and Comment Letters

Commenter	Index	Date
Executive Office of Energy and Environmental Affairs-MEPA Office	EEA	April 28, 2017
Massachusetts Department of Environmental Protection	DEP	April 21, 2017
Massachusetts Department of Transportation	DOT	April 24, 2017
Massachusetts Water Resources Authority	MWRA	April 5, 2017
Massachusetts Division of Fisheries & Wildlife-Natural Heritage & Endangered Species Program	NHESP	April 11-2017
Massachusetts Department of Energy Resources	DOER	April 20, 2017
Massachusetts Water Resources Commission	WRC	April 20, 2017
MWRA Water Supply Subcommittee	WSSC	April 21, 2017
Metropolitan Area Planning Council	MAPC	April 24, 2017
Old Colony Planning Council	OCPC	April 21, 2017
State Senator Patrick M. O'Connor	SPOC	April 18, 2017
State Representative Ronald Mariano	SRRM	April 20, 2017
State Senator Patrick M. O'Connor, House Majority Leader Ronald Mariano, State Representative, James M. Murphy	SSSR	April 21, 2017
United States Environmental Protection Agency	USEPA	April 21, 2017
Congressman Stephen F. Lynch	CSFL	April 21, 2017
Town of Weymouth – Robert L. Hedlund, Mayor	TOW	April 21, 2017
Brian McDonald, Weymouth Councilor-at-Large	WCBM	April 18, 2017
Jane Hackett, Weymouth Councilor-at-Large	WCJH	April 18,2017
Michael Smart, Weymouth District Six Councilor	WCMS	April 19, 2017
Thomas J. Lacey, Weymouth District Two Councilor	WCTL	April 20, 2017
Arthur E. Mathews, Weymouth District Four Councilor	WCAM	April 20, 2017
Town of Rockland-Board of Selectmen	RBOS	April 13, 2017
Rockland Open Space Committee	ROSC	March 26, 2017
Abington Planning Board	APB	April 7, 2017

Commenter	Index	Date
Mass Audubon	MA	April 21, 2017
North & South Rivers Watershed Association	NSRWA	April 21, 2017
Al Ferreira	AF	March 9, 2017
Barbara C. Manning	BCM	April 22, 2017
Jennie Horsch	JH	Undated
Joanne Marques	JM	April 21, 2017
Joseph Shea	JS	April 21, 2017
Joyce Bethoney	JB	April 19, 2017
Kathleen Peters	KP	March 30, 2017, April 18, 2023,
Kathy Kirby	KK	March 20, 2017
Kirsten Rolph	KR	March 19,2017
Kristen & David derKinderen	KDD	March 16, 2017
Laura A. McCarthy	LM	April 19, 2017
Lillie Durgan	LD	April 3, 2017
Mary Parsons	MAP	April 13, 2017, April 20, 2017, April 21, 2017
Mike Bromberg	MB	April 21, 2017
Pamela Titus	PT	April 3, 2017
Pamela D. Worden	PDW	April 3, 2017
Patricia and Brian Bouzan	PBB	April 18, 2017
Tricia Pries	TP	April 20, 2017

13.2 RESPONSE TO COMMENTS ON THE 2017 NPC

The extensive comment/response matrix included as Table 12-2 below sets forth responses to all material comments in the Scope and Comment Letters, each if and as they remain relevant to the 2023 Modified Development Program. Other comments that included declaratory statements or otherwise did not pose questions related to the proposed development program are not addressed here.

The topics addressed in these comment letters are as follows:

Table 13-2 Response to Comments on the 2017 NPC

Commenter	Project Description/Permitting Comment	Response
EEA-1	The DSEIR should include a detailed description of the project and describe any changes to the project since the filing of the NPC. This should include clarification of the amount of residential uses by type proposed as part of Phase 1. Furthermore, the DSEIR should summarize potential environmental impacts of Phase 1 alone, as these uses differ in type and scale to the development program described in the FEIR. The DSEIR should include updated site plans, if applicable, for existing and post-development conditions at a legible scale.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
EEA-2	The DSEIR should contain a separate graphic and environmental impact table identifying on-site and off-site projects completed to date (grouped by subproject with an accompanying description of use and units/ square footage or similar metric), including off-site roadway/intersection improvements and mitigation efforts constructed in accordance with previous approvals subsequent to the issuance of the FEIR.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
EEA-3	The DSEIR should include a comprehensive list of all local, federal and State permits and approvals necessary for the project. The DSEIR should identify the type, date and issuing authority for all project-related permits to date.	A list of federal, state, and local permits that may be required is included in Section 2.2.
DEP-2	The proposed project change includes the possible addition of a sports stadium; 10,730 to 31,700 additional parking spaces; 1,000 more housing units; and 6,000,000 square feet of additional commercial buildings.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
DEP-23	As with prior MassDEP comments and has been included in prior Secretary's Certificates, either connection would require the formation of a Consecutive Water Supply System, as defined in 310 CMR 22.00 and require an Interbasin Transfer Act approval through the Department of Conservation and Recreation.	See Section 7.1, which presents the current approach and analysis for Water solutions.

Commenter	Project Description/Permitting Comment	Response
DEP-24	The Project construction activities are scheduled to disturb 38 acres of land and therefore, may require a NPDES Stormwater Permit. The Proponent should determine if any of the following U.S. EPA NPDES permits are necessary: Construction General Permit; Dewatering General Permit; Remediation General Permit	A list of federal, state, and local permits that may be required is included in Section 2.2.
ROSC-24	It is our understanding that the 50 acre former Coast Guard Housing parcel at Union Point is for sale by the GSA. An additional 50 acres of development at Union Point on this parcel will only add to the impacts of this Notice of Project Change and we believe it should be considered to be included in this EIR. Ideally, we would like this parcel preserved as open space with a Conservation Restriction.	The SRA acquired the Coast Guard Housing parcel from the GSA. Accordingly, the Coast Guard Housing parcel is now included within and will be developed as part of the Project.
DOT-25	The DEIR or any future stage development should provide an update of the local permitting processes for the proposed project, particularly with respect to any state highway issues being discussed. We strongly encourage proponents to consult with MassDOT before any state highway issues are discussed in local meetings or hearings.	A list of federal, state, and local permits that may be required is included in Section 2.2.
WSSC-3	The NPC states that due to the size of the development and variable market demands, the project will be developed in phases. Phase I will be comparable to the project described in the 2007 FEIR. Thus, the number of residential units for Phase I remains at 2,855 and 2,060,000 square feet of commercial out of a total 8,000,000 are proposed. However, additional facilities have been added in the first phase including a long-term care facility and a stadium.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
WSSC-4	We commend the proponent for reuse of a brownfield site, promoting pedestrian and bicycle access, the availability of public transit and preserving open space and wildlife habitat. However, due to the number of changes to the Union Point project in the current NPC and the decade-long delay between the 2007 FEIR and the current proposal, we are requesting that a new EIR be required to address these changes in greater detail.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
WSSC-8	More detail is needed to determine the amount and type of residential units and commercial development that will be built in each town. The NPC states that while the previous development included a golf course, this use has been eliminated. However, Phase I development includes a hotel, stadium, skating rink, a 300 bed long-term care facility, 600 student public school and a civic/community facility. It is not apparent how water and wastewater infrastructure will be developed for these facilities.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MA-1	This is a major redevelopment project that has changed in many significant respects under the new Master Plan. While some of these changes are positive (e.g., the grassland habitat will be larger and more contiguous), many categories of impact are increased including impervious surfaces, wetlands impacts, square footage of development, vehicular trips and parking spaces, and water usage. A new Environmental Impact Report (EIR) should be produced fully documenting the environmental impacts and detailed mitigation plans for this large-scale development project.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-1	The Project is a mixed-use redevelopment project comprising 8 million square feet (sf) of commercial space, 3,855 housing units, and between 19,500 and 43,900 parking spaces on a brownfield site. The Project is forecast to generate 79,900 vehicle trips per day. The amount of proposed parking and vehicle trips is significantly higher compared to the 2007 Final Environmental Impact Report (FEIR), which proposed a range of 8,770-12,200 parking spaces and 34,300 vehicle trips.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-2	The Notice of Project Change (NPC) outlines the implementation of a significantly changed development plan from the 2007 FEIR. The proposed number of residential units has increased from 2,855 units to 3,855 units and proposed commercial space has increased from 2.06 million sf to 8 million sf. Predominant land uses include office (2.89 million sf), life sciences (2.8 million sf), hi-tech manufacturing (800,000 sf), manufacturing (800,000 sf), retail (348,300 sf), a conference center (120,000 sf), and a 285-room hotel. A previously proposed golf course, an indoor recreational field house, and a fitness/wellness center have been removed from the Project. The indoor skating facility has been expanded and a 15,000 seat sports stadium is now included in the Project.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
MAPC-3	While MAPC is pleased that this Project proposes to develop a significant amount of housing and redevelop a brownfield site, it is imperative that the EIR include a mitigation program, a shared parking program, and an effective monitoring program that addresses mode share goals.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts. See Section 8.0 and Appendix D regarding Transportation, Section 6.10 regarding Hazardous Waste Clean-up and Section 10.0 regarding Mitigation.
MAPC-4	The NPC indicates that Phase 1 will comprise 2.06 million square feet (sf) of commercial development and 2,855 housing units. The EIR needs to indicate the phasing for the remainder of this Project which is slated for completion in 2036.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-5	The NPC mentions the potential addition of a sports stadium for a minor league team. The Proponent needs to clearly indicate whether the sports stadium is planned as part of Phase 1.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-8	The EIR should include information about the stadium location, what types of sporting events will take place at the stadium, whether the facility will be a home stadium for a specific sports team, and whether the facility will be used for other events (e.g., concerts) at times when games are not being played.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
MAPC-9	Table 1.3-1, Union Point Development Program Comparison to 2007 FEIR Development Program, identifies several Additional Uses which are listed below: Long-term care facility (300 beds); Multi-modal facility (5,000 sf); Public school (600 students); Civic/community facility (40,000 sf); Institutional/Social services (37,000 sf). The Proponent needs to indicate clearly whether any of these Additional Uses are planned as part of Phase 1.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-10	The Proponent should also indicate which, if any of these facilities, will be built in Phase 1. Even if they are not scheduled for Phase 1 construction, the Proponent should indicate whether they actually intend to build all of these facilities, or only some which turn out, upon further analysis, to be most feasible for future development in later project phases. If these Additional Uses are planned for later phases, their proposed timing should be outlined in the EIR.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-12	According to the NPC, work on the project has proceeded continuously since the issuance of the FEIR Certificate in 2007. Project components have already been completed (e.g., Eventide, Fairing Way, Highlands Neighborhood, Snowbird) or are under construction (e.g., Brookfield Village, The Commons, Transit Village, Winterwoods). The EIR needs to clarify the total number of dwelling units already completed or under construction, the amount of allocated parking (structured or surface), and indicate the locations of these projects on a site plan.	See Section 2.0 regarding the Existing Conditions.
RBOS-1	Past proposals for this site have come before you. As a result, much has been studied and learned about the challenges and benefits of development at this location. We recognize that the changes proposed by Union Point require additional studies be undertaken. We ask that you focus that study on the areas of prime concern, such as traffic and water related issues. We specifically ask that you look into the feasibility of opening Union Street.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
SPOC-1	I fully recognize that a project of this scope will result in environmental impacts. The initial development of this site has been attempted multiple times, which meant that impact assessments and environmental studies were revisited upon each attempt to produce a more solid understanding of the repercussions of this project. Accordingly, I believe that it is important to be clear and focused on a scope that addresses the changes that have been proposed by LStar and that ensures appropriate traffic, water, and wastewater solutions. As you review this submittal and develop a scope going forward, I encourage you to take into consideration the work that has been done in the past and focus on water, wastewater, and traffic impacts so that we are able to maintain developmental momentum at this site while balancing and protecting the quality of life for my constituents.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
JB-1	As a resident and homeowner of 859 Union Street in Rockland, Massachusetts, I urge you to consider not opening the end of Union Street to the Union Point development. The influx of cars would be detrimental to the neighborhood as a cut through. There is already an option for people to go to the end of Union Point and turn right onto VFW to get to the “downtown ”rea". This is a short distance from our street and already provides access. There is no need for an additional opening. Please keep Union Street closed.	The Proponent is not proposing the reopening of Union Street to access the Project.
WCMS-3	Issues related to water supply and wastewater will also require further review and evaluation for their plausibility and sustainability.	See Sections 7.1 and 7.2 regarding water supply and wastewater.
SRRM-1	As with any project of this size, there will be impacts that will need to be evaluated. As the development of this site has been attempted various times, many of those impacts have been vetted and reconciled in past environmental studies. I would suggest that it is important that this latest review focus on a scope that addresses the changes that have been proposed and ensures appropriate traffic, water, and wastewater solutions. As you review this submittal, I would encourage you to take into consideration the work that has been done in the past and focus on the current timely issues that must be addressed in order to develop this site into the potential that has existed ever since the initial base re-use plan was developed in 1998.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
SSSR-1	As you review this submittal and develop a scope going forward, we encourage you to take into consideration the work that has been done in the past. With a continued focus on water, wastewater, and traffic impacts, we will be able to maintain developmental momentum at this site while balancing and protecting the quality of life for residents of the area.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAP-4	The previously reviewed acres of impervious area were not 350 acres but 561 acres with 22 new acres added for a total of 583 acres of impervious surface. Please explain the difference and the addition of new acreage	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAP-10	This NPC is doubling the amount of water, sewer, and traffic to this project from the previous amount in the July 18, 2007 certificate from the Secretary of Environmental Affairs.	This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
JM-1	I noticed that this is the first time that a NPC has been filed for this project solely by the developer. In previous submissions, South Shore Tri-Town Development Corporation, the redevelopment authority at the time, was also listed on the application as a proponent. Is there a specific reason why the SouthField Redevelopment Authority was not included in this submission?	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. As Master Developer, we are submitting this NPC as the Proponent, with the support and approval of the SRA.
JM-2	There has been a major increase in the size and scope of the plan for both the Residential and Commercial components of the development. Residential has been increased by approximately 35%, Commercial has been increased by approximately 300% and Vehicle Trips per Day has increased by approximately 130%. The new plans essentially create a little city within the confines of the former Naval Air Station resulting in the need for a substantial increase in water and wastewater services. That being said, a new Citizen's Advisory Committee should be established as this process moves forward to the next stage.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
JS-1	I am concerned about the extent of the changes (see pages 3,4 of the NPC). The vehicle trips per day have more than double (from 34,300 to 79,900). The water needed per day has increased from 1,400,000 to 2,700,000. The NPC show the totality of the amount of change since the 2007 review which was not clear in reviews of smaller portions of changes (in my case the added (and desired) 1,000,000 SF of commercial development added in Abington. I have, and still do, desired more commercial development the 2007 plan but the extent of the changes will require a detailed investigation and review by all impacts (the local communities, state Highway, DEPA, SRA, developer, regional planning agencies, etc. I believe an Environmental Impact review process is needed as was done in the 2000s.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
BCM-1	Please don't let the developers open up North Union Street. Cars fly down this street already and if this opens, this small street access will be very unsafe for the neighborhood. Hingham Street had the traffic study done and Weymouth has. Not Union Street.	The Proponent is not proposing the reopening of Union Street to access the Project.
APB-5	The Board was also concerned that the only development that appears to be taking place is in Weymouth, they would like to see development done across the three towns evenly. It is an unfair burden to Rockland and Abington to see increased traffic and strains on emergency services but no income from property.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
APB-6	The Board members were adamant that the FEIR process be followed for the project change. The project is so large and these new changes will have extraordinary impacts for the Town of Abington we would like to ensure that our interests are protected.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Project Description/Permitting Comment	Response
PDW-1	For many reasons, J oppose the opening of North Union Street onto Union Point. As far as I know, the road is the same width as it was when the air base was built. Additional traffic of the proportions likely, would probably demand wider roads. As it is a very old neighborhood with some houses dating as far back as the late sixteen hundreds and many from the seventeen and eighteen hundreds, when road placement of houses did not anticipate car and truck traffic, quite a few are already very close to the road. Widening would create an unhealthy and unsightly situation. The North Union Street neighborhood has been a walking kind of neighborhood and has been for my entire seventy one year old life. While North Union Street would bear the brunt of the traffic everyone from North Avenue north would be detrimentally affected by the changing traffic patterns and our property values would plummet.	The Proponent is not proposing the reopening of Union Street to access the Project.
CSFL-1	As with any project of this size, impacts will need to be evaluated. Given the nature of the work done to this point, many of those impacts have been vetted and reconciled in past environmental studies. It is important to be clear and focused on a scope that addresses changes that have been proposed by LStar that ensure appropriate traffic, water, and wastewater solutions.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Open Space Comments	Response
EEA-5	The DSEIR should include graphics at a reasonable scale identifying these open space areas. The DSEIR should outline anticipated dates or milestones that will dictate when various areas of open space will be placed into permanent protection under a CR.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes, including regarding open space.
ROSC-4	Question 1 on page 4 in the NPC is checked no by the proponent. We are uncertain if the conversion of land recently swapped between the proponent and the National Park Service at the request of the proponent to build residential housing, would qualify that question to have an answer of yes.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC.
ROSC-12	Riverfront Riparian areas along French's Stream that were uplands, have been converted into large detention and retention ponds. More of these storm-water management ponds are also planned along the French's Stream Riparian areas. This is not consistent with the commitment of the proponent in the FEIR of preserving wildlife movement corridors and by maintaining Riverfront areas along French's Stream.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
ROSC-13	We are also concerned that the north- south wildlife corridor via the large open field in Abington on the western edge will lose its connectivity because it has been re-zoned to a developable area. This is not consistent with the current FEIR. The Union Point website shows office buildings and parking lots in that area now. (unionpointma.com)	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
ROSC-14	Although we are not against the idea of having a solar field at Union Point, we are concerned that the placement of the solar field and the associated protective fencing at the Westgate Landfill in Weymouth will serve as a potential disconnect of the north – south wildlife corridor in the Trotter Road area. This area is mentioned in the FEIR certificate. It is also partially within the French's Stream Riverfront Riparian area. We believe this area deserves a closer look and be included in the EIR.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Open Space Comments	Response
ROSC-16	We would like to see a timetable in the EIR as to when the 52 acre Thompson Pond parcel, the 24 acre Rockland Meadows parcel and the Grassland Plan parcel will be placed into a permanently protected Conservation Restriction, which the proponent commits to in this NPC.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. Specifically, both Thompson's Pond and Rockland Meadows are located outside of SWNAS and neither property is owned or controlled by the SRA or Proponent.
ROSC-17	We would like to see the existing Navy chain link fences removed in areas that would be beneficial to wildlife movement, between the 52 acre Thompson Pond CR parcel and the 24 acre Rockland Meadows CR parcel and Union Point open space areas.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. Specifically, both Thompson's Pond and Rockland Meadows are located outside of SWNAS and neither property is owned or controlled by the SRA or Proponent.
ROSC-21	We would like to see the entire 52 acres of the Thompson Pond CR parcel cleaned of all rubbish and debris.	Thompson's Pond is located outside of SWNAS and not controlled by either the SRA or Proponent.
ROSC-22	We would like to see the entire 24 acre Rockland Meadows CR parcel cleaned of all rubbish and debris.	Rockland Meadows is located outside of SWNAS and not controlled by either the SRA or Proponent.
MA-2	The NPC boxes regarding conversion of lands subject to Article 97 of the State Constitution (permanently protected open space) and release of a Conservation Restriction (CR) are checked "No." However, the plans and narrative indicate that northern portions of the existing CR established in conjunction with the Massachusetts Endangered Species Act (MESA) Conservation and Management Permit (CMP) will be converted to development under the new Master Plan. Therefore, those areas are requested for release from the CR and this constitutes an Article 97 disposition. Mass Audubon does not necessarily object to this conversion, if it results in an expanded and more contiguous area of permanently protected grassland, and associated wildlife habitat areas, that are appropriately managed in perpetuity for conservation purposes. Nonetheless, the CR release and Article 97 disposition must be properly recognized and addressed through all necessary procedures.	As discussed more fully in Section 6.2.2, the existing restricted area will be modified to create a larger, contiguous, more beneficial open space area.

Commenter	Open Space Comments	Response
MA-6	Give the book page and number of the deed restriction/Grant of restriction for the 1007 acres of Open Space on the former NAS South Weymouth.	The 2017 NPC, and prior filings, referenced 1,007 acres of open space. Please be advised that such acreage: included areas that were located "off Base" and was land not in the Proponent's control; was never developed as open space; and was based on land area that had not been actually surveyed (the Proponent's survey data indicates that the on-site open space acreage in 2017, and prior, was approximately 864 acres). As shown in this filing, the 2023 Modified Development Program increases the open space acreage on-site to 885 acres. That said, this request is no longer applicable as this grant was a commitment of a prior master developer that was not fulfilled and, as detailed in this filing, the Proponent intends to record title restrictions that appropriately reflect the modified project's commitments.
MA-7	According to the FEIR Certificate the 156 acres of golf course will be protected by a conservation restriction. Where can the deed restrictions/ grant of restriction be found for this acreage?	No longer applicable because this was a commitment of a prior master developer that was not fulfilled.
MAP-17	Last paragraph on page 2-18 states: "An 11.8 acre parcel east of the site (I believe this is south and abutting the site) know as The Rockland Meadows, was acquired by the proponent, placed under permanent CR, and transferred to the Town of Rockland." This is a 24 acre parcel. Where is information found, give specifics? What type of CR? When did the transfer take place and was this through the Rockland conservation Commission? This is a wonderful gift by the proponent, but we need the details of the closing, CR and date and name of the committee when given to the town.	No longer applicable because this was a commitment of a prior master developer that was not fulfilled.

Commenter	Open Space Comments	Response
MAP-22	The passive and active recreational component is also stated in Chapter 291 section 14 (b) (4) and is listed in the Town of Weymouth Definitive Development Mitigation Agreement July 31, 2014. Please state how the proponent will comply with the amenities listed. State the location and exact acreage of land that is proposed to be under a conservation restriction to replace the open space acreage that is to become mixed –use development. It appears from seeing a recreation presentation that the 52 acre sports center is reduced to 25 acres. I understand the playing fields will be under a dome. A pile of peat, consisting of tree stumps, asphalt, concrete, brick and rebar has been sitting on runway 17-35 and part of taxi-way C for ten years this month. Is there a timeline to remove this pile?	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAP-23	LStar has recently opened the old Navy perimeter roads as trails on the southeast and west portion of the former NAS South Weymouth and has opened a section for vehicle parking on Spruce Street in Rockland, which is more than any developer has previously done. The trails are the former Navy perimeter roads. Some former Navy perimeter roads are rare species habitat are not open for the public.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.

Commenter	Agricultural Soils Comments	Response
EEA-6	The DSEIR should provide an update on proposed mitigation measures associated with the alteration of agricultural soils. These measures include the designation of space for community gardens, staging farmer's markets, and off-site use of agricultural soils for use by local farmers. The DSEIR should clarify how much space will be designated for community garden space and whether its designation will be tied to overall project occupancy or another metric. The DSEIR should discuss what types of on-site uses may be suitable for the agricultural soils and estimate the amount of agricultural soils that may be available for off-site use if necessary.	The 2023 Modified Development Program only impacts approximately 1.0 acres of mapped prime, state, or local importance farmland soils agricultural soils, a reduction of 50 acres of impact from 2007. None of the agricultural soils on-site are in agricultural use.

