
Appendix F

MEPA Documentation



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April 28, 2017

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE

PROJECT NAME : Union Point
PROJECT MUNICIPALITY : Abington, Rockland, and Weymouth
PROJECT WATERSHED : Weymouth & Weir, North & South Rivers, Taunton
EEA NUMBER : 11085R
PROJECT PROPONENT : LStar Southfield LLC
DATE NOTICED IN MONITOR : March 8, 2017

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62I) and Section 11.10(6) of the MEPA regulations (301 CMR 11.00), I hereby determine that this project change requires the preparation of a Supplemental Environmental Impact Report (EIR). The Proponent should submit a Draft Supplemental EIR (DSEIR) in accordance with the Scope below.

Comments on the NPC are generally supportive of the redevelopment of the SWNAS, but note the additional need for further environmental impact studies. The majority of comments received focus on the project's transportation, water supply and wastewater impacts. I have received comments from State and local officials, including State Senator Patrick O'Connor, House Majority Leader Ronald Mariano, State Representative James Murphy, Mayor Hedlund from Weymouth, and elected officials from the Towns of Weymouth and Rockland. These comments note the recent positive progress towards redeveloping the property and convey an

ongoing willingness to work with the Proponent towards project final design, environmental review, permitting and construction.

Project Change

The project change consists of implementation of an updated master plan for the redevelopment of South Weymouth Naval Air Station (SWNAS) by LStar Southfield LLC (the Proponent) subsequent to input from the Host Communities (Abington, Rockland and Weymouth), the local redevelopment authority, and interested stakeholders. Generally, the project changes consist of:

- Relocation of residential neighborhoods and the commercial district;
- An increase in the number of age-restricted residential units;
- An increase in commercial space;
- An increase in overall project density;
- Elimination of a planned golf course;
- A reconfiguration and increase of permanently protected open space;
- Addition of a potential sports stadium on-site;
- Potential preservation and repurposing of Hangar 2;
- Relocation of the sports and recreation complex; and
- Modifications to proposed water supply and wastewater treatment alternatives.

Project Area

The approximately 1,462 acre project site is located on the former SWNAS property located in the Towns of Abington, Rockland and Weymouth. The project area is bound to the west by Pond Street (Route 58), Main Street (Route 18), the Old Colony/Kingston Line of the Massachusetts Bay Transportation Authority (MBTA) commuter rail system, and residential and commercial uses; to the north by residential and commercial uses in the Town of Weymouth; to the east by Union Street and residential uses in the Town of Weymouth; and to the south by residential uses in the Towns of Rockland and Abington. The project area is bisected by several roads, including but not limited to, Bill Delahunt Parkway, Trotter Road, Shea Memorial Drive, and Memorial Grove Avenue. The project area is characterized by former buildings and runways associated with the NWNAS, open space and wetlands, and newly constructed residential uses proximate to the South Weymouth MBTA commuter rail station.

The project site includes *Priority* and *Estimated Habitat* for state-listed rare or endangered species or species of special concern as designated by the Division of Fisheries and Wildlife (DFW) Natural Heritage and Endangered Species Program (NHESP). The project site is not located in an Area of Critical Environmental Concern (ACEC) and does not contain historic resources listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth. Approximately 135 acres of the project site contain prime, state, or local importance farmland soils.

Project Description

The project 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 large areas of open space and wetlands. The NPC tabulated the proposed project components by allocated space and use, comparing the proposed development plan to that approved in the 2007 FEIR and the newly proposed development program for Phase 1 of the project.

Use	2007 FEIR	NPC	Union Point Phase 1
Residential (dwelling units)			
Single Family Detached	645	355	
Apartment/Condos	1,234	2,000	
Townhomes	806	500	
Age-Restricted	170	1,000	
TOTAL	2,855	3,855	2,855
Commercial (square feet)			
Life Sciences	950,000	2,800,000	565,000
High-Tech Manufacturing	N/A	800,000	200,000
Manufacturing	N/A	800,000	0
Office	575,000	2,485,000	575,000
Retail	300,000	348,000	300,000
Conference Center	N/A	120,000	0
Hotel	90,000 (150 keys)	171,000 (285 keys)	90,000
Stadium		270,000 (15,000 seats)	270,000
Skating Rink/Hockey	60,000	120,000	60,000
Fitness/Wellness Center	85,000	85,000	0
TOTAL	2,060,000	8,000,000	2,060,000

Use	2007 FEIR	NPC	Union Point Phase 1
Open Space (Acres)			
Golf Course	204	0	0
Recreation and Sports	52	25	25
Neighborhood Parks	43	43	43
General Passive and Open Space	708	939	939
TOTAL	1,007	1,007	1,007

Use	2007 FEIR	NPC	Union Point Phase 1
Additional Uses			
Long-Term Care Facility	N/A	300 beds	300 beds
Indoor Recreation Field House	200,000 sf	0 sf	0 sf
Wastewater Treatment Facility	3 acres	3 acres	3 acres
Multi-Modal Facility	5,000 sf	5,000 sf	0 sf
Public School	600 students	600 students	600 students
Civic/Community Facility	40,000 sf	40,000 sf	40,000 sf
Public Works Parcel	2 acres	2 acres	2 acres
Institutional/Social Services	37,000 sf	37,000 sf	37,000 sf

The NPC included an updated site master plan identifying the areas of proposed development, open space, grassland habitat conservation areas, and adjacent uses. Commercial density has increased and commercial development areas have been consolidated on-site.

Modifications to site design will facilitate the creation of 158.5 acres of contiguous, preserved, and restored grasslands habitat, an increase of 55.5 acres from that proposed in the FEIR. Elimination of the golf course will increase area available for open space preservation and for creation of an approximately 50-mile network of hiking trails. The project will include the refurbishment of Hangar 2 and the adjacent Building 82. According to the NPC, Building 82 will be used for offices and Hangar 2 may be used as a movie sound stage or community building, or be retrofitted for office or retail use. The proposed sports and recreation complex will be relocated in a more central area to improve access for all users.

I note that the uses and space allocations presented for review in the NPC were developed by the Proponent for planning and analysis purposes and may vary based on market forces. The vast variety of uses, project size, and construction period will present challenges for the structuring of future MEPA review and the development of appropriate mitigation measures. The DSEIR and future filings should identify worst-case scenarios (i.e., highest potential environmental impact); however additional information on programming will be necessary to conduct meaningful review. If this is not achievable, NPCs may be necessary to ensure that the project avoids, minimizes and mitigates Damage to the Environment. Additional discussion of this matter is included in the Scope for the DSEIR.

Procedural History

The redevelopment of the SWNAS has a lengthy history of MEPA review. MEPA review was initiated in July 2002 with the submission of an Environmental Notification Form (ENF) for the "SouthField" project by the former project proponent, South Shore Tri-Town Development Corporation (SSTTDC). A scope for an EIR was issued in October 2002 and a Special Review Procedure (SRP) was established in accordance with 301 CMR 11.09. Subsequently, in 2002 SSTTDC requested additional review and received approval of a Phase 1 waiver to develop a portion of the project in advance of the completion of the EIR. In 2005, SSTTDC received approval through an NPC for a Village Center Master Plan and a modified Scope for the SouthField EIR was issued. Review of the Draft EIR and Final EIR for SouthField were completed in 2006 and 2007, respectively. In 2008, an NPC was filed proposing changes to the interim water supply and wastewater treatment options for SouthField. A Certificate on this NPC was issued in April 2008. No additional MEPA review was required. The Certificate highlighted the additional permitting work necessary in collaboration with the Massachusetts Department of Environmental Protection (MassDEP). Finally, in 2012, the Massachusetts Department of Transportation (MassDOT) filed a Supplemental EIR for review regarding proposed widening of Route 18 to support the redevelopment of the former SWNAS. A Certificate was issued on September 28, 2012 concluding that this Supplemental EIR adequately and properly complied with the MEPA regulations.

The Massachusetts General Court's Chapter 291 of the Acts of 2014 (the Act) resulted in the replacement of the SSTTDC with the Southfield Redevelopment Authority (SRA). The SRA assumed the role of the Local Redevelopment Authority (LRA) for site redevelopment and currently serves to reinforce municipal control over land use and development decisions affecting areas of the Host Communities within the project boundaries consistent with the purposes of the SRA as described in the Act. As noted in Section 1 of the Act, "it is the purpose

of this 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.”

As noted in the NPC, to accommodate the updated redevelopment project, zoning bylaws in each of the Host Communities were amended (Abington: June 6, 2016; Rockland: May 2, 2016; and Weymouth: November 18, 2015). These amendments created new overlay zoning districts allowing additional density and mixture of uses while minimizing demands on municipal services. The NPC included an updated zoning map for Union Point depicting the amended zoning districts.

Permits and Jurisdiction

The project was subject to review and mandatory preparation of an EIR because it will require State Agency Actions and exceed the following EIR review thresholds:

- 301 CMR 11.03(1)(a)(1) – Direct alteration of 50 or more acres of land;
- 301 CMR 11.03(1)(a)(2) – Creation of ten or more acres of impervious area;
- 301 CMR 11.03(4)(a)(2) – New interbasin transfer of water of 1,000,000 or more gallons per day (gpd) or any amount determined significant by the Water Resources Commission;
- 301 CMR 11.03(5)(a)(2) – New interbasin transfer of wastewater of 1,000,000 or more gpd or any amount determined significant by the Water Resources Commission;
- 301 CMR 11.03(6)(a)(6) – Generation of 3,000 or more New adt on roadways providing access to a single location; and
- 301 CMR 11.03(6)(a)(7) – Construction of 1,000 or more New parking spaces at a single location.

The project will also exceed the following ENF review thresholds:

- 301 CMR 11.03(2)(b)(2) – Alteration of greater than two acres of designated priority habitat, as defined in 321 CMR 10.02, that results in the take of a state-listed endangered or threatened species or species of special concern;
- 301 CMR 11.03(3)(b)(1)(d) – Alteration of 5,000 or more sf of bordering or isolated vegetated wetlands;
- 301 CMR 11.03(4)(b)(3) – Construction of one of more New water mains five or more miles in length;
- 301 CMR 11.03(5)(b)(1) – Construction of a New wastewater treatment and/or disposal facility with a capacity of 100,000 or more gpd; and
- 301 CMR 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.

The project will require numerous State Agency Actions including:

- A Vehicular Access Permit from MassDOT;
- A Groundwater Discharge Permit, Sewer Extension and Connection Permit, and Section 401 Water Quality Certification (WQC) from MassDEP;
- An Interbasin Transfer Approval from the Department of Conservation and Recreation (DCR) – Water Resources Commission;
- Admission of a New Community to Waterworks System (OP#10) and Admission of a New Community to MWRA Sewer System and Other Requests for Sewer Service to Locations Outside MWRA Sewer Service Area (OP#11) from the MWRA; and
- A Conservation and Management Permit (CMP) from the Natural Heritage and Endangered Species Program (NHESP)

The project will also require Orders of Conditions from the Host Communities, or in the case of an appeal, a Superseding Order of Conditions (SOC) from MassDEP. The project will require review and approval under Section 404 and 401 of the Clean Water Act from the U.S. Army Corps of Engineers (ACOE). Finally, it will require a National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges from Construction Activities from the United States Environmental Protection Agency (EPA). The project is subject to MEPA's Greenhouse Gas Policy and Protocol (the GHG Policy) dated May 5, 2010.

Because the Proponent received Financial Assistance for the construction of Bill Delahunt Parkway, MEPA jurisdiction for this project is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

Environmental Impacts and Mitigation

The project will result in the alteration of approximately 663 acres and create 425 acres of impervious area on the 1,462-acre project site. On-site impacts to wetland resource areas are estimated at 21,448 sf (5,990 sf of which are State-regulated Bordering Vegetated Wetlands (BVW)). The NPC noted that additional wetland impacts may result from off-site utility work. The project will generate an estimated 79,000 total average daily vehicle trips (adt), an increase from the 34,400 adt presented in the FEIR and will include between 19,500 and 43,900 parking spaces. Water use will increase from the 1.4 million gallons per day (gpd) proposed in the FEIR to 2.7 mgd. New on-site water mains will be approximately 6 miles in length and new off-site water mains will be between 6 and 15 miles in length depending upon the selected water supply alternative. Total water withdrawal will be reduced to 90,000 gpd from the previously approved range of 300,000 to 500,000 gpd. Total project wastewater demand will increase to 2.3 mgd from a range of 650,000 to 1.4 mgd estimated in the FEIR. On-site sewer mains are estimated at approximately 6 miles.

The NPC presented generalized preliminary mitigation measures such as: intersection and roadway improvements, energy efficiency measures, wetlands replication, construction of a stormwater management system compliant with the Massachusetts Stormwater Management

Standards (SMS) of the Wetlands Protection Act (WPA) regulations, permanent protection of open space, and development of a Construction Management Plan. A comprehensive and robust mitigation program must be developed for the project, tied to project phasing as necessary, to effectively mitigate unavoidable Damage to the Environment attributable to the project's impacts. Development, review and implementation of this mitigation program will be subject of subsequent MEPA and State Agency permitting processes.

Review of the NPC

The NPC included a summary of project changes since the FEIR and a general discussion of additional project impacts and anticipated future impact studies. The NPC briefly summarized elements of the project completed to date and provided an update on collaboration with local, State and federal authorities regarding the site redevelopment. The NPC contained broad-based graphics depicting proposed development areas, potential utility routes, and locations of wetlands, rare species habitat and other sensitive environmental resources. Additional data, analysis and assessment of impacts will be provided in subsequent MEPA review documents. The NPC did focus on various categories of environmental impact that will require supplemental review and described the types of studies completed as part of the FEIR for comparative purposes.

The NPC summarized development completed to date. These include a series of completed and occupied residential developments (Highlands Neighborhood, Fairing Way, Eventide, Snowbird, Transit Village, Winterwoods (under construction), and The Commons. An additional 250 market rate apartments with 14,000 sf of ground-floor retail is also under construction. Eventide includes a 40,000-sf nursing facility. The project site has also been used as a location for motion picture filming and by law enforcement agencies for high-speed driving training. Recreational and community amenities completed to date include refurbishment of the gymnasium and soccer fields, construction of a children's play area, street hockey rink, a dog park and a small-scale Fenway Park replica for baseball games. The Proponent has also commenced construction on a proposed 50-mile trail network.

Transportation

The project is anticipated to generate approximately 79,900 adt on the local and regional roadway network within the traffic study area. The NPC identified 64 intersections within the communities of Abington, Braintree, Hingham, Norwell, Rockland, Weymouth and Whitman that were assessed as part of the FEIR Traffic Impact Assessment (TIA). Study area traffic volumes at 17 locations within the towns of Abington, Rockland, Hingham, and Weymouth were collected in June 2016 and presented in the NPC.

The NPC indicated that since the completion of the FEIR, several transportation infrastructure improvement projects have been completed, including intersection upgrades along Route 18, the construction of Bill Delahunt Parkway, widening of Queen Anne's Corner, and intersection improvements at Route 53/Middle Street. The segment of Bill Delahunt Parkway between Shea Memorial Drive and Trotter Road is under construction, while the eastern and central segments of the roadway were completed in 2013. Other infrastructure projects are

currently in the design or construction phases, including MassDOT's Route 18 widening project, improvements to the Route 3 interchange at Derby Street, and signal and geometric improvements at the Route 53/Derby Street/Gardener Street intersection. The full Route 18 widening and reconstruction project is expected to be completed by 2023. The NPC also described those mitigation measures proposed in conjunction with the original project that have not been constructed.

According to the NPC, 2,056 parking spaces have been permitted or constructed. Estimated parking demand for full build-out of Union Point is estimated between 19,500 and 43,900 spaces per the minimum and maximum parking spaces required by the applicable zoning bylaws for the proposed land uses. The NPC indicated that transportation demand management (TDM) measures will be implemented consistent with those outlined in the FEIR, including a trip reduction goal of 15%.

Given the substantial increases in project-related traffic and potential regional impacts, transportation mitigation measures reviewed in the FEIR will require reassessment as part of the DSEIR process and are outlined in the Scope below.

Water Supply

The project's water demand at full build-out is estimated at approximately 2.7 mgd on an average daily basis. The Proponent is currently discussing water supply development options for Union Point with the MWRA and several municipalities, including Braintree, Brockton, Weymouth, Quincy, Abington, and Rockland.

The NPC stated that in conjunction with the Town of Weymouth, the Proponent will pursue an interim water supply for project development within the Town of Weymouth. Pursuant to an amended Memorandum of Agreement (MOU) between the two parties, Weymouth will increase the amount of potable water supplied to Union Point from 245,000 gpd to 600,000 gpd. The MOU states that the water supply capacity and allocation shall be temporary in nature but shall continue until a permanent supply is operational. The NPC indicated that this water will be provided by the Town of Weymouth's existing supply infrastructure under existing permits. A similar interim water supply agreement is proposed for the Abington-Rockland Joint Water Works (Abington-Rockland) to provide up to 250,000 gpd only to those areas at Union Point located in these respective communities.

According to the NPC, the long-term water supply option presented in the FEIR may no longer be viable. The FEIR option consists of a direct connection to the MWRA water system by way of an 8-mile long dedicated water transmission pipeline to connection point M-246 in the City of Quincy. The NPC identified additional water supply alternatives including a connection to the MWRA system at connection point M-166 farther north in Quincy, alternative MRWA connection pipeline routes from Quincy through North Weymouth to Union Point, and a potential connection to the Aquaria desalination plant in Brockton. These routes are anticipated to follow roadway ROWs, utility ROWs and cross-country outside existing ROWs.

Wastewater

Upon completion, Union Point will generate an estimated average daily wastewater flow of 2.3 mgd. The wastewater management program presented in the FEIR included the construction of an on-site wastewater treatment facility. Wastewater from the initial phases of the project was to be directed to the Town of Weymouth sewer system and redirected to the on-site wastewater treatment facility once operational. An emergency connection to Weymouth was proposed to remain in place. Three wastewater alternatives were presented in the NPC:

- **All MWRA Alternative** - All Union Point wastewater conveyed to the MWRA Deer Island Treatment Facility for treatment and disposal;
- **All On-Site Alternative** - All Union Point wastewater treated in a new, privately-owned on-site wastewater treatment plant and discharged to groundwater or well, or used for irrigation or industrial uses; and
- **Hybrid Alternative** - All Union Point wastewater conveyed to a combination of both the MWRA Deer Island Treatment Facility and to a new, privately-owned on-site wastewater treatment plant, where it will be treated and discharged to groundwater.

The NPC dismissed a fourth alternative comprised of conveying wastewater generated in the Weymouth portion of the development to the MWRA Deer Island Treatment Facility while wastewater from the Rockland and Abington portions of the project would be conveyed to the Rockland wastewater treatment facility. This alternative was dismissed as Rockland does not have adequate capacity to accept the projected flows from the project.

The All MWRA Alternative would convey project wastewater through the Weymouth sewer system (via Mill River, Old Swamp River, and Lower Central interceptor sewers) to the MWRA's Sanitary Drainage Area 4 and ultimately to the Deer Island Treatment Facility prior to discharge into Boston Harbor. Weymouth is currently a member of the MWRA, with its wastewater system managed by the MWRA. However, the Abington and Rockland portions of the project site would need to be admitted into the MWRA under this scenario. This requires approvals from the MWRA, MassDEP, the Towns of Weymouth, Abington and Rockland, and the Governor and the General Court.

The All On-Site Alternative was originally proposed in the FEIR, albeit for lower expected wastewater generation volumes. The NPC indicated that the previously proposed system included reclamation of wastewater for use as seasonal golf course irrigation and year-round use by industrial and biotechnology users. The design included a 9-acre leading area and a 10-acre reserve area for redundancy. The NPC stated that soils may not have sufficient capacity to accommodate the projected flows from the new master plan development program. Such a system would require approximately twice as much acreage as the system described in the FEIR. Potential flow and nutrient impacts from recharge would require further study to determine if nearby wetland resource areas would be negatively impacted. This alternative would require a Groundwater Discharge Permit from MassDEP.

The Hybrid Alternative assumes that on-site treatment and discharge would be provided for approximately 830,000 gpd of wastewater, with some of this treated wastewater used for

seasonal irrigation or year-round use by an industrial user. Wastewater from the Abington and Rockland portions of the project would be discharged on-site pursuant to a Groundwater Discharge Permit from MassDEP. The remaining portion of Union Point's wastewater would be conveyed to the MWRA Deer Island Treatment Facility via Weymouth's sewer infrastructure.

The MWRA has consistently noted concern with a significant new discharge to the MWRA system and the potential that the recent enlargement of the Weymouth Lower Central Interceptor may affect downstream conditions in the MWRA wastewater system during wet weather events. The MWRA also noted the additional wastewater flow may increase sanitary sewer overflows (SSOs) into local rivers and streams during larger wet weather events in locations such as Smelt Brook Siphon, the Weymouth Landing Interceptor, and East Braintree. Additional discussion of each of these alternatives, including further analysis of potential environmental impacts, is outlined in the Scope below.

Wetlands

Approximately 383 acres of wetland resource areas are located within the project site. The project site is located within two major river basins, the South Coastal (North and South Rivers) and the Boston Harbor (Weymouth and Weir River Basin) River Basins. The project site is comprised of three major drainage basins: the East Branch of French's Stream, the West Branch of French's Stream, and the Old Swamp River. Old Swamp River is listed as an Outstanding Resource Water (ORW) by the Commonwealth, as it is a tributary to Whitman's Pond, a public water supply. French's Stream is an impaired water, per the *Massachusetts Year 2014 Integrated List of Waters, Final Listing of the Condition of Massachusetts's Waters Pursuant to Sections 305(b), 314 and 303(d) of the Clean Water Act*. The segment of French's Stream near the project site is impaired by fecal coliform, low dissolved oxygen, total phosphorus, and whole effluent toxicity. Additional downgradient segments are also listed as impaired due to the same pollutants.

The project site contains extensive areas of Bordering Vegetated Wetlands (BVW) and an associated 100-foot buffer zone. According to the NPC, all Isolated Vegetated Wetlands (IVW) anticipated to be impacted by the project are subject to regulation under Section 404 of the Clean Water Act. Some areas of potential wetland impacts off-site have been delineated in conjunction with roadway improvement projects. Wetland mitigation projects constructed to date in conjunction with the original ACOE authorization include:

- Restoration of the Old Swamp River crossing;
- Daylighting approximately 800 linear feet of the West Branch of French's Stream; and
- Construction of "Wetland Replication Area 2".

The expanded development program is anticipated to result in additional impacts to wetland resource area buffer zones. The NPC noted that upgrades for wastewater service will impact two sewer lines that run underground through vegetated wetlands. The NPC characterized off-site utility infrastructure wetland impacts as temporary in nature and that it will be permitted through the WPA as a limited project under 310 CMR 10.24(7)(b). The NPC

summarized permitting actions completed to date under the WPA and Section 404 and 401 for project-related work. The modified project will require new Notices of Intent pursuant to the WPA and an amendment to the 401 WQC (last amended August 27, 2014).

Stormwater

The project will result in significant areas of impervious area and associated stormwater runoff. The project change will result in a net increase of 75 acres of impervious areas compared to the 2007 FEIR conditions. The project site includes ORWs, wetland resource areas, and areas of high groundwater that will influence the design of any new stormwater management system. As described in the NPC, several changes to regulatory guidelines and baseline information for stormwater management and modeling have occurred since completion of the FEIR. These include incorporation of the SMS into 310 CMR 10.00 (WPA) and 314 CMR 9.00, updated USDA NRCS soils mapping, and updated precipitation frequency estimates (NOAA Atlas 14, Volume 10).

Since the FEIR, several subprojects on-site were completed, with mitigation provided, in accordance with the historic stormwater modeling data and approvals. These include: the Phase 1A Definitive Subdivision Plan, Pulte Residential Developments (Transit Village and Winterwoods), Bill Delahunt Parkway, and Market Street. Stormwater generated by the project is anticipated to be mitigated by large regional or distributed stormwater management/detention facilities constructed as specific phases of development are designed and built.

Rare Species

The NPC outlined the project's proposed rare species program presented in the FEIR. The project site contains *Priority or Estimated Habitat* for the Eastern Box Turtle (*Terrapene carolina carolina*), upland sandpiper (*Bartramia longicauda*), and grasshopper sparrow (*Ammodramus savannarum*) as designated by the NHESP. As outlined in the FEIR the Proponent's program included habitat protection, construction-period measures, and long-term habitat management. The previously proposed golf course would have resulted in the loss of 90 acres of grassland habitat; however, a permanent deed restriction was placed on the 280-acre links-style golf course area (golf course CR). A CMP was issued by NHESP (Permit No. 008-125.DFW) on February 12, 2009. The construction of portions of Bill Delahunt Parkway was completed in accordance with this CMP. Furthermore, several conservation restrictions (CR) were placed on parcels within the project area including: 1) an 11.8-acre parcel, known as Rockland Meadows; 2) 85 acres of box turtle habitat on the east end of the site; and 3) 71 acres of grassland and forest habitat at the south end of the site. The Proponent has also made the required escrow payments per the CMP for funding off-site protection and maintenance of grassland habitat used by the grasshopper sparrow.

Removal of the golf course from the proposed development program will result in an expansion in grassland habitat and open space on-site. An additional 18.6 acres of grassland will be preserved and 37 additional acres within the golf course CR area will be restored. To accommodate increased project density and modifications to the location of mixed-use areas, approximately 78 acres of land will be removed along the northern boundary of the golf course

CR. As presented in the NPC, these modifications will create a single 158-acre contiguous grassland habitat area. The Proponent has submitted a request to NHESP to modify the existing CMP in accordance with the revised development plan. Comments from NHESP stated that they have agreed with the Proponent to a revised Grassland Conservation Plan which includes active management, enhancement, and creation of grassland habitat. The NHESP will not render a final decision on the CMP amendment until the MEPA review process has concluded.

Hazardous Materials

The project site contains numerous active hazardous waste sites subject to ongoing investigation and remediation by the U.S. Navy. Furthermore, three Navy-operated landfills are located on-site: the West Gate Landfill, the Rubble Disposal Area, and the Small Landfill. Each of these landfills will eventually be transferred to the Proponent and subject to deed restriction and/or Activity and Use Limitations (AULs). The Navy is responsible for the long-term maintenance of the landfill caps and monitoring long-term conditions. As noted by MassDEP, any future use proposed at the Small Landfill will require a Post-Closure Use Permit (BWP SW-36 or BWP SW-37) from MassDEP.

The NPC included a status report of which sites completed remediation activities since the FEIR and those that remain active. The NPC noted that in July 2016, the EPA issued a letter requesting additional investigation of some sites for per- and polyfluoralkyl substances (PFAS). PFAS are considered “emergent” contaminants, only recently identified as a contaminant of concern. EPA recently established health advisory concentrations for two PFAS compounds in drinking water. As noted in the NPC, PFAS compounds have been detected in groundwater on-site, but the groundwater is not used as a potable water supply so it does not create an exposure pathway for people on-site under normal conditions. According to the NPC, the Navy is performing additional investigation of these compounds on-site, with oversight from EPA and MassDEP.

SCOPE

General

The DSEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. I note that while this project has a lengthy history of environmental review, the DSEIR should be comprehensive in nature to facilitate review for those who have limited knowledge of the project’s history and current environmental conditions or access to previous review documents. This context is imperative to ensure a thorough assessment of the project’s potential impacts and confirm that the project will avoid, minimize and mitigate Damage to the Environment.

Project Description and Permitting

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. These conceptual plans should include on-site work and any off-site work associated with transportation or utility improvements for the project. 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.

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. The DSEIR should describe ongoing activities on-site under the purview of the Navy associated with decommissioning and environmental remediation of the SWNAS. I encourage the Proponent to present a conceptual permitting approach and project phasing schedule for comment by State Agencies as part of the DSEIR. Given the potentially lengthy build-out period, uncertain phasing of project subcomponents, and the extensive mitigation required to mitigate project impacts, permitting processes are likely to be complex and require substantial coordination. Initiating a discussion of this process as part of the DSEIR should facilitate a more streamlined review of the project moving forward.

Land Impacts

The project will create substantial new areas of impervious area. The Proponent should strive to reduce impervious area to the maximum extent practicable through thoughtful design, creative stormwater management, and limiting surface parking. Additional exploration of these concepts is outlined later in this Certificate.

The project will include approximately 1,007 acres (70%) of the site as open space, either in its current condition, restored grassland habitat, landscaped areas, or recreational facilities (e.g. playing field and nature trails). 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. A separate plan should be provided of the proposed nature trail network in relation to proposed uses, the roadway network, key destinations (i.e., recreational fields), wetland resource areas and protected open space.

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.

Transportation

The DSEIR must include a revised transportation study prepared in conformance with the current (March 2014) MassDOT/EEA *Transportation Impact Assessment (TIA) Guidelines*. The Proponent is working with Central Transportation Planning Staff (CTPS) to determine the number of New adt generated by the revised master plan and determine trip assignments, including trips on existing and future roadway infrastructure. The Proponent should review comments received. 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. I hereby incorporate by reference MassDOT's comment letter dated April 24, 2016, into the project Scope. MassDOT's comment letter contains guidance pertaining to the development of the revised TIA including trip generation and assignment, traffic operations, safety analysis, and conceptual plans.

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.

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. Transportation mitigation measures presented in the DSEIR should be closely coordinated with impacted communities and MassDOT to ensure feasibility and acceptance by each jurisdiction. As presented in the NPC, Phase 1 of the Union Point project will consist of a development program similar in size to that proposed in the FEIR and intends to use the previously identified transportation improvement program to mitigate related impacts. The DSEIR must clarify the content of the transportation improvement program associated with Phase 1, as proposed uses have been altered and may result in changes to the amount of trips, trip distribution, or peak hours assumed in the FEIR. I refer the Proponent to comments from MAPC for additional guidance on this Scope item. As part of the DSEIR the Proponent should provide a clear commitment to implement the necessary mitigation measures based upon the proposed project phasing and attendant traffic generation.

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.

Parking

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. As recommended by MAPC and MassDEP, 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.). This information should assist in determining opportunities to provide the minimum amount of parking necessary and shared parking benefits. 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 DSEIR should clarify how parking will be constructed to meet the needs of each construction phase. The DSEIR should evaluate parking policies that will minimize parking demand and automobile use, such as charging market rates for parking, parking cash-out policies, and other demand-reduction policies for employees and residents. The DSEIR should discuss how the Proponent intends to incorporate electric vehicle charging infrastructure on-site.

Public Transportation

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. 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. The DSEIR should discuss how the Proponent will coordinate with stakeholders to ensure that this facility will be designed to attract and service different modes of travel.

The DSEIR should describe the proposed Union Point shuttle service, including potential routes, destinations, frequency and ridership goals. I encourage the Proponent to consider extending this route beyond the South Weymouth commuter rail station to other nearby public transit options such as Braintree's Red Line station, MBTA bus route #225 and the Hingham Ferry Terminal. Furthermore, as requested by the OCPC, the Proponent should work with Brockton Area Transit (BAT), the MBTA and private carriers to investigate the feasibility to regional connectivity between the site and existing transit systems.

TDM program

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. I refer the Proponent to comment letters from MassDOT and MAPC regarding feasible TDM measures that should be explored as part of the DSEIR.

As noted previously, the project is located proximate to public transit options that will facility alternative modes of access to the site. 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. An assessment of existing and proposed pedestrian and bicycle accommodations should be prepared in accordance with guidance provided in the MassDOT comment letter.

Transportation Monitoring

The DSEIR should outline a proposed transportation monitoring program to be conducted upon occupancy of the project. The goals of this monitoring program should be to evaluate the assumptions made in the TIA, adequacy of the transportation mitigation measures, and to determine the effectiveness of the TDM program. The Proponent, subsequent to consultation with MassDOT, should present a proposed framework for the monitoring program, including but not limited to, frequency, monitoring locations, evaluation of parking supply and demand, evaluation of shuttle ridership, mode share assessments, and reporting requirements. Given the potential build-out period of the project, the DSEIR should proposed interim monitoring thresholds to allow for tracking TDM progress prior to full occupancy. The DSEIR should set and commit to specific mode share goals for the project (vehicular, commuter rail, shuttle, cycling, walking). The monitoring program should identify how the TDM program or roadway mitigation measures will be updated based upon the results of the monitoring program.

Water Supply

Interim Supply

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. Given the complexity of designing, permitting and constructing the long-term water supply, the DSEIR should address the Proponent's ability to meet the terms of the interim water supply agreement described by the Town of Weymouth. The DSEIR should identify the location of proposed infrastructure improvements to accommodate additional flows, the length, type and size of new or modified water mains, and the location of new pump stations, if applicable. The DSEIR should discuss how these additional interim flows will impact existing permitted withdrawal volumes for each community. The DSEIR should respond to MassDEP's comments regarding impacts to Water Management Act (WMA) compliance, mitigation requirements, existing unaccounted for water (UAW) issues, and ability to meet future water demand for each community as a whole during the proposed interim condition. Historic water use data from each of these communities should also be provided to highlight use and UAW trends. 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.