Commenter	Transportation Comments	Response
EEA-7	The DSEIR must include a revised transportation study prepared in conformance with the current (March 2014) MassDOT/EEA Transportation Impact Assessment (TIA) Guidelines.	This NPC includes a new TIA that has been prepared in accordance with the current MassDOT/EEA Transportation Impact Assessment (TIA) Guidelines and includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.
EEA-8	In coordination with MassDOT, the Metropolitan Area Planning Council (MAPC), the Old Colony Planning Council (OCPC), and community leaders, the Proponent should consider expansion of the TIA study area to ensure that sufficient mitigation will be provided to offset project-related traffic generation.	This NPC includes a new TIA that includes an expanded study area that reflects the current built environment and the impacts associated with the current project trip-generation. The elements of the transportation improvement program have been structured to address the impacts of the current project.
EEA-9	The DSEIR should address traffic-related impacts specifically attributable to the proposed sports stadium. The TIA should address how patrons will access the facility and outline traffic management options to control crowd/traffic surges before and after events. To assist in this analysis, the DSEIR should provide additional specifics regarding the stadiums use, including but not limited to, its location, use profile (e.g., weekends, evenings only), and how timing of its use may overlap with peak traffic periods within the local and regional roadway network.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
EEA-10	The DSEIR should include a comprehensive list of transportation mitigation improvements focused on providing multi-modal service throughout the study area, ensuring acceptable operations of study area intersections and roadways, access to public transit, and safe travel for all users.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program.

Commenter	Transportation Comments	Response
EEA-11	I note significant concerns raised by project abutters and Town officials regarding potential site access via North Union Street in Rockland to Bill Delahunt Parkway. The DSEIR should clarify whether the Proponent is not currently considering reestablishing access to the project site at this location. The TIA should reflect the status of this road closure. If the project will include access at this location it must be added to the study area considered in the TIA.	The Proponent is not proposing the reopening of Union Street to access the Project.
RBOS-1	Past proposals for this site have come before you. As a result, much has been studied and learned about the challenges and benefits of development at this location. We recognize that the changes proposed by Union Point require additional studies be undertaken. We ask that you focus that study on the areas of prime concern, such as traffic and water related issues. We specifically ask that you look into the feasibility of opening Union Street.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program. The Proponent is not proposing the reopening of Union Street to access the Project.
WCBM-1	I feel as though the issue that requires the most attention is, not surprisingly, traffic. That said, I would like to emphasize that I believe the focus for review should be on traffic and other issues that have arisen from the Notice of Project Change (NPC).	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program.
TP-1	Weymouth residents at a public meeting on the Master Plan, watched as traffic modeling software showed increasing congestion on roadways. With the trips per day going from 34,000 to 79,000, what are the environmental impacts to the watershed?	This NPC includes a new TIA to reflect the current development program and includes an updated transportation improvement program, trip reduction plan and traffic monitoring program which have been structured to address the impacts of the project on the transportation infrastructure.

Commenter	Transportation Comments	Response
MB-1	First, the 2007 FEIR for this development included approximately 34-35,000 vehicle trips per day and the local intersections and road improvements needed to be made were based on that. Now that the new estimated vehicle trips per day is nearly 80,000, all of the above local intersections and road improvements and more now will have to be revisited, including intersections that have already been improved for this project. For example, the intersection at Weymouth Street, Bill Delahunt Drive and Reservoir Park Drive. It has already been improved for this project a few years back but will doubtfully accommodate the proposed additional traffic.	This NPC includes a new TIA to reflect the current development program and includes an updated transportation improvement program, trip reduction plan and traffic monitoring program which have been structured to address the impacts of the project on the transportation infrastructure.
MB-2	There is no mention of opening the Union Street gate in Rockland included in this NPC, so I am assuming it is not being considered by the Master Developer and I will not provide comments on that, except by mentioning that the opening of the Union Street gate in Rockland for this project has been voted down at least on two separate occasions at town meetings in Rockland. Can I ask that if the opening of the Union Street Gate in Rockland was to be considered at some future point, would that require the filing of another NPC?	The Proponent is not proposing the reopening of Union Street to access the Project.
KDD-1	I am writing to you in opposition of the proposed opening of the Union St. Gate, within the residential neighborhood in Rockland, Massachusetts.	The Proponent is not proposing the reopening of Union Street to access the Project.
KDD-2	My concern in opening the gate is the amount of thruway traffic that would be generated from one end of Rockland to the other. Neighboring towns will simply use Union Street as a cut through from Braintree/Weymouth all the way to Halifax, causing Rockland's streets to be flooded with traffic, much like Hingham St. and Pond St.	The Proponent is not proposing the reopening of Union Street to access the Project.
MAP-11	Opening of the Union Street Gate (in Rockland) at the former NAS South Weymouth property line is an issue with the residents who live on Union St. and adjacent roads off Union St. and off VFW Drive.	The Proponent is not proposing the reopening of Union Street to access the Project.
DOT-1	The Draft Environmental Impact Report (DEIR) should include a Transportation Impact Assessment (TIA) prepared in conformance with the current MassDOT/EOEEA Transportation Impact Assessment Guidelines.	This NPC includes a new TIA that has been prepared in accordance with the current MassDOT/EEA Transportation Impact Assessment (TIA) Guidelines.

Commenter	Transportation Comments	Response
DOT-3	Once the scenarios are established and agreed upon, capacity analyses should be conducted for the weekday AM, PM for both existing and future conditions for each development phase considered based on the model. In addition, capacity analyses for Build with mitigation conditions should be provided for all intersections, particularly those with impacts to the state highway system.	This NPC includes a new TIA that includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.
DOT-4	A traffic signal warrant study (TSWS) should be performed and the need documented for any locations where signalization is being proposed, including site driveway intersections with the public roadway system. A left-tum lane warrant analysis should be conducted and the need documented for any locations where the addition of such a lane is being proposed, including at site driveways.	This NPC includes a new TIA that includes updated Traffic Signal Warrants Analyses and turn lane evaluations where applicable.
DOT-5	The DEIR should include a comprehensive safety analysis based on the study area identified by the CTPS model. Specifically, the DEIR should conduct analysis for any study area intersections having crash rates higher than the State and/or District 6 averages.	This NPC includes a new TIA that includes an updated motor vehicle crash analysis.
DOT-6	Roadway Safety Audits (RSAs) will be required for intersections within an HSIP cluster in order to assess safety issues and develop safety improvements for these locations. The RSAs should be completed prior to the submission of the FEIR to identify safety improvements that the Proponent could implement as part the mitigation program for the project. The Proponent should work closely with the MassDOT Traffic Safety Unit to schedule the RSAs and to obtain all appropriate crash data.	This NPC includes a new TIA that includes a review of the current HSIP cluster map and RSAs have been proposed and are currently underway at the identified high crash locations.
OCPC-5	The proponent should be aware that the geographic scope of the MassDOT Route 18 Roadway Reconstruction, Widening and Bridge Replacement Project (601630) stops just north of the intersection of Route 18 at Route 139 in Abington. As such, the proponent should include this intersection in its transportation analysis and determine and provide appropriate mitigation measures.	This NPC includes a new TIA that incorporates an updated transportation improvement program that includes the Route 18/Route 139 intersection.

Commenter	Transportation Comments	Response
OCPC-7	It is our understanding from the Notice of Project Change that there is no change in the status of the closed access/ egress from the Bill Delahunt Parkway to Union Street. The opening of an access/ egress point from Union Street to the Bill Delahunt Parkway could provide for a more balanced trip distribution, provide for reduced emergency vehicle response times, and may assist with the revitalization of the downtown Rockland area.	The Proponent is not proposing the reopening of Union Street to access the Project.
OCPC-8	As such, the proponent should include this as an alternative to be analyzed in its transportation analysis to identify potential transportation demand and determine appropriate mitigation and improvement measures for Union Street and the surrounding area.	The Proponent is not proposing the reopening of Union Street to access the Project.
MAPC-6	The NPC mentions the potential addition of a sports stadium for a minor league team. The Proponent needs to clearly indicate whether the sports stadium is planned as part of Phase 1. If so, the sports stadium needs to be included in the EIR's transportation analysis.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-7	While MAPC recognizes that the trips the stadium will generate will most likely occur on the weekends and after the evening peak hour, a transportation analysis will need to be prepared. The transportation analysis will need to address how patrons will access the facility and outline traffic management plans for crowd surges following events.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts.
MAPC-9	Table 1.3-1, Union Point Development Program Comparison to 2007 FEIR Development Program, identifies several Additional Uses which are listed below: Long-term care facility (300 beds); Multi-modal facility (5,000 sf); Public school (600 students); Civic/community facility (40,000 sf); Institutional/Social services (37,000 sf). The Proponent needs to indicate clearly whether any of these Additional Uses are planned as part of Phase 1. If so, they need to be included as part of the EIR's transportation analysis.	This NPC includes a new TIA that identifies and assess the trip-generation and associated impacts of the current development program.

Commenter	Transportation Comments	Response
MAPC-11	The NPC indicates that the Project also includes the preservation and repurposing of other buildings, which should be included as part of the transportation analysis in the EIR, if the work is scheduled for Phase 1. For example, the NPC mentions plans to refurbish Hangar 2 and Building 82, and that other buildings are being evaluated for preservation and reuse.	This NPC includes a new TIA that identifies and assess the trip-generation and associated impacts of the current development program.
MAPC-13	The EIR should clarify how the transportation analysis will incorporate trips for projects already completed or under construction (e.g., as part of existing conditions or as part of Phase 1).	This NPC includes a new TIA that includes new traffic counts that are inclusive of the existing uses that have been constructed as of the date of the traffic counts (June and July 2022).
MAPC-14	The NPC states that the Project is forecast to generate 79,900 vehicle trips per day and that the Proponent is working with CTPS to determine the number of new trips that will be generated by the revised master plan and make trip assignments, including trips on existing and future roadway infrastructure. The EIR should clarify the extent to which the Proponent is working with CTPS on the Project's four-step modeling process – trip generation, trip distribution, mode choice and trip assignment.	This NPC includes a new TIA that includes updated trip-generation calculations that were developed using current data from the Institute of Transportation Engineers (ITE). The trip distribution pattern was developed using data from the U.S. Census, a review of the local and regional roadway network, and refined based on existing traffic patterns. Given the current access to public transportation resources, a mode split that included pedestrian, bicycle and public transportation resources was not applied beyond the consideration of internal trips that will be facilitated by the pedestrian and bicycle network that will be expanded within the development.
KR-1	As a resident of Rockland, I am not opposed to reasonable growth within Union Point, but I am concerned at the large number of projected additional vehicle trips (75,600-79,900) to the area and also what it might mean to have 15,000 people/cars coming and going at same general times for stadium events. Although I don't believe I see this proposed in the NPC, I would just like to note that I would be opposed to the Union Street gate being opened to traffic if that issue were to arise. Even a percentage of the projected Union Point traffic/vehicle trips (and noise of traffic) is not appropriate for the residential section of Union Street and neighborhood near the gate.	No longer applicable because, as discussed in this NPC, the 2023 Modified Development Program is materially different than the proposal in the 2017 NPC. This NPC fully sets forth the proposed changes to the Project with supporting information to fully explain such changes and the related impacts. The Proponent is not proposing the reopening of Union Street to access the Project.

Commenter	Transportation Comments	Response
JH-1	When the base was built, the gate was closed which diminished the accidents. My main objection to it being open is the houses on North Union Street are very close to the road with no room to spare. Please don't open the gate.	The Proponent is not proposing the reopening of Union Street to access the Project.
KP-1	I have been a resident of North Union St., Rockland all my life and must respond amid the recent publicity regarding opening the gate area for through traffic separating Union Pt. from North Union St. dead end. Being a native of this area and many others who reside on Union St. strongly oppose any measures to allow such a deleterious effect this would be for Union St. and its tributaries.	The Proponent is not proposing the reopening of Union Street to access the Project.
KP-3	Opening of this gate on North Union St. will do nothing for the Town of Rockland but to flood the area with more traffic using it as a short cut to other towns and escaping traffic lights. Side roads affected now are Oregon Ave., Salem St., Liberty St., Pleasant St. This notion of opening the area to through traffic has been turned down by Rockland voters three times within 10 years and we remain with strong feelings to keep the gate closed not only for safety reasons but for home valuations which would drop significantly.	The Proponent is not proposing the reopening of Union Street to access the Project.
PT-2	Also, as a resident of Rockland's North Union Street I am very concerned about the amount of traffic that would be created by the opening of "he "gate". This area of the town is a residential area with significant historical value to our community. My house alone was built in 1762 and represents the original families and industries of Rockland. The increase in traffic would devastate this residential section.	The Proponent is not proposing the reopening of Union Street to access the Project.
LD-1	I am very much opposed to any thought of opening up this gate at the end of No. Union St. to thru traffic for safety and environmental sake. It is a dead end St. put in place in 1960 just for that reason and not on a collision course with replacement of VFW Drive just up the Street from this area in question.	The Proponent is not proposing the reopening of Union Street to access the Project.

Commenter	Transportation Comments	Response
PBB-1	We have been a resident of the dead end section of Union St. for 17 years. I can't imagine the traffic that would come through our nice little neighborhood!!! Please help keep our neighborhood a neighborhood where children can play without worrying about being hit by car and where neighbors can greet each other in the streets!! We do NOT want to live on a route 18 in the middle of our small, quaint town!!	The Proponent is not proposing the reopening of Union Street to access the Project.
WCMS-1	Require that necessary traffic improvements be evaluated prior to the approval of this NPC including, but not limited to, the following intersections: Traffic impacts associated with the entirety of Route 18 from Rt. 139 to Rt. 3 and most especially the intersection of Routes 18, 58 and Pond Street and Rt. 18 and Trotter Rd. in South Weymouth which will require significant analysis; Central Street and Union Street; Columbian Square Weymouth; Merge of Ralph Talbot Street and Park Avenue; Park Avenue and Pleasant Street at Weymouth High School; Pleasant Street and Pine Street; Pleasant Street and Libbey Industrial Parkway; Merge of Columbian Street and Park Avenue West.	This NPC includes a new TIA that includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.
LM-1	I have lived in Rockland for the past 46 years. My home is at the dead end of Liberty St., near Union Street, and it borders VFW Drive. I object to the opening of the gate at the North end of Union Street for the following reasons: To open the gate at the North end of Union Street to allow thru traffic from Union Point into Rockland center would not encourage an increase in revenue for Rockland Center businesses but rather have a deleterious effect on an already congested traffic area. Traffic studies have been done numerous times and the most recent traffic study has added 79,000 to the already 39,000 vehicles which would be devastating to the town of Rockland.	The Proponent is not proposing the reopening of Union Street to access the Project.
LM-2	Opening of the Union Street gate for thru traffic will only encourage traffic to an already congested area by individuals using it as a short cut to other towns and to escape traffic lights. Other streets affected will be Salem St., Oregon Ave., Greenwood St., Pleasant St. and Liberty St., where I live. As previously mentioned, my home borders VFW Drive, which already has an extremely high traffic volume.	The Proponent is not proposing the reopening of Union Street to access the Project.

Commenter	Transportation Comments	Response
WCTL-1	Most important is your high quality review and due diligence regarding the ramifications of the increased traffic projections. It is promising to develop this area both from a residential and commercial standpoint, but it cannot overburden our streets and roadways without further and increased investment in planning, design and construction of the appropriate infrastructure to support increase traffic submitted as part of the NPC. I'd ask that you require of the developer, in partnership with the Commonwealth and the Town of Weymouth, to ensure that this project doesn't threaten or jeopardize the investments both the Commonwealth and the town of Weymouth have already made in this area in anticipation and support of this project.	This NPC includes a new TIA that includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.
WCAM-4	The last issue I would like to bring up is transportation. At full build out the traffic numbers will significantly increase compared to the numbers in the 2007 FEIR. I would request that the proponent be required to discuss in the EIR what their plan is if the traffic cannot be mitigated at full build out. If the overall size of the project would have to be reduced where would the reductions take place?	This NPC includes a new TIA that includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.
JM-3	Traffic has always been an issue dating back to when the Mills Mall proposal required a direct connection to Route 3.	This NPC includes a new TIA that includes an updated transportation improvement program that is designed to off-set the predicted impact of the project such that a direct connection to Route 3 is not required.
JM-5	Aside from the fact that our daily routines are negatively impacted by traffic jams now, the bigger concern is that of public safety, especially for first responders.	This NPC includes a new TIA that includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.

Commenter	Transportation Comments	Response
JS-7	In planning for the traffic infrastructure improvements since the 2007 FEIR (pages 2-8 to 2-10) Mass. Highway used the 2007 projections of traffic from Southfield as one of the factors in projecting traffic. What is the impact of the doubled vehicle trips per day estimate? What will be increaser in truck traffic and its impact be? With the greatly increased commercial development will there be more impact at peak hours?	This NPC includes a new TIA that includes new traffic counts, field measurements, crash data trip-generation calculations and analyses, as well as an updated transportation improvement program, trip reduction plan and traffic monitoring program.
JS-8	Will additional improvements be needed or further refinement of improvements already done. For example, in Abington work was done on the Rte. 18 & 139 intersection including left lane turn signals on Rte. 18. However, no left hand turn signal lanes were added on Rte. 139. On 3/13 at 3:30 I was in the west bound lane of Rte. 139 trying to take a left turn onto Rte. 18 going south. It took me 3 light cycles to accomplish this. On the 2nd cycle the car in front of me ran a red light to get thru. This is even worse during peak hours now without more Southfield traffic.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
JS-9	In Abington will more improvements (adding signals, etc.) be needed at other intersections such as Rte. 18 at Trucchis or Shaw Avenue or on Rte. 58? Will the additional intersection improvements listed on page 2-10 be implemented and when?	This NPC includes a new TIA that includes an updated transportation improvement program with specific measures to address the impacts that are associated with the current project, including at the Route 18/Route 58 intersection.
JS-10	Will the increase in traffic lead to drivers using neighborhood streets such Thicket Street in Abington/Weymouth, Pine or Vineyard or Summit in Abington, Spruce in Rockland and Abington? Will there be increased truck traffic on neighborhood streets? Will this be during nighttime?	This NPC includes a new TIA that includes an updated transportation improvement program that is designed to off-set the predicted impact of the project and create additional capacity so as to limit impacts to local roadways such as Thicket Street, Pine Street or Vineyard Street or Summit Street. Truck traffic associated with the project will use Route 18, Route 228/Higham Street and other regional roadways.

Commenter	Transportation Comments	Response
JS-12	For public safety vehicles (police, fire, highway) there needs to be an emergency access to the Southfield area (both the Abington portion and the remainder of the area where Abington must provide mutual aid). This is needed both to provide quick support and services and also to reduce the time needed for access using the current routes of Trotter Road and Shea Boulevard with Rte. 18 traffic impact.	This NPC includes a new TIA that includes an updated transportation improvement program that is designed to off-set the predicted impact of the project and includes specific measures to improve emergency response, such as adding or maintaining emergency vehicle pre-emption at signalized intersections.
TOW-13	Certainly, the most significant issue is the increase traffic due to changed development scope from the previous proposal. Particularly with respect to the commercial and residential segments of the project, the proposed project may have a significant impact on the surrounding roadways and intersections. We believe LStar working with the Town, MassDOT, and the Massachusetts Bay Transportation Authority can effectively work together on a solution.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
TOW-14	The substantial increase in vehicle trips described in the NPC along with the proposed increased density of residential neighborhoods and commercial districts will require the Town, LStar, and MassDOT to re-evaluate and improve the transportation corridors serving Union Point. We expect that these proposed changes at Union Point will warrant additional local street capacity improvements and traffic control measures to accommodate the additional traffic volumes generated.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.

Commenter	Transportation Comments	Response
TOW-15	For example, the Town would like to discuss with LStar expanding the impact study area north to include additional intersections on Pleasant, Middle, Summer, and Washington Streets, and possibly others, such as internal Union Point street networks, and the connections of Union Point streets to external arterials. The NPC describes several additional proposed improvements for the Route 18 corridor, including expansion of the roadway to four lanes between Highland Place in Weymouth to Route 139 in Abington, additional intersection improvements, and replacement of the bridge over the MBTA right-of-way. Additional proposed improvement to consider is a proposed roadway link north of and parallel to Route 3, between Derby Street, Hingham and Pleasant Street, Weymouth. The Town is willing to suggest to LStar alternative means of intersection improvement where right-of-way permits.	This NPC includes a new TIA that incorporates the subject roadways includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
TOW-16	Given the travel demand increase, the Town and LStar should work collectively on increasing the connectivity between Union Point and the rest of Weymouth by all travel modes, vehicular, transit, pedestrian, and bicycle, that need upgrading. For example, Union Point currently has good transit access to Boston, via the commuter rail, but no public transit access to other points in Weymouth, or other nearby communities.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
TOW-19	Like the coordination the Town has with LStar over sewer improvements and the Town's roadway improvements, the Town and LStar should similarly closely coordinate any important traffic mitigation measures occurring in the Town.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
TOW-20	We also note that LStar is proposing a mix of roadways for the project, some of which are to be accepted by the Town and others that will remain private ways. The Town seeks to discuss with LStar how these private ways, not accepted or maintained by the Town, could avoid being problematic to residents if not appropriately maintained in the future. Likewise, regardless of whether the roadways are accepted as public ways or privately-owned, LStar should coordinate with the Town appropriate roadway design that accommodates snow removal needs, on-street parking, and other matters of general concern.	The proponent has been and will continue to work with the Town on these issues.

Commenter	Transportation Comments	Response
TOW-21	Finally, the Town is currently in the process of buying the street lights that the Town currently leases from National Grid. The Town is converting these street lights from sodium vapor lamps to energy-efficient LED fixtures. The Town seeks to collaborate with LStar to ensure roadway lighting at Union Point is consistent with what Weymouth is implementing townwide.	The proponent will continue to work with the Town on these issues.
APB-3	In addition to water and emergency services the Town of Abington would see an increase in traffic. The Notice of project change is unclear about which direction the increased traffic would be coming from. We hope that information is provided soon, currently we have no idea which roads in Abington would be impacted and that is very important to the Master Plan.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
APB-4	We would like the intersections at route 18 and route 123 reviewed. Traffic is heavy and would only get worse. In addition, currently it is nearly impossible to take a left hand turn from route 139 onto route 18 at that intersection. The Town was promised many years ago that a left hand turn signal would be added to the lights going east/west on route 139 making this turn possible onto route 18.	This NPC includes a new TIA that includes an assessment of the Route 18/Route 123 intersection and identifies specific measures to improve traffic operations and safety at this intersection.
KK-2	With an increase in vehicle trips from 34,300 to 79,900, the pressure on Reservoir Park Drive, already jammed end to end during rush hour and times of emergencies on Hingham Street or Weymouth Street, will be unsustainable. Sections 2.1.7 and 2.1.8 do not address this issue. The health effects of increased fumes and particulate matter on those using trails and recreational areas at Union Point is of great concern and should be carefully studied. The left turn arrows at the two intersections should be able to be programmed for flashing yellow, as is the signal at the intersection of Market and Plain Streets.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
APB-4	We would like the intersections at route 18 and route 123 reviewed. Traffic is heavy and would only get worse. In addition, currently it is nearly impossible to take a left hand turn from route 139 onto route 18 at that intersection. The Town was promised many years ago that a left hand turn signal would be added to the lights going east/west on route 139 making this turn possible onto route 18.	This NPC includes a new TIA that includes an assessment of the Route 18/Route 123 intersection and identifies specific measures to improve traffic operations and safety at this intersection.

Commenter	Transportation Comments	Response
KK-2	With an increase in vehicle trips from 34,300 to 79,900, the pressure on Reservoir Park Drive, already jammed end to end during rush hour and times of emergencies on Hingham Street or Weymouth Street, will be unsustainable. Sections 2.1.7 and 2.1.8 do not address this issue. The health effects of increased fumes and particulate matter on those using trails and recreational areas at Union Point is of great concern and should be carefully studied. The left turn arrows at the two intersections should be able to be programmed for flashing yellow, as is the signal at the intersection of Market and Plain Streets.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program that address the predicted impact of the current project.

Commenter	Parking Comment	Response
EEA-12	The DSEIR should identify the location and amount of parking proposed in both structures or surface lots and clarify the amount of parking spaces proposed by land use type.	The amount of parking to be provided for each land use will be consistent with the parking requirements of the approved zoning and will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles.
EEA-13	The DSEIR should include an analysis of anticipated parking demand based upon parking needs and supplies (based on multiple data sources, and discounted to allow for the proximity to transit); the projected traffic demand at different times of the day; the expected parking duration; and the different types of parking demand (e.g. resident, employee, visitor, etc.).	The parking requirements were established for the project were informed by parking demand data published by the ITE and other sources.
EEA-14	The DSEIR should provide additional discussion of how the final parking demand will be met given the large range of potential parking supply presented in the NPC.	The parking for each land use will be defined as the individual site plans are advanced.
EEA-15	The DSEIR should clarify how parking will be constructed to meet the needs of each construction phase.	The parking for each land use will be constructed or will be made available prior to occupancy.
EEA-16	The DSEIR should evaluate parking policies that will minimize parking demand and automobile use, such as charging market rates for parking, parking cash-out polices, and other demand-reduction policies for employees and residents.	The amount of parking to be provided for each land use will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles.
EEA-17	The DSEIR should discuss how the Proponent intends to incorporate electric vehicle charging infrastructure on-site.	Each single-family home and townhouse unit will have a 50A garage circuit to provide for Level II EV charging. Twenty percent (20%) of passenger vehicle parking spaces will be EV ready for the multifamily residential buildings and ten percent (10%) of passenger vehicle parking spaces will be EV ready for the other commercial buildings.

Commenter	Parking Comment	Response
DOT-18	According to the NPC, the project change would provide between 10,730 to 31,700 parking spaces, for a total capacity of up to 43,900 spaces. The Institute of Transportation Engineers' Parking Generation generally provides a reasonable basis for comparison to parking requirements under local zoning, but this reference does not present parking rates for this type of mixed land use. In the absence of such a ready reference for parking supply, the DEIR should analyze the anticipated parking demand based upon parking needs and supplies for comparable facilities (based on multiple data sources, and discounted to allow for the location and availability of transit); the projected traffic demand at different times of day; the expected parking duration; and the different types of parking demand (e.g. resident, employee, hotel guest, etc.). The Proponent should consider the travel demand data from the CTPS modeling as part of the parking analysis. The Proponent should propose parking policies that are designed to minimize parking demand and automobile use, such as fees for parking, parking cash-out policies, and other demand-reduction measures for employees.	The parking requirements established for the project were informed by parking demand data published by the ITE and other sources and will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles.
MAPC-20	The estimated parking demand for Union Point ranges from 19,500 to 43,900 parking spaces. The EIR needs to specify a precise number of spaces and explain the methodology used to determine the total amount of proposed parking for the entire Project, parking proposed as part of Phase 1, and the timing of parking proposed subsequent to Phase 1.	The parking requirements established for the project were informed by parking demand data published by the ITE and other sources and will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles. The parking for each land use will be constructed or will be made available prior to occupancy.

Commenter	Parking Comment	Response
MAPC-21	The methodology should include an analysis of the anticipated parking usage based on the different types of parking demand (e.g., office, residential, hotel), projected parking demand at different times of day, anticipated parking duration, and whether the parking is surface or structured. With this analysis, MAPC will be able to assess whether the proposed parking spaces are in fact needed, or whether the number could be reduced to limit permeable surface and other environmental impacts, and to encourage non-auto access to the site. With the capacity to implement shared parking, close proximity to a commuter rail station, and opportunities to implement various parking reduction programs, it is our view that the amount of parking spaces could be significantly reduced.	The parking requirements established for the project were informed by parking demand data published by the ITE and other sources and will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles. The parking for each land use will be constructed or will be made available prior to occupancy.
MAPC-22	MAPC requests that the EIR provide detailed information about the construction phasing and to closely monitor parking utilization. In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary require the Proponent to develop a strong program to reduce the proposed number of parking spaces to the fullest possible extent. A reduced parking supply would encourage the use of non-auto modes of transportation and lead to a more successful project from an environmental perspective.	The parking for each land use will be constructed or will be made available prior to occupancy. The parking to be provided will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles.
MAPC-23	The Proponent has also noted that the Project will provide structured parking for most uses. The amount of structured and surface parking needs to be specified in the EIR.	The use of structured parking will be limited and is not the preferred approach to be used for the current development program.
MAPC-24	The Proponent should clarify how the 2,056 parking spaces, which have already been permitted or constructed, are being allocated and utilized.	The constructed parking is being used by the existing uses and may also be allocated to the proposed uses where there is surplus parking.

Commenter	Parking Comment	Response
MAPC-25	MAPC strongly encourages the Proponent to develop a shared parking program. In order to make such a program work, the Proponent needs to determine how the different land uses (e.g., office, residential, hotel), will be able to use the same parking spaces given their different parking demands during different times of the day and week. Due to the variety of land uses and mixture of peak parking occupancy time periods, the Proponent should be able to optimize the amount of shared parking to reduce the number of spaces required.	The parking strategy for the project includes shared parking where land uses are mixed in order to minimize the amount of new parking constructed.
MAPC-26	MAPC recommends that the Secretary require the Proponent to establish parking banks (a.k.a. landscape reserves) that would remain as greenspaces if it is determined that the surface parking may not be needed subsequent to the construction of the structured parking and full occupancy of the Project site. These areas would be converted to parking only if the need is clearly demonstrated. As long as additional parking is not needed, the land should remain landscaped.	Where appropriate, the minimum amount of parking required to support a specific land use or mix of uses will be constructed and reserve parking will be designed but not constructed (land banked).
MAPC-27	Other specific parking policies and management strategies the Proponent is encouraged to include are: Offer Parking Cash-Out Incentives for Employees-This strategy encourages tenants to provide cash instead of individual parking spaces to their employees, thus encouraging employees to choose alternative modes. Charge a Parking Fee for Residents with More than One Vehicle-Charging a parking fee for residents with more than one vehicle will serve as a disincentive, and it will more legitimately recognize the true cost of parking construction and maintenance. Preferential Parking Program-Provide a preferential parking program for carpools and vanpools, and provide access to Zipcars in convenient locations. Electric Vehicles-Provide electric vehicle charging stations and charging infrastructure and reserve those spaces for such vehicles.	The parking to be provided will be reasonably constrained to encourage the use of alternative modes of transportation to single-occupancy vehicles. A detailed trip reduction program is an integral part of the transportation improvement program for the project and includes measures to reduce both the traffic and parking demands of the project. Electric vehicle charging stations will be incorporated into the project.

Commenter	Public Transportation Comment	Response
EEA-18	The DSEIR should complete an analysis of the project's potential impact on the MBTA's commuter rail and Red Line service in response to the comments submitted by MassDOT. This evaluation will consider ridership and operational impacts and associated mitigation, if necessary.	This NPC includes a new TIA that includes an updated trip-generation calculations. The project includes a trip reduction plan and traffic monitoring program that address the predicted impact of the current project.
EEA-19	The DSEIR should describe the proposed multi-modal transportation facility based on the expansion of the South Weymouth Commuter Rail Station and clarify whether the Proponent is the responsible party for constructing this element of the project.	No longer applicable. The project includes the establishment of a "Tri-Town TMA" in lieu of the construction of a multi-modal transportation facility.
EEA-20	The DSEIR should describe the proposed Union Point shuttle service, including potential routes, destinations, frequency and ridership goals.	It is envisioned that a shuttle service will be provided as a part of the Tri-Town TMA. The service route is envisioned to be internal to the Site and will include continued service to South Weymouth Station. As the service grows, additional service may be provided to Braintree Station to provide connections to the Red Line.
DOT-7	The DEIR should contain an analysis of what additional demand will be generated by the project. Once those vehicle demand and transit trip generation rates are developed and applied to the project, the DEIR should address the following issues (see comments DOT-8 through DOT-15).	The Project includes a trip reduction plan and traffic monitoring program that address the predicted impact of the current 2023 Modified Development Program.
DOT-8	The DEIR should estimate what additional new ridership on the Old Colony Commuter Rail Line can be anticipated and what time of day those impacts will occur. The Proponent should work with the MBTA Service Planning Department to ensure that it has access to the most recent and most relevant ridership and operational statistics for both lines. The DEIR should present a summary of the transit analysis to demonstrate that the proposed improvements would maintain or improve MBTA Service Standards compared to future No-Build conditions based on the phases of the project.	The Project includes a trip reduction plan and traffic monitoring program that address the predicted impact of the current 2023 Modified Development Program.

Commenter	Public Transportation Comment	Response
DOT-9	The DEIR should include a comprehensive discussion of mitigation measures to address the Union Point's transit impacts on the Commuter Rail Line. The Proponent should consult with MassDOT and the MBTA to identify the level of transit improvements required along with a schedule of implementation to address potential constrained capacity conditions. These improvements could be of capital and/or operational nature.	The Project includes a trip reduction plan that envisions that a shuttle service, when demand warrants, will be provided as a part of the Tri-Town TMA. The service route is envisioned to be internal to the Site and will include continued service to South Weymouth Station. As the service grows, additional service may be provided to Braintree Station to provide connections to the Red Line.
DOT-10	The DEIR should contain an assessment of how riders, particularly during the MBTA peak periods, are expected to access the facility via transit. The previous development program has committed to an on-site transit shuttle to connect employees, residents, and customers to the MBTA commuter rail. Due to the revised development program, the NPC has indicated that they would evaluate an expanded transit improvement program to serve the expected increase in ridership. The DEIR should provide a detailed presentation of the transit shuttle between Union Point and the MBTA Commuter Rail Station. Specifically, the DEIR should identify the future Build Demand for the shuttle based on MBTA service and ensure that adequate service and frequency are provided to encourage usage.	The Project includes a trip reduction plan that envisions that a shuttle service will be provided as a part of the Tri-Town TMA. The service route is envisioned to be internal to the Site and will include continued service to South Weymouth Station. As the service grows, additional service may be provided to Braintree Station to provide connections to the Red Line.
DOT-11	The DEIR should show how residents, customers or employees would access the shuttle bus service to get to/from the MBTA Commuter Rail Station and from the shuttle service how they would get to/from their final destination on the site. Special emphasis should be placed on intermodal connectivity and the project site plan should identify transfer locations, amenities, and infrastructure to facilitate efficient and seamless travel. The DEIR should, as part of its traffic analysis, show how pedestrian crossings and rail crossings can be coordinated to ensure safe, accessible travel for customers.	A shuttle service will be provided as a part of the Tri-Town TMA, with the service route envisioned to be internal to the Site and will include continued service to South Weymouth Station. As the service grows, additional service may be provided to Braintree Station to provide connections to the Red Line.

Commenter	Public Transportation Comment	Response
DOT-12	The DEIR should also contain an assessment of how riders, particularly during the MBTA peak periods, are expected to travel between the site and the MBTA Red Line. Due to the proposed large commercial component, the site is expected to attract employees and customers beyond the immediate vicinity. The DEIR should estimate what additional new ridership on the MBTA Red Line can be anticipated and what time of day those impacts will occur. The Proponent should work with the MBTA Service Planning Department to ensure that it has access to the most recent and most relevant ridership and operational statistics for both lines.	A shuttle service will be provided as a part of the Tri-Town TMA, when demand warrants, with the service route envisioned to be internal to the Site and will include continued service to South Weymouth Station. As the service grows, additional service may be provided to Braintree Station to provide connections to the Red Line. The commercial component of the Project has been significantly reduced from the program that was envisioned as a part of the 2017 NPC.
DOT-13	The TIA should clearly evaluate and recommend whether the MBTA should connect the site with bus services based on transit ridership projections or whether the proposed on-site shuttle system should be expanded to accommodate those expected to use the Red Line	The project includes the establishment of a “Tri-Town TMA”. A shuttle service will be provided as a part of the Tri-Town TMA, with the service route envisioned to be internal to the Site and will include continued service to South Weymouth Station. As the service grows, additional service may be provided to Braintree Station to provide connections to the Red Line.
DOT-14	The Proponent should also work with area regional transit authorities such as the Brockton Area Transit Authority (BAT) to evaluate the feasibility of serving the site. These services should complement existing services or proposed services such as the shuttle system to increase service frequency.	The Project includes the establishment of a “Tri-Town TMA”. A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities, including BAT.
DOT-15	The NPC identifies as potential mitigation the addition of a multi-modal transportation facility based on the expansion of the South Weymouth Commuter Rail Station. The Proponent should coordinate with appropriate stakeholders to ensure that this facility would provide all necessary accommodations to attract and service different modes.	No longer applicable. The project includes the establishment of a “Tri-Town TMA” in lieu of the construction of a multi-modal transportation facility.

Commenter	Public Transportation Comment	Response
OCPC-2	The proponent should work with Brockton Area Transit (BAT), the MBTA, and private carriers to investigate the feasibility of regional connectivity with existing transit systems and to ensure that future transit demands are analyzed, met, and funded. This would include developing potential bus route connections, providing connectivity with Brockton and other important inter-modal connections in the region, and providing secondary transit signal priority technologies. An example that should be explored is connecting the Union Point transit center with the existing Brockton Area Transit's (BAT) intermodal center.	The project includes the establishment of a "Tri-Town TMA". A shuttle service will be provided, as demand warrants, as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities, including BAT.
OCPC-3	The proponent should coordinate with the affected communities, the regional planning agencies, and the regional transit authorities in the development, design, and operation of the on-site shuttle service. The proposed transit center has the potential to address the cross hub connection issues missing from most MBTA commuter rail stops.	The project includes the establishment of a "Tri-Town TMA". A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities.
OCPC-4	The proponent should also work with the MBTA on commuter rail expansion, and the expansion of the South Weymouth station, to accommodate increases in ridership due to the development. Furthermore, the proponent should explore the potential for the construction of a parking garage at the South Weymouth Commuter Rail Station in an effort to reduce the total impervious surface footprint while providing the additional parking for commuters.	No longer applicable. The project includes the establishment of a "Tri-Town TMA" with an associated shuttle service to connect the project to the South Weymouth Commuter Rail Station. This will eliminate the need for additional parking at the Station as a result of the Project.
MAPC-28	MAPC is pleased that the Proponent has mentioned it intends to provide its own shuttle service. Specifically, the shuttle will be a clean-fuel, potentially self-driving, on-site transit shuttle between Union Point districts and the South Weymouth Commuter Rail Station.	The project includes the establishment of a "Tri-Town TMA". A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities.

Commenter	Public Transportation Comment	Response
MAPC-29	MAPC recommends that the Proponent expand the shuttle service to access other area residential and business centers and to provide a connection to MBTA Bus Route 225. The shuttle service must ensure that travel times and headways are convenient enough to encourage riders to use the system instead of other modes. In addition, the shuttle service's routes should be based on an on-going assessment and analysis of commuting patterns based on the data collected as part of the Project's monitoring program. MAPC looks forward to reviewing plans of the proposed shuttle routes in the EIR.	A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities.
AF-2	Commuter Rail: I found this statement particularly amusing "The 'BTA's commuter rail operator is able to use these cars in the Kingston/Plymouth Corridor to increase capacity" As someone who takes commuter rail out of S Weymouth daily I can assure you this is not the case. It is well known FACT and has been reported in the media that MBTA/Keolis DO NOT have enough rolling stock to meet CURRENT NEEDS.	A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities. This service will allow for transit trips to be dispersed between available resources.
AF-3	As more housing has been built at this project it has become increasingly difficult to find seating on the trains in the AM. Many trains are standing room only, it is even worse during the evening rush hours as trains have become so crowded conductors can't collect fares. If additional passengers are added capacity must be added to accommodate them. Making improvements to, and running buses to funnel more people to the station is not adequate mitigation. For too long developers have been allowed to view public transit as a free unlimited resource they can exploit to maximize profit. The riders are left to bear the burden. Public transit is neither free nor unlimited.	A shuttle service will be provided, as demand warrants, as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities. This service will allow for transit trips to be dispersed between available resources.
MAP-14	Define the relocation of the South Weymouth Commuter Rail Station Platform. Define the reason for relocation of South Weymouth commuter Rail Parking Lot. Where would this be located?	No longer applicable. The project includes the establishment of a "Tri-Town TMA" with an associated shuttle service to connect the project to the South Weymouth Commuter Rail Station. This will eliminate the need to relocate the station platform.

Commenter	Public Transportation Comment	Response
JS-11	What is the capacity of the MBTA to handle increase commuter use due to the increase number of workers/shoppers? Does the MBTA station in South Weymouth have the capacity for this increase? Does South Station have the capacity to increase the number of trains or cars per train on the Kingston line?	The current development program reflects a significant reduction in the amount of commercial space that is to be constructed from the program that was contemplated as a part of the 2017 NPC. A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities. This service will allow for transit trips to be dispersed between available resources.
TOW-17	Furthermore, the Secretary may be helpful with having the MBTA and its commuter rail contractor, Keolis, work with the Town and LStar on expanding capacity to the South Weymouth rail station on the Plymouth line of the Old Colony line. The Plymouth line saw a decrease in peak hour trips with the opening of the Greenbush line. These commuter rail lines should not cannibalize each other and internally compete for resources, but instead each line should receive additional trips and more cars during each trip.	The proponent has been and will continue to coordinate with MassDOT concerning the transportation resources that serve the project site. A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities. This service will allow for transit trips to be dispersed between available resources.
TOW-18	We understand that commuter rail traffic suffers from bottlenecks outside of Weymouth, such as the main Old Colony trunkline north of Town and also train capacity at South Station. While many of the issues addressed in this letter are ones the Town and LStar could resolve with minimal involvement by the state, this issue of increased public transit to Union Point is a matter beyond the scope of simply the Town and LStar.	The proponent has been and will continue to coordinate with MassDOT concerning the transportation resources that serve the project site. A shuttle service will be provided as a part of the Tri-Town TMA and will provide connections to MBTA services and those of other regional transit authorities. This service will allow for transit trips to be dispersed between available resources.

Commenter	TDM Program Comment	Response
EEA-21	The DSEIR should include a proposal for a robust TDM program that comprehensively addresses site design opportunities and incentives to reduce single occupancy vehicle (SOV) trips.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program.
EEA-22	In addition to enhancing access to public transit, the DSEIR should identify bicycle and pedestrian accommodations within the project site, connections to existing bicycle networks or on-road infrastructure, and connections to the South Weymouth commuter rail station.	The project includes the expansion of the pedestrian and bicycle network within the project site and provides connectivity of these accommodations between Route 18 and Weymouth Street/Reservoir Street.
EEA-23	An assessment of existing and proposed pedestrian and bicycle accommodations should be prepared in accordance with guidance provided m the MassDOT comment letter.	This NPC includes a new TIA that includes an updated inventory of existing and proposed pedestrian and bicycle accommodations.
DEP-32	The project includes commitments to numerous Transportation Demand Management (TDM) measures to reduce vehicle trips and to mitigate traffic impacts. MassDEP supports these measures, but suggests additional measures be included to provide incentives to encourage the use of electric and plug-in hybrid vehicles such as the installation of charging stations and preferential parking for these vehicles.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program. EV charging stations will be incorporated into the project.
DOT-19	The DEIR must include a proposed Travel Demand Management (TDM) program based on the project proposal that would implement measures aimed at reducing site trip generation. The DEIR should further refine the Transportation Demand Management (TDM) program in light of the regional context of the project. The TDM plan should be based on the specific measures that have been successful in reducing trip generation for similar facilities, and should further investigate measures that would maximize usage of existing and new pedestrian, bicycle, and transit facilities. Such measures should include subsidizing transit passes for both employees and residents, limiting the available parking supply, providing on-site amenities and conveniences that would reduce the need for automobile travel, and providing a circulating shuttle between transportation hubs, activity centers, and the MBTA Commuter Rail intermodal center. The Proponent should consider providing a central location for shuttle bus services with adequate amenities such as bus shelters or near locations with climate-controlled waiting area.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program. The project includes the expansion of the pedestrian and bicycle network within the project site and provides connectivity of these accommodations between Route 18 and Weymouth Street/Reservoir Street.

Commenter	TDM Program Comment	Response
DOT-20	The Proponent should also commit to hiring a full-time, dedicated Transportation Coordinator for the project. The Proponent should also seek to address any gap in MBTA weekend transportation services by reaching out to other transportation service providers to provide connections to the MBTA Red Line as necessary.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program. The trip reduction program includes hiring a full time transportation coordinator and the establishment of a Tri-Town TMA that will include establishment of a shuttle service to connect to, expand and supplement MBTA services.
DOT-21	The DEIR should also describe the full range of TDM proposals being considered by the proponent and how those TDM concepts will be incorporated into the operations of the site and its different tenants. The DEIR should also propose how these TDM ideas can be tracked and evaluated during operations so that they can be regularly reviewed and updated as appropriate. The Proponent should provide ample bicycle parking; on-site showers, lockers, and changing facilities; and financial incentives to encourage employees or customers to walk, bicycle, or ride public transit to the site.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program. The trip-reduction program includes bicycle parking, showers, lockers and charging facilities and financial incentives to encourage the use of alternative modes of transportation to the use of single-occupancy vehicles.
DOT-22	The project proponent should also consult with MassRIDES, the Commonwealth's travel options service, as well as the South Shore Transportation Management Association. These travel options services can help the Proponent identify potential trip reduction measures, especially those targeting residents and employees, and support the implementation of the TDM program. The proponent should also promote ridesharing through NuRide, the Commonwealth's web-based trip planning and ridematching service that enables participants to earn rewards for taking "green" trips. The proponent should provide information on the substance and outcomes of its consultations in the DEIR, along with a summary of the TDM program proposal.	The proponent will coordinate with MassDOT to develop travel options. A Tri-Town TMA will be established to facilitate travel mode options for the project and will include the operation of a shuttle service to connect the project to services provided by the MBTA and other transit providers. The trip reduction measures include ride-matching services. A traffic monitoring program is defined in the TIA that will be used to measure the effectiveness of the trip reduction program.