Long-Term Supply

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. 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. The DSEIR should identify water demand rates and total volumes by use, noting data sources, and community of origin.

The DSEIR should demonstrate how it will meet MWRA's policy *OP#10 – Admission of a New Community to Waterworks System*. 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. The DSEIR should also discuss whether the improvements will be designed to facilitate future connections for additional communities to the MWRA system.

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. 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. Finally, 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.

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.

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.

Wastewater

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 off-site 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. 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 securing 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. 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.

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*. 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. The DSEIR should also address comments from the WRC regarding potential ITA review for the various wastewater alternatives.

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. 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.

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. 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.

Numerous comments highlighted the project's opportunity to use reclaimed wastewater for a variety of uses. 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. As noted by MassDEP, reclaimed water permitting can be included in the permitting for a Groundwater Discharge Permit. The Proponent should review comments from MassDEP regarding upfront

design considerations to accommodate reclaimed water use by the project and incorporate infrastructure as appropriate.

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 on-site 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.

Wetlands

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. 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. 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.

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. A corresponding graphic noting the location of these mitigation areas should be included in the DSEIR. I note MassDEP's comments regarding wetland mitigation proposed in accordance with the current WQC for the project. 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.

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. While temporary or permanent impacts at each of these locations may be minor, the cumulative impact to wetland resource areas given the size of the project has the potential to be significant. 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 requested by MassDEP, 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. 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 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.

Stormwater

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 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. 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 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.

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)1-10 and 314 CMR 9.06(6)(a)1-10 to protect wetland resource areas. Furthermore, MassDEP noted issues related to high groundwater and BLSF in the project vicinity that may complicate the project's ability to meet the SMS. The Proponent should meet with MassDEP staff prior to preparation of the DSEIR to discuss this issue and the overall stormwater management system modeling methodology.

Greenhouse Gas Emissions

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.

Mobile-source GHG emissions should be estimated using the standard methodology in the EEA/MassDOT Guidelines for EIR/EIS Traffic Impact Assessments and MOVES CO₂ emission factors.

Direct stationary source CO₂ emissions included those emissions from the facility itself, such as boilers, heaters, and internal combustion engines. Indirect stationary source CO₂ emissions were derived from the consumption of electricity, heat or other cooling from off-site sources, such as electrical utility or district heating and cooling systems. Indirect mobile CO₂ emissions included those emissions associated with vehicle use by employees, vendors, visitors and others.

The NPC indicated that the Proponent is not proposing to construct buildings at Union Point. Instead, as market conditions allow, the Proponent will sell or lease building sites to others

who will develop them. The Proponent noted in the NPC that it anticipates preparing the GHG analysis assuming emissions associated with buildings representative of anticipated uses, based on typical features, and scaled to reflect the project at full build-out. This aspect of the GHG analysis methodology will require additional coordination with DOER and the MEPA office and should be a primary focus of the aforementioned meeting that should be held prior to preparation of the GHG model. I expect that the Proponent will consider creative and feasible options to ensure that redevelopment of the site will be done in a manner that supports the Commonwealth's statutory obligation to reduce GHG emissions by 25% from 1990 levels by 2020 and by 80% from 1990 level by 2050. This may include the creation of design/development guidelines that address energy efficiency, requirements in lease agreements, and/or operational tenant manuals. Meeting these goals will be further enhanced by commitments to reduce transportation-related GHG emissions through TDM measures, limiting parking, promotion of public transit, and pedestrian and bicycle-friendly site design.

Stationary Sources

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. As an additional measure to confirm modeling accuracy, I encourage the Proponent to compute the Energy Use Index (EUI) for the proposed buildings and compare the values obtained against data prepared by Pacific Northwest National Laboratory (PNNL) for the applicable climate zone. DOER can assist in this matter.

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. Separate calculations for certain types of uses (e.g., parking lot lighting, garage ventilation, wastewater treatment) may be required to identify energy savings associated with project elements that cannot be effectively modeled by the energy modeling software. An on-site wastewater treatment facility has the potential to be a large energy user and as such, wastewater treatment processes should be independently evaluated as part of the GHG analysis. Staff from MassDEP, DOER and the MEPA office is available to meet with the Proponent to discuss energy modeling methodologies for this aspect of the project. The DSEIR should explain, in reasonable detail, any measure not selected- either because it is not applicable to the project or is considered technically or financially infeasible- that would result in a significant reduction of GHG emissions.

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. I hereby incorporate by reference, the comments from DOER, dated April 20, 2017, into the scope for the DSEIR.

Mobile Sources

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 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.).

Climate Change Adaptation

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. I recommend that the Proponent evaluate the ability of the stormwater management system to capture, treat and convey more frequent higher-intensity rain events using Northeast Regional Climate Center data for extreme precipitation events (<http://precip.eas.cornell.edu/>) as part of the Stormwater Management Report.

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. Potential measures include, but are not limited to:

- Ecosystem-based adaptation measures, such as integration of tree canopy cover, rain gardens, LID stormwater management techniques, to reduce the heat island effect and mitigate stormwater runoff.
- Use of on-site renewable energy or CHP systems may provide added resiliency during periods of power loss during storms. Storm response actions and resiliency measures could be incorporated into leasing agreements or Tenant Manuals and be considered as part of guidance related to tenant fit-out of commercial space.
- Designing the residential units for improved natural ventilation.
- Protection of emergency generators and associated fuel supplies from effects of extreme weather and flood proofing.

To assist in the evaluation of climate change resiliency and adaptation measures I encourage the Proponent to review EEA's *Climate Change Adaptation Report* (September 2011) (<http://www.mass.gov/eea/docs/eea/energy/cca/eea-climate-adaptation-report.pdf>). 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.

Air Quality

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. The Proponent should work with relevant agencies during the screening process for intersection selection to ensure concurrence on the study area and methodology. 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.

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).

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. Implementation of a TDM program on-site will provide an opportunity for additional air quality improvements through a reduction in trips. TDM measures and their ability to reduce trip generation rates will be evaluated in the DSEIR as part of the transportation analysis.

Noise

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.

Rare Species

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. 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. 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. The DSEIR should describe how grassland habitat creation and maintenance plans will be coordinated with Box Turtle protection efforts on-site. 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.

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. 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.

Hazardous Materials

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. 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. 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).

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. 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. I note that failure to identify this potential State Agency Action during the current MEPA review may require the preparation of an NPC at a future date should the Small Landfill be redeveloped. Finally, as directed by MassDEP 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.

Construction Period Impacts

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.). 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. 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*. I strongly encourage the Proponent to set solid waste recycling/reuse target percentage goals of at least 75%. This information may be included as part of a larger draft Construction Waste Management Plan for the project.

The NPC indicated that the Construction Management Plan (CMP) included in the DEIR remains in effect for the project moving forward, but if conditions warrant, may be modified to address community concerns. The DSEIR should include a copy of this CMP, modified as necessary to address the Scope items below. The 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. 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.

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. The should address how construction period dewatering and soil management will be conducted consistent with on-site hazardous material remediation and monitoring requirements. The DSEIR should confirm if a Dewatering General Permit or Remediation General Permit will be required from the EPA for the project.

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. The Proponent is advised that, if sources oil and/or hazardous material (OHM) are identified during the implementation of the project, notification pursuant to the MCP (310 CMR 40.0000) must be made to MassDEP, if necessary.

Mitigation and Draft Section 61 Findings

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. 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. 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.

Responses to Comments

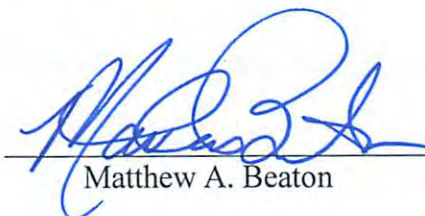
The DSEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the DSEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended to, and shall not be construed to, enlarge the Scope of the DSEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the DSEIR to those parties who commented on any previous MEPA submission for the project, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. A copy of the DSEIR should be made available for review at the Weymouth, Abington and Rockland public libraries. Contingent upon the water supply, wastewater and transportation mitigation alternatives proposed in the DSEIR, copies of the document should also be provided to the libraries of any community that will be directly impacted through construction of these improvements.

To save paper and other resources, the Proponent may circulate copies of the DSEIR to commenters other than State Agencies in a digital format (e.g., CD-ROM, USB drive) or post to an online website. Large appendices of supporting data may be included on CD-ROM or USB drive in the hard copies provided to State Agencies. To facilitate review by State Agencies, a complete copy of the submission should also be provided in digital format. The Proponent should make available a reasonable number of hard copies to accommodate those without convenient access to a computer to be distributed upon request on a first come, first served basis. The Proponent should send a letter accompanying the digital copy or identifying the web address of the online version of the DSEIR indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. The DSEIR submitted to the MEPA office should include a digital copy of the complete document.

April 28, 2017
Date



Matthew A. Beaton

Comments received:

3/9/2017	Al Ferreira
3/16/2017	Kristen and David derKinderen
3/19/2017	Kristen Rolph
3/20/2017	Kathy Kirby
3/20/2017	Jennie Horsch
3/26/2017	Rockland Open Space Committee
3/30/2017	Kathleen Peters
4/3/2017	Pamela Titus
4/3/2017	Pamela D. Worden
4/3/2017	Lillie Durgan
4/5/2017	Massachusetts Water Resources Authority
4/11/2017	Division of Fisheries and Wildlife – Natural Heritage and Endangered Species Program
4/13/2017	Town of Rockland Board of Selectmen
4/18/2017	Kathleen Peters (2 nd letter)
4/18/2017	Patricia and Brian Bouzan
4/18/2017	Brian McDonald, Town of Weymouth, Councilor-at-Large
4/18/2017	State Senator Patrick M. O'Connor, Plymouth and Norfolk District
4/18/2017	Jane Hackett, Town of Weymouth, Councilor-at-Large
4/19/2017	Joyce Bethoney
4/19/2017	Michael Smart, Town of Weymouth, District Six Councilor
4/19/2017	Laura A. McCarthy
4/20/2017	State Representative Ronald Mariano, 3 rd Norfolk District
4/20/2017	Department of Energy Resources
4/20/2017	Water Resources Commission
4/20/2017	Thomas J. Lacey, Town of Weymouth, District Two Councilor
4/20/2017	Arthur E. Mathews, Town of Weymouth, District Four Councilor
4/20/2017	Tricia Pries
4/20/2017	Mary Parsons
4/20/2017	Mary Parsons (2 nd letter)
4/21/2017	Mary Parsons (3 rd letter)
4/21/2017	Mike Bromberg
4/21/2017	Joanne Marques
4/21/2017	Joseph Shea,
4/21/2017	State Senator Patrick M. O'Connor (Plymouth and Norfolk District), House Majority Leader Ronald Mariano (3 rd Norfolk District), and State Representative James M. Murphy (4 th Norfolk District)
4/21/2017	U.S. Environmental Protection Agency – New England – Region 1

4/21/2017 Town of Weymouth Mayor Robert L. Hedlund
4/21/2017 Old Colony Planning Council
4/21/2017 Water Supply Citizens Advisory Committee
4/21/2017 Mass Audubon
4/21/2017 North South Rivers Watershed Association
4/21/2017 Massachusetts Department of Environmental Protection – Southeast Regional
Office (MassDEP-SERO)
4/22/2017 Barbara C. Manning
4/24/2017 Metropolitan Area Planning Council
4/24/2017 Massachusetts Department of Transportation

MAB/HSJ/hsj

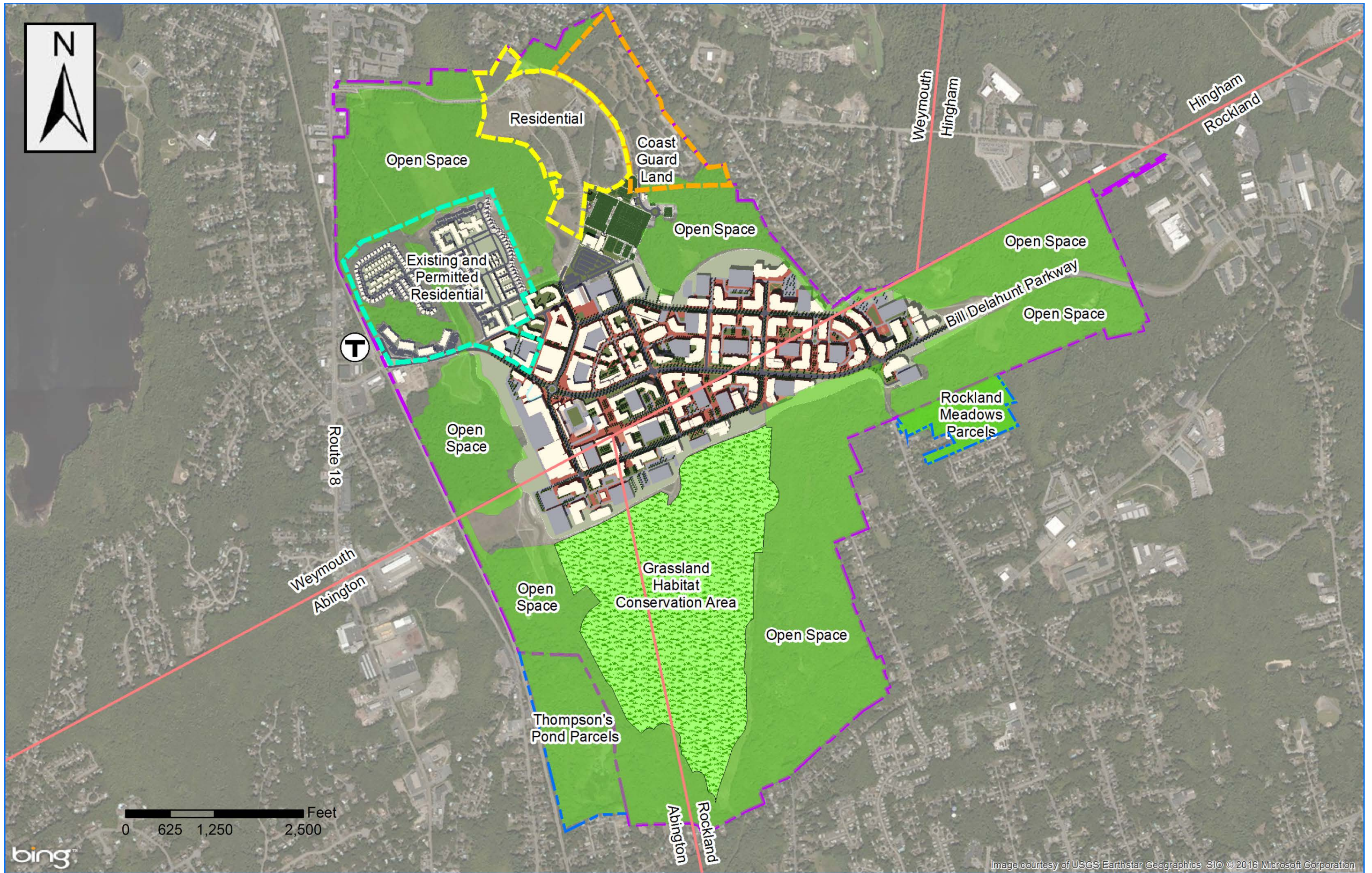


Image courtesy of USGS Earthstar Geographics SIO © 2016 Microsoft Corporation

Union Point Abington, Rockland, Weymouth, Massachusetts



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

April 21, 2017

Mathew A. Beaton,
Secretary of Environment and Energy
Executive Office of Environmental Affairs
ATTN: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: ABINGTON, ROCKLAND &
WEYMOUTH – NPC Review
EOEEA # 11085 Union Point

Dear Secretary Beaton,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Notice of Project Change(NPC) for the Union Point Project in the Towns of Abington, Rockland, and Weymouth, Massachusetts (EOEEA #11085R). The Project Proponent provides the following information for the Project:

This NPC presents the results of the year-long re-imagining and refinement of the Union Point Project conducted by the Proponent and with the assistance of the Host Communities, the local redevelopment authority, and valued stakeholders. The Union Point development plan and the rezoning efforts of the Host Communities are summarized as follows:

- **Redesign of the Project to relocate residential neighborhoods and the commercial district to more appropriate sites.**
- **Increase in the number of age-restricted residential units.**
- **Increase in potential commercial square footage.**
- **Increased density to further Smart Growth goals.**
- **Elimination of planned golf course and replacement with additional passive, environmentally protected, and ecologically valuable open space.**
- **Reconfiguration of open space to make it a more sustainable environmental resource.**
- **Potential addition of a sports stadium to the Project.**
- **Consideration of preservation and repurposing of Hangar 2.**
- **Relocation of the sports and recreation complex to better serve the community.**

Which State Agency Permits will the Project require?

Department of Transportation Access Permit, Street Opening Permit;
Department of Environmental Protection Groundwater Discharge Permit, Sewer Extension and

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

Connection Permit, Water Quality Certification;
 Department of Conservation and Recreation Interbasin Transfer Approval; and
 Department of Fish and Game Conservation and Management Permit.

General Comment:

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.

Bureau of Water Resources Comments:

Wetlands Comments: 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. The NPC indicates that an additional 7,310 square feet of Bordering Vegetated Wetlands is proposed to be altered, for a net total of 10,790 square feet of BVW alteration. MEPA #11088 includes wetland resource area and buffer zone alterations proposed at Union Point (So. Weymouth Naval Air Station redevelopment), South Weymouth Commuter Rail Station improvements, the MassDOT Delahunt Parkway (formerly East-West Parkway), and MassDOT Route 18 widening, however the wetland alterations quantified in the NPC appear to be just for those associated with Union Point. Since these different projects are all inter-related and filed under the same MEPA filing number, quantification of the wetland alterations associated with each project, and the percent completion of each, needs to be provided. For the Union Point portion in the NPC, it is indicated that the additional alterations proposed to BVW beyond the 5,000-square-foot threshold qualify as a limited project to construct utilities (310 CMR 10.53(3)(d), not 310 CMR 10.24(7)(b)). A notice of intent (NOI) is currently before the local conservation commission and MassDEP to alter resource areas/buffer zone to construct multiple athletic fields, a restaurant building, 390 parking spaces and utilities (DEP Wetlands File #81-1192).

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. 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 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. MassDEP is aware of high groundwater and Bordering Land Subject to Flooding (BLSF) issues in this

vicinity that may present challenges in meeting the Stormwater Management Standards so consultation with MassDEP is advised. Additionally, the proponent needs to consult with the U.S. Army Corps of Engineers to determine if the proposed increased alterations to BVW qualifies to be considered under the General Permit or requires an individual permit pursuant to Section 404 of the Clean Water Act. The future NOIs need to include measures to meet the Riverfront Area and wildlife habitat provisions in the Wetlands Protection regulations. As there is rare species habitat within these wetland resource areas, the Orders of Conditions (OOC) should require that the revised Conservation Management Plan (CMP) be approved by Massachusetts Natural Heritage and Endangered Species Program (MNHESP), and that it must be complied with. Union Point must consult with MassDOT and MassDEP to ensure consistency in permitting of new Union Point and Route 18 activities in delineating the extent of BLSF near the Mill River Tributary "A" to determine which new project elements are within this wetland resource area.

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.

The prior Project Proponent submitted at least one "after the fact" NOI. An after the fact NOI deprives the public from providing meaningful comment on the OOC. Care should be taken to avoid an after the fact filing of an NOI.

Wastewater Comments: 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. 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.

The Proponent has stated that it is possible that a Groundwater Discharge Permit (GWDP) may be required to dispose of some wastewater.

M. G. L Chapter 21, Section 43(7) states:

"A permit shall specify effluent limitations, interim and final deadlines as appropriate for compliance, the term for which the permit is issued, which shall not be in excess of 20 years, as prescribed by the director by regulation for each category of permits and such requirements of proper operation and maintenance, monitoring, sampling, recording, reporting and inspection as the director may prescribe; provided, however, that the term for permits issued for wastewater discharges of 10,000 gallons per day or more to ground waters of the Commonwealth, and wastewater discharges to surface waters shall not be in excess of 5 years. Permits may specify additional requirements as the director deems necessary to safeguard the quality of the receiving waters or to comply with pertinent

provisions of the laws of the commonwealth or of federal law, including technical controls and other components of treatment works to be constructed or installed and provisions for insuring payments of user charges” (Italics added for emphasis)

Pursuant to this law, 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.” (Italics added for emphasis)

The “Massachusetts Year 2014 Integrated List of Waters, Final Listing of the Condition of Massachusetts’ Waters Pursuant to Sections 305(b), 314 and 303(d) of the Clean Water Act lists waters that are impaired and not meeting Surface Water Quality Standards.

French Stream, segment MA94-03, located from the headwaters on the southeast side of the South Weymouth Naval Air Station, Rockland through Studley’s Pond to the confluence with Drinkwater River, Hanover is listed as impaired by fecal coliform, low dissolved oxygen, total phosphorus and whole effluent toxicity. Many other downgradient segments are also listed as impaired due to the same pollutants.

Much of the Project area is located in the South Coastal watershed in an area that serves as the headwaters of French Stream. 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.

Water Reuse: The density of the development and need to construct new buildings and infrastructure, provide an excellent opportunity to maximize the use of reclaimed water.

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. Because two of the uses (toilet and urinal flushing and fire protection) require separate plumbing, strong consideration should be given to include this plumbing in buildings that are under construction so that the reclaimed water may be used as it becomes available. The cost of retrofitting a building to use reclaimed water is often cost prohibitive. Also, consideration should be given to install a reclaimed water utility as development areas are constructed. This would allow reclaimed water to be readily available for the above mentioned uses, industrial and irrigation purposes.

Reclaimed water permitting can be included in the permitting of a Groundwater Discharge Permit and does not require a separate permitting process.

Industrial Wastewater: 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.

Drinking Water Comments: The project proponent proposes two interim water supply sources that will be used until a long-term water supply option is available. One of the interim supply sources is the Town of Weymouth, who has agreed to supply up to 600,000 gallons per day (GPD) of water to the project development located in the Town of Weymouth and the other interim supply source is the Abington-Rockland Joint Water Works (Abington-Rockland), who has committed to provide up to 250,000 GPD of water to the project development located in the Towns of Abington and Rockland. The Water Management Program has concerns about the abilities of the Town of Weymouth and the Abington-Rockland 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.

In a related issued, 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.

The Town of Weymouth's WMA permit in the Boston Harbor basin is expected to undergo a twenty year review and renewal in the next two to three years.2018. As part of that review, MassDEP will be evaluating its authorized volumes and projected future demands. The DCR-OWR issued a temporary allocation to the Weymouth Water Department on 2015 due to its significant Unaccounted for Water (UAW) and the uncertainties about the status of the water supply agreement between Weymouth and the project proponent. The Town of Weymouth is also withdrawing more than its baseline volume for triggering mitigation requirements. The additional volume proposed for this development will increase the mitigation requirement for the Town of Weymouth. Therefore, 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. The project proponent should contact the Water Management Program if it needs additional information about the WMA mitigation requirements and activities.

The NPC states that the full build-out water supply demand for Union Point is approximately 2.7 million gallons per day (gpd). The 2007 FEIR included as the full build-out option for drinking water a direct transmission pipeline from the MWRA, with the proposed connection beginning at MWRA Meter 246 in Willard Street in Quincy and running approximately 8 miles through Quincy, Braintree, and Weymouth, terminating at Union Point.

Based on changes in background conditions near Union Point and in surrounding communities, and due to issues related the need to construct a larger transmission pipeline to meet the revised full buildout needs, the Proponent has identified four alternatives in the NPC for a permanent source of drinking water for the project. The full build-transmission line route described in the 2007 FEIR remains one scenario. In addition, the Proponent is evaluating two other options for

the direct connection to the MWRA, both connecting to M 166 in Quincy and running from Quincy, across the Fore River, through Weymouth to Union Point. 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. There are two such hybrid systems within the Southeast Region of MassDEP, Stoughton and Canton. These systems provide the majority of the water from local sources and are able to rely upon the MWRA system as demand requires. This has worked very well to provide abundant and reliable sources of drinking water to these communities. The Proponent should continue discussions with MWRA and area communities as it evaluates development of water supply options for Union Point.

The Proponent is also evaluating an to connect to the Aquaria desalination plant (Option 4). The Aquaria plant was designed to supplement the Brockton water supply system and is contracted to produce water, on demand, to the City. In evaluating this Option, the Proponent needs to carefully evaluate whether the plant will have the ability to provide the quantity of water necessary for the maximum daily demand and to provide the reliability necessary as a primary water supply. MassDEP notes that the location shown as a connection point on figure 2.11-1 would likely not provide sufficient capacity for the maximum daily demand for the project and would need to be extended to a location with greater flow capacity.

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.

U.S. EPA NPDES Permitting: 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

Information regarding these permits may be found at:

<http://www.epa.gov/region1/npdes/stormwater/assets/pdfs/CGP-DGP-RGP-Flow-Chart.pdf>

Bureau of Waste Site Cleanup Comments:

Site Management Comments: The Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed Project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

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. There are other MCP sites in the vicinity of the proposed Project area. Most of these sites are closed, but response actions and reporting are required at others prior to closure under the MCP. Specifically, Kol-Tar, Inc., located at 699 Adams Street in Abington, Release Tracking Numbers 4-10855 and 4-22723.

Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer (Oliver) at: http://maps.massgis.state.ma.us/map_ol/oliver.php Under “Available Data Layers” select “Regulated Areas”, and then “DEP Tier Classified 21E Sites”. The compliance status and report submittals for specific MCP disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: <http://public.dep.state.ma.us/SearchableSites2/Search.aspx>

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. A Licensed Site Professional (LSP) should be retained to determine if notification is required and, if need be, to render appropriate opinions. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. The BWSC may be contacted for guidance if questions arise regarding cleanup.

Federal Facilities Comments: Table 2.13-1 does not provide a complete list of study areas where Per-and Polyfluoroalkyl Substances, (PFAS) are being investigated at this former naval base. Currently, there are approximately 30 PFAS study areas under investigation at this Project and are being reviewed by EPA and MassDEP under the Superfund cleanup process, 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.

Bureau of Air and Waste Comments:

Solid Waste Comments: 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 on-line at the MassDEP website: www.mass.gov/dep.

Any future use(s) that is proposed (i.e., post-closure uses) at the landfill located in the eastern portion of Union Point, known as the Small Landfill, requires submittal of MassDEP's Post-Closure Use Permit Applications BWP SW-36 (Major) or BWP SW-37 (Minor) for MassDEP review and approval. Post-Closure Use permits are intended to protect the public health, safety and the environment by regulating all proposed activities at closed solid waste management facility sites to ensure that such uses are consistent with that facility's closure plan and site specifics. According to the NPC, the ownership of the Small Landfill has been transferred to the Proponent who would be responsible for submitting any Post-Closure Use Permit applications.

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.

Air Quality: Construction and operation activities shall not cause or contribute to a condition of air pollution due to dust, odor or noise. To determine the appropriate requirements please refer to:

- 310 CMR 7.09 Dust, Odor, Construction, and Demolition
- 310 CMR 7.10 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. Specifically:

- 310 CMR 7.26(30) thru (37) – Boilers;
- 310 CMR 7.26(40) thru (44) Engines & Turbines (including 310 CMR 7.26(42) specific to Emergency Engines and Turbines); and
- 310 CMR 7.26(45) Combined Heat and Power

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.

It should be noted that should facilities operate one or more on-site back-up power generators when there is a threat of power loss as an operational practice rather than waiting for an actual power loss, operation of these generators under these conditions may exceed the emergency generator performance standard requirement of 300 hours during a 12 month rolling average. It is the obligation of the facility operator to determine which of the performance standards best fits the planned operational needs and comply with those standards. The Business Compliance Unit of MassDEP's Boston Office is willing to provide assistance regarding the applicability of these generators to the regulations.

Greenhouse Gas Emissions: The air quality mesoscale analysis has not been updated since the FEIR was prepared in 2007 and MassDEP is not offering additional comments on this analysis. 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 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.

Construction-Related Measures: 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. If a piece of equipment is not available in the Tier 4 configuration, then the Proponent should use construction equipment that has been retrofitted with the best available after-engine emission control technology, such as oxidation catalysts or diesel particulate filters, to reduce exhaust emissions. 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.

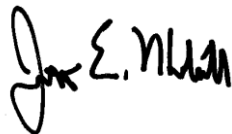
Massachusetts Idling Regulation: MassDEP reminds the Proponent that excessive idling is prohibited during the construction phase of this Project. If subsequent environmental filing is required, the Proponent shall state specifically how it plans to prohibit excessive idling during the construction period. 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.

Resource Conservation and Recovery Act (RCRA): 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.

Proposed s.61 Findings

The “Certificate of the Secretary of Energy and Environmental Affairs on the Environmental Notification Form” may indicate that this Project requires further MEPA review and the preparation of an Environmental Impact Report. 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.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
David Johnston, Deputy Regional Director, BWR
Maria Pinaud, Deputy Regional Director, BAW
Gerard Martin, Deputy Regional Director, BWSC
Jennifer Viveiros, Deputy Regional Director, ADMIN
Jim Mahala, Chief, Wetlands and Waterways
Lealdon Langlely, Director, Wetlands and Waterways, Boston
Michael Stroman, Chief, Wetlands and Waterways, Boston
Anne Malewicz, Chief, Federal Facilities, Boston
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Tom Maguire, Wetlands and Waterways, Boston
Lisa Rhodes, Wetlands and Waterways, Boston
Kevin Brander, Chief, Wastewater Management, NERO
Jeff Gould, Chief, Wastewater Management
Marybeth Chubb, Wastewater Management, Boston
Susannah King, Director, NPDES, Boston
Duane LeVangie, Chief, Water Management, Boston
Mark Dakers, BAW Chief, Solid Waste
Allen Hemberger, BWSC Site Management



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

April 24, 2017

Matthew Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Abington, Rockland, Weymouth – Union Point: DEIR
(EEA #11085R)

ATTN: MEPA Unit
Holly Johnson

Dear Secretary Beaton:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the proposed Union Point project in Abington, Rockland, and Weymouth, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

cc: Thomas J. Tinlin, Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
Walter Heller, P.E., District 6 Highway Director
Mary Joe Perry, District 5 Highway Director
Karl Quackenbush, Executive Director, CTPS
Andrew Brennan, Director, Environmental, MBTA
Neil Boudreau, State Traffic Engineer
Town of Abington, Planning Board
Town of Rockland, Planning Board
Metropolitan Area Planning Council
Old Colony Planning Council
Brockton Area Transit Authority
City of Weymouth, Planning Department
Boston Region Metropolitan Planning Organization
PPDU Files



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO

massDOT
Massachusetts Department of Transportation

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: April 24, 2017

RE: Weymouth: Union Point – NPC
EEA # 11805R

The Public/Private Development Unit (PPDU) has reviewed the Notice of Project Change (NPC) for the proposed Union Point project in Abington, Rockland, and Weymouth. The project is located on the 1,450-acre site of the former South Weymouth Naval Air Station (the Base), on the east side of Route 18.

The original project (Naval Air Station Redevelopment) entailed the construction of a mixed-use development consisting of approximately 1,400,000 square feet of office and research space; 2,100,000 square feet of retail space; 500 to 700 senior residential units; 100,000 square feet of institutional space; an 18-hole golf course and recreational facility; 14,280 parking spaces; and an access road between Route 3 and Route 18. The project proponent submitted in June 2002 a Phase I Report that identified a new development program for the project consisting of the construction of approximately 2.5 million square feet of office/research and development, 700 units of housing, 100,000 square feet of institutional uses, an 18-hole golf course, a 250-room hotel with a 500-seat conference center, 32 recreational fields, and approximately 300,000 square feet of retail space. The project was to be developed in several phases. On August 2002, the Secretary of Environmental Affairs issued a Certificate granting the Proponent a request to proceed with Phase I of the project.

On December 15, 2005, a NPC was submitted for a revised project named "Southfield", which entailed a new development program based on a "Village Center Plan" concept. The development plan consisted of up to 2,850 units of housing; up to 2,000,000 square feet of commercial/industrial space; civic and educational improvements to include schools and performing arts center; recreation to include an 18-hole golf course and 9-13 playing fields; and a multi-modal transportation center based on an expansion of the existing commuter rail station in South Weymouth. As part of this NPC, the Proponent requested a waiver to proceed with a revised Phase I development, which included the construction of 150,000 square feet of office, research and development, light industrial space, and 500 units of housing. Phase I was to be located on 342 acres in the northwest quadrant of the Base bounded by Shea Memorial Drive on the north and east, Trotter Road on the south, and the western property line along the Massachusetts Bay Transportation Authority ("MBTA") track right-of-way and Route 18. Phase I of the project was expected to generate a total of approximately 4,344 vehicle-trips on an average weekday.