Commenter	TDM Program Comment	Response
MAPC-36	MAPC is pleased that the Proponent has committed to include a Transportation Demand Management (TDM) program that includes a variety of measures to minimize automobile usage and Project-related traffic impacts. These strategies include designating an on-site TDM Coordinator, subsidizing transit passes for employees, and establishing a ride-matching program. By working with the site's future tenants, the Proponent should be required to execute the following TDM measures: A guaranteed ride home program available for employees. Work with a car sharing service (e.g., ZipCar) to locate vehicles within the Project site. Provide bicycle parking and shower facilities/changing rooms within buildings.	This NPC includes a new TIA that includes an updated transportation improvement program, trip reduction plan and traffic monitoring program. The trip-reduction program includes ride-matching services, bicycle parking, showers, lockers, a guaranteed ride home program and financial incentives to encourage the use of alternative modes of transportation to the use of single-occupancy vehicles.
MAPC-37	TDM commitments should be institutionalized so that future managers of the development sites will be required to adhere to these commitments.	The trip-reduction program will be managed by the Tri-Town TMA. Building owners and management associations within the project will be required to become a member of the Tr-Town TMA and to implement the trip-reduction program that is defined in the TIA.

Commenter	Pedestrian / Bicycle Comment	Response
DOT-16	The NPC indicates that the project would integrate sidewalks and bike paths into Project wide design. The DEIR should be very specific in providing pedestrian accommodations on site with appropriate connectivity to the off-site pedestrian network in the area. The DEIR should provide a thorough inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site. It should also provide an evaluation of the network to include pavement conditions, sidewalk widths, crosswalks, compliance with current accessibility standards, and existing pedestrian volumes and movements. The Proponent should develop the site plan to ensure that the project is as open to pedestrians, and to the neighborhood, and as permeable along all edges, as possible	The project includes the expansion of the pedestrian and bicycle network within the project site and provides connectivity of these accommodations between Route 18 and Weymouth Street/Reservoir Street. This NPC includes a new TIA that includes an updated inventory of existing and proposed pedestrian and bicycle accommodations.
DOT-17	Similarly, the DEIR should include a detailed inventory of the bicycle network to include bikeway types, bikeway widths, and bicycle numbers. The Proponent should identify suitable bicycle routes within the study area, as well as any other existing bicycle facilities (e.g., bicycle lanes, cycle tracks, shared-use paths). The DEIR should reevaluate these routes based on the origin-destination of potential site employees, residents, and visitors. Based on this analysis, the Proponent should consider the feasibility of expanding some of these existing routes or consider new routes to encourage bicycle travel in and around the site. The Proponent should also evaluate whether a bike sharing program would be feasible at the site. In addition, amenities such as bicycle racks, shower facilities, and incentives to use bicycle should be identified.	This NPC includes a new TIA that includes an updated inventory of existing and proposed pedestrian and bicycle accommodations. This updated inventory served as the basis of the recommendations to expand the pedestrian and bicycle network. The trip reduction program includes specific measures to encourage bicycle travel and includes the establishment of a bikeshare program.
MAPC-30	The NPC indicates that the Project has an extensive and comprehensive network of sidewalks, paths, and bicycle lanes. For example, residential areas are linked to the Town Center District by paths that encourage walking and biking. The NPC mentions that the Proponent has started construction of a proposed 50-mile trail network. The EIR needs to describe the extent to which the proposed 50-mile trail network will connect with the regional trail network. MAPC looks forward to written and graphic descriptions addressing the internal network of sidewalks, paths, and bicycle lanes within and connecting to the Project site.	The project includes the expansion of the pedestrian and bicycle network within the project site and provides connectivity of these accommodations between Route 18 and Weymouth Street/Reservoir Street. This NPC includes a new TIA that includes an updated inventory of existing and proposed pedestrian and bicycle accommodations.

Commenter	Pedestrian / Bicycle Comment	Response
MAPC-31	The Proponent should also plan to install bicycle racks proximate to building entrances. These bicycle racks should be secure, weather-protected, and highly-visible. Internal bicycle parking for employees and financial incentives to encourage employees to bicycle to the project should also be provided by the Proponent. The specific number of internal and external spaces should be included in the EIR.	The trip reduction program for the project includes the installation of bicycle racks and weather protected bicycle parking, and incentives for bicycle commuting. The location of bicycle parking will be defined as the plans for each building or development area are advanced.

Commenter	Interim Water Supply Comment	Response
EEA-25	The DSEIR should provide an update on agreements between each of the Host Communities regarding the acquisition of potable water supply for the project. The DSEIR should explain the conditions of each agreement, specifically noting commitments by the Proponent to ensure that these withdrawals remain temporary in nature.	There is no proposed interim water from the Abington Rockland Joint Water Works (ARJWW). The interim agreement with Weymouth is under review regarding the availability of water and sewer services, while the Weymouth/SRA, connection to the MWRA South Water System is being implemented.
EEA-26	The DSEIR should address the Proponent's ability to meet the terms of the interim water supply agreement described by the Town of Weymouth.	See above.
EEA-27	The DSEIR should discuss the amount and type of anticipated build-out under the interim condition to clarify how much of Phase 1 can be served by the proposed interim water supply agreements.	No longer applicable.
DEP-19	The Water Management Program has concerns about the abilities of the Town of Weymouth and the Abington-Rockland Joint Water Works to supply the stated amount of water to the project. Abington-Rockland`s Water Management Act (WMA) permit application in the South Coastal basin is under review for an authorized withdrawal volume of 2.9 million gallons per day (MGD). When issued, this permitted amount will be less than the system-wide water needs forecast prepared by the Department of Conservation and Recreation`s Office of Water Resources (DCR-OWR) for Abington-Rockland's current customer base. The most recent demand projection for Abington-Rockland is 3.27 MGD by the year 2030 with a 5% buffer that increases that projection by 0.16 MGD, for a total allocation of 3.43 MGD. The additional water demand from this project on top of existing and already projected needs, may increase the demand pressure on the system and require a new WMA permit.	No longer applicable. Weymouth is in the process of joining MWRA Water and there is no proposed water supply connection to the ARJWW.
DEP-20	Abington-Rockland is already withdrawing more than its baseline volume (based on withdrawals between 2003 through 2005). Withdrawals over a WMA permit baseline require mitigation of the withdrawal impacts. The addition of this project`s water use on the system will increase the volumes needing to be mitigated by Abington-Rockland.	No longer applicable.

Commenter	Interim Water Supply Comment	Response
DEP-21	The project proponent should work with the Town of Weymouth and the Abington-Rockland Joint Water Works to address the potential mitigation and minimization requirements, as well as any issues related to unaccounted for water that those systems will need to address.	Agreed. The Proponent is working with the Town of Weymouth and supporting the Town's efforts to reduce unaccounted water and is contributing to underwriting Weymouth's MWRA application.
RBOS-1	Past proposals for this site have come before you. As a result, much has been studied and learned about the challenges and benefits of development at this location. We recognize that the changes proposed by Union Point require additional studies be undertaken. We ask that you focus that study on the areas of prime concern, such as traffic and water related issues. We specifically ask that you look into the feasibility of opening Union Street.	Section 7.1 presents the current approach and analysis for Water solutions and Section 8.0 presents the current approach and analysis for Transportation solutions. The Proponent is not proposing the reopening of Union Street to access the Project. The decision to open Union Street rests with the Town of Rockland.
WRC-3	The NPC states that the interim water supply sources (Weymouth and Abington/Rockland) will only be used until a long-term water supply solution is in place. If this circumstance changes, and these sources continue to be used, there may be ITA implications and the proponents should discuss this with WRC staff as soon as possible.	There is no proposed use of the ARJWW. Weymouth's interim water supply agreement would serve only the Weymouth portion of the Base and not trigger ITA issues.
WSSC-7	How does the residential and commercial development proposed for Phase I correlate with the proposed amount of interim water available from Weymouth (600,000 gpd) and Abington/Rockland (250,000 gpd)?	No longer applicable.
NSRWA-1	The proponent has proposed increasing the demand from the original EIR from 1.4 MGD to 2.7 MGD and is proposing the review of 2 alternatives for supplying 2.7 MGD at full buildout: 1. MWRA; 2. Aquaria Desalination Because either of these solutions proposed would take years to be completed, the proponent has proposed an interim water supply with 600,000 gpd (a 355,000 gpd increase over existing agreements) coming from Weymouth, and 250,000 gpd coming from Abington and Rockland. In order to take this amount of water from Weymouth the proponent must find 2 gallons for every 1 gallon it seeks. It is unclear how the proponent will do this, the Supplemental FEIR should provide detailed plans for how it will accomplish this mitigation as the current withdrawal permit could be exceeded with these additional demands if not properly mitigated for.	The revised proposal reduces the new water demand to 1.8 mgd from 2.7 mgd at full buildout. There is no proposed use of ARJWW water. See Section 7.1.

Commenter	Interim Water Supply Comment	Response
WCAM-2	On the interim water supply with Weymouth section 2.11.2.1, the mayor has committed up to 600,000 GPD to Union Point which puts the town at or near the allowable usage 5.0 MGPD figure from DEP, if all of the water is used in said agreement. This does not account for any other future new growth within the town of Weymouth. The other interim agreement that is discussed in section 2.11.2.2 is with the Abington-Rockland Joint Water Works to provide up to 250,000 GPD. It was brought to my attention and confirmed by the master developer during a recent Weymouth Town Council meeting that there is no commitment letter for that amount of water. The letter was to fund a study to see if there was any available water for Union Point without a specific amount of dedicated water.	No longer applicable. There is no proposed use of ARJWW supply. See Section 7.1.The Weymouth 2022 updated water and sewer system capacity analysis report projects both Town growth needs and the programmed Base redevelopment over the time period 2025-2040. The SRA underwrote the cost of that study.
MAP-9	The second paragraph states, “As an interim water supply for development located at Union Point the Towns of Abington and Rockland, the two towns have committed to provide up to 250,000 gpd.” The two towns have not committed to supply 250,000 gpd. They have agreed to review and analyze the Myers Avenue well to see if it could provide 250,000 gpd. The Abington / Rockland Joint Water Works has only agreed to do a study, at the cost of $18,000 to see if the Myers Avenue wells can provide up to 250,000 gpd temporarily until a permanent water supply is in place.	No longer applicable. See Section 7.1.
MAP-33	Has MADEP given Weymouth a permit to supply a total of 600,000 gpd?	The Town of Weymouth has approximately 700,000 gpd excess capacity under its current DEP withdrawal permit.
MAP-37	The Town of Weymouth has contracted to provide up to 600,000 more gallons of temporary water daily to the Union Point project. My question is Weymouth capable of providing this amount of water?	The Town of Weymouth has approximately 700,000 gpd excess capacity under its current DEP withdrawal permit.
JM-6	As far as the Interim Water & Sewer Supply in concerned, the Mayor of Weymouth did enter into an Inter-Municipal Agreement with the SouthField Redevelopment Authority that would provide up to 600,000 gpd of water and 540,000 gpd of sewer capacity for the Weymouth portion of the project on an interim basis. (copy attached) There are many questions that still surround the terms of this agreement including why it's open ended and with no restrictions as to how the water is used?	The agreement is under discussion.

Commenter	Interim Water Supply Comment	Response
JM-8	Under the Interim Water Supply sections of this NPC it states that the Towns of Rockland and Abington have committed to provide up to 250,000 gpd that would be used until the long-term supply is available. That statement is simply false. I attended multiple public meetings of the Abington Rockland Joint Water Works. The ARJWW entered into an agreement with LStar only to determine if they have the ability to provide temporary water service to Union Point within the boundaries of Rockland and Abington. The Agreement did not contain language committing to any interim water for Union Point. (copy attached)	No longer applicable. See Section 7.1.
JS-15	Page 1-11 Interim Supply 2nd paragraph; page 2-44 2.11.2.2 - The first sentence says the towns of Abington and Rockland have "committed" to provide up to 250,000 gallons of water per day to development in the Abington/Rockland areas of Southfield. The word "commitment" does not agree with what has been said at public meetings (including the 2/27 Selectmen meeting with LSTAR. It also does not agree with conversations I have had recently with the superintendent of the Joint Abington/ Rockland Waterworks. According to what was said in these meetings and discussions, the agreement now is to investigate whether (and how much) water could be provided to Southfield for as limited time (3 years??) If the investigation is results are favorable, then there would be an agreement to be provide water for an interim period.	No longer applicable.

Commenter	Interim Water Supply Comment	Response
TOW-1	LStar agreed with the Town to use Weymouth's water system as an interim water supply until it identifies and implements a mutually agreed upon permanent water supply source. In this NPC, LStar identifies several options, including water supplied from the Massachusetts Water Resources Authority, Aquaria in Brockton, or possible partial supply from Weymouth, Abington, Rockland, or the combination of the three towns. During this short interim period before LStar identifies, permits, and constructs a permanent solution, Weymouth has offered to provide Union Point with up to 600,000 gallons per day (gpd) of water. The Town's temporary water agreement with LStar and the Southfield Redevelopment Authority establishes as an example the positive relationship between the parties and shows that the Town and LStar are best served when we can resolve issues to the extent practicable between us directly with minimal state involvement.	Agreed. The alternative supplies of MWRA or Brockton/Aquaria are studied again in Section 7.1 and Weymouth, with the SRA, has acted to join MWRA Water.
TOW-2	LStar's agreement with the Town recognizes that LStar will require time to realize fully their long-term water supply options. The interim agreement requires a specific timeframe for design, construction, and implementation of the permanent water supply for Union Point. LStar identified a connection to the Massachusetts Water Resources Authority (MWRA) as the likely permanent water supply solution for Union Point, but the Town is willing to consider other external sources of water. The interim agreement sets up a specific timeframe for development of that supply. Before November 2017, the Town must review and approve any final design. LStar must receive all permits no longer than two years after the Town's approval of design. A permanent water supply must be operational no later than two years after construction begins. LStar is unlikely to use the full 600,000 gpd allotment of water from the Town given LStar's commitment to a permanent solution.	Interim time frame agreements no longer apply. The Town of Weymouth, with the SRA, is in the process of joining MWRA Water.

Commenter	Long-Term Water Supply Comment	Response
EEA-28	The DSEIR should include a comprehensive description of each long-term water supply alternative, including but not limited to, the location of proposed infrastructure improvements to accommodate additional flows and connections, the length, type and size of new or modified water mains, and the location of new pump stations or other related infrastructure.	See Section 7.1 for the Brockton/Aquaria alternative. The Weymouth/MWRA connection is documented in a separate Town of Weymouth/ SRA MEPA filing.
EEA-29	Plans at a legible scale should be provided identifying the proposed routes as they relate to environmental resources, rare species habitat, Article 97 land and/or open space accompanied by conceptual cross-sections for work within roadway, utility or cross-country ROWs.	See Section 7.1 for the Brockton/Aquaria alternative. The Weymouth/MWRA connection is documented in a separate Town of Weymouth/ SRA MEPA filing.
EEA-30	The DSEIR should identify water demand rates and total volumes by use, noting data sources, and community of origin.	See Section 7.1.
EEA-31	The DSEIR should demonstrate how it will meet MWRA's policy OP#10- Admission of a New Community to Waterworks System.	See Section 7.1. Weymouth, with the SRA, is joining MWRA Water, will comply with MWRA policy.
EEA-32	The DSEIR should discuss how the project will address potential differences in water treatment in chemistry between the Weymouth and MWRA or Aquaria supply sources may result in water quality impacts and present mitigation options to ensure a quality drinking water and the integrity of existing water main infrastructure.	That work is underway with the Town of Weymouth's consultant and will be included in their application to join the MWRA and MEPA filing in progress.
EEA-33	The DSEIR should also discuss whether the improvements will be designed to facilitate future connections for additional communities to the MWRA system.	The Weymouth transmission main to the MWRA is being planned for a full capacity MWRA South connection. The studied routes pass through Quincy, which is already an MWRA community, and Braintree, which is completing a new, expanded capacity WTP for the Braintree, Randolph, Holbrook system, so direct connections to the main look unlikely. It may be possible to wheel water on an emergency or supplemental basis through the Weymouth system. The Brockton/Aquaria water supply alternative could supply modest amounts of supplemental water to the ARJWW.

Commenter	Long-Term Water Supply Comment	Response
EEA-34	Assessment of the Aquaria Desalination Plant alternative should discuss the plant's capacity, available supply, and cost to purchase water. Comments from the Water Resources Commission (WRC) indicate that a connection to this facility may require an Interbasin Transfer.	See Section 7.1. Such a connection to the SRA would require an ITA.
EEA-35	As noted by MassDEP, it is unclear if the plant will have the ability to provide the quantity of water necessary to meet maximum daily demand and reliability as a primary water supply. The DSEIR should discuss this potential constraint, as well as concerns regarding the potential connection point presented in the NPC.	See Section 7.1. The plant expanded to its full 5.0 mgd capacity can provide the reduced water demand of the new program.
EEA-36	The DSEIR should address whether this alternative will require additional permitting or modification of existing permits for the plant, most notably an NPC for accepting a new customer.	See Section 7.1.
EEA-37	The project will require MassDEP approval for the formation of a Consecutive Water Supply System, as defined in 310 CMR 22.00 and an Interbasin Transfer Act (ITA) approval from DCR. The Proponent should meet with WRC staff to discuss the revised master plan and ITA issues prior to preparation of the DSEIR. The WRC comments noted that previous comments on the FEIR related to a connection to the MWRA' s water supply system remain outstanding and should be updated and addressed as part of the DSEIR.	See Section 7.1.
EEA-38	The DSEIR should estimate potable vs. non-potable demand for the project. The DSEIR should discuss feasible opportunities to reduce water demand (and corresponding wastewater discharges) through water conservation measures such as innovative low-flow fixtures and natural, drought-tolerant landscaping. A feasibility assessment of rainwater capture and reuse, and reuse of greywater for non-potable uses should be included in the DSEIR, with commitments to implement these measures, if feasible. The DSEIR should discuss how the project will meet Water Conservation Standards for residential indoor and outdoor water use, as applicable, and implement water conservation BMPs by industrial users. The DSEIR should outline BMPs for outdoor irrigation that may be considered on-site.	See Section 7.1. The revised program has no significant non-potable water demand.

Commenter	Long-Term Water Supply Comment	Response
DEP-22	In evaluating potential options for connecting to MWRA, MassDEP strongly urges the Proponent to consider the opportunity for additional communities to connect to the MWRA transmission line. Several communities within this region are considering future water supply needs, including Braintree, Randolph, Holbrook, Weymouth, Brockton, Abington and Rockland. The availability of MWRA transmission line could help meet future water supply needs and the potential for creating hybrid systems to provide greater capacity and resiliency to the municipal systems. The Proponent should continue discussions with MWRA and area communities as it evaluates development of water supply options for Union Point.	See Section 7.1. Both the City of Brockton and the Braintree, Randolph, Holbrook systems are implementing expanded capacity outside of the MWRA. A SRA alternative connection to the Brockton/Aquaria system could provide supplemental water to the ARJWW.
ROSC-23	This is a closed military site with existing known groundwater contamination as well another emerging contaminate (PSAS) currently not listed by the EPA/DEP. For reasons of potential ecological risks as well as the potential risk of domestic pets, we would like to ask that no groundwater within the Union Point site be used for irrigational purposes or as drinking water for human consumption.	See Section 7.1. No groundwater supply is proposed.
MWRA-1	The NPC notes that at full build-out. Union Point's water demand will be 2.7 mgd. This is similar to projected demand discussed with the MWRA in 2015 when the MWRA Board of Directors and the MWRA Advisory Board voted to endorse/support Union Point's admission to the MWRA Water System, contingent upon the fulfillment of the requirements of Policy #OP.10, Admission of New Community to MWRA Water System. MWRA's Safe Yield is over 300 million gallons per day (mgd) and our water system demand is approximately 200 mgd, resulting in more than ample supply to serve Union Point.	Agreed. The new program demand has been reduced to 1.8 mgd.

Commenter	Long-Term Water Supply Comment	Response
MWRA-2	Pursuant to MWRA's policy OP#10, Admission of New Community to Waterworks System, the new community connecting to MWRA is responsible for the connection. LStar is in the process of determining the best means of getting MWRA water to Union Point for its permanent water supply. Rather than the route proposed in the FEIR, the NPC indicates that the routing now includes a connection to MWRA at meter 166 in Quincy, after which the route would cross Fore River into North Weymouth and directly to Union Point. As in the past, MWRA remains available to meet with the project proponent as they explore alternative routes and conveyance options.	Agreed. Alternate routes are being evaluated.
MWRA-3	Further, since there is a difference in treatment and chemistry between the MWRA and Weymouth systems, MWRA is available to work with the Proponent and the Town of Weymouth as they review with MassDEP any potential water quality impacts due to a switch from the Weymouth supply (treatment, corrosion control etc.) to the MWRA supply.	Agreed. Weymouth is currently working with MWRA on water chemistry issues as part of its MWRA application and MEPA filing.
MWRA-4	MWRA understands that LSTAR is also evaluating the feasibility of purchasing water from the Aquaria Desalinization Plant since it entails a shorter transmission main than the MWRA connection alternatives. As a result of our demand management, an integrated Water Supply Improvement Program, and redundancy initiatives, MWRA has one of the most abundant and high quality water supplies in the world available to the project proponent, if the Proponent can develop the appropriate connection plan.	Agreed. Weymouth connection is in study.

Commenter	Long-Term Water Supply Comment	Response
WRC-1	We have previously commented on the Final Environmental Impact Report and previous NPC for this project (comments enclosed) concerning Interbasin Transfer Act (ITA) issues with respect to the proponents' preferred alternative for water supply: connection to the Massachusetts Water Resources Authority (MWRA) Water Works System. If the MWRA continues to be the preferred alternative for water supply, the information provided previously by the proponents and the outstanding information requested through the WRC's MEPA comments, must be updated and addressed before the WRC can proceed with its review. A discussion with WRC staff will clarify what is needed and expected in order to complete the ITA process.	The Weymouth/SRA application to join the MWRA is in progress under a separate MEPA filing
WRC-2	The current NPC indicates that the proponents of Union Point are also exploring a connection to the Taunton River Desalination Plant (Aquaria) as an alternative for water supply. If this alternative is chosen for Union Point, Interbasin Transfer review may be necessary. The WRC has reviewed and approved the donor basin portion of the Aquaria project. If the ITA applies, Union Point would still need to address the receiving basin portion of the application and obtain approval from the WRC for the transfer. In addition, the Final MEPA certificate for the Aquaria project requires that Aquaria file an NPC for any new customer. The proponents should coordinate with Aquaria and your office on this, and should include any Interbasin Transfer information in the NPC, if the Aquaria system is chosen as the final preferred alternative for water supply.	See Section 7.1. Aquaria would have to acquire an ITA under a MEPA filing to supply the SRA.
TP-2	In the initial FEIR for the development of the former South Weymouth Naval Air Station, the MWRA was called out as the preferred water source. The Town of Weymouth's water supply could not support the initial Master Plan and it cannot support the additional water requirements called out in the NPC. Noticing the numbers on Water use, Water Withdrawal, and wastewater generation, in the NPC, how are the Water Withdrawal numbers calculated? I notice there is no mention of MWRA OP #10.	See Section 7.1.