The NPC also included an overview of the impacts of the new master plan for the project, The Village Center Plan, proposed by the South Shore Tri-Town Development Corporation and its developer LNR South Shore LLC. The project at full build was estimated to generate approximately 20,000 vehicle trips on an average weekday and was expected to be built in three phases over an approximately twelve-year period. Following the NPC, a Draft and Final EIR were filed for the project to assess environmental impacts and identified mitigation for the project. On July 18, 2007, the Secretary of Environmental Affairs issued a certificate finding the FEIR adequate. As transportation mitigation, the construction of the East-West parkway (now named the Bill Delahunt Parkway) and a multi-modal transportation center at the South Weymouth MBTA Commuter Rail Station were identified as necessary infrastructure improvements to address the project's impacts. In addition, MassDOT was to implement a series of intersection improvements at specific locations along Route 18, to be followed at a later date by the widening of Route 18 from its intersection with Highland Place to its intersection with Route 139 in Abington. These improvements were to alleviate existing operational and safety deficiencies and mitigate the traffic impacts of the Southfield project. To date, all the intersection improvements have been completed and the design of the Route 18 widening has been permitted and advertised for construction. The full widening and reconstruction project is expected to be completed by 2023.

Project Change

Ongoing economic challenges had brought construction at the Southfield site to standstill for several years, until a recent change of developer/ownership resumed construction activities on several previously permitted residential components of Phase I of the project. The Proponent has committed to implement the Phase I mitigation program, primarily the already agreed upon Transportation Demand Management (TDM) program that will serve as the basis for the overall site TDM.

With this current NPC, the project would now include 3,855 residential units and approximately 8 million square feet of gross floor commercial development. More specifically, the NPC entails:

- an increase of the number of residential units from approximately 2,855 to 3,855;
- an increase of the total gross floor area of commercial space from approximately 2 million sf to up to 8 million sf;
- the elimination of a previously proposed golf course, an indoor recreational field house, and a fitness/wellness center;
- the expansion of a skating facility; and
- the construction of a 15,000-seat stadium.

As a result of the revised development program, the project is expected to generate 79,000 additional unadjusted vehicle trips based on appropriate land use codes from the ITE Trip Generation Manual; therefore, an Environmental Impact Report (EIR) is required.

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. The Proponent previously met with MassDOT to discuss the traffic impacts of the previous development program and the recommendations for infrastructure improvements to address the full-build traffic impacts of the 2007 FEIR project for the site. The improvements consisted of providing access from Route 18 to the east side of the Base via a connector road, the East-West Parkway; the widening of Route 18 from the Route 3 interchange to Route 139; and intersection improvements at several locations in the vicinity of the project. 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.

Trip Generation and Assignment

As part of the EIR traffic study for Route 18 and the East-West Parkway, MassHighway (now MassDOT) has used the services of the Central Transportation Planning Staff (CTPS) to estimate future traffic volumes for the study area based on the CTPS regional model. The traffic model represented the region's transportation network with links and nodes to signify roadways and intersections. The model depicted the actual transportation network as closely as possible, including attributes such as capacity and travel speeds along roadway links. With factors in the model including socio-economic projections, CTPS was able to accurately estimate the number of vehicle trips anticipated to be generated by the project and assign vehicle routes based on roadway capacity and travel speeds. In addition, the model was able to derive an internal capture rate for the site and to make assumptions for transit and non-motorized trips.

The Proponent, with MassDOT approval, has agreed to work with CTPS to conduct a similar modeling effort to determine the number of new net trips that will be generated by the revised master plan and to make trip assignments, including trips on existing and future roadways as well as the transit system. CTPS would also develop mode share assumptions for the project. The Proponent is in contract negotiation with CTPS for the work program for the project.

The objectives of this work program are summarized as follows:

1. Provide traffic projections for a base year (2017), an interim year with build conditions (2024), and a future year to coincide with the full build-out of the development (2032). CTPS will also provide projections for 2032 build conditions with some mitigation measures. The forecasts will be for AM and PM peak travel periods. These outputs will be consistent with those developed for the MPO's Long-Range Transportation Plan (LRTP).
2. Provide a transit-crowding analysis for the MBTA Kingston/Plymouth commuter rail line, and an air-quality analysis and other travel characteristics as required by MassDOT for the Proponent to prepare its TIA.

CTPS will also model several scenarios, including no-build scenarios, build scenarios, and build scenario with mitigation measures. MassDOT will work closely CTPS and the Proponent in establishing the different scenarios. CTPS will produce a technical memorandum documenting all of the model methodology, assumptions, results, and analyses findings. The memorandum will be provided to MassDOT and the project team to assist in the preparation of the EIR for the project.

Traffic Operations

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.

The DEIR should provide illustrations depicting the peak hour 50th (average) and 95th percentile queue lengths for each lane group/turning movement at each study area intersection, for all analysis scenarios. The information contained in these illustrations should clearly demonstrate that the project would not result in any extended queues that would block vehicle movements to/from study area intersections. Appropriate mitigation should be identified at any locations with excessive delay and where queue blockages occur. Color-coded illustrations should also be prepared depicting the level of service (LOS) for each lane group/turning movement for each case. Table 2.1-2 3 in the NPC includes intersection locations identified in 2007 for the study area. The study area is generally acceptable for the project. MassDOT may require additional locations to be included based on the results of the CTPS model.

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-turn 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.

Safety Analysis

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. The analysis should include a discussion of causality, suggestions for mitigation, and commitment to implementing this mitigation. 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.

Conceptual Plans

The DEIR should include sufficiently detailed conceptual plans (minimum of 80-scale) for proposed roadway improvements in order to verify the feasibility of constructing such improvements. The drawings should clearly show proposed connection of the public road system, lane widths and offsets, layout lines and jurisdictions, and the land uses (including access drives) adjacent to areas where improvement are proposed. In particular, the DEIR should state all land takings and permits that are necessary to implement proposed improvements and should identify the party responsible for such takings.

Public Transportation

As described above, the MBTA currently operates commuter rail service via the Old Colony/Kingston Line near the site and rapid transit via the Braintree Red Line station within driving distance to the site. 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:

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 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 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 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 place on intermodal connectivity and the project site plan should identified 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.

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. 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 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 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.

Pedestrian Access

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.

Bike Access

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.

Parking

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.

Transportation Demand Management

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.

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.

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.

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.

Transportation Monitoring Program

As part of the project mitigation program, the project proponent should commit to implement a transportation monitoring program to be conducted upon the occupancy of the project. The goals of the transportation monitoring program will be to evaluate the assumptions made in the DEIR and the adequacy of the transportation mitigation measures, as well as to determine the effectiveness of the TDM program. The project proponent shall discuss with MassDOT an appropriate timeframe for the monitoring program, or commit to initiating the monitoring program upon MassDOT's request.

Due to the size of the project, MassDOT anticipates the need to monitor and update the TDM program as necessary before the project reaches full occupancy. If the traffic monitoring program indicates that the proposed mitigation is not effective in accommodating the future traffic volumes at key area intersections impacting the state highway system, the project proponent will be responsible for identifying and implementing operational improvements at these constrained locations. These improvements could entail traffic signal timing and phasing modifications, optimization of the coordinated/interconnected signal system, and/or further refinement of the TDM program to reduce site trip generation.

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.

We encourage the proponent to continue working with appropriate MassDOT divisions, including the Office of Transportation Planning's Public/Private Development Unit, the District 5 and District 6 Offices, Highway Design and Traffic Operations, during the preparation of the DEIR or additional submissions for this project. If you have any questions regarding these comments, please contact me at (857) 368-8862.



MASSACHUSETTS WATER RESOURCES AUTHORITY

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April 5, 2017

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA

Attention: Holly Johnson

Subject: Union Point, Notice of Project Change, EOE #11085
South Weymouth Naval Air Station, Abington, Rockland and Weymouth

Dear Secretary Beaton:

MWRA appreciates the opportunity for comment on LSTAR Southfield's Notice of Project Change for Union Point. We look forward to seeing development of environmentally sound and sustainable solutions for water and wastewater management and towards this objective, offer the following comments.

Water

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.

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. 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.

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.

Wastewater

The NPC indicates that at full build-out, 2.3 mgd of wastewater will be generated and that three wastewater management alternatives under consideration:

- All wastewater conveyed to MWRA
- All wastewater treated in new privately owned on-site wastewater treatment plant and discharged to groundwater or ... for irrigation of industrial uses
- Mixture: conveyed to MWRA as well as privately owned on-site wastewater, (wastewater within Weymouth to MWRA, wastewater within Abington and Rockland to on-site, 830,000 gpd).

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. 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. 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 1,000sf (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.

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. 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.

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.

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.

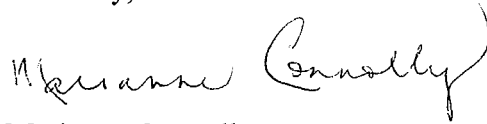
Under OP#11, prior to extension of our sewer system to communities or portions of communities from outside our service area, there must be due consideration to feasible alternatives. MWRA must make a determination that the additional discharge will not change the conclusions reached in approved planning 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.

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.

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 on-site 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.

We understand from LSTAR that more detailed evaluation will follow in an EIR, and we look forward to further coordination, discussion and evaluation. Should you have any questions, please do not hesitate to contact Pam Heidell, Policy and Planning Manager at 617 788 1102.

Sincerely,

A handwritten signature in black ink that reads "Marianne Connolly". The signature is written in a cursive style with a large, looped initial "M".

Marianne Connolly
Senior Program Manager
Environmental Review and Compliance

cc: Pam Heidell, MWRA
Steven Vining, LStar Southfield, LLC
Tom Murray, LStar Southfield, LLC
Laura Rome, Epsilon Associates
Tom McShane, Dewey Square Group

C:11085UnionPointAbingtonRocklandWeymouthNPC.docx



MASSWILDLIFE

DIVISION OF FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581
p: (508) 389-6300 | f: (508) 389-7890
MASS.GOV/MASSWILDLIFE

Jack Buckley, *Director*

April 11, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Holly Johnson, EEA No. 11085R
100 Cambridge St.
Boston, Massachusetts 02114

Project Name: Union Point
Proponent: LStar Southfield LLC
Location: Abington, Rockland, Weymouth
Document Reviewed: Notice of Project Change
EEA No.: 11085R
NHESP No.: 00-8257

Dear Secretary Beaton:

The Natural Heritage & Endangered Species Program of the Massachusetts Division of Fisheries & Wildlife (the "Division") has reviewed the *Notice of Project Change* ("NPC") for the proposed Union Point Project and would like to offer the following comments.

On February 12, 2009, the Division issued a Conservation and Management Permit (CMP) for the redevelopment of the Former South Weymouth Naval Air Station. Since that time the Permit Holders (*LStar Southfield LLC/Southfield Redevelopment Authority*) have been in communication with the Division regarding the implementation of and compliance with the CMP.

Over the course of the last year, the Proponent and their consultants have been in early consultation with the Division regarding the feasibility of amending the CMP in order to eliminate the previously proposed golf course in exchange for the development of additional Town Center and Discovery Districts(Commercial/Industrial/Residential).

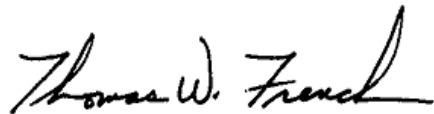
As a result of these early discussions, the Division and the Proponent have agreed to a revised Grassland Conservation Plan which includes the active management, enhancement, and creation of Grassland Habitat. In addition, the Grassland Conservation Area will be permanently protected through a Conservation Restriction with Division approved signage and monumentation. As part of the CMP Amendment the Proponent and their consultants are working to update attachments/associated documents that are associated with the existing CMP. These updates will be required in order to submit a formal CMP Amendment Request to the Division. Despite what is suggested in the NPC, the Division has not yet issued the CMP Amendment. The Division will not render a final decision until the MEPA review process and its associated public comment period is complete.

MASSWILDLIFE

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 Division looks forward to working with the Proponent and their consultants on the implementation of this plan.

We appreciate the opportunity to comment on this project. If you have any questions about this letter, please contact David Paulson, Senior Endangered Species Review Biologist, at david.paulson@state.ma.us or 508-389-6366.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. French". The signature is written in a cursive, flowing style.

Thomas W. French, Ph.D.
Assistant Director

cc: Laura Rome, Epsilon Associates, Inc.



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Telephone: 617-626-7300
Facsimile: 617-727-0030

Charles D. Baker
Governor

Matthew A. Beaton
Secretary

Karyn E. Polito
Lt. Governor

Judith F. Judson
Commissioner

20 April 2017

Matthew Beaton, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114

Attn: MEPA Unit

RE: Union Point; Abington, Rockland, Weymouth; EEA #11085

Cc: Arah Schuur, Director of Energy Efficiency Programs, Department of Energy Resources
Judith Judson, Commissioner, Department of Energy Resources

We've reviewed the Notice of Project Change Form for the above-referenced project.

The proposed project consists of 8,000,000 sf of commercial space and over 3,800 dwelling units. The size, scale, and density of the project lends itself toward making significant strides in GHG reduction through efficiency measures and renewables.

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.

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. As just one example, about \$2M is potentially available for achieving Tier 3 Performance Path through MassSave for the 2,000 apartments and condominiums planned. Additional incentives are potentially available for other portions of the development, as well.

The residential portion of the development (single-family, apartments, townhomes, and age-restricted) is potentially well-suited to Passive design. See <http://www.phius.org/home-page>. This

Union Point; NPC #11085
Abington, Rockland, Weymouth, Massachusetts

approach would significantly reduce GHG. In terms of additional cost, a recent Passive project, Village Centre, in Maine, reportedly cost only 3% more to construct, compared to a code alternative. Additional cost would be netted against Mass Save performance incentives, and other incentives, described above.

We look forward to receiving the GHG mitigation evaluation. Detailed recommendations for the submission follow.

Recommendations for Submission

- Future submissions should demonstrate that the project is taking all feasible measures to avoid, minimize and mitigate GHG emissions. The GHG Policy and supporting documentation is available at <http://www.mass.gov/eea/agencies/mepa/greenhouse-gas-emissions-policy-and-protocol-generic.html>
- 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.)
- Above-code mitigation measures and renewables should be thoroughly evaluated to maximize all feasible GHG avoidance, including:
 - *PV*: Roof-mounted solar PV would have a significant positive effect on GHG reduction for this project. Roof-mounted solar PV would likely be one of the most significant GHG mitigation measures.
 - *Envelope*: We recommend at least two above-code envelope mitigation measures be evaluated. Be sure to consider the value of downsizing HVAC systems as envelope improves.
 - *Window-to-Wall*: We recommend not exceeding the maximum-allowed window to wall ratio described by Code.
 - *Heat Pump*: Heat pumps may be an effective strategy, providing highly efficient cooling and heating while also enabling trading of concurrent heating and cooling. We recommend both space and water-heating heat pumps be evaluated.
 - *Variable Refrigerant Flow*: We recommend an evaluation of VRF, which also provide highly-efficient cooling and heating as well as trading of concurrent heating and cooling.
 - *Building Lighting*: We recommend a thorough examination of reduced lighting power densities for both interior and exterior lighting.
 - *Energy Recovery; High Efficiency Equipment*: Where not already required by code, we recommend energy recovery options be investigated. Above code

heating, cooling, pumping, fan and appliances also typically provide effective GHG reduction approaches.

- *Responsive Systems and Controls:* Responsive HVAC systems, where not already required by Code, such as economizers and demand controlled ventilation usually are effective GHG mitigation strategies which we recommend be investigated.
- Extensive credits, incentives, and grants are available for efficiency measures and renewables, including:
 - Tax credits and accelerated depreciation for solar PV and solar thermal
 - Utility performance-based incentives for energy efficiency improvements
 - Grants for various technologies from the Massachusetts Clean Energy Center
 - Energy credits for renewable thermal and PV production

We recommend a thorough evaluation be conducted on financial benefits associated with efficiency and renewables.

- 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.

Information for Submission

In order to expedite the DOER review, we recommend the following accompany the submission:

- A table similar to the example below should be included:

Measure/Area	Base Code 2013 90.1 App. G or 2015 IECC	Proposed	% Change	Comment
Roof Assembly U-value (Btu/hr-Ft ² -f)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
(Additional rows for each bldg.)	<i>code value</i>	<i>design value</i>	%	
Wall Assembly U-value (Btu/hr-Ft ² -f)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
Area Window/Area Wall (%)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
Window U-value (Btu/hr-Ft ² -f)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	

Union Point; NPC #11085
 Abington, Rockland, Weymouth, Massachusetts

AC Efficiency (EER)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
ERV Effectiveness (%)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
Boiler (% efficiency)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
LPD (Watts/sq ft)				
Bldg 1	<i>code value</i>	<i>design value</i>	%	
Bldg 2	<i>code value</i>	<i>design value</i>	%	
(continue to include service water, equipment, etc)				

- A description of the proposed building envelope assembly: report both component R-values and whole assembly U-factor. Utilize the pre-calculated relationships between R-Value and U-factor contained in Appendix A in the code.
- A description of the building energy simulation model and procedures utilized.
- A detailed and complete table of modeling inputs showing the item and the input value for both the base and as-designed scenarios. The area of the building should be included.
- The output of the model showing the monthly and annual energy consumption, totalized and by major end use system.
- Baseline (e.g. Code) energy use intensity and proposed mitigated building energy use intensity.
- Project modeling files are to be submitted to the DOER with the submittal on a flash drive or may be transmitted via electronic file transfer to paul.ormond@massmail.state.ma.us.
- Separate “side calcs” may be required for non-building energy consuming site improvements which are not included in the building energy modeling software (e.g. parking lot lighting).
- Estimate area of roof potentially usable for solar development (e.g. ‘Usable Roof Area’ (URA)). Estimate resulting power production and associated GHG reduction if all this URA was utilized.
- A description of the proposed project building usage and size, including a site plan and elevation views, should be included.
- Provide a summary of discussions with MassSave.

Union Point; NPC #11085
Abington, Rockland, Weymouth, Massachusetts

- We recommend cross-examining produced model results' total and individual end uses with representative, prototype buildings developed by Pacific Northwest National Labs/Department of Energy found here:
 - https://www.energycodes.gov/sites/default/files/documents/BECP_901_2013_Progress_Indicator_0_0.pdf
 - <http://www.energycodes.gov/sites/default/files/documents/2013EndUseTables.zip>
 - <https://www.energycodes.gov/commercial-energy-cost-savings-analysis>

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul F. Ormond', with a stylized flourish at the end.

Paul F. Ormond, P.E.
Energy Efficiency Engineer
Massachusetts Department of Energy Resources



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION
100 CAMBRIDGE STREET, BOSTON MA 02114

April 20, 2017

Matthew Beaton, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Holly Johnson, EOE #11085R
100 Cambridge Street
Boston, MA 02114

Dear Secretary Beaton:

Staff for the Water Resources Commission (WRC) has reviewed the Notice of Project Change (NPC) for the Union Point Project, formerly known as the South Weymouth Naval Air Station Redevelopment Project, and Southfield. The project is located within the Towns of Weymouth, Rockland, and Abington.

I urge the proponents of Union Point to contact WRC Staff at their earliest possible convenience to discuss the updated project and all Interbasin Transfer Act (ITA) issues. Please have them call Michele Drury at 617-626-1366 or Erin Graham at 617-626-1426 to set up a meeting.

We have previously commented on the Final Environmental Impact Report and previous NPC for this project (comments enclosed) concerning 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 proponents should also review the application material on the ITA webpage (<http://www.mass.gov/eea/agencies/dcr/water-res-protection/interbasin-transfer-act/>) to familiarize themselves with the process.

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.

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.

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.

The proponents should also delete Linda Hutchins and Kathleen Baskin from the mailing list, as they are no longer with the State. Linda should be replaced with Erin Graham, and Kathleen should be replaced with me.

Thank you for the opportunity to comment. If you have any questions, please contact Michele Drury at 617-626-1366.

Sincerely,



Vandana Rao
Executive Director

enc

cc: Water Resources Commission
Michele Drury, DCR
Erin Graham, DCR
Laura Rome, Epsilon Associates



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION
100 CAMBRIDGE STREET, BOSTON MA 02114

March 27, 2008

Ian Bowles, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Aisling Eglington, EOE # 11085R
100 Cambridge Street
Boston, MA 02114

Dear Secretary Bowles:

The staff of the Water Resources Commission (WRC) has reviewed the Notice of Project Change (NPC) for the Naval Air Station Redevelopment Project within the Towns of Weymouth, Rockland, and Abington (also known as "Southfield"). Our comments on the Environmental Impact Reports for this project concerned 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. These served as our request for additional information under the ITA and must be addressed before the WRC can proceed with its review. The NPC does not seem to change this alternative, so our comments on that aspect of the project have not changed.

Once we have received answers to our request, and the MEPA process has been concluded, the WRC can accept the application as complete and will then have 60 days to hold public hearings. A recommendation will then be made to the WRC which will vote to approve or deny this transfer. We have attached those comments here for your convenience.

Thank you for the opportunity to comment. If you have any questions, please contact Michele Drury at 617-626-1366.

Sincerely,

Kathleen M. Baskin, P.E.
Executive Director

enc

cc: Water Resources Commission
Michele Drury, DCR
Erin Graham, DCR



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION
100 CAMBRIDGE STREET, BOSTON MA 02114

July 11, 2007

Ian Bowles, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Aisling Eglinton, EOE # 11085R
100 Cambridge Street
Boston, MA 02114

Dear Secretary Bowles:

The staff of the Water Resources Commission (WRC) has reviewed the Final Environmental Impact Report for the Naval Air Station Redevelopment Project within the Towns of Weymouth, Rockland, and Abington (now known as "Southfield"). As stated in our comments on the DEIR, the WRC's jurisdiction over this project is caused by the proponents' preferred alternative for water supply, connection to the Massachusetts Water Resources Authority (MWRA) Water Works System. This connection will require WRC approval under the Interbasin Transfer Act (ITA) (M.G.L. ch 21 §§8B-8D and 313 CMR 4.00). The proponents have provided much of the information requested through our comments on the DEIR, however, information still must be provided before the WRC Staff can recommend that the ITA application is complete:

- The preferred alternative for water supply is described as being service from the MWRA via a dedicated 12-inch diameter ductile iron pipe and an intermediate booster pump station. From conversations with the proponent, WRC Staff understand that the booster pump station is not needed to supply the initial 0.65 mgd needed from the MWRA, but would be needed if build-out conditions required the development to obtain the full 1.4 mgd average day demand. As you know, the ITA can be triggered by an increase in the capacity of transfer facilities, such as pumps and pipelines. Therefore, the WRC will evaluate this transfer based on the full request for 1.4 mgd average day demand and the 12-inch diameter pipe and intermediate booster pump station. The proponent should provide the proposed capacity of this booster pump to WRC Staff. If in the future, Southfield utilizes the full 1.4 mgd using the transfer facilities described in the FEIR and ITA documents, further ITA review will not be needed.
- We understand that use of the reclaimed water for residential areas is inconsistent with DEP's current water reuse policy but that DEP is preparing draft water reuse regulations. Will residential areas have access to water from the non-potable well? It appears that potable water may be used for irrigation of some residential landscaped areas. We assume that this irrigation use was factored into the 65

residential gpcd factor requested for residential water use. Information is still needed on the irrigation plan for individual residential areas of the development. Although 90% of the residential units will be multi-family dwellings, these, and all other residential units, will have some landscaped areas. The proponent should provide information on the landscape water conservation techniques that will be used in these areas. This can include rainwater irrigation systems, climate/soil moisture sensors, plant selection, lot/lawn size, community gardens, etc. We also encourage the use of non-potable water for residential lawn watering.

- Section 2.3 of the Water Conservation Plan states that home water audit kits, which include low flow devices and toilet bladders, will be provided to residents. It seems odd that these devices would need to be provided to new developments that are built to State Plumbing Code specifications. Instead, we encourage the use of the most efficient devices available without the need for immediate retrofits. We applaud the inclusion of lawn care instructions, rain gauges and leak detection tablets in the kits. In addition, customers of the water supply system should be regularly provided with water conservation educational materials, including guidance on how to determine how much water they use.
- Section 3.5 of the Water Supply Contingency Plan, Drought Mitigation Measures: How do the drought stages listed under this section relate to the drought levels listed under Section 3.4 and in Table 3-2?
- It is not clear how Pricing and Water Audits (Sections 3.5.2 and 3.5.3 of the Water Supply Contingency Plan) help with drought mitigation (although these measures should be implemented regularly as part of good water supply management practices).
- Section 4.3 of the Draft Local Water Resources Management Plan, Water Reuse, states that the golf course will be designed with water conservation features, however, it also states that the course will be irrigated every other day during the peak summer period. The Plan should be amended to describe these water conservation features. We also suggest that the irrigation system be outfitted with soil moisture sensing features in each watering zone to prevent irrigation during any rainy periods that may occur on or just prior to the designated irrigation day, thus avoiding unnecessary watering.
- Maps showing the features described under Section 5.0 of the Local Water Resources Management Plan should be included. If these were presented in the Draft or Final EIRs, they should be reproduced here, as the Local Water Resources Management Plan is meant to be a stand-alone document.
- Release data from both the Quabbin and Wachusett Reservoirs must be provided as documentation for the ITA process. This data should be provided electronically (either in CD format or website reference) to assist the WRC in considering the adequacy of instream flow and ecological protection in the donor basins. Its provision to the ITA reviewers (previously provided to the proponent),

including the public libraries in the donor basins, will assure adequate public access to the information.

Thank you for the opportunity to comment. Please be aware that WRC has been coordinating with MWRA, DFW, and DCR to address in-stream flow needs of the Ware, Swift, and Nashua basins in its review of interbasin transfers from the MWRA system, as you directed through the certificate on the Reading SFEIR (EOEA #12514).

WRC staff is available to provide assistance as the proponent addresses these comments. The proponent is encouraged to contact Michele Drury at 617-626-1366 with any questions and to obtain the release data from the Quabbin and Wachusett Reservoirs. Once we have received answers to the items in this request, and the MEPA process has been concluded, the WRC can accept the application as complete and will then have 60 days to hold public hearings. A recommendation will then be made to the WRC which will vote to approve or deny this transfer.

Sincerely,

Kathleen M. Baskin, P.E.
Executive Director

cc: Water Resources Commission
Michele Drury, DCR
Erin Graham, DCR



**WATER SUPPLY CITIZENS
ADVISORY COMMITTEE**
to the Mass. Water Resources Authority

485 Ware Road
Belchertown MA 01007
(413) 213-0454
fax: (413) 213-0537
email: info@wscac.org

April 21, 2017

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Attention: Holly Johnson

Subject: Union Point, Notice of Project Change, EOEEA #11085

Dear Secretary Beaton:

The Water Supply Citizens Advisory Committee (WSCAC) is the formally contracted water supply advisory committee to the Massachusetts Water Resources Authority (MWRA) Board of Directors and staff. Since 1977, we have been providing comments on MWRA water programs and projects, on state water policy issues including legislation, and on water resources management policies.

We appreciate the opportunity to provide comments on the NPC for Union Point. We commented on the July 2007 FEIR for an earlier version of the proposed development for the former Weymouth Naval Air Station then called SouthField.

The NPC notes that the project size has increased from 1,386 to 1,462 acres. Impervious cover has also increased from 350 to 425 acres. The bordering vegetated wetlands alteration has increased from 3,430 to 10,790 square feet, and other wetland alteration has increased from 9,090 to 10,658 square feet. A total of 663 acres of land is proposed for alteration for this project.

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.

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.

As a water supply advisory committee, our primary concerns include:

- Current and projected public drinking water options

Water for the current residential development in Weymouth is provided by the Southfield Redevelopment Authority through the Weymouth public water system. WhiteWater Inc. operates and maintains the Southfield drinking water system. 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. Pictures taken during last summer's drought of Weymouth's surface water supplies show less than optimal conditions.

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.

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)? 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. 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.

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.

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.

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.

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.

- Wastewater Options

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. WSCAC recommends that the EIR provide additional information to evaluate this option and the proponent's commitment to keep wastewater within the basin.

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.

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.

- Stormwater

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.

- Rare Species Protection

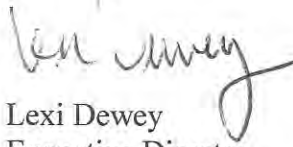
With the golf course eliminated, we look forward to learning more about the proposed revisions to this area including the 158 acre contiguous grassland habitat and restoration plan requested by NHESP.

- Sustainable Development Principles

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.

We appreciate the opportunity to comment on the NPC and request a new EIR to address our concerns in more detail.

Sincerely,



Lexi Dewey
Executive Director
WSCAC



SMART GROWTH AND REGIONAL COLLABORATION

April 24, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Holly Johnson, MEPA #11085R
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Union Point, MEPA #11085R

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*. The Commonwealth also has established a mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking by 2030. Additionally, the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. In May 2016, the Massachusetts Supreme Judicial Court released a unanimous decision in *Kain vs. Massachusetts Department of Protection (DEP)* ordering the state's DEP to take additional measures to implement the 2008 Global Warming Solutions Act. Specifically, the Court held that DEP must impose volumetric limits on the aggregate greenhouse gas emissions from certain types of sources and that these limits must decline on an annual basis. This recent ruling reasserts the state's obligation to meet these goals.

LStar Southfield LLC (the Proponent) is proposing the Union Point Project as the updated development plan (the Project) for the former South Weymouth Naval Air Station, a tract of approximately 1,462 acres of land located in Abington, Rockland, and Weymouth. 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.

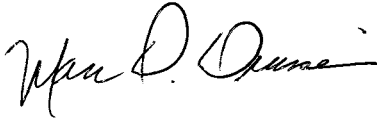
The Notice of Project Change (NPC) outlines the implementation of a significantly changed development plan from the 2007 FEIR. The proposed number of residential units has increased from 2,855 units to 3,855 units and proposed commercial space has increased from 2.06 million sf to 8 million sf. Predominant 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.

Please see the attached set of comments and recommendations regarding this Project. 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.

The intent of these recommendations is to encourage a greater shift of auto trips to transit, bicycling, and walking, which will minimize adverse impacts and help to keep the Commonwealth on track to meet its statutory and regulatory goals. MAPC respectfully requests that the Secretary incorporate these recommendations into the Certificate for the project's EIR.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, with a prominent initial "M".

Marc D. Draisen
Executive Director

cc: John Lucas, Town of Rockland
Robert Luongo, Town of Weymouth
Pat Ciaramella, Old Colony Planning Council
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on
Union Point Notice of Project Change, MEPA #11085R**

Building Program

Project Phasing

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.

Sports Stadium

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. 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. 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.

Additional Uses

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. 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.

Preservation and Repurposing of Other Buildings

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.

Components Already Completed or Under Construction

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. 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).

Trip Generation

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.

Transportation Mitigation

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)

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. 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 pick-up/drop-off area and shuttle bus service.

Intersection Improvements

- Route 58 at Route 139
- Pond Street at Derby Street/Hollis Street
- Columbian Square (Pond St/Pleasant St/Union St)
- Columbian Street/Forest Street
- Weymouth Street/Sharp Street/Abington Street
- Columbian Street/Park Avenue West

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

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.

In addition to committing to the multi-modal transportation facility as a mitigation requirement, the EIR should clearly distinguish what improvements pertain to the South Weymouth Commuter Rail Station and what specific components comprise the multi-modal transportation facility. A well-designed multi-modal facility has the potential to improve accessibility and connectivity between modes in addition to coordination with land use plans.

Parking

Parking Program

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 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.

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.

Structured Parking

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.

Existing and Permitted Parking

The Proponent should clarify how the 2,056 parking spaces, which have already been permitted or constructed, are being allocated and utilized.

Shared Parking

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.

Parking Banks (Landscape Reserves)

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.

Other Parking Policies and Management Strategies

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.

Shuttle Service

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.

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.

Bicycle and Pedestrian Connections

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 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.

Mode Share Goals and Monitoring Program

Mode Share Goals

While the Proponent has committed to a monitoring program that will include vehicular data collection, there is no discussion of mode share goals. Developing and monitoring mode share goals is a central component of TIA preparation as outlined in the *EOEEA/MassDOT Guidelines for Traffic Impact Assessments (TIAs)*. Specifically, the TIA Guidelines state: "*The TIA should include an assessment of the mode split assumptions, as well as the Proponent's plan to maximize travel choice, promote non-SOV modes, and achieve the assumed mode shares.*" (p. 17)

The Proponent needs to define mode share goals clearly (vehicular, commuter rail, shuttle, bicycling and walking) for residents and employees as part of their commitment to conduct monitoring and reporting, and to adjust the project's TDM program as necessary.

Monitoring and Reporting

The Proponent's monitoring and reporting program must be well defined and eventually be committed to in the Section 61 findings. Trip generation, parking usage and Level of Service (LOS) must all be monitored on a continuous basis. It is imperative that the Proponent outline an extensive and thorough transportation monitoring and reporting program.

The monitoring program needs to include details of how the mode share goals will be attained, as well as steps that will be taken if goals are not met. The Proponent must also commit to conducting regular monitoring and reporting of transportation mode shares and adjust the Project's alternative transportation services and TDM programs as necessary (see below). MAPC recommends that the monitoring program take place annually and for at least five years after full occupancy. The monitoring and reporting program should include annual data collection of traffic counts, parking, public transportation, shuttle, bicycling, and walking. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary.

Transportation Demand Management (TDM) Program

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.

TDM commitments should be institutionalized so that future managers of the development sites will be required to adhere to these commitments.

Water Supply

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.

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.

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.

Wastewater

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.

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.

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.

Affordable Housing

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.

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.

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 Neighborhoods*¹, "people of color, low-income households and renters are all more likely to use transit than the average American" (p. 2).

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.

¹ Prepared by the Dukakis Center for Urban and Regional Policy; Stephanie Pollack, Barry Bluestone, Chase Billingham; October 2010.

<http://www.northeastern.edu/dukakiscenter/transportation/transit-oriented-development/maintaining-diversity-in-americas-transit-rich-neighborhoods>

Old Colony Planning Council



Frank P. Staffier
President

70 School Street
Brockton, MA 02301-4097

Pasquale Ciaramella
Executive Director

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April 21, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs (EOEEA)
Attention: MEPA Office (Holly Johnson)
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Beaton,

Old Colony Planning Council (OCPC) has reviewed the Notice of Project Change (NPC) submitted for the Union Point Project (EEA #11085). It is noted that the proponent filed a Notice of Project Change as the result of a year-long reimagining and refinement process with input that was provided by the Host Communities, the local redevelopment authority, and interested stakeholders. This outreach resulted in a development program that relocates residential neighborhoods and the commercial district to more appropriate sites, increases the number of age-restricted residential units, increases the commercial square footage, increases density to further Smart Growth goals, and eliminates a planned golf course and replaces it with additional open space. In light of these proposed changes, I offer the following comments:

Transit

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 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 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.

Route 18

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.

Traffic and Transit Monitoring Program

The proponent should include a comprehensive traffic and Transit monitoring program. In addition, the proponent should include an evaluation of the effectiveness of mitigation measures at the completion of each development phase. For further coordination, OCPC requests that the results of the monitoring program be provided to the regional planning agencies in the area.

Union Street Access/ Egress

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.

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.

Greenhouse Gas Emissions

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.

I thank you for the opportunity to provide comments on the Notice of Project Change for the Union Point Project. Should you have any questions or require additional information, please contact me at your convenience.

Sincerely,



Pasquale Ciaramella
Executive Director

CC:

Federal and State Legislators

OCPC Delegates and Alternates

Ms. Stephanie Pollack, Secretary and CEO, MassDOT

Mr. Thomas J. Tinlin, Highway Division Administrator, MassDOT

Ms. Astrid Glynn, Rail and Transit Division Administrator, MassDOT

Ms. Mary-Joe Perry, Director, MassDOT District 5

Mr. Lionel Lucien, Public/Private Development Unit, MassDOT

Mr. Trey Wadsworth, MPO Liaison, MassDOT Planning

Mr. Reinald Ledoux, Jr., Administrator, BAT
Mr. Brandon Wilcox, Community Planner, FHWA
Mr. Richard LaFond, Abington Town Administrator
Ms. Maureen Jansen, Chair, Abington Board of Selectmen
Mr. Wayne Smith, Chair, Abington Planning Board
Mr. Allan R. Chiocca, Rockland Town Administrator
Mr. Edward F. Kimball, Chair, Rockland Board of Selectmen
Mr. John Lucas, Chair, Rockland Planning Board
Mr. Robert L. Hedlund, Mayor, Town of Weymouth
Mr. Patrick O'Connor, President, Weymouth Town Council
Ms. Sandra Williams, Chair, Weymouth Planning Board



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR PATRICK M. O'CONNOR
Plymouth and Norfolk District

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MEH

April 18, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

I write to express my strong support for the Union Point development vision for the former South Weymouth Naval Air Station. I am particularly pleased that the land use zoning entitlements associated with this milestone opportunity were approved unanimously, not only by the Town of Weymouth where I serve as State Senator and Town Council President, but by the Towns of Abington and Rockland as well.

We are already beginning to realize the economic development benefits of this project and I believe that what we will continue to see, with your support, will be truly transformative and beneficial not only for the region but for the Commonwealth as a whole.

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.

This project has been a personal priority for almost the entirety of my public career. I have seen varying proposals that go back during my many years as a Weymouth Town Councilor and as

legislative aide to now-Mayor Hedlund. Now in my role as Senator representing Weymouth, I am so pleased to see this project finally blooming into the economic engine that I have always believed to be possible. 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. These are not mutually exclusive objectives. Indeed, I applaud the Baker Administration for its sophisticated understanding that the need for economic growth and responsible environmental stewardship go hand in hand if both are to be sustainable, and I truly believe that the vision for this site is a model for that type of partnership.

Finally, I wish to acknowledge and applaud the efforts of the LStar Communities team in the execution of their responsibility to bring the Union Point vision to reality. The professionals working on this project are responsive, open, and highly proactive.

Thank you for the time and resources that you and your office are providing in this very important review. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat O'Connor", with a long horizontal flourish extending to the right.

Patrick M. O'Connor
State Senator
Plymouth and Norfolk District



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

RONALD MARIANO
STATE REPRESENTATIVE
3RD NORFOLK DISTRICT
DISTRICT: (617) 328-5166
Ronald.Mariano@MAhouse.gov

RECEIVED

APR 20 2017

MEPA

MAJORITY LEADER
STATE HOUSE, ROOM 343
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FAX: (617) 722-2750

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

I write to express my support for the Union Point development at the former South Weymouth Naval Air Station, much of which is located within my legislative district. The vision represented by the current developers brings with it an incredible opportunity for economic development potential not only in Weymouth, Abington and Rockland, but for the entire South Shore and the Commonwealth as a whole.

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.

This project has been of importance to Weymouth and the South Shore since the base was decommissioned, and as such has been a priority of mine for basically my entire legislative career. I have always believed that the land size and location make it uniquely suited to become an economic engine for the region, as well as a vibrant community hub of activity.

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.

Thank you for your time and consideration, please do not hesitate to contact me should you have any questions or concerns.

Sincerely,

RONALD MARIANO
State Representative
3rd Norfolk District



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

SENATOR PATRICK M. O'CONNOR
Plymouth and Norfolk District

STATE HOUSE, ROOM 520
BOSTON, MA 02133-1053
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PATRICK.OCONNOR@MASENATE.GOV
WWW.MASENATE.GOV

April 21, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

We write in support of the Town of Weymouth's testimony for Union Point's notice of project change and development vision for the former South Weymouth Naval Air Station. You will find that the enclosed comments by Mayor Robert Hedlund detail the developments concerning water supply, wastewater, and transportation. These project advances are a continuation of what will prove to be a positive transformation for not only Weymouth, Abington and Rockland, but for the Commonwealth as a whole.

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. These are not mutually exclusive objectives. The need for economic growth and responsible environmental stewardship go hand in hand if both are to be sustainable, and the Union Point vision has proven to be a model for that type of partnership.

Thank you for the time and resources that you and your office are providing in this very important review. Please do not hesitate to contact me if you have any questions.

Sincerely,

Handwritten signature of Patrick M. O'Connor in blue ink.

Patrick M. O'Connor
State Senator
Plymouth and Norfolk District

Handwritten signature of Ronald Mariano in blue ink.

Ronald Mariano
House Majority Leader
3rd Norfolk District

Handwritten signature of James M. Murphy in blue ink.

James M. Murphy
State Representative
4th Norfolk District

Johnson, Holly (EEA)

From: Timmermann, Timothy <Timmermann.Timothy@epa.gov>
Sent: Friday, April 21, 2017 12:13 PM
To: Johnson, Holly (EEA)
Cc: Walsh-Rogalski, William; Monahan, Rosemary; Timmermann, Timothy; Audet, Matthew
Subject: Union Point Notice of Project Change #11085

Dear Ms. Johnson:

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.

Please contact me directly with any questions.

Regards,

Timothy L. Timmermann, Associate Director
Office of Environmental Review
EPA New England-Region 1
5 Post Office Square, Suite 100
Mail Code ORA 17-1
Boston, MA 02109-3912

Email: timmermann.timothy@epa.gov

Telephone: 617-918-1025

E-Fax: 617-918-0025

STEPHEN F. LYNCH
8TH DISTRICT, MASSACHUSETTS

COMMITTEE ON FINANCIAL SERVICES
SUBCOMMITTEE ON CAPITAL MARKETS AND
GOVERNMENT SPONSORED ENTERPRISES
SUBCOMMITTEE ON FINANCIAL INSTITUTIONS
AND CONSUMER CREDIT

COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM
RANKING MEMBER, SUBCOMMITTEE ON
NATIONAL SECURITY
SUBCOMMITTEE ON GOVERNMENT OPERATIONS

ASSISTANT DEMOCRATIC WHIP

April 21, 2017

Mr. Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton:

I write in order to express my continued support for the proposed development at Union Point.

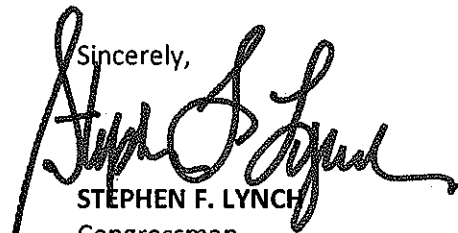
As you may know, the development of the former South Weymouth Naval Station has proceeded slowly. LStar's vision of Union Point presents a once-in-a-generation opportunity for Weymouth, Abington, and Rockland. The economic development we have already seen as well as future benefits to the region will be transformative for the South Shore.

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.

This project truly has the potential to act as an economic engine for the entire South Shore. As you review this submittal by LStar and develop a scope going forward, I respectfully urge that you focus specifically on changes proposed by LStar. It is critical that this project moves forward and the benefits to the South Shore are realized.

Thank you for considering this request. If I may provide any further information, please do not hesitate to contact me.

Sincerely,



STEPHEN F. LYNCH
Congressman
8th District
Massachusetts

Congress of the United States
House of Representatives
Washington, DC 20515-2108

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1245 HANCOCK STREET
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*Town of Weymouth
Massachusetts*

Robert L. Hedlund
Mayor

75 Middle Street
Weymouth, MA 02189



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April 21, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Massachusetts Environmental Policy Act Unit
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

SUBJECT: Massachusetts Environmental Policy Act
Notice of Project Change - Union Point
LStar Southfield L.L.C.
EEA Number: 11085R
Town of Weymouth Comments

Dear Secretary Beaton:

I appreciate your consideration of the comments of the Town of Weymouth ("Town") on the project modifications that LStar Southfield L.L.C. ("LStar") is proposing in a notice of project change ("NPC") for the Union Point neighborhood of the Town. Union Point is a positive development for the Town that we hope will enhance favorably to the future of the Commonwealth's second oldest community.

LStar's development of Union Point turns the corner of decades of inaction at the former South Weymouth Naval Air Station. The Town's recent unanimous approval of new zoning that increased density and leading to the need, in part, for this NPC shows best the positive collective, collaborative, and cooperative relationship between the Town and LStar. The Town and LStar have empowered themselves, stepped forward as partners, and resolved between themselves issues such as water, sewer, and traffic.

We arranged our comments according to various issues we as a Town have about the project, including those associated with LStar's proposed programs including water supply, wastewater treatment and disposal,

transportation, and other issues. We are requesting the Secretary consider these issues.

I. Water Supply.

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.

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.

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.

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.

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.

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.

II. Wastewater.

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.

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.

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.

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.

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.

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.

III. Transportation.

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.

The NPC states that the currently proposed project will result in an increase in average daily traffic (ADT) that is more than double than was proposed in the 2007 FEIR (34,300 vehicle trips per day, increasing by 45,600 vehicle trips per day for a total of 79,900 vehicle trips per day). Further, a new sports stadium is also being proposed that could result in substantial surges in additional short-term traffic and delays, depending on the stadium's scale and schedule of events.

Based on the traffic characteristics for the project described in the 2007 FEIR, MassDOT made modifications to several intersections along the Route 18 corridor to accommodate the originally anticipated traffic demands. These modifications are beginning this construction season.

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.

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.

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.

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.

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.

On the other hand, the Town and LStar's relationship with MassDOT has been exemplary. In addition to the Route 18 improvements discussed above, MassDOT's local partnership with LStar and the Town already has paid

dividends with the recent completion of Patriot Parkway in November 2016. With the Town's assistance and support, LStar convinced MassDOT to allow it to take over construction of the Patriot Parkway, which LStar completed on time and under budget.

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.

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.

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.

IV. General Comments.

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.

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

Secretary Beaton
Union Point Notice of Project Change
April 21, 2017
8 of 8

to coordinate with LStar the harvesting of stormwater for irrigation as an additional manner of reducing water supply demand.

V. Conclusion.

Once again, the Town of Weymouth appreciates the opportunity to provide these comments on the Union Point NPC. The Town supports enthusiastically LStar redeveloping Union Point and this NPC. LStar has the opportunity to transform this neighborhood of Weymouth into a modern development for the 21st century, which is something the Town seeks to encourage, not frustrate. The Town and LStar have partnered and solved several infrastructure issues in the last year. We look at this NPC process as another opportunity to work together and bring need resources and services to Weymouth residents—Union Point residents. Thank you very much for your courtesy and attention to these comments.

Sincerely,

A handwritten signature in black ink that reads "Bob Hedlund". The signature is written in a cursive, slightly slanted style.

Robert L. Hedlund
Mayor

cc: All Members of the Weymouth Town Council
All Members of the Southfield Redevelopment Authority
Patrick O'Connor, State Senator
James Murphy, State Representative
Ronald Mariano, State Representative

*Town of Weymouth
Massachusetts*

*Brian McDonald
Weymouth Town Council
Councilor at Large
75 Middle Street
Weymouth, MA 02189
(781) 340-5020*



RECEIVED

APR 21 2017

MEPA

April 18, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

I am fully supportive of the Union Point vision and plan that has been proposed to develop the former Naval Air Station. One of the primary reasons that I ran for the Town Council in 2005 was to assure that the development of this site moved forward with a responsible, visionary master developer. I am very pleased to see the commitment of LStar with making this development a show place for the region.

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). It is extremely critical for my constituents in the Town of Weymouth to realize the long awaited economic potential of this project. I would hope that we can avoid being sidetracked by past issues that are not a result of this Notice of Project Change as those issues have previously been well identified, characterized and mitigated.

Purely as an *example*, issues related to sensitive habitats have been well defined on this site and addressed earlier. Sensitive habitats will not be further impacted by the proposals in this NPC and thus should not be part of a new extensive scope that will yield little in the way of new information or findings and yet be unnecessarily time and effort consuming.

I look forward to seeing the vision for this part of the Town of Weymouth come to fruition. I believe Union Point is that culmination and urge the timeliest resolution of the NPC as possible.

Sincerely,

Brian McDonald
Weymouth Councilor-at-Large

CC:

State Senator Patrick O'Connor
Representative James Murphy
Representative Ronald Mariano
Mayor Robert Hedlund
Weymouth Town Council

***Town of Weymouth
Massachusetts***

***Jane Hackett
Weymouth Town Council
Councilor at Large
75 Middle Street
Weymouth, MA 02189
(781) 340-5020***



April 18, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

As a Weymouth Town Councilor-at-Large, I want to express my support for the Union Point project and the opportunity that represents for Weymouth and the South Shore. I have been pleased by LStar's proactive community outreach in seeking input from all three communities.

I been involved in the project for over 16years and I believe the project as proposed is exactly what was envisioned when the three communities abandoned the former Mills Mall Plan, rezoned the property for mixed use and changed the Enabling Legislation to reconfigure the roles and responsibilities of the LRA. I believe this is sustainable growth development that will also be an economic stimulator.

There are nonetheless important impact considerations and evaluations that the environmental scope generated by this Notice of Project Change (NPC) should address. Traffic is chief among these, especially along the Rt. 18 corridor from Rt 139 in Abington to Rt 3 in Weymouth. Potential impacts to side streets like Pond, Thicket and Pleasant Streets in South Weymouth are also important study areas for impacts and potential mitigation. Water and wastewater issues are also an important study area, though I do feel progress is being made and am very pleased by that active dialogue with that the proponent is engaged in with the Hedlund Administration and the updates those of us receive on the Council as a result. Finally, while the NPC contemplates a very substantial vision, I also feel as though many characteristics on this site are well understood and that accordingly need not be significantly re-evaluated where they are not impacts by this NPC.

I want to thank you and your office for all of the time and energy that you will be devoting to this project now and over the next several months. I hope you will not hesitate to let me know any questions you have based upon these comments.

Sincerely,

Weymouth Councilor-at-Large

CC: Mayor Robert Hedlund
Weymouth Town Council
State Senator Patrick O'Connor
Representative Ronald Mariano
Representative James Murphy

*Town of Weymouth
Massachusetts*

*Michael Smart
Weymouth Town Council
District Six Councilor
75 Middle Street
Weymouth, MA 02189
(781) 340-5020*



April 19, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

The successful redevelopment of the former South Weymouth Naval Air Station is important for the Town of Weymouth, the South Shore region and the Commonwealth of Massachusetts. The redevelopment site is located entirely within the district I represent and has been a primary focus of my work to maintain the proper balance of the much needed economic development for the Town of Weymouth while ensuring a positive quality of life for the constituents who live on or near the site.

Many aspects of this site have been studied extensively in the past and are well understood. Although the Notice of Project Change before us now does not appear to raise significant new impacts with respect to wildlife habitats, wetlands, or open space, there are areas that will require further review and mitigation. Below is a list of concerns that I am requesting be reviewed further:

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

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.

Issues related to water supply and wastewater will also require further review and evaluation for their plausibility and sustainability. I support the proponent's proposal for obtaining the permanent water source for the project from the MWRA. 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.

A successful Union Point project will have an important and positive impact to the South Weymouth community, the Town of Weymouth and the South Shore region of the Commonwealth. The support and direction of your office will help to ensure a positive future for this development.

Sincerely,

A handwritten signature in black ink that reads "Michael Smart". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Smart
Weymouth Town Councilor
District Six

*Town of Weymouth
Massachusetts*

*Thomas J. Lacey
Weymouth Town Council
District Two Councilor
75 Middle Street
Weymouth, MA 02189
(781) 340-5020*



April 20, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA No. 11085
100 Cambridge Street, Suite 900
Boston MA 02114

Dear Secretary Beaton,

I write with respect to the Notice of Project Change (NPC) submitted by the Union Point proponent, LStar Communities, LLC and the importance of this project's success to the Town of Weymouth and our neighboring south shore communities.

I applaud LStar's aggressive and creative vision for the development. I also believe the developer has proven themselves to be good partners and neighbors since purchasing this property. They have worked cohesively to make their plans as transparent as possible and have made every effort to communicate those plans and subsequent amendments on a regular basis. I am especially pleased with the mixed and varied commercial uses that will be located at Union Point and the economic benefits they will bring to our community. I'm certain you're aware of the numerous stops and starts with this parcel/projects. The redevelopment of Union Point is vital to Weymouth's pathway to future growth and success. I implore your support of this NPC with detailed and specific conditions as well as appropriate mitigation requirements, ensuring the highest level of protection for our community and residents.

I represent District 2 neighborhoods of Weymouth. Impacts of greatest concern to me and my constituents are in the areas of water, wastewater and traffic. I am certain that the scope and detail you and your staff's review will conduct, as part of the NPC process, will be thorough and require mandates in these impact areas so they are well defined, characterized and most importantly mitigated. This is critical to ensure that LStar is held to the highest degree of accountability to comply with all identified and mandated conditions. Also, regular updates from your office to Weymouth will ensure continued transparency and build stronger trust and credibility of the project, developer and investors.

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.

I also believe it is very important for all parties to understand the breadth of the opportunities that this project offers to our Town and the entire South Shore. The commercial uses contemplated by this NPC are transformational for this region's economic future. Though there are exceptions, the South Shore as a whole has not been as successful as other areas in Massachusetts in bringing the kind of knowledge- based development opportunities that truly are the foundation of the future. This project seeks to have that foundation flag planted here, and it is vitally important that we balance that opportunity with a responsible mitigation program which assures the success of both objectives. I am confident that we can reach this goal with your analyses, expertise, due diligence and authority.

Thank you for your time and the effort that you are devoting to this project.

Sincerely,


Thomas J. Lacey
Weymouth District Two Councilor

CC: Mayor Robert Hedlund
Weymouth Town Council
State Senator Patrick O'Connor
Representative Ronald Mariano
Kyle Corkum, LStar Management

Arthur E. Mathews
15 Lake View Road
Weymouth, MA 02189

April 20, 2017

Matthew Beaton, Secretary of Energy and Environmental Affairs
Attention: MEPA Office, Holly Johnson
NPC for Union Point, EEA # 11085
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Beaton,

I am writing to you in regards to the Notice of Project Change that was filed by LStar Southfield LLC, for EEA # 11085 at Union Point in South Weymouth. This project has gone through many changes since the plan that was approved by the three towns in 2005 and after the FEIR was approved in 2007. Those changes as outlined in the NPC include the transfer of land ownership to a new master developer, legislation and zoning changes just to outline a few. My involvement in this project goes back many years as a Town Councilor in Weymouth since 2002. I also served on the Citizens Advisory Committee during the DEIR and FEIR reviews on this project. Overall I am mostly supportive of the revised plans moving forward and understand this project has the potential to provide additional commercial development to the town of Weymouth.

I want to take the opportunity to discuss some of the proposed impacts to the town of Weymouth that may be associated with the NPC that I would like to have addressed in the EIR. 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. 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 MGD 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.

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

April 20, 2017

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.

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 can not be mitigated at full build out. If the overall size of the project would have to be reduced where would the reductions take place?

I am hopeful that this project will continue to move forward and these issues will be address in the EIR by the proponent.

Sincerely,

A handwritten signature in cursive script that reads "Arthur E. Mathews".

Arthur E. Mathews

Weymouth District 4 Town Councilor



TOWN OF ROCKLAND

Board of Selectmen

Town Hall
242 Union Street
Rockland, Massachusetts 02370

Telephone: 781-871-1874
Fax: 781-871-0386

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Chairman:
Edward F. Kimball
Vice Chairman:
Larry J. Ryan

Selectmen:
Michael P. Mullen, Jr.
Deirdre Hall
Michael P. O'Loughlin

Town Administrator:
Allan R. Chiocca

Executive Assistant:
Susan M. Ide

April 13, 2017

Mr. Matthew Beaton, Secretary Of Energy and Environmental Affairs
Executive Office of Energy and E Environmental Affairs (EEA)
Attn: MEPA Office
Holly Johnson, EEA 11085
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Notice of Project Change Union Point

Dear Secretary,

On behalf of the Rockland Board of Selectmen, I want to express our support for the Union Point Development located in Rockland, Abington and Weymouth.

The Town has made it abundantly clear that it supports Union Point and the benefits that it will bring to Rockland. At our May 2016 Town Meeting, we voted unanimously to approve zoning changes that will allow for more than 2 million square feet of commercial development within our Town's borders. This opened the door to significant economic development for Rockland; while at the same time adhering to smart growth principals that will pay dividends for decades going forward.

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.

Thank you for your time. We look forward to taking this next step toward seeing Union Point come to fruition.

Sincerely,

Edward Kimball
Chairman
Board of Selectmen

CC: Mayor of Weymouth/Town Council
Town of Abington Board of Selectmen
SRA Advisory Board



Rockland Open Space Committee

3/26/17

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA. 02114

Subject: Notice of Project Change

Union Point, EEA#11085R

Dear Secretary Beaton,

Please accept the following as comments to this NPC.

First, we would like to say that it has been nothing less than a pleasure working with the entire crew in the L-Star team. Although sometimes our opinions vary, they have been willing to meet with us anytime we have ever asked. We look forward to working with L-Star in the future in hopes of thoughtfully blending the vast natural community at Union Point with the development of this project.

That being said, we offer the following comments and questions that we believe should be included in the EIR:

We would like to request that a complete Master Plan for Union Point project be part of the EIR, as it is often referred to in the NPC and is currently not available for public viewing at this time by the proponent.

We would like clarification as to where the DOT Access Permit and the Street Opening Permit would be needed.

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.

Question 2 on page 4 in the NPC is checked **no** by the proponent.

We are uncertain if release of the 78 acres of land that had a Golf Course Permanent Deed Restriction and was recently rezoned by the towns for development and is currently being reviewed by NHESP ,would have qualified that question to have an answer of yes.

We were certainly happy with the decision of the proponent not to build the golf course, thus leaving all the land in the southern portion of Union Point as contiguous open space that will, this time, be placed in a permanent Conservation Restriction.

Of course, the trade off was losing the northern 78 acre portion of the golf course area to rezoning and new development.

3.0 Wetlands

We would like more information on how the day-lighting of a portion of French's Stream created 8210 square feet of wetlands.

The proponent is committed to constructing compensatory wetlands at a ratio of 2:1 to 3:1 for vegetated wetlands altered by the project. The addition of 7310 sq ft of BVW alteration and another 1568 sq ft of other wetland alteration is concerning to the committee.

We have concerns with the enormous addition of these wetland impacts proposed in the NPC and that the mitigation of these wetland impacts will be the loss of scarce, quality, upland habitat and wildlife corridors at Union Point. Please know that outside the Golf Course area, the majority of open space at Union Point is wetlands.

We are concerned that the huge increase in impervious surfaces mentioned in this NPC may have a flooding effect at Union Point and/or in the Town of Rockland and may potentially change any existed documented flood zone maps, We ask if this could be addressed in the EIR.

We ask that that any wetland alteration be kept to a minimum and that any compensatory wetlands necessary, be build in the development areas of Union Point and not in areas of open space or riverfront areas.

The proponent in the 2007 FEIR was committed to preserving wildlife habitats and wildlife corridors along French's Stream.

Currently there is connectivity of a wildlife corridor from the very east side of Union Point to the very west side. We hope the proponent will adhere to the FEIR and maintain connectivity from the open space to the furthest point north of Union Point to the open space on the furthest point south. These connections are important as Union Point is the intersect of wildlife movement from Weymouth to Abington to Rockland and to Hingham and beyond.

Also, currently there is a trail system that connects the future Nature Center and associated parking at 1119 Union Street in Rockland to the trail system at Union Point. This trail is in rare species habitat and has been approved by NHESP. We hope that connectivity of the east / west wildlife corridor will be maintained by whatever means necessary at this juncture.

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.

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)

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.

We hope to see the NHESP Grassland Plan of the formally proposed Golf Course parcel be included of the EIR.

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.

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.

We would be interested in knowing what the 43 acres of public parks listed as open space will consist of and where they will be located.

Included in the Acts of 2014 Chapter 291 it states:

" (5) the master developer shall submit to the authority no later than 7 months after the passage of this act an open space preservation plan that shall be consistent with any amenities plan agreed upon by the master developer and any of the 3 towns, which shall include a schedule for the removal of all existing runways, taxiways, traffic control towers and other infrastructure located on any land zoned open space as of the effective date of this act."

We would ask that this "open space preservation plan" be included in the EIR as it does not currently exist.

We would like to see a commitment to remove the older Navy Control Tower and all associated asphalt roadways and parking areas and measures be taken to return the area into its natural surroundings. Consideration should be taken to either use the newer Control Tower as an Observation Tower or have it removed. Currently, they are both safety hazards.

We would like to see the entire 52 acres of the Thompson Pond CR parcel cleaned of all rubbish and debris.

We would like to see the entire 24 acre Rockland Meadows CR parcel cleaned of all rubbish and debris.

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.

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.

Lastly,

Because this project has vastly increased in size and impacts to the host communities, as well as the entire region, we would like to ask for your consideration in creating a Citizen Advisory Committee to properly evaluate and mitigate these impacts in the EIR.

Although the Master Developer is the solo proponent applicant in this NPC, we believe that this project also has several public aspects to it as well for the following reasons:

- 1) It was the three host communities , Abington, Rockland, and Weymouth that originally voted for the Master Plan in the FEIR certificate.
- 2) The public entity representing the three towns, which is the Southfield Redevelopment Authority(SRA) , currently owns much of the land within the project site at Union Point, which was transferred to them through the National Park Service.
- 3) It was the SRA that had voted to choose the Master Developer and they currently have a DDA with the proponent.
- 4) There is newer state legislation (Acts of 2014 Chapter 291) that governs this project now than and did not when the FEIR was reviewed..
- 5) The Commonwealth of Massachusetts provided most of the funding for building the Parkway and the day-lighting of 900 feet French's Stream at Union Point.
- 6) The Commonwealth of Massachusetts will likely provide some funding for traffic mitigation associated with the addition traffic impacts from this NPC.

The committee understands the enormity of the proposed project and welcomes the opportunity to comment on the changes sought at this point and in the future as our concern is for maintaining a livable community.

Respectfully submitted,

Donald Cann
Chairman, Rockland Open Space Committee

Rockland Town Hall
242 Union Street
Rockland, MA. 02370



TOWN OF ABINGTON

PLANNING BOARD

TOWN HALL
500 GLINIEWICZ WAY
ABINGTON, MA 02351
781-982-0069

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Executive Office of Energy
& Environmental Affairs

April 7, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Notice of Project Change
Union Point, EEA # 11085

Dear Secretary Beaton,

On behalf of the Town of Abington Planning Board I would like to thank you for the opportunity to make comment on the Notice of Project change.

The Planning Board reviewed the extensive document at the April 3, 2017 meeting. There was insufficient time before their March meeting for such a review.

The Planning Board would like to echo the comments they received from Mr. Joe Shea in correspondence dated 3/18/17.

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 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.

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.


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.

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.

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.

Thank you in advance for your consideration.

Sincerely,


Wayne P. Smith,
Chairman

cc Abington Board of Selectmen
Abington SRA advisory Board member
Abington Fire Chief
Abington Police Chief
Rockland Town Administrator
Mayor of Weymouth
Laura Rome, Epsilon Assoc



Advocacy Department
208 South Great Road • Lincoln, Massachusetts 01773
tel 781-259-2172 • email hricci@massaudubon.org

April 21, 2017

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, EEA #11085R
100 Cambridge Street, Suite 900
Boston, MA 02114

Via Email: holly.s.johnson@state.ma.us

Re: **EOEEA# 11085R, Union Point, Abington, Rockland, and Weymouth (formerly Southfield/Weymouth Naval Air Station)**

Dear Secretary Beaton:

On behalf of Mass Audubon, I submit the following comments on the Notice of Project Change (NPC) for the Union Point project. 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. Mass Audubon submits the following comments in regards to the EIR scope of review for open space, habitat, wetlands, and water resources impacts. We recognize that there are other areas of significant impact as well, e.g. transportation.

Article 97 – Conservation Restriction Release

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.

Rare Species Habitat

This site contains habitat for state-listed rare species including the Eastern Box Turtle (*Terrapene carolina*), Upland Sandpiper, (*Bartramia longicauda*), and Grasshopper Sparrow (*Ammodramus savannarum*). Large blocks of grassland habitat are rare in Massachusetts, and this project offers an important opportunity to protect and restore such habitat. The combination of wetland and upland habitat for the Box Turtle is also important, as these animals require large areas where they can move throughout the year without danger of being killed while crossing roads.

Mass Audubon supports removal of the golf course from the development plan, and expansion of grassland habitat from 103 acres to 158.5 acres. The proposed plan for a single contiguous area of grassland habitat will be more functional for the species that utilize such habitats than the previously planned interspersed habitat strips within the golf course.

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.

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.

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 EIR should include a draft revised CMP, including details regarding ongoing grassland management and monitoring protocols.

Wetlands, Buffers, and Shrub Habitat

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.

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 EIR should also provide details regarding wetlands impacts and mitigation for all aspects of the development project, including off-site utility connections.

Water Supply and Conservation

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.

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.

Low Impact Development

The NPC mentions water conservation measures including planting with drought-tolerant species. 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.

Thank you for considering these comments.