Commenter	Long-Term Water Supply Comment	Response
WSSC -5	Weymouth has a MassDEP registered amount of 4.51 mgd and a Water Management Act permit of .49 mgd for a total of 5.0 mgd. Sources include the Great Pond Water Treatment Plant produces up to 8 mgd from Great Pond, and the Bilodeau Water Treatment Plant which produces 4 mgd from 5 active wells from the Mill River Aquifer. Weymouth has signed an agreement with Union Point to provide 600,000 gpd for current and proposed development within the Weymouth portion of the project for the next 5 years at which time Union Point must have a permanent water supply in place. An EIR should demonstrate the amount of water used over the past 10 years by Weymouth, and whether Weymouth can provide with certainty adequate water during this time period.	See Section 7.1. Weymouth has completed a November, 2022 comprehensive study of the Town's water and wastewater system capacities.
WSSC -6	The NPC indicates that the Abington-Rockland Joint Water Works has committed to provide up to 250,000 gpd for the portion of the Union Point development that is located in Abington and Rockland. Abington/Rockland Water District has a MassDEP registration for 2.67 mgd. The new EIR should demonstrate that the amount of water used over the past 10 years by this water supply, and whether there is sufficient capacity to supply water to Union Point.	No longer applicable.
WSSC-9	Clarity is needed on water conservation measures and implementation strategies. A project of this size and scope should utilize the best technology available for water and energy savings through indoor and outdoor conservation and reuse wherever possible.	See Section 7.1.
WSSC-10	The Union Point full build out water supply is proposed at 2.7 mgd. There are currently two long term water supply options: an MWRA connection originating in Quincy with three proposed pipeline routes, and secondly, the feasibility of purchasing water from the Aquaria Desalination Plant which is in the process of being purchased by the City of Brockton. More information is needed on the actual cost and construction impacts of an MWRA connection originating in Quincy, and for each route proposed in the NPC, as well as the viability of constructing a pipeline from Aquaria to Union Point.	See Section 7.1. Projected demand for the new program reduced to 1.8 mgd.

Commenter	Long-Term Water Supply Comment	Response
WSSC-11	Given the large size of this mixed use development, and the complicated nature of providing water for various uses during multiple phases, the new EIR should go into quite a bit more detail on the justification for each type of water use. A full explanation on how this development will be on the cutting edge of water efficiency and reuse should be given. Potable vs. non-potable uses should be broken out, and alternatives for water re-use should be fully explored and explained.	See Section 7.1.
WSSC-12	Information on how the Water Conservation Standards will be applied for residential indoor and outdoor water use is needed, as well as the use of Best Management Practices for the industries to be developed in Phase I of the project.	See Section 7.1.
WSSC-13	There are updated Best Management Practices for outdoor irrigation from the Irrigation Association of New England and new technologies such as SMART controllers that help reduce wasteful non-essential outdoor uses. More information is needed on where these new technologies will be used to conserve water.	See Section 7.1.
MA-10	Substantial new sources of water will need to be brought to the site to support the proposed development. Alternatives being considered include connection to the Massachusetts Water Resources Authority system or the Aquaria desalinization plant through the City of Brockton's system. The EIR should fully evaluate the impacts of water supply options.	See Section 7.1.
MA-11	Whichever option is selected, firm commitments should be made to reduce existing overstressed water sources in the region. In particular, if the Aquaria plant is to be utilized, that option should only be considered if it is done in combination with a meaningful and long overdue, comprehensive management plan for the City of Brockton's water system management that would significantly reduce the severe, ongoing impacts of that system on waterways including Monponsett Ponds and Silver Lake.	See Section 7.1.

Commenter	Long-Term Water Supply Comment	Response
NSRWA-2	In the long term, MWRA water may be a solution for many communities on the South Shore that are experiencing challenges meeting their water supply demands and whose local surface waters are being impacted by those demands. However importing water from the Quabbin Reservoir to the South Shore should be done with much consideration to how it is done. Providing water to the South Shore must be done with two principals in mind – 1) To reduce impacts on local streams, rivers and surface water bodies from existing demands and 2) to only use that water for essential needs. The proponent should provide information on how a regional solution might work in light of these two principals.	See Section 7.1.
MAPC-38	The previous MEPA filing found that connecting to the MWRA water system was the preferred alternative, and MAPC supported that proposal. The current project as described in this Notice of Project Change is notably different with respect to the Project's water demand, which has increased from 1.05 million gallons per day (mgd) to 2.7 mgd, as a result of an increase in both residential and industrial uses. The NPC continues to consider the MWRA as the source of water, although alternative routes for making the connection to Union Point are described. MAPC continues to support the MWRA alternative and looks forward to the analysis of the preferred route in the DEIR.	See Section 7.1. Projected water demand reduced to 1.8 mgd from 2.7 mgd.
MAPC-39	The NPC also proposes to consider the Aquaria Desalination Plant in Brockton as an alternative source of water supply. Given that the role of an EIR is to explore all alternatives, it is appropriate to compare this alternative to the other water supply alternatives under review.	See Section 7.1.
MAPC-40	Whichever water source and piping route is ultimately selected as a preferred alternative, the project should include maximum efforts for water efficiency and demand management. This is especially important given that any of the water sources being considered would rely on importing water from other watersheds.	See Section 7.1.

Commenter	Long-Term Water Supply Comment	Response
AF-4	Water: Where is the notice of change regarding the amount of water being drawn from the town of Weymouth? When this project was first proposed, it would be independent as far as water goes. Then they were going to connect to the MWRA. Then Weymouth would provide water for "phase 1". Now it seems like Weymouth is in the hook to provide water for the whole project "temporarily". As water usage seems to be a moving target for this project this needs to be addressed in legal binding form.	See Section 7.1. Weymouth is only providing interim water while the Town's MWRA connection is implemented.
WCMS-4	I support the proponent's proposal for obtaining the permanent water source for the project from the MWRA.	Agreed.
WCAM-1	First, I would like to express my support for a direct transmission pipeline for MWRA water from Quincy at Meter-166 through Weymouth and directly to Union Point, either option 2 or 3 as outlined in section 2.11.2.3 and figure 2.11-1. This alternative should be expedited so the proponent can be able to begin to move forward with design and construction. There was talk of the possibility of the option of wheeling MWRA water for portions of Weymouth and I very satisfied that option was removed by the proponent. I do not support any MWRA wheeling option for the town of Weymouth given the age and condition of our water system.	See Section 7.1.
MAP-8	There needs to be a timeline when the permanent water supply will be at Union Point/ former NAS South Weymouth.	See Section 7.1.
MAP-28	We need one alternative to be chosen now. We have spent seventeen years dealing with three options. It is time to get this done and have a deadline for completion.	See Section 7.1.
MAP-34	The MWRA is the preferred water source in the FEIR and in the "AMENDED AND RESTATED MEMORANDUM OF AGREEMENT FOR PROVISION OF WATER AND WASTEWATER SERVICES AND FOR A CONSECUTIVE PUBLIC WATER SYSTEM dated November 18,2016 and signed by Weymouth Mayor Hedlund, SRA chairman Lyndsey Kruzer and Steve Vining, manager LStar Southfield, LLC. I did not see MWRA #OP 10 mentioned in this NPC. According to the agreement with Weymouth, LStar has agreed to pay the MWRA fees. Will this be bonded and by whom?	See Section 7.1. Weymouth's MWRA connection application will comply with #OP 10.

Commenter	Long-Term Water Supply Comment	Response
MAP-36	I noticed that OP#10 of the MWRA requirements is missing from the NPC. There is mention of the ability to sell MWRA water from a pipeline from Quincy through Weymouth to communities outside the former NAS South Weymouth. 'Public Records exempt' Ron Mariano (house Democratic Leader) name is mentioned with this issue. Is there a different agreement with the MWRA than the normal OP#10?	See Section 7.1.
JM-9	LStar indicated that they have decided that the permanent water supply will be a dedicated MWRA pipeline directly to Union Point through Weymouth, that the exact route will be determined in collaboration with Weymouth officials and details will be outlined during the EIR process. However, since LStar is not a Registered Public Water System Supplier does that mean that the Southfield Redevelopment Authority will need to be involved in this process, since they are currently the Registered Public Water System Supplier for Union Point? Also, who would own, operate and maintain the system?	See Section 7.1. Weymouth, with the SRA, is in the process of joining the MWRA Water and the Base will be served from the Weymouth system once connected to the MWRA.
TOW-3	The Town has concerns about summer irrigation on Union Point that may cause unwarranted demand on the Town's water supply. We would like the Secretary to consider opportunities the Town and LStar may agree to in the future about such issues, such as use of treated wastewater for roadside areas, alternatives for providing irrigation during peak summer water demands or periods of low summer water flows, such as on-site irrigation ponds, harvesting stormwater runoff for irrigation, on-site wells, or use of water from an on-site wastewater treatment plant. We are confident the Town and LStar can work out these concerns of the Town.	See Section 7.1. Low demand, native landscaping is planned.
TOW-4	Any long term or permanent water supply connection for Union Point will unlikely entail an interconnection to the Weymouth public water system. External sources of water supply to Union Point should include, however, the possibility of interconnection to Weymouth's public supply, if the Town were to need such additional water supply.	See Section 7.1. The water system on the Base will continue to be integrated with the Weymouth system.

Commenter	Long-Term Water Supply Comment	Response
TOW-5	If LStar were to consider such an interconnection in the future, however, that plan will require careful planning and coordination with the Town. This interconnection could affect multiple pressure zones within our system. Therefore, the Town and LStar need to decide and thoroughly understand the specific infrastructure retrofits for accommodating this interconnection and the construction and schedule requirements for implementing them before any construction. Any interconnection will also affect internal management of the Town's water supply sources, which the Town performs from a long-term, seasonal perspective.	See Section 7.1. An independent SRA connection is not the preferred alternative.
TOW-6	Regarding Union Point's long-term water supply, LStar and its predecessors for this project have been considering alternative permanent supply sources since the start of the project years ago. In view of the proposed scale of LStar's planned development for Union Point, it is critical that the Town and LStar thoughtfully consider these final decisions and specific project implementation details. This is an opportunity for the Town and LStar to create solutions collectively that benefit all resident of Weymouth, whether they live in Union Point or not	See Section 7.1. The Town of Weymouth, the SRA and the Proponent have been working closely together for the past two years, have cooperatively studied and implemented system improvements, and are jointly funding the Weymouth/SRA application to join the MWRA and its required MEPA filing.
APB-2	The Planning Board members are also concerned about the comment that there is a commitment for water from Abington and Rockland. That appears to be a misleading statement as the Board members are not aware of such a commitment. We would hope that this misnomer is corrected if the process moves forward. There has been a sewer moratorium in Abington for several years which was recently lifted, this limited our commercial growth, straining our water capacity could again negatively impact commercial growth in Abington.	See Section 7.1. There is no water supply planned from the ARJWW.
KK-1	In the submission and review of this matter, please specify the manner in which it will be assured that there is compliance with Ch. 291 of the Acts of 2014, Section 19(b) wherein it is forbidden that any water from the Great Sandy Bottom Pond be supplied to NAS South Weymouth. The Rockland/ Abington Joint Waterworks has indicated that there are three sources of water and that if one source is unusable for any reason, ordinarily the other two sources would be used to meet demand. Section 2.11.2.2 does not address the manner in which there will be compliance with the enabling Act, assuring that no Great Sandy Bottom Pond water is ever used at the NAS site.	See Section 7.1. There is no water supply planned from the ARJWW.

Commenter	Wastewater Comment	Response
EEA-39	The DSEIR should include a comprehensive analysis of the three wastewater treatment alternatives presented in the NPC. This analysis should identify the location of on-site and offsite impacts, the relationship of new infrastructure to environmental resources (e.g., wetlands, rare species habitat, etc.), conceptual design plans for an on-site treatment facility, and a discussion of capacity constraints associated with existing Weymouth and MWRA infrastructure during typical and peak flow periods. This analysis should specifically address whether additional flows will exacerbate SSOs.	See Section 7.2. There is no proposed on-site WWTP. The land on the Base of each member Town will discharge to its systems.
EEA-40	The DSEIR should describe the length, type and diameter of sewer lines and ownership of new infrastructure or that which will be modified in the selected alternatives. The DSEIR should provide additional information on whether sewer routes will require the acquisition of, or securement of easements through, property outside of existing roadway or utility ROWs. The DSEIR should indicate if cross-country routes will impact Article 97 land, designated open space, or private property.	See Section 7.2. All proposed system improvements will be within roadway or utility ROW or existing municipal sewer easements.
EEA-41	The DSEIR should identify wastewater generation rates and total volumes by use, noting data sources, community of origin, and other details as specified in the MWRA comment letter.	See Section 7.1 and 7.2. Buildout wastewater flow estimates reduced from 2.3 mgd to 1.6 mgd..
EEA-42	The DSEIR should discuss how the project will comply with applicable performance standards and regulations for each alternative, particularly the Groundwater Discharge Permit requirements from MassDEP and MWRA's Policy OP#11 -Admission of New Community to MWRA Sewer System and Other Requests for Sewer Service to Locations Outside MWRA Sewer Service Area.	See Section 7.2. No discharge to groundwater is planned on the Base and no connection from outside of Weymouth is planned to the MWRA.
EEA-43	MWRA comments noted that historically connections under OP#11 have been many magnitudes less than those presented in the NPC. The DSEIR should present alternatives, consistent with those required under OP#11 review and outlined in MWRA's comments to meet MWRA approval criteria.	No longer applicable.
EEA-44	The DSEIR should also address comments from the WRC regarding potential ITA review for the various wastewater alternatives.	See Section 7.2
EEA-45	The DSEIR must demonstrate that on-site treatment and discharge alternatives will meet MassDEP requirements for limiting potential impacts to the French's Stream or its downgradient segments.	No longer applicable.

Commenter	Wastewater Comment	Response
EEA-46	The Proponent should review the MassDEP comment letter to assist in the preparation of this analysis to ensure that all salient data are presented to confirm that the project will comply with Section 310 CMR 5.06(7) of the Groundwater Discharge Permit regulations.	No longer applicable.
EEA-47	The DSEIR should explicitly discuss how the inflow and infiltration (I/I) requirements for the project will be met, particularly in conjunction with existing I/I removal efforts by the Town of Weymouth.	See Section 7.2. The SRA has recently removed 200,000 gpd I/I through pump station repairs. The Proponent, SRA and the Town of Weymouth have been working cooperatively and providing underwriting for updated system analysis.
EEA-48	The DSEIR should present a conceptual I/I removal program, identifying the amount of I/I mitigation required, potential projects that may achieve these reductions, or other measures (i.e., cash payment) to comply with this directive.	See Section 7.2. Two major sections of the Central Lower Interceptor located in wet areas are proposed to be jointly addressed in the early stages of redevelopment.
EEA-49	The DSEIR should estimate the potential volumes of reclaimed wastewater that will be available for reuse based on seasonal irrigation demand and industrial users. The DSEIR should present a conceptual plan for potential treated wastewater reuse on-site, including how this sustainable measure will be incorporated into overall site and building design.	No longer applicable.
EEA-50	The DSEIR should identify any potential sources of industrial or medical wastewater that may be generated by users on-site. Unpermitted discharge of these types of wastewater to an onsite sanitary system is prohibited. Given the targeted biotech sector uses for site redevelopment, the DSEIR should address how industrial wastewater treatment will be accommodated for these uses, if any.	See Section 7.2. The program has been revised significantly to respond to market demand with a total reduction of 6 msf of commercial use and a shift away from wet lab-type users.

Commenter	Wastewater Comment	Response
DEP-13	The NPC indicates that the proposed Project will generate an estimated 2,300,000 gallons per day (gpd) of new wastewater flow. MassDEP regulations at 314 CMR 12.04(2)(d) require sewer authorities with permitted combined sewer overflows, or tributary to such systems, including the Town of Weymouth, to require removal of four gallons of infiltration and inflow (I/I) for each gallon of new wastewater flow generated for any new connection to their system where greater than 15,000 gallons per day of new wastewater flows will be generated. Accordingly, the Proponent should meet with staff from the Town of Weymouth to ensure that this mitigation requirement is met.	See Section 7.2. The Proponent has been working closely with the SRA and the Town of Weymouth over the past two years; estimated flows at buildout to the Weymouth/MWRA system have been reduced from 2.3 mgd to 0.8 – 0.9 mgd.
DEP-14	In addition, any deficiencies in the wastewater system serving the Project site must be identified, and the Proponent needs to confirm with the Town of Weymouth and with MWRA that the system has sufficient capacity to accept the flow.	See Section 7.2. The SRA has recently cut its discharge to the Weymouth system by over 2/3rd.
DEP-15	The Proponent has stated that it is possible that a Groundwater Discharge Permit (GWDP) may be required to dispose of some wastewater. The GWDP regulations at 310 CMR 5.06(7) state in part: “Restrictions on the Issuance of a Permit: The Department will not issue a permit pursuant to 314 CMR 5.00 if the discharge will cause or contribute to a violation of 314 CMR 4.00: Massachusetts Surface Water Quality Standards or impair the use of ground water as an actual or potential source of potable water.” If the discharge location for any GWDP is located in area that will serve as a source water for French Stream, the Proponent must demonstrate the impact on French Stream and downgradient segments as part of the permitting process.	No longer applicable.
DEP-16	The density of the development and need to construct new buildings and infrastructure, provide an excellent opportunity to maximize the use of reclaimed water.	No longer applicable.
DEP-17	It is apparent that some on-site wastewater treatment will be required as part of the Project. The design and construction of a new wastewater treatment facility create an opportunity to provide treated wastewater for a variety of uses. The reuse standards for different uses can be found in the Reclaimed Water Regulations at 314 CMR 20.17. Reclaimed water permitting can be included in the permitting of a Groundwater Discharge Permit and does not require a separate permitting process.	No longer applicable. Geotechnical analysis of the Base considering the existing PFAS plume and the Navy’s groundwater treatment proposal restricts potential groundwater discharge.

Commenter	Wastewater Comment	Response
DEP-18	Any unpermitted discharge of industrial wastewater (or medical wastewater, if applicable) to an on-site sanitary system is prohibited. If any occupant of the Project will generate industrial wastewater, MassDEP regulations and permitting may apply.	No longer applicable.
MWRA-5	Regarding estimated wastewater volumes, MWRA will need further information including the community of origin. We will want to review the wastewater generation rates and assumptions that the Project proponent presented, as we don't necessarily agree it is appropriate to always adjust water use downwards by 10% to derive estimated wastewater generation rates, as the NPC did. We will want to see a breakdown of bedrooms per residential unit, since MWRA uses 110 gallons per day per bedroom as prescribed by the state's Title V regulations to addressing discharges from outside the service area.	See Sections 7.1 and 7.2. The current NPC uses MWRA flow estimating procedures. No flow from outside of Weymouth is proposed to go to the MWRA.
MWRA-6	For proposed life sciences and hi-tech manufacturing, we will want to know more about assumptions regarding average and peak generation rates and the nature of manufacturing, to not only evaluate quantity, but to also evaluate quality and compliance with MWRA's Toxic Reduction and Control regulations.	See Section 7.2. The program significantly reduces commercial uses, especially high water demands, from 8 msf to 2 msf.
MWRA-7	There is also a discrepancy between Table 2-10.1 and the text on page 2-39 that will need to be resolved (text indicates water demand on average is 525 gallons per day per l,000sf (gpd/ksf) of building space, whereas Table 2-10.1 indicates water demand is 480 gpd/ksf, and wastewater generation is 432 gpd/ksf). It will be important to evaluate peak wastewater discharges for all uses.	No longer applicable.
MWRA-8	On MEPA documentation for predecessor proposals for the Naval Air Station redevelopment, MWRA has consistently noted concern with a significant new discharge to the MWRA system. Now, the volume of wastewater that Union Point might generate and discharge to MWRA via the Weymouth system under either the all wastewater conveyed to MWRA alternative or the combination of MWRA/on-site wastewater management alternative exceeds the volume proposed in prior MEPA documentation.	See Section 7.2. No flow from outside of Weymouth is proposed to go to the MWRA. The present, new flow estimated to discharge to the MWRA is 0.8 – 0.9 mgd compared to the original FEIR approved 1.05 mgd and 2017 NPC of 2.3 mgd total generated flow.

Commenter	Wastewater Comment	Response
MWRA-9	Further, on a related project, Weymouth's enlargement of its Lower Central Interceptor, MWRA commented that replacement of sections of sewer with larger diameter sewer may affect downstream conditions in the MWRA wastewater system under various storm frequencies and size, and that whereas the Weymouth Central Interceptor system may now handle increased flow without significant overflows, overflows during significant wet weather events may be exacerbated downstream. Our concerns remain.	See Section 7.2. Weymouth still proposes to replace LCI with larger diameter pipes, but also improve water tightness and reduce I/I.
MWRA-10	The NPC correctly notes that Weymouth is already an MWRA sewer served community: this is true, but increased wastewater flow nevertheless has potential environmental consequences. Based on preliminary input from LSTAR and an assumed flow of 2 mgd, MWRA conducted hydraulic modeling in 2016. Draft results indicated that new wastewater flow from Union Point would increase sanitary sewer overflows into local rivers and streams during larger wet weather events: the locations where SSOs occur now - Smelt Brook Siphon, the Weymouth Landing Interceptor, and East Braintree - would see greater volumes. Therefore, any increase wastewater discharge to the MWRA system, even if from the Weymouth portion of Union Point, will require careful consideration and the identification of feasible and detailed mitigation measures.	No longer applicable.
MWRA-11	With respect to the wastewater generation in the Abington and Rockland portions of Union Point, estimated to be 850,000 gpd by the Proponent, MWRA OP#11, Admission of a New Community to MWRA Sewer System and Other Requests for Sewer Service to Locations Outside MWRA Sewer Service Area would govern since Abington and Rockland are not part of the MWRA Sewer Service Area. Historically, connections under OP# 11 have been many magnitudes less. With the exception of an institutional applicant's 90,000 gallon per day discharge approved in 1999 and within an area of the MWRA interceptor system that does not experience SSOs, all requests under OP#11 have been 22,750 gpd or less, with most considerably smaller. And the discharge of 22,750 gpd was approved with the requirement that the Proponent maintain a tight tank for storage and contracts for emergency pump-out so that it could cease wastewater discharges to MWRA if directed by MWRA.	No longer applicable.