Sincerely,



E. Heidi Ricci
Senior Policy Analyst

cc: Laura Rome, Epsilon Associates
NHESP
Abington Conservation Commission
Abington Planning Board
Rockland Conservation Commission
Rockland Planning Board
Weymouth Conservation Commission
Weymouth Planning Board

Mass Audubon protects 36,500 acres of land throughout Massachusetts, saving birds and other wildlife, and making nature accessible to all. As Massachusetts' largest nature conservation nonprofit, we welcome more than a half million visitors a year to our wildlife sanctuaries and 20 nature centers. From inspiring hilltop views to breathtaking coastal landscapes, serene woods, and working farms, we believe in protecting our state's natural treasures for wildlife and for all people—a vision shared in 1896 by our founders, two extraordinary Boston women. Today, Mass Audubon is a nationally recognized environmental education leader, offering thousands of camp, school, and adult programs that get over 225,000 kids and adults outdoors every year. With more than 125,000 members and supporters, we advocate on Beacon Hill and beyond, and conduct conservation research to preserve the natural heritage of our beautiful state for today's and future generations. We welcome you to explore a nearby sanctuary, find inspiration, and get involved. Learn how at massaudubon.org.

Protecting the Nature of Massachusetts

Attachment 4A Restoring Warm-Season Grassland for Grasshopper Sparrow Habitat



Figure 1. Sparse, low, little bluestem (*Schizachyrium scoparium*) grassland at the former South Weymouth Naval Air Station, Weymouth, Massachusetts, October 2007. Clumps of little bluestem are separated by areas of litter and bare ground, with sparse shrub cover. This is the vegetation structure used by breeding Grasshopper Sparrows (*Ammodramus savannarum*). Photo by Tom Lautzenheiser.

This document provides prescriptions for creating grassland bird nesting habitat on areas formerly paved or in shrub cover as part of the conversion of the former South Weymouth Naval Air Station to a mixed-use development. Specific recommendations will guide the creation of a grass-dominated habitat with a species mix and structure suitable for nesting by Grasshopper Sparrows and Upland Sandpipers, two state-listed species documented to occur on the site.

Natural History

Grasshopper Sparrows

Grasshopper Sparrows require large areas of sparse grassland habitat for breeding. Comprehensive surveys of grassland bird breeding sites in Massachusetts by the Mass Audubon Grassland Bird Program indicate that Grasshopper Sparrows generally will not nest in grasslands smaller than approximately 12 hectares (30 acres; MAS, unpublished data), similar to the 10-hectare (25-acre) threshold reported in the literature (e.g. DeGraaf and Yamasaki 2001). MAS-GBP surveys, as well as several studies from throughout the sparrow's range (as cited in Dechant *et al.* 1998, rev. 2002), indicate that within these sites, Grasshopper Sparrows prefer to nest in sparse, medium-height (approximately 0.4-meter/1.3-foot), patchy grass cover intermixed with forbs, few patches of bare ground, moderate to high leaf-litter cover, and minor shrub cover. Upland Sandpipers, while having even larger area requirements for nesting than the Grasshopper Sparrow (typically greater than approximately 40 hectares/100 acres), will utilize sites with a similar cover.

The vegetation structure of the habitat is important to Grasshopper Sparrows for reasons related to their feeding and breeding behaviors (Vickery 1996). In summer, the Grasshopper Sparrow diet consists mainly of grasshoppers, supplemented by seeds; patches of bare ground are required for the sparrows to forage and hunt effectively, as the birds generally do not scratch strongly through leaf litter while foraging. In the Northeast, Grasshopper Sparrows construct their domed, cup-shaped nests of grasses and sedges at the base of clumps of vegetation (Vickery 1996), such as those formed by native warm-season grasses. Non-graminoid vegetation also contributes to the habitat value, as male Grasshopper Sparrows frequently sing from favored, fixed perches such as shrubs or forb stems.

In Massachusetts, Grasshopper Sparrow habitat generally occurs on glacial outwash or human-disturbed landscapes with well- to excessively-drained soils of loamy fine sand or coarser texture. These soils are typically nutrient (especially nitrogen) poor, dry, and acidic. Native warm-season grasses can tolerate these conditions where many plants cannot; in fact, in "better" soils, the target native warm-season grass species will likely be outcompeted over time by non-native cool-season grasses and "weedy" meadow species. The proper substrate is critical to the formation of the sparse and somewhat stunted vegetation structure preferred by Grasshopper Sparrows.

Grasslands

Grassland habitats in Massachusetts range from the dense, thatchy, hayfield-type cover preferred by some grassland nesting birds, to the lower, more sparse cover preferred by Grasshopper Sparrows. The plant species composition and density of any grassland are closely tied to the site's soil characteristics – for example, the sparse cover preferred by

Grassland Restoration

Grasshopper Sparrows tends to occur on sandy, dry, nutrient-poor soils. Therefore, a coarse-textured, nutrient-poor substrate is the foundation for creating successful Grasshopper Sparrow breeding habitat.

Vegetation structure, including height and growth form, also varies in different types of grasslands. The objective for this grassland is to create a clumpy distribution of medium height bunch grasses, intermixed with a minor forb and shrub component. The appropriate species to accomplish this objective are native, warm-season grasses. These grasses are called “warm-season” because their optimum growth period is the summer. Many warm-season grasses are clump forming, and can form sparse stands. Where the common forage grasses – often introduced from Europe, sod-forming, and cool-season adapted – do best on more nutrient-rich, loamy soils, native warm-season grasses are adapted to dry, nutrient-poor, sandy soils typical of glacial outwash deposits (or on human-influenced landscapes where topsoil has been removed). Because of the foraging and nesting behaviors described above, Grasshopper Sparrows tend to prefer grasslands dominated by native warm-season grasses.

Establishing a native warm-season grassland requires the appropriate seed mix, seedbed condition, and seeding equipment, among other factors. Generally, the seeding rate for Grasshopper Sparrow habitat will be low, and it is intended that additional graminoid and forb species will spread in from adjacent, undisturbed areas.

A restored native warm-season grassland requires several growing seasons to reach target plant height and stem density. Since these species invest their initial growth in the root system, as an adaptation to poor soils, full aboveground structure may not appear until the third or fourth year. The grassland must be monitored in the planting year and in the following growing seasons to gauge germination and growth, but site managers must not be too quick to judge the planting as a failure if the grassland appears to be putting on little growth in the early years. With that in mind, site planners will need to be prepared for an extremely sparse grassland cover within the restoration areas for at least three years.

Grassland Establishment

Substrate

The following recommendations are based on information from grassland habitat experts in Maine, Connecticut, and Massachusetts (P. Vickery, J. Dickson, and W. Petersen, personal communications). The recommendation is also informed by the results of a soil test from a sample collected at the Westover Air Reserve Base (Chicopee, MA). The sample was collected from an area that provides breeding habitat for Grasshopper Sparrows, and that has a similar vegetation structure and species composition as desired for this project. The results of the soil analysis by the University of Massachusetts Soil and Plant Nutrient Testing Lab are attached. All macronutrients in the sample were

Grassland Restoration

determined to have low concentrations (indeed, nitrogen was reported at 0 ppm), indicating the generally poor nutrient environment in the area.

Soils in the grassland restoration areas should be coarse textured (sands or loamy sands) similar to Merrimac or Hinckley series soils, for examples. These soils resemble those that remain exposed in many abandoned gravel pits throughout Massachusetts. To the degree possible, the top of the soil surface should be 0.9 meters (3 feet) above the high water table, to allow for the growth of grass roots and to favor soil drainage (Dickerson *et al.* 1998). This soil depth could consist of both native and placed soil materials, provided that the texture through the profile is coarse. Soil should consist of more than 70 percent sand by weight, with between 2 and 30 percent silt and between 1 and 15 percent clay (Soil Survey Division Staff 1993). Sand should generally be medium to coarse textured (grain size of 0.25 mm to 1.0 mm). Pebbles (2 to 75 mm) are acceptable at less than 5 percent by weight to create a slightly gravelly soil. Additionally, organic matter (clean compost) at less than 2 percent by weight for the top 15 cm of soil will modestly improve its water-holding capacity.

Warm-season grassland restoration calls for low nitrogen levels (less than 5 to 10 ppm over the yearly cycle) and moderate levels of potassium and phosphorous (University of Massachusetts Soil and Plant Tissue Testing Lab, personal communication). Typical ranges for other nutrients in poor grasslands include: potassium from 5 to 60 ppm; phosphorus from 5 to 25 ppm; calcium and magnesium levels from 5 to 30 ppm. These ranges are all low relative to those desirable for a productive hayfield or other densely vegetated grassland, yet the intention here is to create a nutrient-poor soil where potential competition against the native warm-season grasses is limited, and even the planted grasses remain sparse. Optimum soil pH is 5.5, which also limits the availability of some nutrients. Table 1 summarizes the desired soil texture and nutrient values for the proposed grassland areas.

Table 1. Recommended Soil Characteristics

<u>Texture</u>	
Soil material	Coarse-textured
Sand	> 70%; 0.25 mm to 1.0 mm (medium to coarse sand)
Silt	2 to 30%; 0.002 to 0.05 mm
Clay	<u>1 to 15%</u> ; < 0.002 mm
Rock fragments	100%
Organics	≤ 5%; 2 to 75 mm (pebbles)
	≤ 2%
<u>Nutrients</u>	
Nitrogen	5 to 10 ppm through yearly cycle
Potassium	5 to 60 ppm
Phosphorous	5 to 25 ppm
Calcium	5 to 30 ppm
Magnesium	5 to 30 ppm
<u>pH</u>	
Optimum	5.5
Range	5.1 to 6.0

Soil tests should be conducted prior to planting to ensure that pH and nutrient levels of the substrate are appropriate for warm-season grasses. A common practice in grassland establishment is to lime the soil prior to planting, which generally raises the pH and makes more nutrients available for plants. This practice is strongly discouraged in the establishment of a warm-season grass stand, as increased nutrients and pH can promote the growth of competing weed species.

The soil should be firmly compacted using a roller or similar equipment prior to seeding to ensure good seed-to-ground contact. Compaction is adequate when a footprint presses less than 13 mm (0.5-inch) into the ground (Duebbert *et al.* 1981). The grassland areas should also be flat and level to the extent possible.

Much of the present grassland area on the site appears to occur on soils within the range of the desired soil condition. However grasslands are proposed in areas that are presently shrubland or paved, either partially or continuously. In these areas, following the removal of the vegetation and/or pavement, soil tests should be made to ascertain the soil characteristics. It is possible that these currently obscured soils would be appropriate for the establishment of sparse, native warm-season grassland with little or no amendment. If soil test results indicate that the texture and nutrient characteristics are similar to those described above, these soils could be used in place or elsewhere on the site where proposed grasslands are to be established. In contrast, some soils (e.g. fill derived from wetland soils with high organic content, or fine-textured soils) are not appropriate for the desired grassland condition, and should not be used as a substrate for the proposed grassland areas.

Planting

The seed mix, seeding rate, timing of planting, and equipment used for planting are all critical components of successfully creating a sparse native grassland.

Seed Mix

The recommended seed mix is detailed in Table 2. The existing Grasshopper Sparrow habitat at the former South Weymouth Naval Air Station is dominated by little bluestem (*Schizachyrium scoparium*), and includes areas of Indian grass (*Sorghastrum nutans*) and other graminoids at low density with round-headed bush clover (*Lespedeza capitata*), yellow wild indigo (*Baptisia tinctoria*), bristly dewberry (*Rubus hispida*), and other forbs. Instead of aiming to replicate this species mix by seeding a large number of the species observed, we recommend seeding with the intended dominant grasses and allowing the secondary species to gradually seed themselves into the restored areas from the adjacent patches of retained grassland.

Table 2. Recommended Seed Mix

<u>Common Name</u>	<u>Scientific Name</u>	<u>% in Mix (by Weight)</u>
Little bluestem	<i>Schizachyrium scoparium</i>	60
Indian grass	<i>Sorghastrum nutans</i>	25
Common hairgrass	<i>Deschampsia flexuosa</i>	5
Poverty grass	<i>Danthonia spicata</i>	10

In portions of the planted grassland that are isolated from areas of retained grassland, colonization by desired non-planted graminoids and forbs could take many years. In these cases, round-headed bush clover will be added to the seed mix at approximately 0.016 ounces per acre¹. While co-planted forbs will compete with the grass seedlings, at this low seeding rate competition should be minimal.

Although most of the proposed grassland areas should be flat and level, some areas may be sloped and therefore subject to erosion. In erosion-prone areas, a fast-growing annual grass species, such as annual ryegrass (*Lolium multiflorum*), can be added to the seed mix to hold the soil while the native warm-season grasses become established. If used at all, co-planting will be limited to erosion-prone areas, as it introduces competition and another potential weed. Annual ryegrass will provide cover in the first year after planting, but will tend not persist in the grassland over time.

Seeding Rate

The grassland should be planted at 4 to 6 pounds pure live seed (PLS) per acre (Ernst Conservation Seeds, personal communication). This seed rate is lower than the 8 to 10 pounds per acre recommended for grassland planted for hay production or wildlife

¹ Round-headed bush clover, like the grasses in the recommended species mix, has very light seeds—approximately 128,000 seeds per pound. The 0.016 ounces per acre planting rate will result in approximately 1 seed per 340 square feet, if evenly distributed.

Grassland Restoration

habitat purposes. In this case, however, the low seeding rate should ensure that the intended areas of open soil occur between the clumps.² These patches of open ground between clumps will contribute to optimal foraging and nesting habitat for Grasshopper Sparrows and will provide soil niches for colonization by other plant species from surrounding areas, leading to a slightly increased plant species diversity as intended.

Timing

Late April is the optimal seeding period for this site. Early spring planting gives the seedlings the advantage of higher springtime soil moisture, enabling them to be well established before the onset of hotter and drier summer weather. Soil temperature limits the earliest seeding date – warm-season grasses require a soil temperature of at least 50° Fahrenheit to germinate (Dickerson *et al.* 1998). Later spring planting, when rains are less frequent, leads to drought stress on the seedlings and will severely decrease the chances of successful grassland establishment. Supplemental watering may be necessary if normal rains do not occur. Although supplemental watering may not be practical over tens of acres, in the case of spring drought it could alleviate the potential for stand failure.

Equipment

Native warm-season grass seeds should be installed with a no-till seed drill designed specifically for this purpose, such as the Truax FlexII grass drill. The drill should be set to a depth of 0.25 inch – some seed should be visible on the soil surface after seeding. Seed drills ensure adequate seed-soil contact, appropriate seed depth, and even distribution of seeds, providing the best chance for germination and seedling success at the recommended seeding rate.

The seeds in the recommended seed mix have fluffy structures (aristae), which can tend to make them clog in a seeder. Even though native grass seed drills are equipped with augers/agitators in the seed box to maintain the flow of seeds through the machine, problems with seed flow can still occur. The seed tubes should be checked periodically while seeding to ensure that seed is properly flowing through, and any clogs should be cleared. If clogging is too frequent or if seed does not flow, the seed drill may need a carrier (plain cat litter or dry vermiculite), mixed in equal amounts by weight with the seed mix.

Following seeding, the area must be rolled to ensure good seed-to-soil contact. The seeded area should be rolled twice, with the second pass orthogonal to the first. Although a roller is best tool for the task, some grasslands in the Northeast have been established where this “rolling” is accomplished by tracking the area with a bulldozer until the entire area is covered with tracks (Kelsey 2000). Rolling or tracking will help to prevent desiccation and limit the potential for the seeds to be picked over by birds or blown away by wind.

² As native warm-season grass seeds are extremely light (averaging approximately 380,000 seeds per pound for the four species in the recommended mix), the 4 to 6 pound per acre seeding rate will result in approximately 31 seeds per square foot. Expected low seedling establishment rates should create the desired sparse distribution of plants as the stand matures.

Establishing Grassland with a Shrub Component in Taxiway C

The project area referred to as Taxiway C is intended to be restored to grassland with a higher shrub component than is typical of Grasshopper Sparrow habitat so that it will continue to function also as turtle nesting habitat. Taxiway C consists of a 45 meter (150 foot) wide strip of solid pavement, well-maintained until recently, bounded on either side by a 40 meter (130 foot) wide skirt of long-unmaintained pavement which is now thoroughly broken up by shrubby growth and in most areas nearly obscured by leaf litter. Taxiway C is bounded by a wetland area to the west and a channelized stream to the east. Even though the skirt areas on both the east and west side of Taxiway C currently appear to be well-vegetated, the old broken pavement will tend to restrict turtle nesting activity and should be removed. In order to maximize the size of the grassland habitat restored in the Taxiway C area, clearing and restoration will extend beyond the edge of this skirt, to a flagged buffer from the adjacent wetlands.

In areas where pavement has been removed, grassland establishment should follow the above methods; however to recognize and encourage the value of this section of the property as turtle nesting habitat, the outer edges will be restored and managed to have a higher shrub component than in other grassland areas. Grass seeding should be accomplished as on the rest of the site, with a no-till drill-seeder. Since this large piece of farm-type equipment is not easily maneuverable among dense shrubs, grass seeding will need to occur before installation of shrubs. Foot and vehicle traffic within the drill-seeded areas will have limited impact on germination and growth in the days immediately following seeding, but increased potential impact in the weeks following. To minimize impacts on grass seedlings, shrub installation should occur within a week of drill-seeding.

Shrub cover in ideal Grasshopper Sparrow habitat is generally below 35% with one review finding an average of 10% shrub cover over a range of sites. For Taxiway C, the shrub cover should be installed and managed so that shrub density decreases with distance from the grassland edge, ranging from 30% cover at the edge of clearing to <10% in all areas greater than 30 meters (100 feet) from the edge. Establishment of this shrubby grassland should be planned in three 5-meter bands running parallel to the adjacent wetland buffers with the first band (closest to the buffers) established at 30% shrub cover, the second band at 20% cover, and the third band at 10% cover. Areas beyond 15 meters from the edge of clearing would be restored with grasses and no shrubs.

The first band will be almost entirely within existing shrubby areas beyond the limit of broken pavement. Since this area is currently at greater than 30% shrub cover, the target percent cover can be achieved by removal of existing shrubs as necessary. Invasive species should be prioritized for removal, followed by tall-growing woody species such as red maples and white birches. Gray birch, aspens, and cherries should be thinned to reach 30% cover. Cut stumps should be treated with an appropriate herbicide to prevent resprouting. After thinning, the groundcover in this section will consist primarily of leaf litter with a few forbs and grasses. The groundcover here should be allowed to establish itself without grass reseeding.

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Within the second and third bands, which should fall within the areas where broken pavement will need to be removed, the eventual mix of shrub species should mimic that currently found in the skirt areas of Taxiway C. If at all possible, shrubs should be retained during pavement removal, although not at the cost of leaving pavement in the preferred turtle nesting area around the base of the shrub. This option would provide the lowest mortality risk to the shrubs, although it would somewhat hinder movement of grass seeding equipment. In this case, drill seeding as much of the shrubby area as is possible would be acceptable.

If removing pavement while retaining shrubs in place proves infeasible, shrubs should be replanted on site. One method for replanting would be to restore the length of Taxiway C in a 'rolling' fashion, with the southern-most ~100-meter section cleared of pavement, prepared with suitable soil, and drill-seeded with grasses, then replanted with shrubs removed from the second ~100-meter section as pavement removal proceeds. A second method would involve staging the shrubs in a suitable part of the project area and maintaining them as appropriate (e.g. providing water) until the site is prepared for planting. The least preferable method for installing shrubs would be to acquire plant material from off-site. Representing the *in situ* plant diversity with purchased plants would be very difficult; purchased material would likely face higher mortality from the stress of transportation and handling; and purchased material would likely be restricted to a single variety of each species which may not be well adapted to the site.

Shrub height, which should decrease with distance from the edge of clearing, can be influenced with species selection. The first 10-meter band should have a target maximum height of 4 meters (13 feet) and should include gray birch, quaking aspen, and pin cherry representing roughly 50% of all shrubs with the balance made up of lower-growing species. The second band, with a target maximum height of 2 meters (6.5 feet), should consist mostly of highbush blueberry, bayberry, and *Viburnum* spp. The third band should have a target maximum height of 1 meter (3 feet) and consist almost entirely of sweetfern.

Shrubs should be retained or installed within each band in clusters of 4-5 shrubs rather than evenly distributed. If each clump covers four square meters, the first 5-meter wide band (target 30% shrub cover) should have roughly four clumps per 10 meters length; the second band (target 20% cover) should have two or three clumps per 10 meter length; and the third band (target 10% cover) should have one clump per 10 meter length.

Shrubland Conversion

In addition to areas where native grassland will be established on bare soil, some areas where former grasslands have matured into shrublands or young forest will be restored to grassland. The areas should be cleared with a brush hog or similar implement in the early

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spring or late fall. When cut, shrub stumps should be treated with an appropriate herbicide following standard application procedures.

The next step for re-establishing grassland in these areas would depend on the species composition of the vegetation remaining following the elimination of shrub and tree species. If native grasses cover more than 30 percent of the area, no additional planting or preparation would be required. If native grasses cover less than 30 percent of the area, supplemental seeding using the planting methods described above would be appropriate.

Reducing Thatch in Existing Grasslands

As discussed above, Grasshopper Sparrows tend to prefer grasslands with exposed patches of soil between clump grasses. Grasslands with a thick build-up of dead stems, or thatch, restrict access for feeding on the ground. A <5-acre area of grassland west of the southern end Taxiway C which is to be retained currently has a heavy build-up of thatch. This area should be treated to reduce thatch and increase percent of exposed soil to increase habitat quality. Burning and raking are two potential methods.

Prescribed burning is the preferred method for restoring over-dense grasslands to density more typical of Grasshopper Sparrow habitat. A burn of the area under consideration could most likely be completed in a single day and could possibly be scheduled as a training session for prescribed burn crews and local fire department staff. Prescribed burning requires careful planning and the on-site expertise of a qualified burn crew. Weather conditions need to fall within acceptable ranges for wind, temperature, and humidity. Potential resources include:

- David Crary, Cape Cod National Seashore, (508) 349-3785 Ext. 247
- Bill Patterson, UMass/Amherst, 413-545-1970
- Tim Simmons, Natural Heritage & Endangered Species Program, 508-389-6325

Raking to reduce thatch and increase exposed soil would involve driving over the area with a York Rake type tractor attachment. Teeth should be set to remove thatch and lightly scarify the soil surface. Thatch material should be removed from the area and disposed of outside of the habitat restoration zone.

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Appendix – Soil Testing Results

Grassland Restoration

SOIL ANALYSIS REPORT FOR GRASS-LEGUME HAY AND PASTURE

11/08/07

SOIL AND PLANT TISSUE TESTING LAB
 WEST EXPERIMENT STATION
 UNIVERSITY OF MASSACHUSETTS
 AMHERST, MA 01003

LAB NUMBER: S071105-302
 BAG NUMBER: 74548

SOIL WEIGHT: 7.04 g/5cc
 CROP:

TOM LAUTZENHEISER
 127 COMBS RD
 EASTHAMPTON, MA 01027

COMMENTS: EMAIL: TLAUTZENHEISER@MAS
 SAUDUBON.ORG

SAMPLE ID: WEST01

 RECOMMENDATIONS FOR GRASS-LEGUME HAY AND PASTURE:

Limestone requirement for grass-legume mixtures containing alfalfa is 1.0 tons per acre or 50 lbs/1000 sq.ft.

For grass and mixtures containing any other legumes, the limestone requirement is 1.0 tons per acre or 50 lbs/1000 sq.ft.

Limestone containing at least 10% calcium carbonate equivalence from magnesium sources is recommended.

*** RECOMMENDATION FOR GRASS-LEGUME ESTABLISHMENT ***
 Apply 0-50 lb/acre nitrogen, using lower rate if legume is included.
 Apply 60- 70 lb/acre P2O5 and 140-150 lb/acre K2O. Recommended K2O for first year after seeding year 110 lb/acre. Use nitrogen rates below.

*** RECOMMENDATION FOR TOPDRESSING ESTABLISHED GRASS-LEGUME HAYCROP ***
 Apply nitrogen if less than 50 percent legume: 50 lb/acre early spring, 50 lb/acre after first cut.
 Apply 60- 70 lb/acre P2O5 and 110-120 lb/acre K2O.

*** RECOMMENDATION FOR TOPDRESSING ESTABLISHED GRASS-LEGUME PASTURE ***
 Apply nitrogen if mostly grass: 50 lb/acre early spring & again in August.
 Apply 60- 70 lb/acre P2O5 and 70- 80 lb/acre K2O.

MICRONUTRIENT	PPM	SOIL RANGE	MICRONUTRIENT	PPM	SOIL RANGE
Boron (B)	0.0	0.1-2.0	Copper (Cu)	0.1	0.3-8.0
Manganese (Mn)	0.8	3 - 20	Iron (Fe)	15.5	1.0- 40
Zinc (Zn)	0.3	0.1- 70	Sulfur (S)	12.0	1.0- 40

 SOIL pH 5.1 NITROGEN: NO3-N = 0 ppm
 BUFFER pH 6.8 ORGANIC MATTER: 1.8 % (Desirable range 4-10%)

NUTRIENT LEVELS: PPM	Low	Medium	High	Very High
Phosphorus (P) 7	XXXXXXXXXXXX			
Potassium (K) 17	XXXX			
Calcium (Ca) 32	X			
Magnesium (Mg) 6	X			

CATION EXCH CAP 1.5 Meq/100g PERCENT BASE SATURATION MICRONUTRIENT LEVELS
 K= 2.1 Mg= 2.3 Ca= 7.7 ALL NORMAL

EXTRACTABLE ALUMINUM: 131 ppm (Soil range: 10-250 ppm)

The lead level in this soil is low.

VISIT www.umass.edu/plsoils/soiltest FOR FURTHER INFORMATION ON SOIL TESTING AT UMASS.
 TO CONTACT THE LAB: EMAIL soiltest@psis.umass.edu PHONE (413-545-2311).

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Soil and Plant Nutrient Testing Lab
 West Experiment Station
 University of Massachusetts
 Amherst, MA 01003
 413.545.2311
<http://www.umass.edu/plsoils/soiltest>

11/07/07

TEXTURAL ANALYSIS RESULTS

Customer Name: Tom Lautzenheiser
 127 Combs Road
 Easthampton, MA 01027

Sample ID: S071105-302

Customer Designation: West 01

USDA SIZE FRACTIONS

Main Fractions	Size (mm)	Percent
Sand	0.05-2.0	95.0
Silt	0.002-0.05	3.4
Clay	< 0.002	1.6
Total	< 2.0	100.0

Sand Fractions	Size (mm)	Percent
Very Coarse	1.0-2.0	1.5
Coarse	0.5-1.0	12.8
Medium	0.25-0.5	37.6
Fine	0.10-0.25	34.9
Very Fine	0.05-0.10	8.3
		95.0

Silt Fractions	Size (mm)	Percent
Coarse	0.02-0.05	2.0
Medium	0.005-0.02	0.8
Fine	0.002-0.005	0.7
		3.4

PERCENT OF WHOLE SAMPLE PASSING

Size (mm)	Sieve #	%
2.00	#10	99.6
1.00	#18	98.2
0.50	#35	85.5
0.25	#60	48.0
0.10	#140	13.3
0.05	#270	5.0
0.02	20 um	3.0
0.005	5 um	2.3
0.002	2 um	1.6

USDA Textural Class = sand

Gravel Content = 0.4%

COMMENTS:

Attachment 5A

Grassland Bird Monitoring Protocol

Qualified observers will monitor the native grassland areas at the former South Weymouth Naval Air Station to determine the success of on-site habitat restoration and use by Grasshopper Sparrow and Upland Sandpiper, and to provide information to guide habitat management over the long term. Breeding bird surveys will document use of the restored habitat by grassland-breeding birds.

Grassland Bird Monitoring

A qualified observer will conduct surveys of all grassland habitat areas at the site to document the number and location of Grasshopper Sparrows, Upland Sandpipers, and other grassland birds using the site for breeding. Monitoring will consist of a standard walking transect/spot map protocol over three survey visits during the breeding season with at least one survey in May and at least two surveys in June. The protocol is detailed in Table 1, below. A sample field data sheet is attached.

The grassland bird survey protocol was based on methods developed by Mass Audubon (Jones *et al.* 2001) and the Massachusetts Natural Heritage and Endangered Species Program (Melvin 2004). This protocol accounts for differences in bird behavior, detectability, and/or degree of sexual dimorphism by using different criteria to determine what counts as an observation.

After the completion of the final annual monitoring event, the observer will prepare a report complete with maps and data from the site visits. The report will also include a discussion of the results and their management implications, with specific management recommendations if necessary.

Although Grasshopper Sparrows and Upland Sandpipers are the focus of this survey, the observer will also record any observations of eight other grassland bird species that could also occur on the site. The presence of more than incidental numbers of some of the other grassland bird species could indicate that the grassland mitigation areas do not match the needs of Grasshopper Sparrows, as other species may have different habitat requirements. For example, a large number of Bobolinks (*Dolichonyx oryzivorus*), which typically use grasslands such as hayfields as breeding habitat, would indicate that the grassland is too densely vegetated.

Grassland Bird Monitoring Protocol

Grassland bird monitoring will be conducted annually for the first 5 years following the project's completion, with follow-up monitoring in years 10, 15, and 20 and continuing on a five-year interval in perpetuity. The initial 5 years of annual surveys should be adequate to cover the time when the planted grasslands are maturing (which we anticipate taking three growing seasons), and will also allow a comparison of the avian communities in the planted and retained grassland habitats through the stand establishment period. A pre-construction survey will be completed in 2008, implementing these methods as much as is feasible. The 2008 survey will include particular attention to the possible presence of Vesper Sparrows.

Table 1. Grassland bird monitoring protocol.

Number of surveys	Three surveys, conducted on non-consecutive days.
Timing of surveys (dates)	One survey will occur during the last week of May, in the period of greatest Grasshopper Sparrow singing displays; earlier dates risk detecting migratory, non-breeding individuals. The second and third surveys will be in mid to late June, to detect second-clutch birds or young.
Survey interval	Approximately 5 days between the first two survey dates, and at least 15 days between the second and third surveys.
Duration of daily survey period	Counts will begin no earlier than sunrise and end no later than 0900 hours or before the temperature reaches 21° C (70° F).
Survey method	The surveyor will conduct a walking transect/spot survey, using an appropriately scaled, current orthophoto or other accurate base map, and a GPS unit to record the path of travel. The surveyor will walk slowly along the transect route, and is allowed to stop, listen, and use binoculars and any other aids to accurately identify the species, number, and location of grassland birds.
Width of transects	Approximately 100 meters (or approximately 300 feet) apart, in areas where multiple passes are needed to thoroughly cover the area.
Weather conditions	Breeding Bird Survey (BBS) acceptable weather guidelines will be followed (USGS & CWS 1998). Surveys will be conducted under satisfactory weather conditions: good visibility, little or no precipitation, and light winds. Occasional light drizzle or a very brief shower may not affect bird activity, but fog, steady drizzle, or prolonged rain will be avoided. Counts will be made during mornings when the wind is less than 8-mph. Wind speed can be estimated by observing surrounding woody vegetation. If the tips of small twigs are

Table 1. Grassland bird monitoring protocol.

	swaying constantly, winds are generally greater than 8 mph. If small twigs are swaying intermittently, surveys can take place.
Route	The surveyor will determine a route covering all of the habitat areas. The starting point and path through the habitat areas will differ for all three replicates to minimize effects of visitation path on survey results.
Bird observations	If necessary, the surveyor will also take notes of field conditions along the route, if inappropriate for Grasshopper Sparrows (e.g. large areas of tall grass, dense shrubs, etc.). The surveyor will note the location of each bird observed within the grassland habitat areas following the counting criteria for each species as listed below. The surveyor will mark the approximate location of each observed bird on a current orthophoto field map printed at a maximum scale of 1:2,000, using the standard species codes listed below. All observations will also be tallied on a corresponding field data sheet.
Counting Criteria	
All adults seen or heard	Upland Sandpiper (UPSA) Killdeer (KILL) Eastern Meadowlark (EAME) Horned Lark (HOLA)
Adult males observed	Bobolink (BOBO) Red-winged Blackbird (RWBL)
Singing adults	Grasshopper Sparrow (GRSP)* Savannah Sparrow (SASP) Vesper Sparrow (VESP)

* Only singing adult Grasshopper Sparrows are included for two reasons. First, singing indicates that the bird is on a breeding territory, and not just passing through the area. Second, hearing the bird's song minimizes the possibility that the observer will misidentify a bird that could not be seen clearly. If an observer can confidently identify an observed, non-singing Grasshopper Sparrow, that through its behavior (carrying food, seen feeding young, etc.) can be determined to be breeding, the observer should record the bird and note its behavior.

Reporting

Following the conclusion of each monitoring season, and no later than the end of the year, a report summarizing the grassland bird monitoring results will be prepared and submitted to the Natural Heritage and Endangered Species Program and the site manager.

References

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Grassland Bird Monitoring Field Data Sheet

Site: _____

Latitude (DD): _____

Longitude (DD): _____

Visit: (of 3) _____

Survey Info	Comments
Date: _____	_____
Start time: _____	_____
End time: _____	_____
Observers: _____	_____
Temp (F): _____	_____
Wind (mph): _____	_____
Precipitation: none, drizzle, showers, rain	_____
Cloud cover: % clear	_____

Species	Criteria	Tally	Comments
UPSA	all adults (ad)	_____	_____
KILL	all adults (ad)	_____	_____
EAME	all adults (ad)	_____	_____
HOLA	all adults (ad)	_____	_____
BOBO	all males (m)	_____	_____
RWBL	all males (m)	_____	_____
GRSP	all singing males (m*)	_____	_____
SASP	all singing males (m*)	_____	_____
VESP	all singing males (m*)	_____	_____

OTHER NOTES:

Attachment 6A Grassland Monitoring and Management Protocols

Qualified observers will monitor the native grassland areas at the former South Weymouth Naval Air Station to determine the success of on-site habitat restoration and use by Grasshopper Sparrow and Upland Sandpiper, and to provide information to guide habitat management over the long term. Vegetation surveys will document progress of grassland establishment and will provide data necessary for long-term maintenance of grassland habitat appropriate for the target species. Vegetation data will be critical to long-term adaptive management of the grasslands.

Grassland Monitoring

Vegetation monitoring is necessary at this site to track and manage for vegetation composition and structure appropriate for breeding Grasshopper Sparrows, which prefer to breed in grassland with sparse, patchy cover less than 0.5 meters tall, intermixed with forbs, few patches of bare ground, moderate to high leaf-litter cover, and minor shrub cover. They tend to avoid grasslands that are densely vegetated or where vegetation is tall. Table 1 summarizes the general composition of Grasshopper Sparrow breeding habitat, collected from several studies from throughout its range (as cited in Dechant *et al.* 1998, rev. 2002).

Table 1. Summary of Grasshopper Sparrow Habitat Vegetation Composition and Structure

<u>Component</u>	<u>Range of Values</u>	<u>Notes</u>
Vegetation height	28 to 40 cm	
Percent Grass Cover	30 to 90	
Percent Forb Cover	Less than 30	Average value of 18 percent from 9 studies
Percent Shrub/Woody Cover	Less than 35	Average value of 10 percent from 7 studies
Percent Litter Cover	34 to 99	
Percent Bare Ground	Less than 20	Bare ground is critical to feeding technique
Litter Depth	Less than 5 cm	
Perch Sites	Less than 1.5 m	Scattered perches may be desirable

The objectives of this vegetation monitoring are to evaluate stand establishment, check for invading/competing species, and track structural changes in the grassland over time. The monitoring protocol is designed to track the components of the vegetation that are important for Grasshopper Sparrow habitat, using a standard method that is repeatable over many years. Results from vegetation monitoring will be used to direct actions described in the grassland management plan. This type of monitoring-informed adaptive management approach is critical to the long-term viability of early successional habitats such as grassland.

Mitigation Recommendations

The newly planted grassland will face obstacles to successful establishment including drought and invasion by native and non-native weedy plant species. The establishment phase monitoring protocol will call attention to these potential problems and motivate appropriate management steps. The long-term monitoring protocol will ensure that restoration and management actions have created and are maintaining appropriate grassland bird habitat. Monitoring will involve detailed survey of permanent plots as well as supplemental survey consisting of more rapid inventory of non-permanent plots and broader characterization of sections of the grassland area.

Detailed Vegetation Surveys

The protocol for detailed surveys is derived from the *Monitoring Manual for Grassland, Shrubland, and Savanna Ecosystems* (Herrick *et al.* 2005). Four permanent, randomly located plots will be established in the grassland areas. Each plot will consist of three 50-meter (164-foot) transects, radiating from the plot center like spokes on a wheel. Each transect will begin 5 meters (16 feet) from the plot center, and extend directly away from the center. Information collected along each transect will include photographs, vegetation species composition and structure via line-point intercept methods, and invasive and woody plant data in subplots along each transect. Once plots are established, complete data collection should take an experienced two-person crew less than 2 hours per plot.

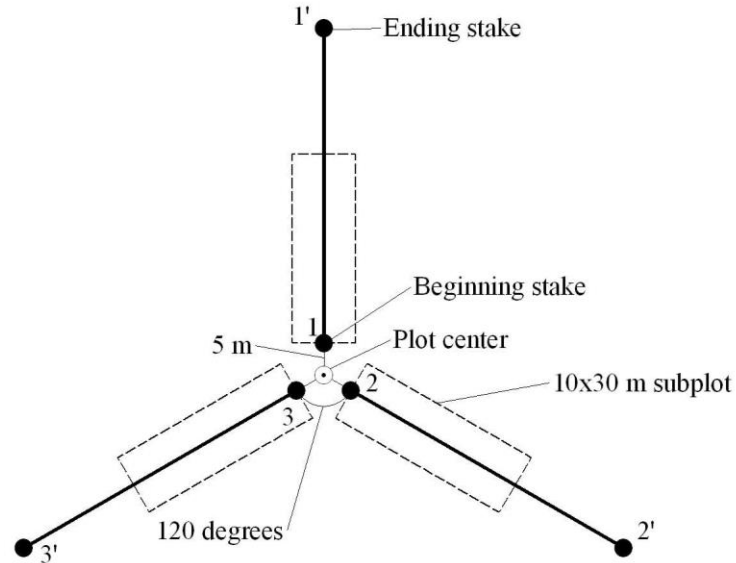
Plot Establishment

Plots will be located in a stratified-random manner within the grassland habitat areas, such that two plots will be established on the largest proposed area of native grassland on the site, and the other plots will be established on smaller areas. Also, if possible, two plots will be in retained grassland areas, and two plots in planted grasslands. Plots will be entirely in either planted or retained grasslands. Plot centers will be at least 50 meters (164 feet) from the edge of the grassland area, and at least 200 meters (328 feet) apart from each other. A GPS unit will be used to record the center point of each plot.

Plot centers, as well as the beginning and endpoints of the three transects at each plot, will be marked with 0.6-meter (2-foot) long, 10-millimeter (3/8-inch) diameter rebar stakes, driven flush into the ground. The rebar stakes will ensure that the plot centers and transect ends can be relocated with a metal detector for years to come. A 1-meter (3-foot) long, 20-millimeter (3/4-inch) diameter PVC pipe will then be driven 0.3 meters (1 foot) into the ground over each rebar stake for visibility. If the PVC pipe is broken during mowing, it will be replaced. Each transect will begin 5 meters (16 feet) from the plot center. The first transect stake will be located due north (true) of the plot center, while the other two will be spaced at 120-degree intervals (120 degrees and 240 degrees). The ends of the transects will be 50 meters (164 feet) away from the beginning stakes, along the line from the center stake through the beginning stake, and will be similarly marked with rebar and PVC pipes. The layout of the vegetation monitoring plots is shown in Figure 1.

Mitigation Recommendations

Figure 1. Grassland monitoring plot layout. Three 50-meter transects are positioned 120° relative to each other, beginning 5 meters from central plot stake. The first transect runs true north. 10x30-meter subplots extend along each transect, from transect beginning stakes. Plot centers will be at least 50 meters from the edge of grassland, and at least 200 meters apart from each other.



Data Collection

Photographs -- Photographs will be made from the plot center viewing down along each transect. The photographer will hold the camera 1.5 meters (5 feet) over the ground, above the center stake of the plot—using a PVC pipe or other aid if necessary—and will align the bottom of the target transect's beginning stake with the bottom center of the frame before releasing the shutter. At a minimum, the length of the transect will be visible in the photograph. Each photograph will also include photo identification information, including date, time, plot number, and transect direction, written on a dry-erase board or similar item placed in the photo. This board may be hung on or leaned against the beginning stake.

Line-Point Intercept and Vegetation Height -- To make a relatively quick assessment of vegetation composition and structure, a line-point intercept method will be used along each transect. A metric measuring tape will be tautly strung between the transect's beginning and ending stakes. A wire stake or similar sampling tool (such as a long pin flag), approximately 1 meter long and held vertically, will be dropped to the ground at each meter mark along the tape. The point where the wire touches the ground is the sample point.

Starting from the top of the stake, each species that intersects with the stake will be recorded, whether live or dead. A species will be recorded only the first time it intersects the stake at each sampling point. The ground surface feature (e.g. plant base, litter, stone, or bare soil) under the stake will also be recorded. A field data sheet for this method is attached.

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The wire stake will be marked with a ring of colored tape (or similar) every 10 centimeters (4 inches), allowing a quick estimation of vegetation height to the nearest half-decimeter. The height of the highest intersection of vegetation with the stake will be recorded.

Subplots for Invasive and Woody Plants -- A 10 by 30-meter (30 by 100-foot) subplot will be monitored along each transect to detect and estimate the coverage of invasive and woody plants in the plot area. The baseline of the subplot will be centered on the transect's beginning stake, and will extend 5 meters (16 feet) perpendicular to either side of the transect line. The subplot's end line will then be located at 30 meters (100 feet) along the transect line.

Within each subplot, a thorough search for invasive and woody species will be made. For this search, the subplot will be divided into height layers relevant to Grasshopper Sparrow habitat structure: less than 0.10 meters (4 inches), 0.10 meters to 0.40 meters (1.3 feet), and greater than 0.40 meters. Each invasive or woody species encountered in each height layer will be listed, and its percent cover estimated by cover class in the layer. Sociability classes will also be assigned for each species. Cover and sociability classes are provided in Table 2. A field data sheet for this method is attached.

Table 2. Cover and Sociability Classes for Vegetation Subplots

<u>Class</u>	<u>Cover (%)</u>	<u>Sociability</u>
+	< 1	Single plant
1	1 to 5	Growing solitarily
2	6 to 25*	Small groups; small tussocks
3	26 to 50	Small patches; large tussocks
4	51 to 75	Large patches; mats
5	> 75	Great crowds; mats covering much of plot

*Cover class 2, if desired, can be divided into 2- (6 to 12) and 2+ (13 to 25)

Supplemental Surveys

Permanent plot based data collection will not be sufficient to ensure success of the grassland restoration areas. Supplemental surveys will serve to provide broader quantitative and complete qualitative assessments of grassland establishment and development. In the establishment phase, grassland maintenance will be focused on reducing weed pressure on the developing seedlings. Therefore, quantitative seedling monitoring surveys of the entire planted area will begin 4 to 6 weeks after planting and qualitative inspections of the entire grassland area will occur throughout the establishment phase twice annually in the years beyond.

Seedling Monitoring Surveys

To monitor seedling density, data will be collected from a minimum of 50 randomly placed samples from throughout the seeded areas (one sample plot per acre is recommended; Dickerson *et al.* 1998). Sampling will consist of dropping a square frame

Mitigation Recommendations

covering 0.1 square meters (1 square foot) on the ground at randomly located points, and counting the number of seedlings rooted in the area covered by the frame. This procedure will be done twice during the planting year, once 6 to 8 weeks following seeding, and again in late summer; during the following year it will be done once, in September. The location of each sampled plot will be recorded with a GPS unit.

By the time of the final seedling density inspection, the stand will have gone through two growing seasons and the success of the planting, based on seedling establishment, can begin to be judged (Rothbart and Capel 2006). It is likely that planting success will vary over the planted area, and that some patches will have higher seedling establishment rates than others. At this point, corrective measures, including reseeding, can be planned for areas where seedling establishment has failed.

Qualitative Supplemental Inspection

These supplemental inspections will include qualitative monitoring of seedling vitality and weed density in the establishment phase and overall grassland development and condition in the maintenance phase. Establishment phase inspections will note obvious threats to the planted grasslands, including water stress, insect damage, or signs of disease. Problem areas, and the nature of the problem, will be delineated on a map of the planted areas. Maintenance phase inspections will include a list of species found in each grassland area, including specific locations of invasive plants, and visual estimates of percent cover for each species. Photographs will be taken to document development of the grassland area, and distinct sub-types of grassland – e.g. sparse, dense, shrubby – will be photographed.

Monitoring Phases

To accommodate the development of the grassland, the vegetation monitoring protocol is divided into establishment phase and maintenance phase activities. The establishment phase consists of the planting year and the two following growing seasons, and includes frequent monitoring events to catch potential problems in their early stages. The maintenance phase is less intensive, anticipating that the grassland species composition and structure will become more stable following the fourth full growing season. The schedule for monitoring events is provided in Table 3.

Establishment Phase

Initial monitoring and plot establishment will take place 6 to 8 weeks following planting. At this point, planted seeds should have germinated, and small seed leaves should be visible. The second monitoring visit will occur in mid-September. During the following two years, monitoring visits will occur in late spring (last week of May or first week of June) and late summer (second or third weeks of September).

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Table 3. Schedule of Grassland Monitoring Events, Years 0 to 20

<u>Phase</u>	<u>Year</u>	<u>Monitoring Event</u>	<u>Timing</u>
Establishment	0	Permanent Plot Establishment	Once, 6-8 weeks after planting
		Permanent Plot Monitoring	Twice, at plot establishment, and in mid-September
		Seedling Monitoring	Twice, 6-8 weeks after planting, and in September
	1	Supplemental Inspections	Monthly, starting 4-6 weeks after planting through September
		Permanent Plot Monitoring	Twice, late spring and late summer
		Seedling Monitoring	Once, in September
2	Supplemental Inspections	Monthly, May through September	
	Permanent Plot Monitoring	Twice, late spring and late summer	
Maintenance	3	Supplemental Inspections	Monthly, May through September
		Permanent Plot Monitoring	Once, late summer
	4	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	5	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	6	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	7	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	8	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	9	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	10	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	11	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
	12	Supplemental Inspections	Once, late summer
		Permanent Plot Monitoring	Once, late summer
13	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
14	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
15	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
16	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
17	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
18	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
19	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	
20	Supplemental Inspections	Once, late summer	
	Permanent Plot Monitoring	Once, late summer	

Full plot data collection (photographs, line-point intercept transects, and subplots for woody and invasive plants) will occur at all plots in all monitoring visits during the establishment phase. These data will provide a picture (in images and numbers) of the maturation of the grassland restoration areas as well as characterize the retained grassland areas.

Mitigation Recommendations

Maintenance Phase

To track the progress of the grasslands over time, full monitoring of the permanent vegetation plots will be conducted in the first year of the maintenance phase, the third year, and then on a five-year period through year 20. Detailed monitoring will be conducted only during the late summer period to minimize impacts to breeding birds. Monitoring will include all of the components at each of the permanent plots. Qualitative supplemental inspections will occur once annually during the maintenance phase.

Grassland Management Protocol

The newly planted area requires attention in the weeks and months following planting to ensure the best possible chance of successful establishment. Plot-based monitoring, seedling monitoring, and supplemental inspections will provide information necessary to guide the management of the grassland areas. As with the monitoring protocol, grassland maintenance activities will change over the course of the few years following planting, to become more regular when the plantings become mature.

Establishment Phase

At least the first two growing seasons of the planted grasslands will be treated as an establishment period, when monitoring and maintenance activities are more intense than after the stand has matured. Mowing, as described below, will be the primary management activity conducted to reduce weed¹ pressure, if monitoring results dictate that such activity is necessary. The use of fertilizer, herbicide, and supplemental seeding during this phase is also described below.

Mowing

In the first 4 to 8 weeks following planting, the planted area will be monitored as described above to evaluate the progress of sprouting and watch for invading weed species. If weed species are becoming established, the stand should be mown with the blade set high enough (15 to 30 cm/5 to 10 in) to cut the weed plants before they seed while avoiding damage to the native grasses. If necessary, this mowing should be done in July, when native grass seedlings have two or three leaves. More than one mowing may be necessary over the course of the first growing season.

All mowing will be accomplished with a sickle bar mower only, as rotary mowers tend to leave unevenly distributed clumps of cuttings. All cuttings will be removed and disposed of away from the planted area until the grassland habitat is fully established and post-establishment management has begun, some two or three growing seasons following planting.

Fertilizers

The use of fertilizers after planting is prohibited to minimize the possibility of weed encroachment, and to build the sparse structure desired for this site. The low nitrogen available from the soil is an important factor in keeping many potential invaders from

¹ Weed species could include native as well as non-native species, and not all non-native species would be weeds. Some colonization of the area by non-planted species is desirable, so the distinction between a weed and a non-weed is blurry (though plants known to be invasive are considered weeds). Plants typically associated with Grasshopper Sparrow habitat in Massachusetts would generally not be considered weeds. Such species include, but are not limited to, shrubs such as meadowsweet (*Spiraea alba*), huckleberry (*Gaylussacia baccata*), and sweetfern (*Comptonia peregrine*), and herbs such as bush clovers (*Lespedeza* spp.), pineweed (*Hypericum gentianoides*), and sedges (*Carex* spp.).

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thriving in the grassland restoration areas. Runoff from the adjacent proposed golf course, potentially carrying elevated nutrient loads from fertilizer, could pose a challenge to maintaining sparse grassland. Therefore, golf course greens and fairways should be managed using an Integrated Pest Management strategy that minimizes fertilizer runoff onto adjacent grasslands.

Herbicides

While low nutrient availability is intended to limit weeds, and mowing is the preferred method for controlling them when they occur, herbicides could be used if unwanted plants are threatening to overwhelm the planted native grasses. This should occur if forb species comprise more than 30 percent of vegetative cover based on results from monitoring. Appropriate broad-leaf herbicides should be used only according to their directions.

Supplemental Seeding

As the goal of this project is to create sparse grassland, the seedling germination and density subplots should have an average of approximately three to five established native warm season grass plants per square meter (0.3 to 0.5 per square foot) after the second growing season. This density will ensure that areas of bare ground will occur between clumps of native grasses, and will provide space for forbs and other plants as the stand matures.

Certain areas of planted grassland are likely to have less seedling vigor than others, due to slope, aspect, soil conditions, or other factors. If plant density is very low in an area (one plant per square meter, or 0.1 per square foot), supplemental planting should be considered. Before reseeding, however, the reasons for the failure of the initial planting should be determined to the extent possible, so that the risk of failure is reduced.

Maintenance Phase

By the fourth growing season, the planted grasslands should be reaching maturity, with full clumps of little bluestem and other planted grasses, and some additional forb, graminoid, and shrub species scattered throughout at low densities. At this point, management activities will switch into a maintenance phase. As during the establishment phase, mowing remains the primary management activity. Special attention is also given during this phase to the occurrence and spread of non-native invasive and woody plants.

Mowing

Half of the grassland habitat area will be mown annually in early August to maintain the grassland habitat, limiting the opportunity for shrubs and late-blooming forbs to spread, and allowing the grasses time to recover before dormancy. The other half of the grassland will be mown in alternate years. All mowing will be accomplished with a sickle bar mower, to drop individual plant stems in place. Cuttings may be left in place at this time,

Mitigation Recommendations

though if thatch is becoming thick (greater than 5 cm (2 in.) deep), they should be removed. Early August mowing will allow time for bird breeding and ensure sufficient late summer growing period. Later season mowing will result in grassland areas that are too short and uninviting for bird breeding the following spring. If monitoring results indicate that mowing any particular section of the grassland bi-annually is favoring non-grass species, mowing frequency will be increased to cover the entire area annually.

Non-native Invasive and Woody Plants

Annual monitoring events should alert site managers of the potential for non-native invasive plants to spread into the grassland areas on the site, changing the species composition and structure to conditions unsuitable for breeding Grasshopper Sparrows. The detection of invasive plants in the grassland areas will trigger a management response. The choice of management response would depend on the species and the severity of invasion; options include hand pulling, mechanical removal, and herbicide treatment.

Non-native invasive plants that could occur at this site, based on their presence in adjacent areas or their potential to invade sparse grassland include, but are not limited to:

- Autumn olive (*Eleagnus angustifolia*)
- Glossy and common buckthorns (*Rhamnus frangula* and *R. cathartica*)
- Multiflora rose (*Rosa multiflora*)
- Shrub honeysuckles (*Lonicera* spp.)
- Common reed (*Phragmites australis*)
- Black and pale swallowworts (*Cynachum louiseae* and *C. rossicum*)
- Oriental bittersweet (*Celastrus orbiculata*)
- Knapweeds (*Centaurea* spp.)
- Japanese knotweed (*Polygonum cuspidatum*)

Native woody plants such as shrubs and tree saplings also pose a threat to the success of this area as Grasshopper Sparrow habitat if they become too dense or tall, and will be monitored. Based on values reported in the literature, summarized in Table 2 above, shrubs average 10 percent cover in Grasshopper Sparrow habitat. Therefore, if total shrub cover is found to be more than 10 percent, shrub species will be managed to reduce percent cover below this threshold. Management options include mowing or trimming, pulling, and herbicide treatment. Shrubs growing over 1.5 meters (5 feet) will also be trimmed or removed.

Maintenance of Shrubby Grasslands in Former Taxiway C Area

Maintenance in the shrub transition areas along the outer edges of the former Taxiway C will be maintained with periodic clearing with brush cutting equipment. The grassland center of Taxiway C will be mown in alternate years as detailed above. The 15-meter shrubby grassland band along the edges will be mown on a 4-year period. Rather than clearing the entire shrubby area every four years, the shrub transition zone should be

Mitigation Recommendations

divided into four nearly equally sized sections – northwest, southwest, northeast, southeast -- and one section should be cleared each year.

Reporting

Following the conclusion of each monitoring season, and no later than the end of the year, a report summarizing the monitoring results will be prepared and submitted to the Natural Heritage and Endangered Species Program and the site manager. This report will include an assessment of the success of the planted grassland areas in the establishment period and recommendations for management. Mowing and shrub clearing as prescribed above, reduction of woody cover, and hand or mechanical control of invasive species will be considered approved management techniques for the grasslands. Other management steps, such as prescribed burning, supplemental seeding, and invasive species control involving application of herbicides will be subject to written approval from the Natural Heritage & Endangered Species Program.

References

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Mitigation Recommendations

Appendix 1 – Field Data Sheets

Field Data Sheet for Vegetation Monitoring



April 21, 2017

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
MEPA Office Suite 900
100 Cambridge Street
Boston MA

Attention: Holly Johnson
Sent to: holly.johnson@state.ma.us

Subject: Public Comment on Union Point, Notice of Project Change, MEPA EOE #11805
South Weymouth Naval Air Station, Abington, Rockland and Weymouth

Dear Secretary Beaton:

The North and South Rivers Watershed Association (NSRWA) would like to offer comments and recommendations regarding the environmental impacts described in the Notice of Project Change for the Union Point development. We are a 47 year old nonprofit based on the South Shore of Massachusetts. Our membership consists of approximately 1,200 households on the South Shore and our watershed spans 12 towns including a portion of the land contained within the former Weymouth Naval Air Station. Specifically French's Stream, which lies within the boundaries of the project site, is a tributary to the North River and Indian Head River Watershed.

Water Supply

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 North & South Rivers Watershed Association Inc.
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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.

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.

Wastewater

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

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. 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. 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.

Stormwater

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

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www.nsrwa.org



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).

In short, the redevelopment of the former Weymouth Naval Air Station offers the South Shore a unique opportunity to get water right – or at least better. Because of the massive investment proposed, this project has not only regional economic consequences, but will influence regional water decisions on the South Shore for years to come. Ensuring that this project provides a pathway forward that is a net benefit to our local streams, rivers and water supplies and that is sustainable will require examining innovative strategies for water conservation, reuse and holistic planning for the region.

Thank you for consideration of these comments.

Samantha Woods
Executive Director
North and South Rivers Watershed Association

Cc: Representative David Decoste
Representative Josh Cutler
Representative Joan Meschino
Representative Jim Cantwell
Senator Patrick O'Connor
Peter Forman, South Shore Chamber of Commerce
Laura Rome, Epsilon
Pine DuBois, Jones River Watershed

Secretary Matthew A Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge St Suite 900
Boston, MA 02114

RECEIVED

MAR 09 2017

Executive Office of Energy
& Environmental Affairs

RE: Notice of Project Change

Union Point EEA #11085

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

Commuter Rail: I found this statement particularly amusing " The MBTA'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.**

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.

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.

A handwritten signature in cursive script, appearing to read "Al Ferreira".

Al Ferreira

80 Tommy Marks Way

Weymouth, MA 02190

Johnson, Holly (EEA)

From: Barbara .C. Manning <barbcm57@aol.com>
Sent: Saturday, April 22, 2017 10:15 AM
To: Johnson, Holly (EEA)
Subject: Please Keep Union Street Close #11085R

Hello Holly,

I am worried about the changes being discussed.

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.

Thank you,
Barbara C. Manning
1056 Union Street
Rockland, MA

My name is Jennie Horsch and I live at 1007 N. Union Street, Rockland with my husband, Bill. I have lived at this address for 89 years. Growing up, there was no gate and the road went straight through to So. Weymouth Square. I remember the cars going very fast because it was a straight road, with many accidents, plus pedestrian injuries. 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. We would be living back in the olden days with fast traffic and no regard for speed limits. As it is now, we have a speed limit which is completely ignored. They drive by my house at 50 miles or more only to find that there is a gate at the end of the road. If it was completely open, there would be more tragedies. There are families with children who moved in the area because it was quiet and not much traffic and a great neighborhood to bring up families. We live in a big colonial home that was built in 1797 and is only 18 feet from the road so there is no room to widen the road. There are also many older homes built in the early 1800 that are also very close to the road on both sides of this section of Union Street. Please don't open the gate.

Sincerely
Jennie M Horsch

April 21, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Subject: Notice of Project Change
UNION POINT, EEA # 11085

Dear Secretary Beaton:

As a resident of Weymouth, I would like to submit the following comments on the above captioned Notice of Project Change for the redevelopment of the former South Weymouth Naval Air Station currently known as Union Point.

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?

As you know, this is not a run-of-the-mill development and the issues covered in the NPC are complex.

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.

Traffic has always been an issue dating back to when the Mills Mall proposal required a direct connection to Route 3.

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.

As for Route 18 in Weymouth, there's not much that hasn't been said before. It's a nightmare now and I'm not sure how the DOT widening project is going to change it, especially with the almost 80,000 vehicle trips per day currently being proposed.

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.

To date, the only Commercial development that exists on the site was built as part of an apartment complex project several years ago that has been unoccupied since the day it was built.

LStar has announced that ProDrive, a robotics company, plans to relocate their overseas headquarters to Union Point and that construction could start this Spring.

This was presented to the public like a "Field of Dreams" marketing concept, "if you build it they will come". Weymouth even approved a 20 year TIF Agreement as an incentive to jump-start the commercial development component at Union Point.

Spring is definitely in the air but so far, unfortunately, no sign of ProDrive yet.

It is my understanding that their desired planned location is still owned by the U.S. Navy and that the Navy is still in the process of conducting an extensive environmental clean-up effort in that area of the site.

As far as the Interim Water & Sewer Supply is 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?

It was troubling to say the least this past year, during a severe drought, to watch our depleted water supply being used to irrigate the landscaping at Union Point particularly when the sprinklers continued to water sidewalks, parking lots and pavement.

I am concerned that if we should have several drought cycles (like last year) before a permanent supply becomes available, we could find ourselves in a position where we can no longer afford to provide the interim supply for the development because our supply gets to the point of being dangerously low. (photos attached)

What would happen then?

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.

There are several other construction projects in the area that are on the same sewer trunk line.

Weymouth still suffers from sewer overflows. In fact, on Easter Sunday an overflow occurred at the Libbey Industrial Parkway sewer pumping station. A report was filed with MA DEP. (copy attached)

Also, Weymouth is on a Sewer Bank Program and the balance in the Old Swam River Basin would not accommodate anywhere near the 540,000 gpd included in the Mayor's Interim Agreement.

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)

While NPC raises many of the same talking points that have been raised over the years it doesn't specifically identify solutions, which I'm sure will be forthcoming during the EIR process.

However, at the Weymouth Special Town Council meeting on March 27, 2017, LStar did provide other information about water and sewer that was not reflected in the NPC.

The video is available on line at <http://weymouth.tv/video-on-demand> (click on Town Council & then on 3/27/17

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?

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?

Many of the issues covered in this NPC are still more or less a work in progress and will need to be more fully addressed in the EIR and I look forward to participating in that public comment process.

Sincerely,

A handwritten signature in blue ink that reads "Joanne Marques". The signature is written in a cursive style.

Joanne Marques
60 Circuit Road
South Weymouth, MA 02190.

Enclosures: Weymouth Water & Sewer Interim Agreement
ARJWW Water Study Contract
Weymouth Sewer Overflow Report to DEP
Photos of Great Pond, Weymouth

Send via email to Holly Johnson, MEPA Analyst

**AMENDED AND RESTATED MEMORANDUM OF
AGREEMENT FOR PROVISION OF WATER AND WASTEWATER SERVICES
AND FOR A CONSECUTIVE PUBLIC WATER SYSTEM**

This Amended and Restated Memorandum of Agreement for Provision of Water and Wastewater Services and for a Consecutive Public Water System (the "Agreement") is entered into as of November 18, 2016 by and between the Town of Weymouth, a body corporate and politic, acting through its Mayor, with an address of 75 Middle Street, Weymouth, Massachusetts 02189 (the "Town") and Southfield Redevelopment Authority, a body corporate and politic established by Chapter 301 of the Acts of 1998, as amended by Chapter 303 of the Acts of 2008 and as further amended by Chapter 291 of the Acts of 2014, having a usual place of business at 223 Shea Memorial Drive, South Weymouth, Massachusetts 02190 ("SRA") (from time to time the parties may be referred to collectively as the "Parties").

RECITALS

WHEREAS, South Shore Tri-Town Development Corporation ("SSTTDC"), the predecessor to SRA, was established to acquire the former Naval Air Station South Weymouth (the "Base") from the United States Government and to secure the redevelopment of the Base to the greatest benefit of the Town and the Towns of Abington and Rockland; and

WHEREAS, SSTTDC and the Town entered into that certain Memorandum of Agreement for Provision of Water and Wastewater Service dated as of March 7, 2008 to set forth certain conditions under which the Town would provide municipal water and sewer services for certain portions of the redevelopment of the Base (the "2008 Agreement"); and

WHEREAS, LNR South Shore, LLC, a Delaware limited liability company, now known as LStar Southfield LLC, a Delaware limited liability company ("LStar"), executed that certain side letter agreement dated March 7, 2008 in favor of SSTTDC in connection with the 2008 Agreement (the "Side Letter"); and

WHEREAS, the parties agree that the Side Letter is null and void and no longer of any force and effect; and

WHEREAS, SSTTDC and the Town entered into that certain Amendment #1, Memorandum of Agreement for Provision of Water and Wastewater Service dated July 1, 2012 to amend certain provisions of the 2008 Agreement (the "First Amendment"), SSTTDC and the Town entered into that certain Amendment #2 Memorandum of Agreement for Provision of Water and Wastewater Service dated as of June 30, 2014 (the "Second Amendment") and SRA and the Town entered into that certain Amendment #3 Memorandum of Agreement for Provision of Water and Wastewater Service dated as of June 30, 2016 (the "Third Amendment"); and

WHEREAS, the 2008 Agreement, as amended by the First Amendment, the Second Amendment and the Third Amendment, and as affected by the Side Letter is referred to herein collectively as the "Existing Agreement"; and

WHEREAS, SRA, as the successor to SSTTDC, and the Town desire to amend and restate in its entirety the Existing Agreement; and

WHEREAS, SSTTDC and the Town entered into that certain Memorandum of Agreement for Consecutive Public Water System dated as of October 22, 2010 (the "Consecutive System Agreement"); and

WHEREAS, SRA is registered as a Public Water Supplier ("PWS") with the Massachusetts Department of Environmental Protection ("DEP") PWS identification number 4336007; and

WHEREAS, the Town is also registered as a Public Water Supplier with DEP PWS identification number 4336000; and

WHEREAS, the Town and SRA desire that the water system in the portion of the Base located in Weymouth continue to be considered a consecutive public water system as defined in 310 CMR 22.00 the "Consecutive System" with the Town's public water system, Weymouth - PWS ID# 4336000, being defined as the so-called "Parent System"; and

WHEREAS, the Town and SRA desire to amend and restate in its entirety the Consecutive System Agreement to clarify certain aspects of the relationship between the Parent System and the Consecutive System and to identify operation and maintenance responsibilities for their respective water supply systems; and

WHEREAS, the Town Council unanimously approved an amendment to the zoning and land use by-laws at Union Point. The amendment increased the age restricted housing by 1,000 units and commercial development by one million square feet. The third-party economic analysis estimated that at full build out Union Point will increase the tax revenue for the Town by more than Fifty-Million Dollars (\$50,000,000.00) annually. The full build out will require two to three million gallons of water, which is more water than the Town can provide. Therefore, a permanent Massachusetts Water Resources Authority ("MWRA") water solution is required; and

WHEREAS, the design and construction of the permanent sewer system and water supply will add capacity to the Town's water supply and sewer system. Such additional capacity and a second water supply will provide protection against draw down of the reservoir and ponds in the Town. Such additional capacity will also provide additional commercial development opportunities throughout the entire Town; and

WHEREAS, the Weymouth Department of Public Works has certain water and sewer system policies regarding mitigation requirements (the "Mitigation Policies") for all new uses and all increases in existing uses of water and sewer, defined as follows:

- a) The water mitigation requirement consists of completing water conservation work in the amount of 2 gallons saved for every 1 gallon proposed to be used (base flow). At the Town's discretion, in lieu of completing actual water conservation work, the Town may allow the project proponent to pay a water conservation mitigation fee in the amount of \$10/gallons per day ("gpd") (base flow).