Commenter	Wastewater Comment	Response
MWRA-12	Under OP#11, prior to extension of our sewer system to communities or portions of communities from outside our service area, there must be due consideration to feasible alternatives. MWRA must make a determination that the additional discharge will not change the conclusions reached in approved planning and design documents, and that acceptance of any discharge from outside the service area will not jeopardize MWRA's ability to comply with current and anticipated regulations. We must also find that the MWRA regional sewer system has capacity to convey the additional wastewater without causing negative impacts.	No longer applicable.
MWRA-13	In addition to criteria noted above, OP#11 requires that for every gallon of wastewater contributed to our system from outside the service area, four gallons of inflow must be removed from the transporting community (Weymouth) or further downstream (Quincy). Per OP#11, a detailed plan for inflow removal must be submitted to MWRA, and if approved, the inflow removal plan should be completed and inflow removal documented prior to the actual discharge so that new flows are offset with decreases in existing flows. Additional mitigation measures may also be required, such as storage/tanks to detain wastewater during severe wet-weather events when MWRA's wastewater transport system may be overloaded.	No longer applicable.
MWRA-14	Just as the NPC notes that the potential flow and nutrient impacts from the on-site wastewater management alternative would have to be analyzed more fully to determine if the onsite wastewater treatment alternative is feasible, the same is true for discharges to the MWRA. Given the potential for sanitary sewer overflows during wet weather events, which not only threaten the environment and public and private property, but which also violate state and federal law, a detailed and implementable mitigation program must be part of the feasibility determination for the MWRA discharge alternatives. This should be defined in the EIR.	See Section 7.2.

Commenter	Wastewater Comment	Response
WRC-4	It is unclear if the Interbasin Transfer Act would apply to any of the wastewater alternatives under consideration. This will depend on the point of origin of the water supply and the ultimate point of discharge of the wastewater. The proponents should discuss this with WRC staff as soon as possible.	See Section 7.2. Under the preferred alternative of Weymouth and the SRA serves the entire Base with MWRA water, then the wastewater sent from the Rockland portion of the Base to the Rockland sewer system, eventually the North and South River Basin, and the Abington portion of the Base to the Abington/Brockton WWTP, eventually the Taunton River Basin, both of those would require an individual ITA, under at least an NPC, for flows in the 350,000 gpd – 400,000 gpd range. No significant effect is expected in the larger MWRA water system.
WSSC-14	The NPC states that three wastewater management alternatives are being considered. Wastewater would be sent to MWRA's Deer Island Wastewater Treatment Plant. The second alternative is construction of a new on-site wastewater treatment plant, or a combination of both options. Because several of the surrounding towns have stressed basins as determined by MassDEP's SWMI criteria, treating Union Point wastewater on-site has distinct advantages for recharge. WSSC recommends that the EIR provide additional information to evaluate this option and the proponent's commitment to keep wastewater within the basin.	See Section 7.2. There is very little geohydraulic potential for an on-site WWTP's groundwater discharge. There are also significant constraints on inducing a recharging mound and conflicting with existing PFAS contaminated groundwater under treatment by the Navy as part of its Base closure.
WSSC-15	With the addition in Phase I of a 300-bed long-term care facility, the potential effects of pharmaceuticals in wastewater from this facility should be investigated and addressed. Also to be evaluated further is the potential for hazardous biotech pathogens and radioactive contaminants from bio lab facilities because there are very specific restrictions on wastewater from Biosafety Level 3 and 4 labs.	See Section 7.2. The program and the suburban commercial market is moving away from bio lab facilities. It is not expected to be a significant portion of the wastewater.

Commenter	Wastewater Comment	Response
WSSC-16	Table 2.10-1 in the NPC shows the water demand and wastewater flow projections. The water demand estimates for "other uses" is said to be based on MassDEP wastewater generation rates. The EIR should specify the source of these estimates from MassDEP. Similar tables provided by Epsilon Associates for other projects (for example, Springfield MGM Casino EIR from only three years ago, EEA No. 15033) indicate volumes that are less for retail, restaurant, office, and cinema spaces. If anything, water efficiency is getting better, and these numbers should be going down, not up. Justification for the volumes and source of information should be provided.	See section 7.1 and 7.2.
NSRWA-4	The wastewater proposed in the Notice of Project Change will increase from the 1.4 MGD to 2.3 MGD. The proponent offers two proposals for wastewater treatment – 1) All discharge through Weymouth's MWRA sewer connection 2) All discharge onsite through groundwater discharge, or 3) a combination of MWRA and On Site discharge plus irrigation or industrial use.	No longer applicable.
NSRWA-5	As noted in Water Supply above the reduction in demand through conservation fixtures, reuse and recycling of water may reduce the volume needed for treatment and discharge.	Agreed.
NSRWA-6	Discharging to groundwater will most likely be challenging due to high groundwater, tight soils, flooding issues and French's Stream is already listed on the 303d list as being impaired due to Fecal Coliform, Fishes Bioassessment, Oxygen, Total Dissolved Phosphorus and Whole Effluent Toxicity. In the summer the streamflows in French's Stream are already 90% effluent dominated from Rockland Wastewater Treatment Plant downstream. If MWRA Sewer is an option then potentially taking some of Rockland sewerage may be a way for French's Stream water quality to be restored.	See Section 7.2.
NSRWA-7	However in order to access MWRA sewer, Weymouth sewer lines will need to be addressed through I/I reduction to eliminate wet weather discharges in Weymouth. We ask that the proponent include in their analysis – reducing water demand through innovative conservation as noted in our water supply comments, thus reducing the treatment volumes and then analyze the alternatives and identifying how MWRA pipes would be improved and the improvement of French's Stream's water quality.	See Section 7.2.

Commenter	Wastewater Comment	Response
MAPC-41	The wastewater option proposed in the previous MEPA filing was based on an on-site wastewater treatment facility that incorporated water reuse. Re-use of treated water was proposed for both the industrial users and for irrigation, including the then-proposed golf course. MAPC strongly supported this as one of the hallmarks of sustainability of the project.	No longer applicable.
MAPC-42	The current project as described in the NPC has some marked differences. The total wastewater volume is significantly higher. The FEIR estimated a range of 0.64 mgd to 1.04 mgd, while the wastewater volume for the current project in this NPC is 2.3 mgd, despite the fact that a golf course is no longer part of the proposed project. Given these changes, the NPC proposes a range of three alternatives for managing the projects wastewater: (1) all MWRA sewer; (2) all on-site treatment; and (3) a combination of MWRA and on-site treatment.	See Section 7.2. The overall new program buildout wastewater flow is reduced from 2.3 mgd to 1.6 mgd and the portion tributary to the MWRA is 0.8 – 0.9 mgd.
MAPC-43	Unlike the MWRA water system, which has ample capacity to add Union Point's water demand, the MWRA sewer system has significantly more constraints against added capacity. While it is understandable that all alternatives should be considered in the MEPA review process, there are clear advantages in terms of sustainability that favor on-site treatment with water reuse. That being said, given the significantly increased volume of wastewater in this NPC, the proponent makes the case that treating all of this volume on site would have its own challenges in terms of the increased land area needed, and the increased volume of treated wastewater to be assimilated in the local watershed. While the final decision on a preferred alternative will await the full analysis of the EIR, MAPC continues to express its support for including on-site treatment with water reuse to the maximum extent feasible, and to minimize reliance on the MWRA wastewater system to the maximum extent feasible.	See Section 7.2. Discharges to the MWRA sewer have been significantly reduced with the new program.
WCMS-5	I also concur with the proponent's plan to build several smaller onsite sewerage treatment plants to treat sewerage and have the ability to produce sustainable electricity.	No longer applicable.

Commenter	Wastewater Comment	Response
WCAM-3	My second concern is in regards to wastewater and option outlined in section 2.10.2.1 for an all MWRA Sewer Alternative. I do not support Weymouth accepting wastewater flows from Rockland and Abington's portions of Union Point. Weymouth ratepayers have spent tens of millions dollars over the years to make the town compliant with prior DEP consent orders. Accepting the additional flow from the other communities would restrict future new development and or redevelopment within the town of Weymouth. One of areas that would accept this additional flow is the sewerage pumping station in Libbey Industrial Park. This area just experienced a sewerage overflow as recently as April 16th 2017. This pumping station was one of the five projects outlined in the consent order with DEP and was upgraded in 2005. Even with another overhaul of this pumping station it still would not be able to handle the option outlined in section 2.10.2.1. I still would like to see All On-Site Treatment Alternative in section 2.10.2.2 be pursued further. This option is still currently approved under the 2007 FEIR certificate for a smaller GPD wastewater number. I would suggest a hybrid approach for the wastewater at full build out. Weymouth's portion of Union Point to accept flows into the MWRA system with proper mitigation. Abington and Rockland's portions of Union Point to have their wastewater treated with an onsite treatment plant. At a recent Weymouth Town Council meeting the master developer mentioned using another technology approach for wastewater, however that option is not included in the NPC.	No longer applicable.
MAP-27	Please see signed agreement for Town of Weymouth water / wastewater services dated 11/16/2016 and include this document in the EIR. This agreement was signed by SRA, Mayor Hedlund and LStar Southfield, LLC. and will provide temporary 600,000 gpd of water and 540,000 gpd of sewer capacity.	Noted.
MAP-29	French's Stream would not be capable of taking excess wastewater without flooding homes and streets in Rockland. Flooding has occurred several times in the past without any new building on the former Naval Air Station South Weymouth.	No longer applicable.

Commenter	Wastewater Comment	Response
MAP-30	There is only one location that could be sited (FEIR) for a WWTP. That location is in the Abington section along French's Stream.	No longer applicable.
MAP-31	A new wastewater reclamation program, involving General Electric, has been mentioned, but no detailed information has been given as of this date. We would need to know how solids are being disposed and where the wastewater would drain to.	No longer applicable.
MAP-35	Will the wastewater infrastructure be bonded and by whom was well?	No.
JM-7	I have serious concerns whether or not Weymouth's sewer trunk line and pumping stations will be able to handle, even on a temporary basis, the volume of up to 540,000 gpd from Union Point without incident.	See Section 7.2 and the November, 2022 Town of Weymouth capacity report.
JM-10	LStar also stated that they are now looking at a new technology which uses bioreactors to process wastewater as well as food waste in a way that would create an energy source that could be used within Union Point and that they do not intend to use the Weymouth sewer system. If this does end up being the wastewater solution, where will this system be located since the land in Abington that had been designated for a private wastewater treatment facility but has since been rezoned? How will the effluent discharge be handled and who will own, operate and maintain the wastewater facility?	No longer applicable.
TOW-7	LStar is evaluating three long-term options for wastewater disposal to accommodate the estimated 2.3 million gallons per day (MGD) of wastewater the project will generate: (i) construction of an onsite system for treatment and disposal, (ii) connection to MWRA, or (iii) a combination of the two. As we worked with LStar about water supply issues, we are confident that the Town and LStar can work collaboratively to address also this concern in a mutually agreeable manner.	See Section 7.2. The Proponent is working collaboratively with the Town of Weymouth.

Commenter	Wastewater Comment	Response
TOW-8	If LStar were to convey substantially more wastewater from Union Point to MWRA under the permanent MWRA alternative, this solution will involve routing wastewater through Town's public sewer system via interceptor sewers at Mill River, Old Swamp River and Lower Central. Like commitments LStar made under the temporary water agreement, improvements to Weymouth's sewer infrastructure would be necessary to accommodate Union Point's wastewater flows, especially during peak flow periods. We would ask the Secretary and the MWRA to allow the Town and LStar the chance to creatively arrive at solutions that benefit the Town, LStar, and all residents of Weymouth, including residents of Union Point.	See Section 7.2. Flows have been significantly reduced.
TOW-9	For example, under sewer commitments as part of the temporary water agreement, LStar and the Town are working to minimize the construction activities in the Town related to the sewer improvements and the Town's additional roadway improvements. We would expect LStar to continue to work collaboratively with the Town on future sewer improvements necessary for a permanent wastewater solution, such as collection system modifications designed to accommodate the project's maximum flows in a way that precludes multiple and disruptive construction efforts. Since LStar anticipates these construction activities to start within the next year, the Town and LStar should begin work soon to prioritize in any construction schedule improvements to currently deficient infrastructure that will be burdened by possible future Union Point flows.	See Section 7.2. The Proponent is working collaboratively with the Town of Weymouth.
TOW-10	In addition, MWRA has significant requirements for infiltration/inflow (I/I) reduction for new connections so that they can accommodate new wastewater flows in their system. These requirements should lead LStar to consider planning and integration with the Town's existing I/I reduction program to realize I/I improvements within the entire Town and not strictly limited to I/I reduction in Union Point. The Town has spent millions of dollars in recent years to increase sewer capacity and make I/I reduction a priority. Over the last several years, the Town has already eliminated significant volumes of I/I and the Town looks forward to working with LStar on any further I/I reduction plans.	See Section 7.2. The Proponent is cooperating with the Town's I/I reduction program and with the SRA, reduced over 200,000 gpd of I/I from the Base.

Commenter	Wastewater Comment	Response
TOW-11	We anticipate working collaboratively with LStar to determine the nature, cost and scheduling of these wastewater improvements so that the Town and LStar can coordinate the appropriate due diligence and construction planning.	Agreed.
TOW-12	With respect to the on-site wastewater treatment and disposal alternative, the Town anticipates being able to creatively problem solve with LStar any solution for Union Point that addresses the Town's concerns. Also, the original project described use of treated wastewater as a source of water for irrigation, which would assist with peak summer water supply demands. We would appreciate the opportunity for the Town and LStar to create solutions collectively that protect the residents of Weymouth while also finding innovative solutions for these problems in the revised project.	See Section 7.2. On-site WWTP and treated effluent reuse is no longer proposed.

Commenter	Wetlands Comment	Response
EEA-51	The DSEIR should include supporting documentation and graphics to allow for sufficient characterization and estimation of potential wetland resource area impacts for both on-site and off-site development activities. The DSEIR should verify that the current on-site wetland delineation remains valid under the WPA, or if not, provide supplemental information to ensure that the most current data area used to estimate project impacts.	Wetlands are shown on Figure 6-3. The majority of all wetland impacts have been previously addressed in connection with parkway and roadway improvements. Future wetland impacts will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.
EEA-52	The DSEIR should include graphics distinguishing between the types of wetlands resource areas on-site (IVW, BVW, Bordering Land Subject to Flooding (BLSF)) and their associated jurisdictional oversight (i.e. MassDEP, ACOE, etc.). The DSEIR should identify potential vernal pools on-site and include an update regarding their potential certification by NHESP.	Figure 6-3 identifies the approximate location of wetlands by type. No flood plain is presently mapped for the Site.
EEA-53	The DSEIR should include plans or graphics at a legible scale depicting wetland resource areas, buffer zones and associated temporary or permanent impacts areas, particularly those associated with the on-site cross-country sewer mains, roadway crossings, development of stormwater management system features (e.g., detention basins, outfalls, etc.) and hazardous waste remediation efforts.	Figure 6-3 identifies the approximate location of wetlands at the Site.
EEA-54	The DSEIR should include a table clearly calculating wetland impacts that have already occurred, wetland mitigation completed to date, outstanding mitigation projects identified in the FEIR, and additional mitigation requirements as may be required due to expansion of the project's development program. This table should include quantification of impacted or created wetlands broken out by resource areas type (i.e., BVW, inland Bank, etc.) for each specific subproject completed or proposed.	Wetlands are shown on Figure 6-3. Impacts discussed in 2017 were for a program-specific series of impacts; the 2023 Modified Development Program is different than the program proposed in the 2017 NPC. Future wetland impacts will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.
EEA-55	The DSEIR should include a schedule to ensure that wetland mitigation required by the WQC is successfully established prior to new alterations to resource areas being authorized through an amended WQC.	Completed mitigation is described in Section 6.4. Future wetland mitigation will be addressed on an ongoing basis in coordination with DEP and implemented in accordance with applicable WQC terms and requirements.

Commenter	Wetlands Comment	Response
EEA-56	It is likely that the off-site transportation, water supply and wastewater infrastructure improvements will result in temporary and/or permanent impacts to regulated wetland resource areas. The DSEIR should provide additional detail, at a legible scale, identifying the proximity of wetland resource areas to each potential intersection improvement area and the proposed routes for water supply and wastewater infrastructure.	The alternatives for infrastructure requirements are presently being assessed and will be addressed in the future as Project design progresses. As shown on Figure 6-1, the proposed open space encompasses almost all of the wetlands on the Site. There are wetlands associated with the west branch of French's Stream within which it is anticipated there will be limited projects for roadway and utility connections. All such work will be completed in compliance with the applicable local regulatory requirements.
EEA-57	The DSEIR should clarify the extent to which infrastructure improvements will be contained within the ROW, as this will reduce impacts to adjacent wetland resource areas. The DSEIR should also identify stream crossings along each water and wastewater alternative route, as these may result in additional impacts during the construction process.	As shown on Figure 6-1, the proposed open space encompasses almost all of the wetlands on the Site. There are wetlands associated with the west branch of French's Stream within which it is anticipated there will be limited projects for roadway and utility connections. All such work will be completed in compliance with the applicable local regulatory requirements.
EEA-58	The DSEIR must include a discussion of how the project intends to meet the limited project provisions for utility construction (310 CMR 10.53(3)(d)), as some of the project elements are not utility related. For those portions of the project that do not meet the limited project criteria, the DSEIR must include a discussion how the project will meet applicable performance standards if wetland impacts cannot be avoided, including the Riverfront Area and wildlife habitat provisions of the WPA regulations, as applicable.	As shown on Figure 6-1, the proposed open space encompasses almost all of the wetlands on the Site. There are wetlands associated with the west branch of French's Stream within which it is anticipated there will be limited projects for roadway and utility connections. All future work within wetland resource areas will be completed in compliance with the applicable local regulatory requirements.
EEA-59	The Proponent should meet with MassDEP and MassDOT to ensure consistency in permitting of the project and MassDOT's related Route 18 widening project and delineating the extent of BLSF near the Mill River Tributary "A". This delineation should be reflected in the DSEIR filing.	The Route 18 Widening work was completed at the beginning of 2023. This comment is no longer applicable.

Commenter	Wetlands Comment	Response
EEA-60	The DSEIR should clarify if the project will qualify under the new ACOE General Permit or if an Individual Permit will be required pursuant to Section 404 of the Clean Water Act. The DSEIR should note if additional action under Section 404 will be necessary for off-site improvements and if so, how the project intends to comply with applicable regulatory requirements.	The majority of the wetland impacts previously permitted have already occurred. Any future work within regulated wetland resource areas will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.
DEP-4	The proposed new alterations to BVW and other wetland resource areas and buffer zones will require submission of new notices of intent(s) pursuant to the Massachusetts Wetlands Protection Act and an amendment to the 401 Water Quality Certificate (last amended August 27, 2014).Given that the project change proposes to alter additional BVW beyond the 5,000 square foot threshold, the proponent needs to better explain how the Union Point project as proposed meets the limited project provisions for utility construction (310 CMR 10.53(3)(d)), as some of the new elements contained in the NPC are not utility related.	The majority of the wetland impacts previously permitted have already occurred. Impacts discussed in 2017 were for a program-specific series of impacts; the 2023 Modified Development Program is different than the program proposed in the 2017 NPC. Future wetland impacts will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.
ROSC-5	We would like more information on how the day-lighting of a portion of French's Stream created 8210 square feet of wetlands.	We understand that the described 8,210 sf of wetland mitigation has been completed. This comment is no longer applicable.
MA-7	Figure 1.1-2 shows the entire southern end of the airfield as “Grassland Habitat Conservation Area.” However, this also includes extensive wetlands and wetland buffer as shown in Figure 2.5-1. Clarification is needed as to how the wetlands and wetland buffer zones will be managed.	Impacts discussed in 2017 were for a program-specific series of impacts; the 2023 Modified Development Program is different than the program proposed in the 2017 NPC. Future wetland impacts will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.

Commenter	Wetlands Comment	Response
MA-9	The EIR should also provide details regarding wetlands impacts and mitigation for all aspects of the development project, including off-site utility connections.	The alternatives for infrastructure requirements are presently being assessed and will be addressed in the future as Project design progresses. As shown on Figure 6-1, the proposed open space encompasses almost all of the wetlands on the Site. There are wetlands associated with the west branch of French's Stream within which it is anticipated there will be limited projects for roadway and utility connections. All such work will be completed in compliance with the applicable local regulatory requirements.
MAP-5	Square feet of bordering vegetated wetlands alterations was reduced to 3,620 sq. BVW not 3,480 reviewed. The Net Change will be 7,310 sq. ft. of BVW altered for a total of 10,790 sq. ft.	Impacts discussed in 2017 were for a program-specific series of impacts; the 2023 Modified Development Program is different than the program proposed in the 2017 NPC. Future wetland impacts will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.
MAP-25	Please state where the eight constructed wetlands are located? I count only five. The two wetlands located at the entrance of the Delahunt Parkway in Rockland are replacement wetlands that were destroyed to take down two buildings along Weymouth Street in Rockland to make room for the Delahunt Parkway. I do not think the new developer has knowledge of this.	See Figure 6-3 for the location of the two existing wetland replication areas. Impacts discussed in 2017 were for a program-specific series of impacts; the 2023 Modified Development Program is different than the program proposed in the 2017 NPC. Future wetland impacts will be addressed on an ongoing basis with the applicable regulatory authority as the development progresses.
MB-3	Lastly and on a different note, in the 2007 FEIR, Volume 11- Graphics, Fig 6-2-2, it contained 24 certifiable vernal pools at Union Point (then the SSTTDC) that were to be certified by NHESP. For unknown reasons and now ten years later, they still have not all been certified and I would like to ask that this be further looked into so the VP's can get the proper protection that the proponents in 2007 had recommended in their DEIR.	The Proponent will comply with local regulatory requirements with respect to any certified vernal pools on the Site.

Commenter	Stormwater Comment	Response
EEA-61	The DSEIR should include an updated stormwater management report to inform the design and implementation of the stormwater master plan. This should include the results of hydrologic and hydraulic modeling for the existing (2007 FEIR) conditions, the current interim conditions, and the proposed master plan conditions. The DSEIR should describe and include supporting data to confirm that the project will be designed in compliance with MassDEP Stormwater Management Regulations and the SMS. As part of the stormwater management analysis the Proponent should specifically address potential changes to stormwater runoff patterns, particularly changes in discharges to French's Stream and Old Swamp River that could exacerbate flooding. The DSEIR should demonstrate that the stormwater runoff will be mitigated within the proposed development and peak rates of stormwater runoff discharging from the project site will be equal to or less than the pre-existing condition.	The Proponent has prepared a new existing conditions hydrologic analysis as well as a new proposed conditions hydrologic analysis to demonstrate how the Project will comply with the Massachusetts Stormwater Management Standards in accordance with the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.00).
EEA-62	The DSEIR should identify the types of stormwater best management practices (BMPs) that will be used in conjunction with the project, the locations of these proposed BMPs and discharges (noting relationship to wetland resource areas and buffer zones) and provide specifics on how construction and stormwater management will be designed to maximize protection of the adjacent environmental resource areas. The DSEIR should focus on the extensive opportunities to implement green infrastructure on-site, including but not limited to, decentralized rain gardens, tree boxes, and grassed swales.	Refer to Section 7.3 for various types of BMPs and green infrastructure that will be implemented on-site.
EEA-63	The use of large detention ponds should be discouraged in favor of local solutions, particularly given the unknown build-out order of the project. Structured parking, permeable surfaces and other low impact development (LID) measures will also assist in reducing overall impervious area and reducing stormwater flows. These measures should be addressed specifically in the DSEIR, including reducing surface parking to the maximum extent practicable.	The use of large detention ponds will be avoided to the maximum extent feasible. As described on Section 7.3.5 the Phase 1 stormwater improvements consist of a large, created wetland basin in order to divert the Base's upper tributary area. This will allow for a phased construction approach and use of the existing TACAN for stormwater mitigation, rather than additional large detention ponds.