- b) The sewer infiltration/inflow (“I/I”) mitigation requirement consists of completing sewer I/I work in the amount of 6 gallons saved for every 1 gallon proposed to be used (base flow), or 4 gallons saved for every 1 gallon proposed to be used if water conservation work in the amount of 2 to 1 is completed. At the Town’s discretion, in lieu of completing actual I/I work, the Town may allow the project proponent to pay an I/I mitigation fee in the amount of \$10/gpd (base flow).
- c) The sewer connection fee is an amount equal to \$7/gpd and is applicable to all proposed new sewer flows (base flow). This fee is in addition to any infrastructure requirements required for the proposed project.
- d) All new and proposed increases in flow (base flow), whether temporary or permanent, shall be calculated based on the following DEP guidelines and regulations: 314 CMR 7.15 and 310 CMR 15.203; and the residential bedroom allotment of 60.9 gpd/bedroom as defined in the Naval Air Station Development Project Final Environmental Impact Report dated May 31, 2007 (the “FEIR”); and additional calculations for specialty commercial uses as mutually agreed upon by the Town and LStar.
- e) The Town has approved the water and sewer improvements as shown in Exhibit A attached hereto and incorporated herein by reference. The Town’s outside engineer, Environmental Partners Group, has provided an independent engineer’s estimate for the improvements in Exhibit B attached hereto and incorporated herein by reference. The water and sewer mitigation fees required for initiating phase 1B construction are Nine Hundred and Fifty Thousand and Zero (\$950,000) Dollars in water mitigation fees and Six Hundred and Seventy Thousand and Zero (\$670,000) Dollars in sewer mitigation fees. The engineer’s estimate for the “entrance fee” to the MWRA will exceed Fifteen Million Dollars (\$15,000,000) and the sewer improvements are estimated as Five Million Seven Hundred Thousand and Zero (\$5,700,000) Dollars. The Town has agreed to accept the MWRA entrance fee and sewer improvements in lieu of the payment of phase 1B water and sewer mitigation fees. At full build-out, the engineer’s estimate at this time for sewer and water improvements to be paid by LStar is \$30,000,000 in Weymouth sewer system improvements and \$20,000,000 in Weymouth water system improvements.

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which hereby are acknowledged, the parties hereby amend and restate the Existing Agreement and the Consecutive System Agreement as follows:

1. **Recitals**. The recital set forth above hereby are incorporated into this Agreement and made a part hereof.
2. **Availability**. The Town agrees to make available for use by existing and future development on the Base a total of 600,000 gallons per day of water supply and 540,000 gallons per day of sewer capacity (hereinafter referred to as the “Temporary Water”

Plan”). The water supply capacity and allocation shall be temporary in nature but shall continue until a permanent supply is operational.

The Town shall retain a third-party engineer to plan, design, and engineer the necessary infrastructure. The selection of the engineer and final design shall be as mutually agreed upon by the Town and LStar. LStar shall construct the infrastructure and pay the MWRA fees, to provide a permanent water supply from MWRA water system (hereinafter referred to as the “Permanent Water Plan”) through the Town, subject to approval by the Town. In addition, the Town shall be allowed to review, examine, and observe all construction work. LStar shall reimburse the Town for costs incurred by the third-party engineer in carrying out these functions. If a portion of the Town becomes an MWRA water district, LStar shall pay the Town the MWRA entrance fee, and any other associated additional water or wastewater charges, when due, under any terms of the agreement between the MWRA and Town. LStar and the Town agree to mutually agree to the terms of such agreement with MWRA. If LStar were to sell, convey, transfer, or assign all of its remaining interests in Union Point, which would nullify this Agreement, LStar shall pay to the Town prior to any sale, conveyance, or transfer the remaining balance the Town owes to the MWRA as an entrance fee.

The Permanent Water Plan shall be fully designed, reviewed and approved by the Town before November 18, 2017. Construction will begin on the Permanent Water Plan as soon as the permits are obtained or two (2) years after completion of design. The Permanent Water Plan will be operational and fully functional as soon as commercially reasonable or within two (2) years of start of construction.

Such Permanent Water Plan shall ultimately provide water to the portions of the Base in Abington and Rockland. The Temporary Water Plan will not provide water to Abington and Rockland.

3. **Usage.** Such capacities and authorization of the Parent System to provide water to the Consecutive System are only applicable to those portions of the Base located in Weymouth. The foregoing water supply and sewer capacities do not limit any further agreements the Town may make to provide additional water or sewer services for the redevelopment of the Base. The Town and SRA agree and acknowledge that LStar shall have the sole ability to allocate water and sewer usage among all Weymouth end users at the Base. In response to a request for additional water or sewer capacity under this Temporary Water Plan, the Town and SRA agree and acknowledge that before issuing a “will serve” letter, the Mayor may request additional information to satisfy any concern over any need for the requested additional capacity.
4. **Calculation of Flows.** All new and proposed flows (water and sewer) shall be calculated and accounted for based on (a) the following DEP regulatory guidelines: 314 CMR 7.15 and 310 CMR 15.203; (b) the FEIR factor for bedroom use; and (c) specific calculations for commercial users as mutually agreed upon by the Town and LStar.
5. **Water System Connection Loop.** LStar shall design and construct a second water system connection loop such that it is on-line and fully functional within one (1) year of

exceeding the Base Phase 1 water flow of 245,000 gpd. LStar will present multiple options for the connection loop to the Town. The final design of the connection loop shall be as mutually agreed upon by the Town and LStar. Such connection loop shall be designed and constructed at LStar's sole cost and expense. All design and construction work shall comply with all applicable laws, regulations, and DEP guidelines. The Town's independent, third-party engineer shall review and approve all applicable plans prior to the start of construction work and shall be allowed to review, examine, and observe all construction work. Work shall be conducted in accordance with the approved plans and any deviations or new field requirements shall be completed in accordance with approval by the Town's independent, third-party engineer. LStar shall reimburse the Town for costs incurred by the Town's independent, third-party engineer in carrying out these functions.

6. **Additional Sewer Construction.** The Town shall retain a third-party engineer to design the improvements specified on Exhibit A attached hereto and incorporated herein by reference. The selection of the engineer and final design shall be as mutually agreed upon by the Town and LStar. LStar shall construct the improvements. Such improvements shall be designed and constructed in accordance with Town and DEP guidelines and policies and at LStar's sole cost and expense. The Town's independent, third-party engineer shall be allowed to review, examine, and observe all construction work. Work shall be conducted in accordance with the approved plans and any deviations or new field requirements shall be completed in accordance with Town approval. LStar shall reimburse the Town for costs incurred by its engineer in carrying out these functions.
7. **Mitigation Fees.** Water and sewer mitigation fees, or Town approved improvements in lieu of fees, shall be applicable to all SRA and LStar proposed development projects based on the Town's Mitigation Policies.
8. **Usage Fees and Billing.** Usage fees charged by the Town (i.e. rates charged for water and sewer service) shall be as follows:
 - a) SRA shall be billed monthly by the Town for all water and sewer usage. Subject to Section 15, all bills are due and payable within 30 days from date of issue.
 - b) SRA shall be charged in accordance with the Town's then effective Rate Schedule as applied to all Weymouth customers without prejudice.
 - c) The Town shall adjust SRA's water and sewer usage charges for each monthly billing cycle based on SRA's submitted Utility Billing Registers as follows: for each 9 hundred cubic feet, 6,732 gallons, in a given month, SRA will pay the Town's so called "First Step Rate" then in effect for water and sewer use. All remaining use shall be charged as per Section 8(b).
 - d) Except as otherwise set forth in this Section 8, usage fees charged by the Town for developments on the Base shall be the same as the usage fees then charged by the Town for other developments without any additional charges or premiums.
9. **Infiltration/Inflow.** LStar may, at its option, from time to time, implement sewer mitigation projects approved by the Town, which approval shall not be unreasonably

withheld, conditioned or delayed. The Town agrees that the four sewer mitigation projects described as projects "A", "B", "C" and "D" on Exhibit A attached hereto and incorporated herein by reference have been approved by the Town.

Any and all documented I/I savings accepted by the Town can be used to offset the sewer I/I mitigation fee. For every six (6) gallons of sewer flow removed, the project base flow used for the calculation of the sewer I/I mitigation fee shall be reduced by one (1) gallon, resulting in a savings of \$10 for every 6 gallons of sewer flow removed. If, at its option, LStar implements any such approved sewer mitigation project, then LStar shall receive a credit, in the full amount expended by LStar in connection with such implemented approved sewer mitigation projects, against sewer mitigation fees that would otherwise be charged by the Town. LStar may use such credit and/or assign such credit in whole or in part to any third party within the Town.

10. **Service.** The Town shall provide the same level of water and sewer service to all of its customers, whether located within or outside the Base, in accordance with its effective rate schedule, water system rules and regulations and sewer system rules and regulations.
11. **Customer.** To be considered a customer of the Town, the user of the Town water or sewer services must be located within the Town boundaries of Weymouth. This Agreement is not applicable to any water and sewer services outside of the Town boundaries of Weymouth. With respect to the portion of the Base located in the Towns of Abington or Rockland, water and sewer services will be extended as a part of the permanent water and sewer supply arrangement.
12. **Consecutive System.** The Town shall furnish potable water for the portions of the Base located in Weymouth to SRA's Consecutive System, and in accordance with this Agreement, provided that SRA meets the requirements of 310 CMR 22.03(3) and fulfills the recommended guidelines of the DEP standard operating protocol for consecutive water systems.

The following provisions of this Section 12 shall apply to the relationship between the Town's Parent System and SRA's Consecutive System with respect to the portions of the Base located in Weymouth:

- a) The Parent System physically ends at the boundaries of the portions of the Base located in Weymouth and the Consecutive System begins at the boundaries of the portion of the Base located in Weymouth.
- b) The Town shall continue to comply with the requirements of the Drinking Water Regulations, 310 CMR 22.00.
- c) SRA shall comply with the requirements of the Drinking Water Regulations, 310 CMR 22.00.
- d) The Town shall continue to be responsible for source water compliance, including quantity and quality of water, sampling and monitoring, as well as wellhead and watershed protection.

- e) The Town shall continue to be responsible for operation, maintenance, repairs, sampling and monitoring of the Parent System.
- f) SRA shall be responsible for the management, administration, operation, maintenance, repairs, sampling and monitoring of the Consecutive System.
- g) The Town shall continue to be responsible for providing operators and ensuring timely billing and payments for the Parent System.
- h) SRA shall be responsible for providing certified operators for the Consecutive System.
- i) The Town shall be responsible for the reading of the master water meters and the billing for the usage of that water. The Town shall bill SRA for the usage of water. Without limiting any other provisions of this Agreement, the policy and procedures for the collection of those payments shall be consistent with the policy and procedures for the collection of bills employed for any other user of the Parent System.
- j) For purposes of this Agreement, the term "master water meter" as used in Section 12(i) above shall mean the meter(s) placed at each point of connection between the Parent System and the Consecutive System.
- k) SRA shall be responsible for ensuring the timely billing and payments for all users of the Consecutive System. This shall include but is not limited to the reading of all nonmaster water meters, as defined above, and the issuing and collection of utility bills.
- l) SRA shall abide by the rules and regulations of the Parent System. SRA shall be responsible to enforce all the rules, regulations, and orders of the Parent System.
- m) SRA may choose to utilize the services of the Town for fulfilling its obligations as identified above in this Section 12. If SRA so chooses to utilize the services of the Town, the terms and conditions under which those services will be performed will be memorialized in a separate agreement.

13. **Discharge.** The Town shall permit SRA and any user located on the Base to discharge its wastewater into the Town's sewer collection system in accord with SRA's DEP permits W116225, dated August 27, 2007, BRPWP71 X2508640, dated August 28, 2012, and this Agreement, provided that: (i) the Town is in compliance with all applicable state, federal, and local sewer rules and regulations, and DEP administrative consent orders; and (ii) SRA meets the requirements of the Town's sewer rules and regulations, the Town's permit with the MWRA, and does not cause the capacity of any sewer pipe segment to exceed 80% capacity or a mutually agreed upon standard.

14. **Calculation and Fees.** The Town's sewer connection fees shall be calculated for residential construction based on the projected sewer flows in the FEIR. In accordance with the FEIR, the sewer connection fee for residential construction will be calculated

based on a sewer flow of 60.9 gallons per day/bedroom. The sewer connection fee for non-residential construction shall be calculated based on the design flows set forth at 310 CMR 15.000.

15. **Payment.** SRA will budget sewer connection fees in accordance with approved Massachusetts Department of Revenue (“DOR”) methods and will transmit sewer connection fees to the Town on a quarterly basis if and only if said budget is approved by the Secretary of Administration and Finance in accordance with the Memorandum of Agreement on Financing the South Shore Tri-Town Development Corporation’s Parkway. In the event that the Secretary of Administration and Finance does not permit said budgeted amount, then SRA shall make payments on an annual basis upon certification of retained earnings by DOR.
16. **Reports.** SRA shall provide quarterly reports to the Town indicating the number of water and sewer connections permitted by SRA in the prior quarter and with respect to each such connection, SRA will report the type of connection permitted (e.g., residential, commercial, retail), the total amount of sewer connection fees collected, and how the fees were calculated. Reports shall be submitted within 30 days of the quarter’s end.
17. **Certain Laws.** SRA and the Town are subject to the provisions of the Open Meeting Law, G.L., c. 39, § 23B, the Public Records Law, G.L., c. 4, §7, c. 66, § 10, CORI and HIPPA laws. The parties agree that certain provisions and exemptions of the above laws exist as protection of confidentiality, privacy and security, a common goal of the Parties. Some of these provisions and exemptions are as follows:
 - a) Open Meeting Law exemptions and requirements G.L. c. 30A;
 - b) Public Records exemptions and requirements G.L. c. 66;
 - c) Criminal Offender Record Information Systems G.L., c. 6, § 167-178L (access and dissemination);
 - d) HIPPA - private health care data and information- (access and dissemination) the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Public Law 104-191 inclusive;
 - e) Massachusetts General Laws and Federal Laws relating to information regarding students residing within the Base who are being educated in the public schools of the Town;

The Parties agree and understand that SRA, with its complement of private citizen adults, minors and business entities, requires municipal services in the nature of police, fire, water, sewer, school services and other services to be best served by the Town in the manner, and in such amounts and proportions, as hereinafter set forth.

Notwithstanding the generality of the foregoing, the Town and SRA agree that certain practices and General Laws listed below are included therein:

Electronic Records

Guidelines are jointly issued by the Supervisor of Records, the Records Conservation Board and the Information Technology Division under the authority of G.L. c. 66, § 1; G.L. c. 30, § 42; and G.L. c. 110G, § 17. The purpose of these Guidelines is to help ensure that government electronic records are created, maintained, disseminated and destroyed in a manner consistent with the transparency and accountability requirements of the Massachusetts Public Records Law, G.L. c. 66, § 1, et seq. and the standards set by the Records Conservation Board.

18. **Confidential Business Records and Practices.** SRA and the Town hereby agree to treat each other's business information as its own and to safeguard and use such information in a legal manner to safeguard against unauthorized use or disclosure of information consistent with common municipal practice and within the constraints of Massachusetts General Laws.

SRA and the Town agree to not to disclose SRA's confidential business information to anyone other than employees of Town solely for the purpose of fulfilling the Town's obligations and only to such persons on a need-to-know basis, except as required by law. The Town shall inform such employees of the provisions of this Agreement and shall require them to act at all times in compliance with this Agreement. No SRA confidential business information shall be disclosed to such employees unless such employees are made aware of this Agreement. The Town agrees to provide SRA with prompt notice of any court or other governmental orders requiring disclosure, in order to give the SRA the opportunity to seek appropriate protective orders.

SRA and the Town agree to use all appropriate safeguards to prevent the unauthorized use or disclosure of information but shall immediately report any use or disclosure of information that is not provided for herein and report any security incident of which it becomes aware to the Town Solicitor at 781-335-2000, and use reasonable efforts to mitigate any harmful effect. The Town Solicitor shall also promptly notify SRA at 781-682-2187 ext. 100.

19. **Cooperation Among Contracting Parties.** SRA and the Town agree to discuss and to share information to achieve common goals of serving the public interests of persons residing within the geographic limits of Weymouth associated with the Base.
20. **Indemnification.** SRA and the Town agree to indemnify and hold harmless each other from damages resulting from their default in performing their obligations under this Agreement.
21. **Third Parties.** SRA and the Town agree that any remedies or obligations hereunder shall inure solely to the benefit of the parties herein, except that LStar is a third-party beneficiary of this Agreement. LStar shall not delegate, assign, or transfer, however, its duties or beneficial interests in this Agreement without the prior, express written consent of SRA and the Town. If SRA and the Town were to approve any such delegation, assignment, or transfer, this Agreement shall be binding upon LStar's assigns,

transferees, and successors in interest, who shall be entitled similarly to enforce any or all of the provisions of this Agreement, including without limitation enforcing SRA's rights under this Agreement if SRA fails to do so.

22. **No Expiration.** This Agreement shall continue in perpetuity unless terminated in writing by each of the Parties hereto and consented to by LStar.

23. **No Amendment.** This Agreement may only be amended in writing, by a document signed by each of Parties hereto and consented to by LStar.

**SOUTHFIELD REDEVELOPMENT
AUTHORITY**

By: Lyndsey M. Kruzer
Lyndsey M. Kruzer, Chairman

TOWN OF WEYMOUTH

By: Robert L. Hedlund
Robert L. Hedlund, Mayor

Approved as to form:

By: Joseph Callanan
Joseph Callanan, Town Solicitor

LStar Southfield LLC hereby joins in this Agreement for the purpose of (a) agreeing to perform the work specified in Sections 5 and 6 and elsewhere in this Agreement, (b) acknowledging all the other provisions of this Agreement and (c) confirming that LStar Southfield LLC is a third-party beneficiary of this Agreement, and (d) understanding that if SRA and the Town were to approve a delegation, assignment, or transfer of LStar's duties or beneficial interests, as specified in Section 21, LStar Southfield LLC and its assigns, transferees, and successors in interest shall be entitled to enforce any or all of the provisions of this Agreement, including without limitation enforcing SRA's rights under this Agreement if SRA fails to do so.

LStar Southfield LLC, a Delaware limited liability company

By: Steven Vukob, MAW
Steven Vukob, MAW



Legend

- Existing Weymouth PS
- - - Force Main
- Contract 1-5 Upgrade
- Trunk Lines
- Gravity Sewer
- Parcels



EXHIBIT B

Weymouth, MA
Base Scenario - Existing MOA

Pipe Designation	Upstream Manhole	Downstream Manhole	Length (ft)	Dia. (in)	Maximum Flow (gpm)	Existing Full Flow Capacity (gpm)	Maximum Flow/Existing Full Capacity	Existing Remaining Capacity (gpm)	Existing Remaining Capacity (mgd)	Proposed Dia. (in)	Proposed Full Flow Capacity (gpm)	Maximum Flow/Proposed Full Capacity	SDA	Location	Replacement Cost
P-1661	12-MH-2002	12-MH-1971	90	30	5,010	3,972	126%	(1,037)	(1.494)	36	6,459	78%	Lower Central	Traveled Way	\$159,750
P-3994	2-MH-1645	2-MH-5735	84	30	5,115	4,759	107%	(356)	(0.513)	36	7,738	66%	Lower Central	Traveled Way	\$148,390
P-3979	2-MH-1107	2-MH-1076	268	30	5,516	5,393	102%	(124)	(0.178)	36	10,364	53%	Lower Central	Cross Country	\$442,200
P-3980	2-MH-1145	2-MH-1107	264	30	5,523	5,547	100%	24	0.035	36	10,660	52%	Lower Central	Cross Country	\$436,095
P-3978	2-MH-1076	2-MH-1039	327	30	5,534	5,574	99%	40	0.057	36	10,712	52%	Lower Central	Cross Country	\$539,880
P-1660	12-MH-1971	12-MH-1929	174	30	5,007	5,216	96%	209	0.301	36	8,481	59%	Lower Central	Traveled Way	\$308,850
P-6276	2-MH-5735	2-MH-5736	16	30	5,112	5,512	93%	399	0.575	36	8,957	57%	Lower Central	Traveled Way	\$27,690
P-6291	12-MH-2111	12-MH-2083	161	30	5,013	5,415	93%	402	0.580	36	8,806	57%	Lower Central	Traveled Way	\$286,485
P-1662	12-MH-2083	12-MH-2002	387	30	5,009	5,527	91%	518	0.745	36	8,987	56%	Lower Central	Traveled Way	\$687,635
P-1663	12-MH-5813	12-MH-2111	330	30	5,034	5,617	90%	583	0.839	36	9,134	55%	Lower Central	Traveled Way	\$585,750
P-3977	2-MH-1039	2-MH-1002	281	30	5,525	6,586	84%	1,060	1.527	30	7,783	71%	Lower Central	Cross Country	\$379,755
P-1659	12-MH-1929	12-MH-1880	205	30	5,088	6,072	84%	984	1.416	36	9,874	52%	Lower Central	Traveled Way	\$364,585
P-3996	12-MH-1717	2-MH-1667	194	30	5,057	6,056	84%	999	1.438	36	9,847	51%	Lower Central	Traveled Way	\$343,640
P-1658	12-MH-1880	12-MH-1816	331	30	5,078	6,099	83%	1,021	1.471	36	9,918	51%	Lower Central	Traveled Way	\$587,170
P-6025	32-MH-4916	32-MH-4919	258	8	300	362	83%	62	0.089	10	656	46%	Swamp River	Traveled Way	\$128,750
P-1907	25-MH-3725	25-MH-3683	304	21	1,493	1,825	82%	332	0.478	21	2,156	69%	Mill River	Cross Country	\$273,420
Total															\$5,700,045

**WATER CONSULTANT REIMBURSEMENT AGREEMENT
BY AND BETWEEN
ABINGTON ROCKLAND JOINT WATER WORKS AND
LSTAR SOUTHFIELD, LLC**

THIS AGREEMENT, is entered into on this 1st day of February, 2017, by and between the Abington Rockland Joint Water Works, having a usual place of business at 366 Centre Avenue, Rockland, Massachusetts 02730 (the “ARJWW”), and LSTAR Southfield, LLC, having a usual place of business at 26 Memorial Grove Avenue, South Weymouth, Massachusetts 02190 (“LStar”). (From time to time the parties may be referred to collectively as the “Parties” and individually as a “Party.”)

NOW, THEREFORE, in consideration of the mutual agreements herein contained, the Parties hereto agree as follows:

Scope of Work Performed:

The ARJWW agrees to perform specific evaluations for the redevelopment of the former South Weymouth Naval Air Station, now commonly known as “Union Point.” To perform those evaluations, ARJWW will contract with Weston & Sampson Engineers, Inc. of 5 Centennial Drive, Peabody, Massachusetts (the “Consulting Engineer”) to provide engineering services to ARJWW. Those engineering services shall consist of - analyzing the Union Point development and evaluating the water supply options to support Union Point. Specifically the ARJWW and its Consulting Engineer shall:

1. Review and analyze the Myers Avenue Water Treatment Plant to determine if there is capacity to develop and provide temporary water to Union Point and how much capacity is available; and

2. Review and evaluate current systems to determine and assess impacts on said systems should ARJWW provide temporary water services to Union Point.

Compensation, Reimbursement of Fees:

As a direct beneficiary of the evaluation work to be performed, LStar hereby agrees to reimburse the ARJWW for all reasonable costs and expenses incurred for the professional engineering services rendered by Weston & Sampson Engineers, referenced in the preceding section. Those services, in which are described in greater detail in a proposal dated October 24, 2016, have been reviewed by LStar, and accepted by LStar as necessary and reasonable in order to properly perform the evaluation contemplated herein. ARJWW shall provide LStar with a monthly invoice and supporting documentation, and LStar shall – upon its review and approval of same – forthwith remit the reimbursement payment to the ARJWW. In the event of any disputed cost or expense, LStar shall promptly notify ARJWW of the same; and all further work may cease until the dispute is resolved to the reasonable satisfaction of the Parties. The Parties hereby agree that the total costs and expenses for said work shall not exceed Eighteen Thousand Four Hundred Dollars, (\$18,400.00).

Confidential Business Records and Practices:

To the extent business information (which shall mean a Party's business records or business practices) is exchanged, LStar and the ARJWW hereby agree to treat each other's business information as confidential and not to disclose the information to any third party other than the Consulting Engineer. The Consulting Engineer shall be required to treat all such information as confidential and not disclose it to any third party.

The parties acknowledge that ARJWW is subject to the public records laws of the commonwealth of Massachusetts.

Cooperation among Contracting Parties:

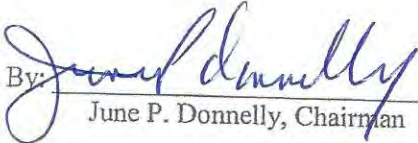
LStar and the ARJWW agree to discuss and to share information as the evaluation proceeds, and each agrees to allow the other full and complete access to public and private properties under their control, to the extent such access is required to perform the services contemplated under this Agreement.

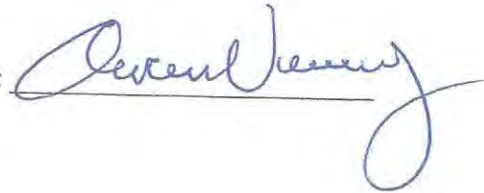
This Agreement shall be governed by the laws of the Commonwealth of Massachusetts.

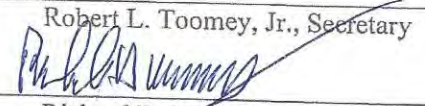
EXECUTED AS AN INSTRUMENT UNDER SEAL the date first written above,

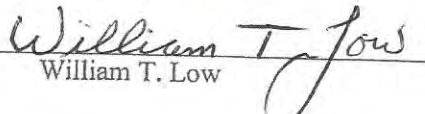
Abington Rockland Joint Water Works:

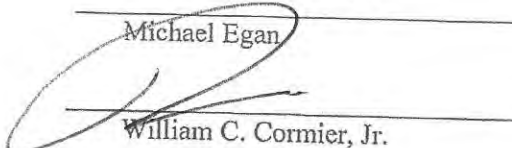
LStar Southfield, LLC:

By: 
June P. Donnelly, Chairman

By: 

Robert L. Toomey, Jr., Secretary

Richard D. Muncy


William T. Low

Michael Egan

William C. Cormier, Jr.

Dated: _____

Dated: 3-3-2017



Massachusetts Department of Environmental Protection
 Bureau of Resource Protection – Watershed Permitting Program
Sanitary Sewer Overflow (SSO)/Bypass
Notification Form

FOR DEP USE ONLY

Tax Identification Number _____

A. Reporting Facility

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



1. Facility Information

Town of Weymouth / MWRA
 Reporting Sewer Authority

39101403
 Permit #

2. Authorized Representative Transmitting Form:

Kenneth
 First Name

Morse
 Last Name

(781)337-5100
 Telephone No.

Superintendent
 Title

kmorse@weymouth.ma.us
 E-mail Address

B. Phone Notifications:

See DEP Regional Office telephone and fax numbers at the end of this form.

- | | Notification Line | | |
|---|---|-----------|--|
| | first name | last name | |
| 1. MassDEP staff contacted: | David | Turin | |
| Date/Time contacted: | 4/18/17 | 04:30 | <input type="checkbox"/> am <input checked="" type="checkbox"/> pm |
| | Date | Time | |
| 2. EPA staff contacted: | David | Turin | |
| Date/Time EPA contacted: | 4/18/17 | 04:30 | <input type="checkbox"/> am <input checked="" type="checkbox"/> pm |
| | Date | Time | |
| 3. Board of Health contacted: | Dan | McCormack | |
| Date/Time contacted: | 4/18/17 | 04:30 | <input type="checkbox"/> am <input checked="" type="checkbox"/> pm |
| | Date | Time | |
| 4. Others notified (select all that apply); | <input checked="" type="checkbox"/> Conservation Commission | | |
| | <input checked="" type="checkbox"/> Harbormaster <input type="checkbox"/> Shellfish Warden <input checked="" type="checkbox"/> Division of Marine Fisheries | | |
| | <input type="checkbox"/> Downstream Drinking Water Supplier <input type="checkbox"/> Watershed Association | | |
| | <input type="checkbox"/> Beach Resource Manager <input checked="" type="checkbox"/> Other: MWRA (specify) | | |

C. SSO Information

1. SSO Discovered: 4/16/17 07:50 am pm
 Date Time
- By: Police
2. SSO Stopped: 4/16/17 08:10 am pm
 Date Time
3. SSO Discharge from: Sanitary Sewer Manhole Pump Station
- Backup into Property Other: _____ (specify)
4. SSO Discharge to: Ground Surface (no release to surface water)
- Direct to Receiving Water _____ (surface water)
- Catch basin to Receiving Water _____ (surface water)
- Backup into Property Basement



Massachusetts Department of Environmental Protection
 Bureau of Resource Protection – Watershed Permitting Program
Sanitary Sewer Overflow (SSO)/Bypass
Notification Form

FOR DEP USE ONLY

Tax Identification Number _____

C. SSO Information (cont.)

Location: 200 Libbey Industrial Parkway
 (Description of discharge site or closest address)

5. Estimated SSO Volume at time of this Report: 500 gals

Method of Estimating Volume: gals x mins

6. Cause of SSO Event:

Rain Event Pump Station Failure Insufficient Capacity in System

Treatment Unit failure

Sewer System Blockage: Pipe Collapse Root Intrusion Grease Blockage

Other: _____
 (Specify)

7. Corrective Actions Taken:

Bubbler tube blocked with grease caused Libbey Station to fill up causing over flow from manhole next door at 200 Libbey Industrial Parkway. As soon as we purged bubbler tube station pumped down in 10 minutes causing overflow to stop.

Impact Area cleaned and/or disinfected: Yes No

Corrective Actions Completed: Yes No

D. Comments/Attachments/Follow-up

I wish to provide (select all that apply):

Attachment Additional comments below: No additional comments or attachments

Additional comments and planned actions:



Massachusetts Department of Environmental Protection
Bureau of Resource Protection – Watershed Permitting Program
Sanitary Sewer Overflow (SSO)/Bypass
Notification Form

FOR DEP USE ONLY

Tax Identification Number _____

E. Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Authorized Representative

04/18/17

Date Signed

Please keep a copy of this report for your records. When submitting additional information, include the MassDEP Incident Number from this report.