Commenter	Stormwater Comment	Response
EEA-64	The DSEIR should discuss how the stormwater management system will be designed to work with existing infrastructure constructed under previously applicable regulations and policies and whether or not these areas will need to be upgraded again to accommodate the increased volumes of stormwater runoff generated by the new master plan. Given that the project will be constructed in phases over time and the Proponent is uncertain which elements of the master plan will be built in what order, the DSEIR must provide a detailed discussion of how the stormwater management system will function properly and sufficiently mitigate runoff on a phased basis.	A specific project review process has been developed by which individual phases of development will be reviewed for consistency with the SMP
EEA-65	As noted by MassDEP, BVW and IVW that border Old Swamp River are also considered ORWs. The DSEIR should discuss how the project intends to meet the ORW provisions of the SMS at 310 CMR 10.05(6)(k)l-10 and 314 CMR 9.06(6)(a)1-10 to protect wetland resource areas.	Refer to Section 7.3.6. All work will be performed in accordance with the WPA and the Stormwater Management Standards.
DEP-6	The amount of impervious area is proposed to be increased, resulting in additional stormwater runoff that will be directed to wetland resource areas. The future NOI applications and request for amendment to the Water Quality Certificate must also address the increase in stormwater runoff to be directed to wetland resource areas. Those BVWs and IVWs that border the Old Swamp River Outstanding Resource Water (ORW) are also ORW's, where no discharge is allowed pursuant to 314 CMR 4.00 (with limited exceptions). The future NOIs must demonstrate compliance with the ORW provisions and Stormwater Management Standards at 310 CMR 10.05(6)(k)1-10 and 314 CMR 9.06(6)(a)1-10 to protect wetland resource areas.	Comment acknowledged. All work will be performed in accordance with the WPA and the Stormwater Management Standards.
WSSC-17	The amount of impervious cover for the project has increased from 350 acres to 425 acres. There is a lack of information in the NPC regarding the use of green infrastructure to address at least a portion of the stormwater runoff from numerous impervious areas. A project of this size has a responsibility to implement improved stormwater options including permeable pavement, raingardens in residential areas, and other options included in EPA's Green Infrastructure Case Studies: Municipal Policies for Managing Stormwater with Green Infrastructure. These options should be investigated and included in the new EIR.	Refer to Section 7.3 for various types of BMPs and green infrastructure that will be implemented on-site.

Commenter	Stormwater Comment	Response
MA-12	Mass Audubon recommends that a commitment be made to build and maintain all aspects of the project using Low Impact Development (LID) techniques including minimization of impervious surfaces, capture and use of stormwater for landscape irrigation, and use of native plants. This should include minimizing the use of turf/lawn and maximizing native trees, shrubs and perennial plantings. In addition to saving water, this strategy will minimize the need for chemical fertilizers and pesticides and maximize value for native birds and pollinators. This approach can also be attractive and produce high property values and quality of life. The Devens development regulatory standards are a model that could be applied here for comprehensive application of LID.	Refer to Section 7.3 for various types of LID measures that will be implemented on-site.
NSRWA-8	The change in the project increases impervious cover by 75 acres. The proponent says they are using Low Impact Development Techniques (LID). Those techniques require the minimization of the amount of impervious cover through thoughtful design, consideration of multi-level parking, and then determine where they can use alternative permeable surfaces and when no further impervious surfaces can be reasonably reduced, then treat the remaining stormwater generated in decentralized rain gardens, grassed swales and other LID techniques throughout the development. We ask that the proponent provide an analysis of the reduction of the use of impervious surfaces through design alternatives and the use of alternative surfaces (i.e., porous asphalt, permeable pavers, etc.).	Refer to Section 7.3 for various types of LID measures that will be implemented on-site.
WCMS-2	Reassess the methods which will be used to prevent storm water runoff from flooding French's Stream and Old Swamp River. The Old Swamp River, which is a tributary river for Weymouth's secondary water supply, travels many miles through residential neighborhoods and backyards. If the runoff is not managed well damaging floods could impact these property owners.	As demonstrated in the SMP the proposed stormwater management design will significantly reduce the future fully developed runoff in major storms by approximately 20% from existing peak runoff rates, therefore there will be no adverse flooding downstream.

Commenter	Stormwater Comment	Response
MAP-24	Stormwater impacts are an issue with the town of Rockland since French's Stream floods its banks beginning on the former NAS South Weymouth. The west branch of French's Stream combines with the east branch of French's stream on former Navy property and flows through Rockland flooding homes and a golf course along the way. As of this morning (April 1st) it is overflowing its banks from the former military base and flooding further south in Rockland.	See comment WCMS-2 response.
MAP-26	Since there will be an increase in impervious surface, I would like the Secretary of Energy and Environmental Affairs to have the Southfield Redevelopment Authority (SRA) inform the Rockland Conservation Commission when the proponent requests an approval for wetlands, vernal pool, detention / Retention ponds, TACAN Outfall and river front area work to be done in the town of Weymouth on the former Naval Air Station South Weymouth.	Comment acknowledged. All work will be performed in accordance with the WPA.
TOW-22	The NPC describes Lstar's intention to update the stormwater runoff hydrologic modeling that was developed as part of the 2017 FEIR and to use current mapping and data that more accurately reflects existing conditions using EPA's Stormwater Management Model. This model of existing conditions should also incorporate the large watershed areas north and west of Union Point to ensure that as the project is developed these flows can continue to be accommodated without causing backflows or flooding of residential areas outside of Union Point.	The Proponent has prepared new existing conditions hydrologic analysis HydroCAD, Version 10.0 software. Refer to Section 7.3 for additional information.
TOW-23	Since the project proposed by the NPC adds another 75 acres of impervious surface, Weymouth would also like to work with Lstar on a long-term maintenance plan for the storm water infrastructure and detention facilities that identifies the parties responsible for its maintenance. The Town would like to coordinate with Lstar the harvesting of stormwater for irrigation as an additional manner of reducing water supply demand.	A specific project review process has been developed by which individual phases of development will be reviewed for consistency with the SMP. During this review the Proponent will coordinate with the SRA on the stormwater O&M Plan and identify responsible parties.

Commenter	Greenhouse Gas Emissions Comment	Response
EEA-66	The DSEIR should include an analysis prepared in accordance with the GHG Policy. The GHG Policy requires projects to quantify carbon dioxide (CO2) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis quantifies the direct and indirect CO2 emissions associated with the project's energy use (stationary sources) and transportation-related emissions (mobile sources). The GHG analysis should evaluate CO2 emissions for each alternative as required by the Policy including: 1) a Base Case compliant with current Massachusetts Building Code and related Stretch Energy Code (10% improved over ASHRAE 2013) requirements for development in Rockland and Weymouth and compliance with ASHRAE 2013 for development in Abington; and 2) a Mitigation Alternative that incorporates additional energy saving measures beyond the Base Case in a manner that demonstrates that GHG emissions have been avoided, minimized and mitigated to the maximum extent practicable. The Proponent should meet with representatives from the MEPA Office and the Department of Energy Resources (DOER) prior to preparing this updated analysis.	The Greenhouse Gas (GHG) and Mesoscale Analysis report (Appendix B) for the SWNAS Project submitted with the NPC fully complies with the EEA GHG Emissions Policy and Protocol. It identifies measures to avoid, minimize and mitigate CO2 emissions associated with the project. Consistent with the 2023 Stretch Code and current DOER guidance, the analysis examines an Appendix G Baseline Case, 2023 Stretch Code Base Case, and Proposed Design Case. The Proposed Design adopts all reasonable and feasible mitigation measures to reduce energy use and GHG emissions.
DEP-31	However, an air quality microscale analysis was presented to determine whether the project will cause an exceedance of the National Ambient Air Quality Standard (NAAQS) for carbon monoxide (CO). The analysis results indicate all CO concentrations are well below the NAAQS. The NPC indicates a Greenhouse Gas (GHG) analysis will be presented in the EIR pursuant the MEPA Greenhouse Gas Emissions Policy.	The Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) submitted with the NPC satisfies MassDEP's request for a GHG analysis.
DOER-1	Based on a preliminary review, we would expect that the project could achieve a GHG mitigation of at least 50 to 75% below project baseline. This can be achieved through a combination of energy efficiency measures, passive design, and renewables.	Table 13 in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) demonstrates the Proposed Design has Performance Energy Index (PEI) results of 0.285 to 0.387, which means energy use 61% to 71% below the Appendix G Baseline Case, with comparable reductions for GHG emissions.

Commenter	Greenhouse Gas Emissions Comment	Response
DOER-2	Both energy efficiency and renewables are supported by generous incentives and grants through the local utility (National Grid for all three towns through Mass Save programs) and the Massachusetts Clean Energy Center.	The Proponent is pursuing both the design support and customer incentives offered by National Grid. The financial incentives available for Passivehouse design are included in the Passivehouse financial analysis in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B).
DOER-3	Future submissions should demonstrate that the project is taking all feasible measures to avoid, minimize and mitigate GHG emissions.	The Proposed Design as presented in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) includes all reasonable and feasible measures to avoid, minimize and mitigate GHG emissions.
DOER-4	Baseline should be set at local, current building codes. Accordingly, baseline is Stretch Code (10% improved over ASHRAE 2013) for Rockland and Weymouth; while baseline for Abington is ASHRAE 2013. (It appears that a vast majority of the building space will be located in Rockland and Weymouth.)	The 2023 Stretch Code analysis required by DOER now requires both an Appendix G Baseline and 2023 Stretch Code Base Case. Both were included in the energy and GHG emissions modeling for the project.
DOER-5	Above-code mitigation measures and renewables should be thoroughly evaluated to maximize all feasible GHG avoidance.	Above-code mitigation measures are included in the Proposed Design. All measures, including renewables, not included in the Proposed Design are thoroughly evaluated in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B).
DOER-6	Extensive credits, incentives, and grants are available for efficiency measures and renewables.	The Proponent is pursuing both the design support and customer incentives offered by National Grid. The financial incentives available for Passivehouse design are included in the Passivehouse financial analysis in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B),

Commenter	Greenhouse Gas Emissions Comment	Response
DOER-7	We recommend a thorough evaluation be conducted on financial benefits associated with efficiency and renewables.	A thorough analysis of rooftop PV systems, for emissions and financial feasibility, is included in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B).
DOER-8	As discussed above, Passive building approach can be a highly-effective GHG reduction strategy, especially for residential uses. We recommend this approach be investigated for the residential portion of the development.	A complete Passivehouse analysis for the residential portions of the project, including emissions and financial analysis, is included in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B).
OCPC-9	The project proponent should incorporate MassDOT GreenDOT strategies in the development of this project in an effort to reduce greenhouse gas (GHG) emissions, improve air quality, consume less energy, and promote healthy transportation options such as walking, bicycling, and public transit.	The proponent is proposing a number of traffic demand measures (TDMs) that will assist in meeting MassDOT's GreenDOT commitments as presented in Section 10.5.

Commenter	Stationary Sources Comment	Response
EEA-67	The DSEIR should include a summary of modeling inputs (e.g., R-values, U-factors, efficiencies, lighting power density, etc.) for energy efficiency measures modeled such as equipment, walls, ceilings, windows, lighting, HVAC units, etc. for both the Base Case and Mitigation Alternative based upon the conceptual design for the proposed buildings and garages.	The Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) includes a complete list of all eQUEST and emissions model inputs for the building components, for the App. G Baseline Case, the 2023 Stretch Code Base Case, and the Proposed Design.
EEA-68	The GHG analysis should clearly demonstrate consistency with the objectives of MEPA review, one of which is to document the means by which the Proponent plans to avoid, minimize, or mitigate Damage to the Environment to the maximum extent feasible. The DSEIR should state modeling assumptions and explicitly note which GHG reduction measures have been modeled and those that cannot be modeled due to the constraints of the modeling software.	The Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) is consistent with the MEPA policy to avoid, minimize and mitigate GHG emissions. The Appendix includes information on all model assumptions and inputs.
EEA-69	Comments from DOER highlight various above-code mitigation measures that should be evaluated as part of the DSEIR. These include measures such as rooftop solar photovoltaic (PV) systems, enhanced building envelope design, passive residential design, use of heat pumps, etc. The DOER comments also highlight the substantial credits, incentives, and grants available for efficiency measures and renewables. The Proponent should initiate contact with utility service providers as soon as possible to explore potential monetary incentives and energy modeling support services.	The Proposed Design includes low-TEDI building envelopes, air source heat pumps, and other above-Code mitigation measures. A full evaluation of Passivehouse design and rooftop PV solar is included in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B). The Proponent is pursuing both the design support and customer incentives offered by National Grid.

Commenter	Mobile Sources Comment	Response
EEA-70	The GHG analysis in the DSEIR should demonstrate that mobile source GHG emissions are avoided, minimized and mitigated to the maximum extent feasible through establishment of aggressive mode share goals supported by: strong transit user incentives, right-sized parking supply, safe and convenient access and services for bicyclists and pedestrians, and a robust TDM program with clearly defined goals and monitoring. The DSEIR should include a mobile source GHG emissions analysis and proposed mitigation based on the traffic study and air quality analysis with an emphasis on these overarching goals.	The Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) includes a mobile source GHG emissions analysis based on the traffic study and its projected traffic volumes including mitigation measures and TDM goals.
EEA-71	The mobile source GHG analysis should also evaluate direct mobile source emissions from the proposed shuttle service. The DSEIR should present assumptions regarding ridership, frequency and trip length and then compare GHG emissions based upon vehicle technology (i.e., diesel versus electric or other lower emitting fuel) to identify appropriate mitigation. Operational GHG mitigation measures should also be considered (e.g., limiting idling, etc.).	The Proponent is proposing a number of traffic demand measures (TDMs) that will assist in meeting MassDOT's GreenDOT commitments. The Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) includes a mobile source GHG emissions analysis based on the traffic study and its projected traffic volumes including mitigation measures and TDM goals. Traffic demand measures (TDMs) have been incorporated into the air quality mesoscale analysis to reduce air quality and GHG emission increases. A shuttle service will be operated by the Tri-Town TMA that will connect the development areas within the Project site with continued service to the MBTA South Weymouth Commuter Rail Station.
EEA-69	Comments from DOER highlight various above-code mitigation measures that should be evaluated as part of the DSEIR. These include measures such as rooftop solar photovoltaic (PV) systems, enhanced building envelope design, passive residential design, use of heat pumps, etc. The DOER comments also highlight the substantial credits, incentives, and grants available for efficiency measures and renewables. The Proponent should initiate contact with utility service providers as soon as possible to explore potential monetary incentives and energy modeling support services.	The Proposed Design includes low-TEDI building envelopes, air source heat pumps, and other above-Code mitigation measures. A full evaluation of Passivehouse design and rooftop PV solar is included in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B). The Proponent is pursuing both the design support and customer incentives offered by National Grid.

Commenter	Climate Change Adaptation Comment	Response
EEA-72	The DSEIR should consider the potential effects of climate change on the site and consider incorporation of measures to increase resiliency and adaptation. In particular, the Proponent should consider the potential impacts of more frequent and intense storm events in the development of site design and the stormwater management system.	Agreed. See Section 6.1
EEA-73	The DSEIR should identify site elements that will be designed to reduce the impact of extreme heat waves and limit the potential impact of more frequent and intense storm precipitation.	See Section 6.1.2
EEA-74	Finally, the Proponent should meet with EEA staff and the MEPA office prior to preparation of the DSEIR to discuss feasible climate change adaptation and mitigation measures for the project.	Noted. The Proponent met with the MEPA office in September, 2023, to review the project. See Section 6.1.

Commenter	Air Quality Comment	Response
EEA-75	The DSEIR should include a microscale analysis prepared in compliance with the technical and policy requirements of the EPA, U.S. Department of Transportation, and MassDEP.	A detailed qualitative microscale analysis was performed and included in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) and Section 6.7 Air Quality in the NPC.
EEA-76	The DSEIR should also include a mesoscale analysis prepared in accordance with MassDEP guidelines using a study area consistent with that used for the transportation study. This modeling should use the updated MOVES model in lieu of the MOBLIE 6.2 model used during previous air emissions modeling efforts.	A mesoscale air quality analysis was performed using the latest version of the MOVES model (Version 3.1) as presented in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) and Section 6.7 Air Quality in the NPC.
EEA-77	The DSEIR should identify the types and locations of potential stationary source air emissions, including those that may be associated with on-site wastewater treatment. If applicable, the DSEIR should discuss how these sources will comply either with relevant MassDEP or EPA permitting requirements or if they are eligible for review in accordance with the Environmental Results Program (ERP).	A summary of the stationary sources and potential permitting requirements are presented in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) and Section 6.7 Air Quality in the NPC.
EEA-78	Emission increases due to the project must be mitigated and any subsequent environmental impact analysis should include the Proponent's commitment to implement these mitigation measures.	Traffic demand measures (TDMs) have been incorporated into the air quality mesoscale analysis to reduce air quality and GHG emission increases as presented in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B).
DEP-30	Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor, or noise. Many industrial, commercial, and institutional development activities have facility heating and supplemental or emergency power generation associated with them that require air quality permitting from MassDEP before construction or operation. The determination of when a permit is required is based on the size of the proposed combustion unit. Smaller units and specifically, engines (emergency and non-emergency), combined heat and power (CHP) units and some boilers may not require a specific Plan Approval but are subject to performance standards and certification, the requirements for which are found at 310 CMR 7.26. Any unit that exceeds the size limit or does not meet the applicability requirements of the above listed regulations will require a permit under 310 CMR 7.02.	A summary of the operating stationary sources and potential permitting requirements are presented in the Greenhouse Gas and Mesoscale Analysis for the SWNAS Project (Appendix B) and Section 6.7 Air Quality in the NPC. Mitigation measures to reduce construction air quality impacts are also presented in Section 6.7 Air Quality in the NPC.

Commenter	Noise Quality Comment	Response
EEA	The DSEIR should include the results of a noise model to evaluate current and future sound levels at sensitive receptors due to increases in traffic. This traffic noise model should be prepared in accordance with applicable U.S. Federal Highway Administration and MassDOT guidelines to assess project-related impacts and determine appropriate mitigation, if any.	A traffic noise analysis was prepared comparing the 2017 NPC Project Design with the 2023 Proposed Design for the future build year of 2043. The modeling results show a small improvement in overall noise due to the reduction in project-generated traffic for the 2023 Proposed Design. The results of the analysis are presented in the Noise technical report and Section 6.8 Noise in the NPC. Mitigation measures to reduce construction air quality and noise impacts are presented in Section 6.7 Air Quality and Section 6.8 Noise in the NPC.
MAP	This study did not include the cul-de-sac area of Union St. It also did not include Oregon Ave., Greenwood Street, and Forest Street. Future proposed development will be located in an area that may make these streets receptors, especially Ward Ave., Stanley Ave. Warren Ave., Lavina Ave. and Loretta Ave. between the former NAS South Weymouth boundary and Forest Street in Rockland.	

Commenter	Rare Species Comment	Response
EEA-80	The DSEIR should describe, with supporting graphics, the proposed areas on-site that will be, or have been, designated for permanent habitat preservation and restoration. The DSEIR should characterize each subarea and include a table summarizing overall acreage for each subarea.	Permanent habitat preservation and restoration will occur within the restricted area and the habitat areas as approximately shown on Figures 6-2.
EEA-81	The DSEIR should contain a revised mitigation program consistent with the proposal to modify the CMP, including a draft Grassland Conservation Plan, modified grant restriction, and a metes-and-bounds plan of the CR area.	As discussed more fully in Section 6.3, the proposed 104 acres of grassland mitigation area is shown on Figure 6-2. Additionally, the Proponent will implement an ongoing maintenance program for such grasslands and provide an escrow to account for off-site mitigation, as appropriate.
EEA-82	The DSEIR should discuss how wetland areas located in the proposed grassland habitat conservation area will be managed per the grassland habitat restoration and preservation efforts as noted by comments from Mass Audubon.	Wetland areas are not included in the 104-acre grassland mitigation area. Within the larger restricted area, wetlands will remain in their existing condition.
EEA-83	The DSEIR should describe how grassland habitat creation and maintenance plans will be coordinated with Box Turtle protection efforts on-site.	There are overlapping habitats of the grassland species and the Eastern Box Turtle. Grassland mitigation activities will occur within one Habitat Management Area created for nesting turtle habitat. Work in this area will occur when turtles are not active and in accordance with the Turtle Construction Monitoring Plan.
EEA-84	Finally, the DSEIR should address how the 50 miles of proposed walking trails will intersect, if at all, with permanently protected open space and measures that will be implemented to minimize impacts to these sensitive habitats.	As the Project design progresses, the Proponent will determine the most beneficial location for proposed walking trails.
EEA-85	The DSEIR should discuss the anticipated process to modify the existing golf course CR to allow for mixed-use development, including but not limited to, potential Article 97 of the Amendments to the Constitution of the Commonwealth (Article 97) land disposition and/or state legislative requirements.	As discussed more fully in Section 6.2, the existing restricted area will be modified to create a larger, contiguous, more beneficial open space area.
EEA-86	The DSEIR should reaffirm those terms of the existing CMP that will remain in effect for the broader project site, particularly those related to construction period impacts and ongoing monitoring efforts. The DSEIR should include a copy of the existing CMP for reference.	The Proponent has been working diligently with NHESP to develop a revised CMP reflective of the Project and its current commitments.

Commenter	Rare Species Comment	Response
NHESP-3	In association with the existing CMP, once the Proponent gains control of the Small Landfill and Rubble Disposal Area (as detailed in the NPC), these areas shall be managed and enhanced pursuant to Attachment 4B (Eastern Box Turtle Nesting Habitat Mitigation Plan) of the existing CMP.	The Proponent does not currently control this area and, if and to the extent the Proponent gains control, it will comply with the terms of the amended CMP.
MA-4	As noted above, the proposed plan also involves converting to development areas previously committed to grassland and subject to a CR. This requires a rigorous review through the Article 97 and MESA permitting processes. It should only be allowed if there is a significant and permanent positive benefit.	As discussed more fully in Section 6.2.3, the existing restricted area will be modified to create a larger, contiguous, more beneficial open space area.
MA-5	Restoration of the grassland will require full removal of runways and other pavement and restoration with suitable soil and seed. The soils here are naturally sandy and well-drained, suitable to sustain a sparse, little bluestem-dominated grassland, and that is the ideal habitat for Grasshopper Sparrows and Upland Sandpipers. Specialized seed mix and planting methods need to be applied, not the use of a hay mix or other common meadow mix, which would be inappropriate and ineffective for the habitat conservation goals. Mass Audubon's previous restoration guidelines for the site are attached. These include information on soil preparation and proper seed mix and installation techniques. These guidelines were completed for the previous developer under sub-contract to their consultant, VHB. Minor adjustments are needed based on the revised design.	The Proponent will coordinate with NHESP in the process of amending the CMP to determine a program to address the existing runways and identify appropriate soil treatments and restoration guidelines.
MA-6	Areas to be restored from overgrown shrubland will need ongoing maintenance and management for invasive species. Implementation also must require ongoing monitoring of vegetation and birds (and other wildlife) to ensure that the restored grassland is functioning as intended and to identify any adjustments needed.	The Proponent will coordinate with NHESP in the process of amending the CMP to determine a plan for ongoing maintenance and management for areas to be restored as part of the Project.

Commenter	Rare Species Comment	Response
MA-8	While the opportunity to create an expansive grassland is the highest value here, shrubby vegetation should be maintained in the buffer area around infield wetlands within the "Grassland Habitat Conservation Area," to buffer the wetlands and to provide shrub habitat, which is also of value to many species of birds and wildlife. The grassland habitat creation and maintenance plan also needs to be coordinated with considerations for Box Turtle protection and habitat on the site.	The Proponent will coordinate with NHESP in the process of amending the CMP to identify appropriate vegetation, buffer and maintenance program for the on-Site habitats.
PT	My major concern about the potential opening of the Rockland Union Street gate is the impact on the wetlands and wild life that exist the area. As I am sure you are aware the area between the Union Street "gate" and the rotary on Delahunt Parkway, is designated open space and as a "rare species habitat". The area is protected through permanent conservation restrictions (CRs).	The Proponent is not proposing the reopening of Union Street to access the Project.

Commenter	Hazardous Materials Comment	Response
EEA-4	The DSEIR should describe ongoing activities on-site under the purview of the Navy associated with the decommissioning and environmental remediation of the SWNAS.	See Section 6.10.
EEA-87	The DSEIR should include an update on the status of remediation sites throughout the project area, including a discussion of additional remediation that may be required in conjunction with the discovery of PFAS on-site.	Updated table included in this section below.
EEA-88	As requested by MassDEP, the DSEIR should provide a complete list and location of those sites that are being investigated for the presence of PFAS.	Updated table included in this section below.
EEA-89	The DSEIR should also identify proposed off-site locations that may be impacted by the proposed transportation and water/wastewater utility infrastructure projects that are currently regulated under M.G.L. c. 21 E and the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000).	These areas are addressed in the Transportation, Section 8.0, and Proposed Utilities and Infrastructure, Section 7.0, as well as noted where addressed in separate filing (i.e., the Weymouth/SRA application to join MWRA Water). As noted, much of that work is in public road ROW's and utility easements.
EEA-90	The DSEIR should identify the location of potential AULs and what types of uses will potentially be restricted from these areas. The DSEIR should confirm that proposed uses on-site will be consistent with anticipated limitation of an AUL.	See Section 6.10 and updated table included in this section below.
EEA-91	The DSEIR should identify potential post-closure uses for the Small Landfill and indicate whether a Post-Closure Use Permit from MassDEP will be required.	There are no currently proposed uses. If and to the extent any uses are proposed, the Proponent will obtain any necessary permits for development at such area.
EEA-92	The Proponent should evaluate any and all new receptors (i.e., buildings, utilities, catch basins, and other above/below ground structures, etc., that may serve as conduits of landfill gas) proposed as part of the project to assess the potential impacts, if any, of landfill gas migrating from the Small Landfill.	Noted.

Commenter	Hazardous Materials Comment	Response
DEP-25	The proposed development of the former naval air station encompasses approximately 1462 acres across three towns. There are thirteen MCP sites within the proposed Project boundary, but the sites are closed and no further response actions or reporting are required. The Project Proponent is advised that if oil and/or hazardous materials are identified during the implementation of this Project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP, if necessary.	Noted.
DEP-26	The Project Proponent should coordinate closely with EPA, MassDEP, and the Navy to ensure that PFAS does not pose unacceptable risk to human health or the environment.	Noted. The SRA, and Proponent, have been actively coordinating with the Navy, EPA, and DEP.
DEP-35	If any occupant of the Project will generate hazardous waste and/or waste oil, that entity must register with the MassDEP or EPA to obtain a permanent identification number for legally generating and managing regulated waste.	Noted.
USEPA-1	We are writing to request that we remain on the mailing list for any MEPA documents related to the Union Point project. EPA remains interested in this project given our ongoing work on site contamination and remediation issues.	Noted.

The following table provides an update on the current status for areas under review and controls in place.

Area	Cleanup Status	Future Planned Work	Land Use Controls
Industrial Operations Area	Finding of Suitability to Transfer (FOST) issued by Navy, other than two areas totaling approximately 8.32 acres held back for additional PFAS work by Navy.	Additional assessment for PFAS planned by Navy in areas selected by Navy in consultation with EPA and DEP. Selective soil removal by Navy to occur in held back area near Building 96.	OU27 Controls AULs of record concerning small portions known as Building 8 AUL and Building 14 AUL which were both associated with residual petroleum products in soil. The LUCs regulate future use and disturbance of impacted soil.
Building 81 Area	FOST issued. Remedy implemented by Navy and determined to be operating successfully.	Additional monitoring by Navy continuing.	OU27 Controls LUC/NAUL related to defined portion of the Building 81 area and regulating use and redevelopment without approval of EPA, DEP, and Navy
Building 31 Area	FOST issued by Navy and land transferred.	No additional remediation contemplated by Navy.	LUCs related to accessibility and excavation of soils.
Small Landfill, West Gate Landfill, Rubble Disposal Area	FOST issued for Small Landfill and West Gate Landfill. Cap construction on landfills complete; no further remediation contemplated.	Additional monitoring by Navy continuing.	OU 27 Controls. Cap disturbance prohibited. No post-closure use is currently contemplated. Any such use on land transferred by FOST would be in accordance with all applicable federal and state laws and regulations, including any applicable laws governing the post-closure use of landfills.

Area	Cleanup Status	Future Planned Work	Land Use Controls
PFAS Operable Unit 27	Portions FOSTed. This area (OU 27) was created to manage PFAS in groundwater and applies to the majority of the SWNAS groundwater.	Additional investigation of PFAS by Navy.	OU 27 Controls: LUC prohibits use of groundwater and requires construction dewatering be conducted in accordance with a dewatering plan approved by Navy.
Solvent Release Area	Not transferred by FOST.	Navy is implementing the remedy.	OU 27 Controls. Other LUCs to be determined at time of transfer depending on achievement of remedial goals.
Formerly Proposed Sewage Treatment Plant	Transferred by FOST.	Navy completed removal actions, as set forth in the Record of Decision	OU 27 Controls. LUC/NAUL restricts use on a portion of the area and includes restrictions on disturbance of soil at depth in certain areas.
Former Hangar 2	FOST planned.	No Further Action Decision achieved.	OU 27 Controls.

Commenter	Solid Waste Comment	Response
DEP-27	Asphalt, brick and concrete (ABC) rubble, such as the rubble generated by the demolition of buildings must be handled in accordance with Massachusetts solid waste regulations. These regulations allow, and MassDEP encourages, the recycling/reuse of ABC rubble. The proponent should refer to MassDEP's Information Sheet, entitled "Guide to Regulations for Using or Processing Asphalt, Brick and Concrete Rubble, revised February 2000", that answers commonly asked questions about ABC rubble and identifies the provisions of the solid waste regulations that pertain to recycling/reusing ABC rubble. This policy can be found online at the MassDEP website: www.mass.gov/dep.	Noted. Work will be performed in accordance with MassDEP or the appropriate agency standards and as described in Section 6.9 and 6.10.
DEP-29	In accordance with Massachusetts Solid Waste Regulations, 310 CMR 19.0000, the Proponent shall evaluate any and all new receptors (i.e., buildings, utilities, catch basins, and other above/below ground structures, etc., that may serve as conduits of landfill gas) proposed as part of Union Point to assess the potential impacts, if any, of landfill gas migrating from the Small Landfill.	Noted. Work will be performed in accordance with MassDEP or the appropriate agency standards and as described in Section 6.9 and 6.10.

Commenter	Construction Period Comment	Response
EEA-93	The Proponent should note the MassDEP comment letter with regard to regulatory requirements and potential mitigation measures to be implemented during the construction period (e.g., anti-idling, Tier 4 emissions equipment, etc.).	Noted. Work will be performed in accordance with MassDEP or the appropriate agency standards and as described in Section 9.0.
EEA-94	The project must comply with MassDEP's Solid Waste and Air Pollution Control regulations, pursuant to M.G.L. c.40, §54. Specifically, the MassDEP comment letter provides significant information with regard to solid waste management during the construction period, recycling of construction and demolition (C&D) waste, asbestos removal requirements, and handling of asphalt, brick and concrete (ABC) associated with demolition activities.	Noted. Work will be performed in accordance with MassDEP or the appropriate agency standards and as described in Section 9.0, and Section 6.7 for Air Quality.
EEA-95	The DSEIR should describe how the Proponent will incorporate recycling into proposed construction and demolition activities and comply with the goals of the Massachusetts Solid Waste Master Plan.	See Section 6.9.
EEA-96	The Construction Management Plan (CMP) should include off-site impacts associated with transportation, interim and long-term water supply, and wastewater improvements. As such, the DSEIR should present a conceptual plan with a list of BMPs that could be selected by project contractors to reduce construction related environmental impacts for these roadway and utility improvement projects. These BMPs should focus on erosion and sedimentation controls, staging areas, traffic management, and air/noise pollution.	Noted. Work will be performed in accordance with MassDEP or the appropriate agency standards and as described in Section 9.0,
EEA-97	The DSEIR should identify truck traffic routes associated with construction traffic, staging areas, and how safe pedestrian, bicycle and vehicle access to and through Union Point will be maintained throughout the construction period for each proposed project phase	See Section 9.0.
EEA-98	The DSEIR should describe potential construction period dewatering requirements, discuss how dewatering will be conducted in a manner consistent with local, MWRA, and/or MassDEP regulations/guidelines (as applicable), and identify any necessary permits.	See Section 9.0.
EEA-99	The DSEIR should address how construction period dewatering and soil management will be conducted consistent with on-site hazardous material remediation and monitoring requirements.	See Section 6.9 and Section 9.0.

Commenter	Construction Period Comment	Response
EEA-100	The DSEIR should confirm if a Dewatering General Permit or Remediation General Permit will be required from the EPA for the project.	A list of anticipated federal, state, and local permits is included in Section 2.2
EEA-101	The CMP should include appropriate erosion and sedimentation control BMPs. These erosion and sedimentation controls should be implemented and maintained in accordance with the Stormwater Pollution Prevention Plan prepared in accordance with the NPDES Construction General Permit requirements.	See Section 7.3.
DEP-33	MassDEP requests that the Proponent use construction equipment with engines manufactured to Tier 4 federal emission standards, which are the most stringent emission standards currently available for off-road engines. The Proponent should maintain a list of the engines, their emission tiers, and, if applicable, the best available control technology installed on each piece of equipment on file for Departmental review.	Noted. All work will be performed in accordance with the MassDEP's Diesel Retrofit Program (MDRP).
DEP-34	MassDEP reminds the Proponent that excessive idling is prohibited during the construction phase of this Project. If subsequent environmental filing is required, the Proponent shall state specifically how it plans to prohibit excessive idling during the construction period. Typical methods of reducing idling include driver training, periodic inspections by site supervisors, and posting signage. In addition, to ensure compliance with this regulation once the Project is occupied, MassDEP requests that the Proponent establish permanent signs limiting idling to five minutes or less at the completed Project.	Noted. All work will be performed in accordance with the MassDEP 310 CMR 7.11 (1)(b) Anti-Idling regulations.

Commenter	Sustainable Development Comment	Response
WSSC-19	Noted in the July 2007 Secretary's Certificate for the FEIR is the information that the project had been accepted as a pilot project under the Leadership in Energy and Environmental Design (LEED) for Neighborhood Development program. Is this still the case? If so, the proponent should include more information on the parameters of the pilot project which may have the potential to serve as a model for Smart Growth and sustainable design in the state.	No longer applicable as LEED ND has subsequently been launched as a formal program. The Project has been evaluated with the current version of LEED ND to measure the effectiveness of sustainability initiatives in the Project and is provided in Section 6.1.
NSRWA-3	The development of such a large project has the opportunity to showcase how to use water sustainably. The proponent should outline in its SEIR how it will reduce its water demand through the use of innovative water conservation fixtures that go beyond the plumbing code, natural landscaping that requires no long term irrigation, and the capture and reuse of rainwater from roofs and reuse of graywater for toilet flushing and other nonpotable uses.	Noted. The Project has been evaluated with the current version of LEED ND to measure the effectiveness of sustainability initiatives in the Project and is provided in Section 6.1. The Project is incorporating measures to sustainably and efficiently utilize the water resources as is described in Section 7.1, for Water Infrastructure.

Commenter	Affordable Housing Comment	Response
MAPC-44	Of the 3,855 dwelling units proposed by the Proponent, they are distributed as follows: 355 single-family detached, 2,000 apartments or condos, 500 townhomes, and 1,000 age-restricted. MAPC applauds the Proponent for including a substantial commitment to expanding the housing supply in Abington, Rockland, and Weymouth, and thereby, in the region.	Noted. The Project will maintain the same Affordability thresholds as previously noted and will provide a range of for sale and for rent homes.
MAPC-45	MAPC is also pleased that at least 10 percent of the residential units will be priced as either affordable or workforce housing. We look forward to a more detailed description in the EIR that includes a breakdown of affordable housing among the different types of dwelling units and their locations. This should include a breakdown by tenure (ownership v. rental); a clear indication of the bedroom distribution (i.e., 1-, 2-, and 3-bedroom units); and specific indication of affordability (i.e., how many units will be affordable to households earning below a certain level of Area Median Income as determined by the US Department of Housing & Urban Development). MAPC recommends that the Proponent implement affordable housing throughout the development, so that neither location, design, nor amenities give any indication to the outside observer of where the affordable units are located	Noted. The Project will maintain the same Affordability thresholds as previously noted and will provide a range of for sale and for rent homes and mixed throughout the project.
MAPC-46	We wish to emphasize that the issue of housing affordability is an environmental as well as a housing issue, because there is strong evidence that lower-income households own fewer cars, use less parking, and generate less traffic. According to the study, Maintaining Diversity in America's Transit Rich Neighborhoods1, "people of color, low-income households and renters are all more likely to use transit than the average American" (p. 2).	Noted.
MAPC-47	Finally, we ask that that the EIR outline the extent to which this affordable housing will contribute towards the 10 percent subsidized housing goal for the communities of Abington, Rockland, and Weymouth, pursuant to MGL Ch. 40B. According to the Department of Housing & Community Development Subsidized Housing Inventory, as of November 2016 Abington, Rockland, and Weymouth were at 7.61%, 6.39%, and 8.13%, respectively.	Per the 2014 Enabling Legislation (as the same may be amended to reflect the current development proposal), MGL Ch. 40B shall not apply to the provision of affordable housing at the Base.

Commenter	Public Safety Comment	Response
APB-1	The Planning Board has some grave concerns about the project change. They are extremely concerned about the impact of these changes to our Public Safety Depts. They are currently stretched tight, the expansion of homes and doubling of traffic will only increase the amount of services they will need to render. In addition to this strain on services there is no emergency access, especially for the Fire Department, from the Town of Abington to Union Point. This means that any services rendered by the Town of Abington need to get to Union Point via Route 18 which is difficult on the best day.	The Proponent has met and reviewed the Project with the Town departments, including with Police and Fire, and will continue to work with the Town's to address any questions or concerns to address Public Safety.

Commenter	Mitigation/Draft Section 61 Finding Comment	Response
EEA-102	The DSEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each State Agency that will issue permits for the project. The DSEIR should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.	Proposed mitigation measures are summarized in Section 10.0. Draft Section 61 Findings are included in Section 11.0.
EEA-103	The DSEIR should consider how project phasing and overall project impacts will influence the mitigation implementation schedule and present a mitigation program tied to discrete events and/or estimated impacts (i.e., generation of traffic trips, wastewater demand or water use) rather than construction of a specified square footage of space to allow maximum flexibility to respond to market forces.	Proposed mitigation measures are summarized in Section 10.0. Draft Section 61 Findings are included in Section 11.0.
EEA-104	Mitigation measures should also be provided in a tabular/matrix format that describes each mitigation commitment based upon all previous MEPA reviews, the status of each of these commitments, whether previously approved mitigation measures are no longer proposed due to the project changes, and any new mitigation measures proposed subsequent to additional environmental review.	Proposed mitigation measures are provided in tabular format in Table 10-1, Proposed Mitigation Implementation Plan in Section 10.0
DEP-1	This Project has been subject to eight filings with the MEPA office. MassDEP requests that the proponent review all the Secretary's Certificates and provide a matrix of the commitments, obligations and Section 61 findings for the Project which describes the status of the each of these or if the commitment, obligation Section 61 finding is not needed or feasible due the subsequent changes of the Project.	Proposed mitigation measures are provided in tabular format in Table 10-1, Proposed Mitigation Implementation Plan in Section 10.0. Draft Section 61 Findings are included in Section 11.0.
DEP-5	Further avoidance and minimization measures will be required in the future NOI(s) and amended Water quality Certificate for those specific BVW alterations not eligible for consideration as a limited project (both temporary and permanent impacts).	The proposed development has been designed to avoid, minimize, and mitigate for any wetland impacts. The development area is located primarily outside of the buffer zone to delineated wetlands. Work proposed within Riverfront Areas will meet applicable regulations.

Commenter	Mitigation/Draft Section 61 Finding Comment	Response
DEP-12	Lastly, the NPC described the wetland mitigation areas that were constructed to offset the alterations that were approved to BVW and IVW by MassDEP's 401 Water Quality Certification. It appears that all of the wetland mitigation that was required has not been yet completed. The proponent needs to provide a schedule to MassDEP to ensure that wetland mitigation required by the Water Quality Certificate is successfully established, prior to new alterations to resource areas being authorized through an amended Water Quality Certificate.	As described in Section 6.4, approximately 14,305 sf of wetland, replication has been constructed. Table 6-3 summarizes wetlands impacted to date. It is unclear why additional replication was not constructed. The Proponent will work with MassDEP to determine which actions need to be taken.
DEP-36	Pursuant to MEPA Regulations 301 CMR 11.12(5)(d), the Proponent will prepare Proposed Section 61 Findings to be included in the EIR in a separate chapter updating and summarizing proposed mitigation measures. In accordance with 301 CMR 11.07(6)(k), this chapter should also include separate updated draft Section 61 Findings for each State agency that will issue permits for the Project. The draft Section 61 Findings should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.	Proposed mitigation measures are summarized in Section 10.0. Draft Section 61 Findings are included in Section 11.0.
DOT-2	According to this NPC, Phase I of the Union Point development would entail a development program similar in size to the Southfield project to take advantage of the already identified transportation improvement program. While some of these transportation infrastructure improvements would likely accommodate varying stages up to Phase I development, additional mitigation would likely be required to address the full built out of the site. The Proponent should provide a clear commitment to implement the necessary mitigation measures and should describe the timing of their implementation based on the phases of the project.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.

Commenter	Mitigation/Draft Section 61 Finding Comment	Response
MAPC-15	It is important to point out that the Proponent has not yet committed to a clearly outlined transportation mitigation program. The table in Section 3, Preliminary Mitigation Measures, broadly states: "Improvements to road segments and intersections affected by site-generated traffic and implementation of Traffic Demand Management plan. A traffic monitoring program will be implemented to validate traffic projections." In fact, the Secretary's FEIR Certificate dated July 18, 2007 criticized the Proponent for not providing "a more specific presentation of certain project details, including mitigation." Subsequently, the Secretary directed the Proponent to "finalize clear and enforceable mitigation commitments in consultation with the state permitting agencies." (p. 2)	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.
MAPC-16	Due to the significant increases in the building program's square footage, parking, and traffic impacts, MAPC expects the EIR to contain a comprehensive program for transportation-related mitigation. MAPC recognizes that the Proponent has indicated that improvements, which were also considered in the 2007 FEIR, are being evaluated. Nevertheless, the EIR must contain a comprehensive transportation mitigation program, which also needs to be included in the draft Section 61 Findings.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.
MAPC-17	The transportation mitigation program should build upon the improvements identified by the Proponent which were considered in the 2007 FEIR as outlined below: Route 3 Connection. Reconstruct Hingham Street to provide a consistent four-lane cross section between Weymouth Street and Route 3. South Weymouth Commuter Rail Station Improvements-Improve the South Weymouth Commuter Rail Station by relocating the station platform, adding parking spaces, providing pedestrian and bicycle connections, and introducing a multimodal center with a pickup/drop-off area and shuttle bus service. Intersection Improvements- Route 58 at Route 139; Columbian Street/Forest Street; Pond Street at Derby Street/Hollis Street; Weymouth Street/Sharp Street/ Abington Street; Columbian Square (Pond St/Pleasant St/Union St); Columbian Street/Park Avenue West.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.

Commenter	Mitigation/Draft Section 61 Finding Comment	Response
MAPC-18	Planned Transportation Projects-The NPC mentions several projects that are currently in either the design or construction stages. The timing of when these projects are anticipated to be completed and whether their transportation impacts require mitigation needs to be addressed in the EIR. These projects include: Route 18 Widening; Improvements to the Route 3 interchange at Derby Street; Route 53/Derby Street/Gardner Street - signal and geometric improvements; Extension of Market Street (formerly New Main Street) to the William Delahunt Parkway.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.
MAPC-19	Multi-Modal Transportation Facility-As outlined in the Secretary's FEIR Certificate dated July 18, 2007, the construction of a multi-modal transportation center was a central component of the Project. From reviewing the NPC, it appears that the commitment to construct the multi-modal transportation center has been reduced to a mitigation measure that may be included based on further evaluation. MAPC strongly encourages the addition of a multi-modal transportation facility based on the MBTA's planned improvements to the existing South Weymouth Commuter Rail Station and urges the Secretary to require the Proponent to commit to constructing the facility.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.
AF-1	Additional vehicles trips added by this change notice especially with inadequate proposed mitigation plans are not acceptable. Section 2.0 Table 2.1 omits the Forest St /Columbian St intersection which was included in the original FEIR. It is currently a level F unsignaled intersection which can't support any additional traffic. This was fully covered in Weymouth's traffic engineers' previous comments. In addition, the zoning board of appeals has denied additions to business in the plaza due to traffic. Mitigation was required after "phase 1" for Forest and a light for Forest/Columbian intersection in the original FEIR. None which has been done despite increasing traffic and continued building at the former NAS S Weymouth	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0.
MAP-13	Weymouth St., Reservoir Park Drive and Hingham St. in Rockland are single lane roads at ground zero for the proposed increase in traffic and receive traffic from South Shore Hospital workers and Columbian Sq. now. The mitigation for Reservoir Park Drive and Hingham Street has not been done.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0

Commenter	Mitigation/Draft Section 61 Finding Comment	Response
JM-4	In more recent history, the off-base traffic mitigation improvements that were to be done in Rockland toward the Route 3 exit have yet to be implemented even though there are hundreds of residential housing units already built and serious traffic congestion is an everyday occurrence.	Transportation mitigation is summarized in Section 10.5 and detailed in the TIA attached as Appendix D. Draft Section 61 Findings are included in Section 11.0