MassDEP Regional Office and EPA Telephone and Fax Numbers:

Northeast Region	Phone: 978-694-3215	Fax: 978-694-3499
Southeast Region	Phone: 508-946-2750	Fax: 508-947-6557
Central Region	Phone: 508-792-7650	Fax: 508-792-7621
Western Region	Phone: 413-784-1100	Fax: 413-784-1149
EPA Contact	Phone: 617-918-1870	Fax: 617-918-0870
DEP 24-hour emergency	Phone: 888-304-1133	

1988 TRUST

OWNER'S NAME **Smith, James, Tree of Libby Realty Trust** ADDRESS **200 Libbey Ind. Pkwy.**

SEND BILL TO **Same** BILL: ADDRESS **P.O. Box 306, Rockland, Ma. 02370**

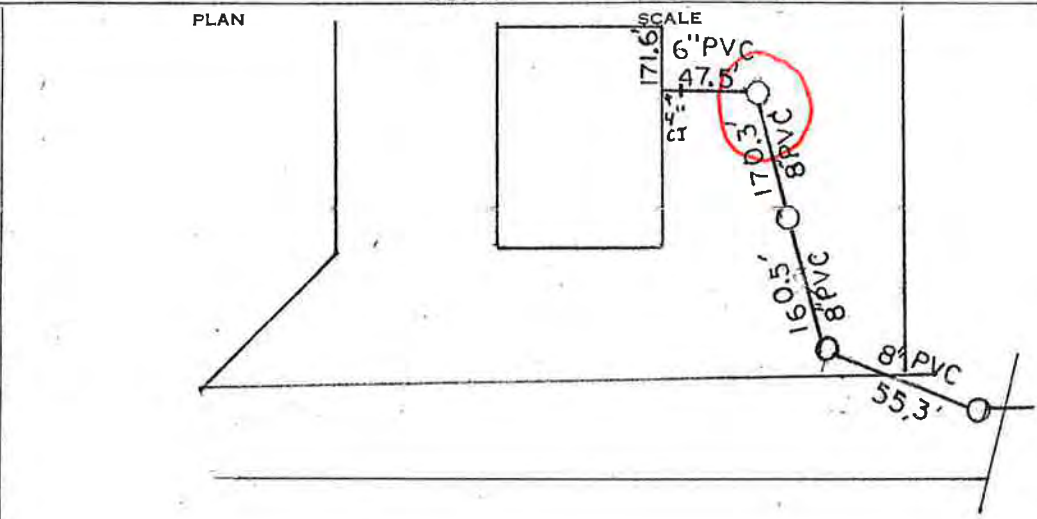
APPLICATION NO. **14658** DATE **5/2/86** CONNECTED TO SEWER IN

SEWER PLAN NO. AMT. **\$668.81** DATE ACCT. **13322**

ASSMT. CERT NO. BLOCK **435** LOT **14** PAGE **38**

DOC. CERT. BOOK PAGE LAND CT. **120475** BOOK **603** PAGE **75** L. C. LOT

MAIN TO ST. LINE	
ST. LINE TO BLDG.	
TOTAL LENGTH	433.60
DEPTH AT MAIN	8.50
DEPTH AT ST. LINE	
DEPTH AT BLDG.	2.50
SOIL CONDITIONS	
WORKING COND.	good
WORK STARTED	8-3-87
WORK COMP.	8-13-87
REMARKS	C-93 D & C
OFFICE/WAREHOUSE	
<i>By: [Signature]</i>	
<i>Paid 2-8-89</i>	



WEYMOUTH SEWER DEPT.—PARTICULAR SEWER RECORD—WEYMOUTH, MASS.

OWNER'S NAME ADDRESS OF PROPERTY

GREAT POND, WEYMOUTH



Concerns, issues, questions on LSTAR Notice of Proposed Change (NPC) EEA 11085R issued 2/28/2017
Joseph Shea, Abington representative on Southfield Advisory Board - 4/6/2017
3 Wyman Road, Abington MA 02351

RECEIVED

APR 21 2017

Executive Office of Energy
& Environmental Affairs

A: Overall concerns

1. I am concerned about the extent of the changes (see pages 3, 4 of the NPC). The number of 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.
2. I am also concerned about the short period given for review of the NPC. I believe the required NPC review period is 4 weeks. However, while the NPC dated 2/28/17, the mail date on my copy is 3/3/17. I did not receive it until 3/3. This reduced the review period from 4 to 3 weeks. This is a problem for communities such as Abington which do not have sufficient planning staff available for quick reviews.

I am also concerned about the lack of advance notice by LSTAR that the NPC was to be issued. LSTAR representatives met with Abington Board of Selectmen on 2/27/17 evening but I do not remember hearing any mention that the NOPC would be issued the next day so that the town could prepare to review and comment.

3. I believe the 3 communities will need projections of how many people will be working and living at Southfield overall and in each community's area of Southfield. This would need to be projected at each phase of the project. This will be needed by the communities to plan the staffing and other resources needed to support this population (especially public service).

Some related questions are:

what % of the workers on the site will be working "traditional" hours ("9 to 5") and how many on "night" shifts?

What will be the number of vehicles (especially large ones) projected especially with the increased commercial area? What will be night traffic for trucks?

B. Traffic concerns

1. 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 increase in truck traffic and its impact be? With the greatly increased commercial development will there be more impact at peak hours?

2. 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.

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?

3. 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?

4. 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?

5. 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.

6. Given the amount of construction that will be needed for the updated plan, the developer and their subcontractors will need to meet regularly with all towns involved to discuss any potential traffic impacts during construction, especially large vehicles.

7. Because of the projected increased costs for the larger project to the Town of Abington, when is commercial/industrial development projected on the Abington portion of Southfield? The resulting tax revenues will be needed to fund the services needed.

C. Water

1. 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.

Joseph Ahen 4/18/17

Johnson, Holly (EEA)

From: joyce bethoney <joycebethoney@gmail.com>
Sent: Wednesday, April 19, 2017 9:30 AM
To: Johnson, Holly (EEA)
Subject: Union Street Rockland Mass

Dear Holly Johnson,

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.

This end of Union street is the nicest in our humble blue collar town. 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 area".

This is a short distance from our street and already provides access. There is no need for an additional opening.

Opening the end of Union street to this development would not only be dangerous to those of us walking dogs on the street but for the safety and well being of children and elderly in the area. Our "downtown" area has no major draw. No one is missing out on anything and quite frankly the argument of those living at Union point would come to Rockland more is false. Those housing projects are on the other side of the development and those people are closest to numerous restaurants and shopping in Weymouth.

It would be irresponsible and short sighted to ruin our town with yet another major cut through.

Please keep Union street closed.

Thank you

Joyce Bethoney
859 Union Street
Rockland, MA 02370
617.834.2116

#2

March 30, 2017

Sec'y Matthew Beaton
Executive Office of Energy & Environmental Affairs
100 Cambridge St. Suite 900
Boston, Mass.02114



ATTENTION: HOLLY JOHNSON

REGARDING Notice of Project Change Union Pt. EEA #11085R

Dear Holly Johnson:

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.

First: A recent traffic study of the area has added 79,000 vehicles to the already 39,000 vehicles coming through a quiet dead end street. VFW Drive meets No. Union St and at its peak hours is bumper to bumper. Residents now experience difficulty getting in and out of their own driveways. I for one cannot get into my driveway without tailgaters, horn blowing and obscene gestures; getting out I rely on a good Samaritan.

Second: Environmental problems such as endangered species are in this very location of Union Pt. and have been investigated by the authorities.

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.

Thank you for taking my plea that this is not good for the Town of Rockland and especially all of Union St.

Sincerely,

A handwritten signature in black ink that reads "Mrs Kathleen Peters". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kathleen Peters

821 No. Union St.

Rockland, Mass. 02370

Johnson, Holly (EEA)

From: Kathleen Peters <kathpete@verizon.net>
Sent: Tuesday, April 18, 2017 3:52 PM
To: Johnson, Holly (EEA)
Subject: comment Union Point No.Union St.Rockland

**Holly S. Johnson
Cambridge St.
Boston, Mass.**

Dear Ms. Johnson **REGARDING UNION POINT & NORTH UNION ST,
ROCKLAND**

I have been a lifetime resident of Rockland living on North Union St. like many other residents of the area.

Amid the recent publicity regarding Union Point and N.Union St. gate area my comments are as follows.

To open this area at the end of N.Union St. for through traffic from Union Point to Southfield absolutely promises a deleterious

effect to Rockland's Union St. and its tributaries.

Traffic studies have been done numerous times and the most recent traffic study has added 79,000 to already 39,000 vehicles which is devastating.

Second, environmental problems such as endangered species are in this very location of Union Pt. which has been thoroughly investigated by EPA .

Opening of the N.Union St. gate will do NOTHING for the Town of Rockland but flood the area with traffic using it as short cuts to other towns and escape

traffic lights and route 18. Side roads also affected, Salem St., Oregon Ave., Liberty St., Pleasant St. North Ave. are a few to mention.

Also when traffic meets VFW Dr. already burdened with extremely high traffic volume would be source for another calamity.

Third, home values will plunge if this gate is open as a through way.

Fourth,Overwhelmingly voters here in Rockland have turned down this notion at least three times within the last 8 years

Thank you for taking my plea and consideration that opening Union St. gate is not good for the Town of Rockland or safety for the residents and their children who live here.

Sincerely, Mrs. Kathleen Peters, North Union St., Rockland, Mass.

- 1. Unbearable traffic**
- 2. Environmental reasons**
- 3. Safety reasons**
- 4. Endangered species**
- 5. home values plunge**
- 6. do nothing for the town of Rockland**

These are just some of the reasons NOT to open Union St gate

THANK YOU FOR LISTENING.

Johnson, Holly (EEA)

From: Kathleen Peters <kathpete@verizon.net>
Sent: Tuesday, April 18, 2017 8:32 PM
To: Johnson, Holly (EEA)
Subject: Union Point Project

*Sec'y Matthew Beaton
Executive Office of Energy & Environmental Affairs
100 Cambridge St. Suite 900
Boston, Mass. 02114*

*RE: Union Point Project EEA Rockland,
Mass.*

Dear Secretary Beaton:

*I have been lifetime resident of Rockland residing on Union St..
Amid recent publicity Union Point and North Union St. gate area my
comments are as follows.*

*To open this area at the end of No. Union St. for thru traffic from Union
Point to Southfield absolutely promises
a deleterious effect to Rockland's Union St. and its tributaries.*

*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 this small town.*

*secondly, environmental problems such as endangered species are living
in this same location of Union Point which has been thoroughly
investigated by the EPA.*

*Opening of the Union St. gate for thru traffic will do NOTHING for the
Town of Rockland but flood the area with new traffic using it as short*

cuts to other towns or to escape traffic lights. Side roads also affected; Salem St., Oregon Ave. Greenwood St.. Liberty St., Pleasant St., North Ave. are a few to mention. When traffic meets VFW Drive already burdened with extremely high traffic volume would be a source for another calamity. In short, Rockland would become a drive-thru town.

*third, Home values will plunge if this gate is open as a thru way.
fourth, overwhelmingly voters here in Rockland have turned down this notion of opening this gate at least three times within the last 8 years at town meetings.*

Thank you for taking my plea and consideration that opening Union St gate is NOT good for the Town of Rockland or for the safety of the residents and their children who live here.

- 1. Unbearable traffic*
 - 2.environmental reasons*
 - 3.endangered species*
 - 4.home value plunge*
 - 5.absolutely no advantage for the Town of Rockland*
- just a few reasons not to open Union St. gate*

Thank you for listening

Sincerely,

Mrs. Kathleen Peters, Union St., Rockland, Ma.

RECEIVED

MAR 24 2017

MEPA

March 20, 2017

Executive Office of Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

LStar Southfield LLC
26 Memorial Grove Avenue
South Weymouth, MA 02190

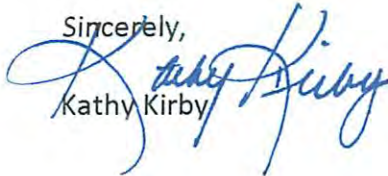
Re: Notice of Project Change, Union Point, EEA#11085R

Dear Reviewing Authority and Proponent:

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.

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.

Sincerely,


Kathy Kirby

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge St. Suite 900
Boston, MA 02114

RECEIVED

MAR 24 2017

MEPA

Subject: Notice of Project Change Union Point, EEA #11085R

March 19, 2017

Dear Secretary Beaton,

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.

Thank you for listening to my comments.

Sincerely,



Kirsten Rolph

HJ

March 16, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge St. Suite 900
Boston, MA 02114
ATTN: Holly Johnson

RECEIVED
MAY 20 2017
MEPA

Subject: Notice of Project Change Union Point, EEA #11085RMA

To Whom It May Concern:

I am writing to you in opposition of the proposed opening of the Union St. Gate, within the residential neighborhood in Rockland, Massachusetts.

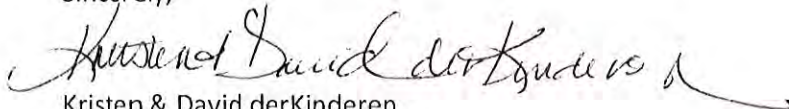
My concern in opening the gate is the amount of thruway traffic that would be generated from one end of Rockland to the other. Neighboring towns will simply use Union Street as a cut through from Braintree/Weymouth all the way to Halifax, causing Rockland's streets to be flooded with traffic, much like Hingham St. and Pond St.

The neighborhood in which the gate is located, is a small tight knit community, with streets barely big enough for two cars to pass by each other. To accommodate the amount of traffic opening the gate would create, the roads would have to be widened and reconfigured. Many of us in the neighborhood barely have any frontage on our property as it is, most of our houses sit very close to the street.

There are a lot of us who have young children who play outside. This is my greatest concern, as it would impact their safety and wellbeing. Right now, our kids can safely ride their bikes, play manhunt and basketball without too much fear of getting hit by a car or strangers approaching. There is also the question of wildlife. The areas by the gate are surrounded by wetlands, which are home to many endangered species. I would imagine with the increased pollution the traffic will cause, these endangered species would die and become extinct in our area.

The impingement to my home and more importantly our neighborhood would be significant. I urge you to visit the area and reconsider this proposal. Thank you very much for your time and consideration.

Sincerely,



Kristen & David derKinderen
1010 Union St.
Rockland, MA 02370
339-788-8578
krisndavedk@verizon.net

Johnson, Holly (EEA)

From: Laura McCarthy <laura.a.mccarthy@comcast.net>
Sent: Wednesday, April 19, 2017 8:24 AM
To: Johnson, Holly (EEA)
Subject: Union Point Project

Sectary Matthew Beaton
Executive Office of Energy & Environmental Affairs
100 Cambridge St. Suite 900
Boston, Mass 02114

Re: Union Point Project, Rockland, MA

Dear Secretary Beaton,

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.

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.

Rockland would become a “ drive-thru town” and property values in the area would be adversely affected. Rockland voters have overwhelmingly voted **against** opening the North Union Street gate at least three (3) times within the last eight (8) years at town meetings.

As an environmentalist, I am very concerned about the numbers of endangered species that inhabit the Union Point area. This fact has been thoroughly investigated by the EPA.

Opening the North Union street gate in Rockland would **not** be good for the Town of Rockland, the citizens who live here and the endangered wildlife that inhabit the area of Union Point.

Thank you for your time and consideration,

Laura A. McCarthy
925 Liberty Street
Rockland, MA 02370

April 3, 2017

Sec'y Matthew Beaton
Executive office of Energy and Environmental Affairs
100 Cambridge st. STE 900
Boston , Mass.

RECEIVED

APR 06 2017

MEPA

ATTN HOLLY JOHNSON Union Pt. EEA #11085R
Project Notice change Union Pt

Dear Ms Johnson:

I settled in Rockland year 1954 and built my home on Lavina Ave , a quiet community, adjacent from the North Union St gate area.

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 collison course with replacement of VFW Drive just up the Street from this area in question.

Traffic studies from Southfield and Union Pt. have been done and has added 80,000 vehicles to the 40,000 already confirmed. This would be devastating to Union St and its surrounding side roads as already the bumper to bumper traffic from VFW Dr during work hours find ways to short cut thru Rockland to other towns.

Now these roads have become more like living in a City. THREE times Rockland voters have voted this idea and plan down because of the safety and environmental issues.

The area in question is also is home to endangered species which was confirmed awhile past.

Opening this gate will do nothing for the Town of Rockland but only to add more vehicles to the already stressed roads and turn into a drive thru town escaping route 18 to Whitman, Abington , Hanson etc. Home values would certainly plunge and the historic Union St. destroyed. Thank you for hearing my case about N.Union St gate.

Sincerely,

Lillie Durgan

Ms Lillie Durgan, Lavina Ave, Rockland, Mass. 02370

INCREASE SINCE

ON A SLOW DAY THE
PEAK 3-6 P

traffic

UNION PT. ~~UNION~~



THIS IS WHAT I WOULD HAPPEN
WITH TRAFFIC

meeting UFW DR.

UNION ST



Mary A. Parsons
754 Union St.
Rockland, MA 02370
March 9, 2017

RECEIVED

APR 13 2017

MEPA

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs

100 Cambridge Street, Suite 900

Boston, MA 02114

Subject: Notice of Project Change Union Point, EEA #11805R

Dear Secretary Matthew A. Beaton,

These are my comments to the Notice of Project Change for the redevelopment of the former Naval Air Station South Weymouth, formerly know as Southfield and recently renamed Union Point.

I find there are some inaccuracies and omissions in this Notice of Project Change (NPC). Through no fault of the current Master Developer, much of the mitigation for this project has not been done to date and I find this NPC listing the same alternatives as are in the 2007 FEIR. The previous developers did nothing.

Page 2 which state Agency Permits will the project require?

Please name the DOT Street needing an Access Permit for opening. The Delahunt Parkway and the Patriot Parkway are not MASS state highways. These private roads were paid for with state funds.

Page 3 Summary of Project Change Parameters and impacts

Footnote 1 states the full development program is shown in Table 1.6.1 **there is no table 1.6.1 in the NPC**

LAND

Total site acreage states 1386 acres of land. This acreage includes the 64 acre Coast Guard land that is not transferred to the Southfield Redevelopment Authority (SRA) and not transferable to the Master Developer, LStar. Please detail where this extra acreage is in the EIR.

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.

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. There is no map showing the location of the change and the explanation for the change.

1.0 PROPOSED PROJECT CHANGE

PAGE 1-9

Table 1.3-1 Union Point Development Program

Open Space

The golf course was reduced in size to 156 acres per the Certificate dated July 28, 2007. 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 204 acres here are actually listed on the zoning maps as Golf Course/ Open Space District (GOSD).

Reconfiguration of Open Space and Habitat Preservation

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? Was a Notice of Project Change submitted for the change in status since the golf course has been eliminated? The trail system is outside of the golf course area.

PAGE 1-10

1.3.4. Infrastructure Improvements

1.3.4.1 Water Supply

Seventeen years after the ENF for the redevelopment of NAS South Weymouth was first filed, we are still commenting on 3 alternatives to supply water (some are the same) to the former Naval Air Station. The MWRA, through a dedicated eight-mile pipeline is the preferred. A new connection point (M-166) is being evaluated. There isn't any mention of needing to meet #10 of the MWRA requirements for entrance to the MWRA and what has been initiated to start the process. There needs to be a timeline when the permanent water supply will be at Union Point/ former NAS South Weymouth.

Page 1-11

Interim water supply

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 250,000gpd." The two towns have **not committed** to supply 250,000gpd. They have agreed to review and analyze the Myers Avenue well to see if it could provide 250,000gpd.

Page 1-13

1.3.4.3 Transportation

1.3.5 Bill Delahunt Parkway Construction Status

Reservoir Park Drive was left out of this statement in sentence 1. The Delahunt Parkway connects to Hingham Street indirectly through Reservoir Park Drive. The parkway (named the Patriot Parkway) from the Delahunt Parkway to Trotter Rd. was completed and opened on November 23, 2016.

Page 15

1.4 Status of MEPA review

1.5 Previously Proposed Project

Next last paragraph, "The Legislation, enacted in 1998 by the Massachusetts General Court as Chapter 310" should be **Chapter 301**.

Page 1-17

1.6 2014 Legislation

The Acts of 2014, chapter 291, reformed the SSTITDC into a new governing board of the former NAS South Weymouth. This Act made changes to the previous 1998 legislation, but did not change its public corporation status. It called for the new board, Southfield Redevelopment Authority, (SRA) to name a Master Developer for the redevelopment project of the former Naval Air Station South Weymouth. A Citizen Advisory Committee was formed and reviewed the environmental impacts to this project from 2001 to 2007. 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. I still have my FEIR volumes.

Next to last paragraph:

"In response to the Act, the Proponent created a development plan that retains many of the goals of the 2007 FEIR project and provides significantly greater benefit to the Host Communities." The FEIR is not about project goals; it is about environmental impacts and the solutions to mitigate those impacts not goals. Goals are an objective, and end result, you strive to achieve but do not have to happen. Currently the widening of Reservoir Park Drive and Hingham Street in Rockland has not been done and is not mentioned in this NPC. The Proponent has incorporated the old Navy perimeter roads into the trail system and the previous are of Thompsons' Pond outside the NAS South Weymouth was purchased by the former Master Developer, LNR, in 2006. Please state

the Conservation Restriction book page and number and whether or not it is a deed restriction or a Grant of Restriction.

1.7.2 Rockland

The newly created chapter 291 allowed the town to zone their respective area of the former NAS South Weymouth. The amendment for the Annual Rockland Town Meeting was created by the Rockland Open Space Committee, The Proponent and the zoning sub-committee. The selectmen placed the amendment on the Town Warrant and 730 people voted unanimously to approve the zoning overlay district in May 2016.

1.7.3 Weymouth

Weymouth has a mayoral form of government and an 11 member Town Council who approved the zoning change in that town.

Page 1-21

The parkway (Patriot Parkway) is now complete to Trotter Rd.

Page 2-1

2.0 Potential Impacts

2.1 Transportation

3rd paragraph, Table 2.1.1 does not show any other phase than phase 1.

2.1.4 Study Area

Table 2.1.2 Study Area intersections

Rockland # 31, Union St. and Market St. (Market St. is also Rte. 123).

Rte. 123 Webster St. and E. Water Street is left out of study Area.

Weymouth

#'s 39, 40 and 41 Why are these Weymouth town roads under Mass DOT jurisdiction?

Page 2-7

2.1.5 Traffic Volumes

Table 2.1.3 Study Area intersections Volumes

One Street only was studied for the Town of Rockland – Hingham St.

This is a list of streets a traffic study was not done in Rockland and should have been done. The month of June is not the best month for traffic studies here. After school activities are done and some people are away for vacation.

Weymouth St. North and south of the Delahunt Parkway.

Hingham St. North and south of Reservoir Park Drive.

Reservoir Park Drive.

VFW Drive

Union St. south of VFW Drive and north of North Ave.

North Ave. east and west of Salem and Plain St. Rte. 139

Salem St.

Spruce St. Rockland

Union St. south of North Ave.

Union St. at the center of town.

Union St. north and South of Taunton Ave. at 2:30 p.m.

Webster St. (Rte. 123) at Hingham St. both east and west

Abington St. Rockland at Weymouth St. Rockland

East Water St. (Rte 123) at Liberty St. Rockland

The Bill Delahunt Parkway intersects with Weymouth St. and Reservoir Park Drive in Rockland yet there is no traffic study for this street or Weymouth Street. And VFW Drive.

Does the difference in traffic volume on Hingham Street north of Commerce Road end up on Reservoir Park Drive?

The mitigation in the FEIR for Reservoir Park Drive and Hingham St. has not been done as of this NPC.

Opening of the Union Street Gate (in Rockland) at the former NAS South Weymouth property line is an issue the residents who live on Union St. and adjacent roads off Union St. and of VFW Drive. Opening that gate will not disperse traffic from Union Point since the parkway does not disperse traffic, it only takes traffic from one heavily congested roadway (Rte 18) to another heavily congested roadway (Reservoir Park Drive to Hingham St.), and it will not revitalize downtown Rockland. It will destroy a large residential neighborhood, which includes Greenwood Ave. Oregon Ave., Salem St. Spruce St. Forest St. West Pleasant St., Lincoln Rd.; all become cut-thru streets for rush hour traffic. The area inside the former NAS South Weymouth fence is rare specie habitat and was received by the SRA board through the Federal Lands to Parks Program through the National Park Service for use by the general public. The SRA Board cannot sell this land. The New Master Developer (the proponent of this NPC) has started the work on walking trails and protected rare species space. The Federal Lands to Parks

Program acreage at the Union St. Gate is also protected rare species land with specific infrastructure in place.

Page 2-8

2.1.6 Infrastructure Improvements since the 2007 FEIR

Second paragraph – the first sentence needs to be corrected to state: “the Bill Delahunt Parkway serves as the main thoroughfare connecting Rte. 18 and **Weymouth Street, Reservoir Park Drive and Hingham Street/Route 3.**” **Weymouth Street has been left out as the connection to Hingham Street in more than one place in this NPC.**

South Shore Hospital employees park at 67 Sharp St. daily and have a shuttle service to take the employees to work at the hospital. This is traffic that is on Weymouth Street, since Liberty Street in Weymouth, Sharp Street in Hingham become Weymouth St. in Rockland. It is one roadway. Columbian Square generates traffic on these roads and into Rockland and Hingham. The hospital employees have to travel these roads to park and take the shuttle.

Third paragraph – The parkway between Shea Memorial Drive and Trotter Road has been completed.

Page 2- 9

2.1.7 Proposed Improvements from Section 61 Findings/FEIR

Route # Connection – second sentence, needs correcting to read: “**Hingham Street and Reservoir Park Drive will be reconstructed to provide a consistent four-lane cross-section between Weymouth Street and Route3.**” This is mitigation, in the FEIR, to be done now. The Proponent is responsible for this mitigation. The proponent states they have contributed \$450,000 to advance the design of Columbian Sq. 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.

3rd sentence – define the relocation of the South Weymouth Commuter Rail Station Platform.

Page 2-10

Weymouth Street/Sharp Street/ Abington St. (which the intersection is located in Rockland) functions better without the delay a traffic signal would cause.

Page 2-11

Define the reason for relocation of South Weymouth commuter Rail Parking Lot. Where would this be located?

Page 2-16

2.2 Noise

2.3.1 Summary of the Study Presented in the EIR

This study did not include the cul-de-sac area of Union St. It also did not include Oregon Ave., Greenwood Street, Warren Ave. Stanley Ave., Lavina Ave. and Ward Ave. all off 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.

Page2-17

2.3.3 Change to the Project

Will an EIR be done for the changes in certain Thresholds to this current project? And will a Citizen Advisory Committee be appointed to review the impacts of the this project since the this project has had state funding for the Bill Delahunt / Patriot Parkway, which is not a state road /highway.

Page 2-18

2.4 Wildlife Habitat and Rare Species

2.4.1 Rare Species Protection

Second paragraph, The SRA and the proponent of this NPC were not in existence here when the SSTTDC and the former proponent of the FIER (LNR) implemented measures to protect rare species(eastern box turtle and grasshopper sparrow) inside and outside along the Delahunt Parkway in Rockland in 2011.

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.

The signed CMP, dated March 2, 2009, requested an additional +/-449 acres of Open Space through Grants of Restriction, in addition to the +/-381 acres of Public Benefit

Conveyance Land owned by the SSTTDC now SRA board. The 85 acres on the east end of the site has been placed under a CR, but the zoning has not been changed to reflect this. It is still zoned for housing.

Page 2-19

2.4.2 Summary of 2007 FEIR

The 2 year mowing cycle of the grassland in the CMP had not taken place as of this date.

Is there a new CMP for this project?

The last paragraph states there the 280 acre Golf Course was placed under a permanent deed restriction. The actual Golf Course area was reduced before the final EIR to 156 acres.

Page 2-20

2.4.3 Current Status

The 280 acres of golf course included the ripping up of runway to the north of the grassland area. Figure 1.7-1 shows the mixed use development overlay in the proposed grassland CR area in Abington and Rockland. The map also shows the Golf Course / Open Space District (GOSD) as 203 acres and not 280 acres.

Rockland Town Meeting approved a zoning overlay district that covers part of the eliminated Golf Course. How does this affect the 280 acre Golf Course area? Has a new CR been done and where can this be found? What other protections, institutional controls like fencing, for this acreage will be installed to protect the grassland area from people trashing it? Mixed use development will occur in the northern acreage. This does not remove human disturbance from the area. Quite the opposite will happen with mixed use development abutting the grassland. Nothing, to date, has been done to enhance it. A peat pile, consisting of asphalt, concrete, tree stumps, rebar, has been sitting on the runways for the past 10 years, which fragments the grassland. Previous proponents claimed to use the peat for landscaping for Southfield/Union Point. Unfortunately the new proponent has inherited this problem.

Mowing has not happened last year and currently this year. More and More woody product is taking over the grassland. Nothing has been done to remove it. That issue squarely rests with Natural Heritage not enforcing the mowing.

Page 2-21

Table 2.4.1 Comparison of Golf Course Restriction Plans

The Golf Course has been eliminated in the project.

Page 2-21

2.5 Wetland Resources

Page 2-28

Table 2.5.2

There is no map showing the locations of the wetlands areas identified as B,C,D,E,F,Q,I M. The FEIR graphics shows some of the areas. Not everyone has a copy of the graphics from the FEIR.

Page 2-30

Open Space Program

2.6.1 Summary of Discussion in the EIRs

This paragraph states, “Open Space, thus defined referred not only to woodland, wetland, parkland and playing field, but also sidewalks, lawns, sitting areas, and large areas not regularly occupied by people or machines.”

My comment in the 2007 FEIR:

“Privately owned lawns on residential property, zoning setbacks between commercial/business buildings, public sidewalks are not what the public understood to be open space. The proponent should state how much acreage is taken up by private lawns for housing / business and commercial buildings.”

MAPC is a proponent of stating ‘open space’ is also sidewalks, lawns, sitting areas etc. People, and especially children, think they can park their body on someone else’s lawn etc.

Page 2-31

2.6.2 Proposed Open Space

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 and 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, 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?

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.

Page 2-34

2.9 Stormwater

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.

Page 2-36

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.

Page 2-38

2.9.4 Conformance with the 2007 FEIR Master Plan

The 2007 Master plan project included a net increase of 22 acres of impervious area. This new project results in an increase of 75 acres of impervious surface. Stormwater outfalls to one of two rivers on the former NAS South Weymouth, French's Stream or Old Swamp River, an ORW to Weymouth's drinking water supply. The current stormwater system was built by the Navy to drain surface water off the runways as fast as possible. This system is still be used. French's Stream flooded homes and streets even with no Navy presence except for the Navy caretaker since the Base closed in 1997.

Two new detention / retention ponds are built along the bank of French's Stream and discharge into the stream at the water level. French's Stream has an east branch and a west that join together on the land outside the fence boundary of NAS South Weymouth that was owned by the former NAS South Weymouth. French's Stream west branch overflows its banks during certain rain events without major changes to the impervious surface. The Rockland section is woods and grassland and will receive flooding from the 75 acres of future build in the Weymouth section of NAS South Weymouth.

Currently the stream overflowed its banks in a small rain event Saturday morning April 2nd. This stream goes back to its normal flow immediately after the rain stops. This time

the stream didn't return to normal. Water was still flowing from the new detention / retention ponds into French's Stream the following day. Apparently groundwater was at capacity. Some of these detention / retention ponds never dry up, not even in last years' drought. It is my opinion the Weymouth conservation Commission and the SRA conservation Commission were remiss in the placement of the outfall pipe for the overflow of the detention / retention ponds connected to French's Stream and will cause more flooding to homes and streets(West Water Street floods in sever storms). 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 to be done in the town of Weymouth on the former Naval Air Station South Weymouth. The Rockland Conservation Commission has consults that have expertise in peak rate of runoff. They have already exhibited this with the TACAN Outfall when a small structure was removed with out obtaining MADEP permits. The current SRA conservation agent was responsible for not obtaining permits. I have all the information and was the one who contacted MADEP. The outcome was the then board of directors received a UAO for not having a valid Order of Conditions. The board members are not knowledgeable in these matters and rely on the current conservation agent to write the proper Order of Conditions.
The flooding of French's Stream

Page 2-39

2.10 Wastewater

2.10.2.1 All MWRA sewer alternative

The section of the former military base in Weymouth serviced by MWRA sewer is currently in the South Coastal River Basin. The section of Rockland in the former military base to have future sewer service is in the Boston Harbor River Basin. This section references #OP.11 for entrance to the MWRA sewer alternative.

I understand South Shore industrial Park was looking to sewer through Weymouth. Hingham was also looking to place a pump station between Deerfield Rd. and Recreation Park Drive in Hingham. This section did not mention the 540,000gpd of wastewater generated by future build.

Page 2-242

2.10.2.2 All On-site Treatment Alternative

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 600,000gpd of water and 540,000gpd of sewer capacity.

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.

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.

There is only one location that could be sited (FEIR) for a WWTP. That location is in the Abington section along French's Stream.

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.

Also, the section of Weymouth located on the former NAS South Weymouth and currently serviced by MWRA sewer is actually located in the South Coastal River Basin. A large portion of the Rockland section to be developed is in the Boston Harbor River Basin and should not need an inter-basin transfer to sewer the Rockland section of the former naval base. The same should happen for the Abington section since it is in the South Coastal River Basin and Weymouth is already servicing sewer in that basin.

Page 2-43

2.11 Water

2.11.1 Water demand

Current Union Point water demand is 49,100gpd average. Water demand changes to 100,000gpd in summertime. Weymouth drinking water currently irrigates the landscaping at Union Point.

The legislation governing the redevelopment of the former Naval Air Station South Weymouth changed in 2014 and requires the master developer to procure, finance, operate and maintain the permanent water supply and wastewater infrastructure for the project per section 15a of chapter 291 of the acts of 2014 of the Commonwealth of Massachusetts.

2.11.2.1 Interim Weymouth water supply

Has MADEP given Weymouth a permit to supply a total of 600,000gpd? Great Pond and Whitman's Pond are 85% of Weymouth's drinking water supply and are significantly drawn down in summertime. Recharge of these two ponds takes longer to recover from the drawdown without a drought. Photos have been sent to MADEP Boston for ten years. Whitman's Pond is also a herring run in springtime. The herring spawn in the entire pond, including the section called 'south cove'. Whitman's Pond was a recreational pond

only until 1965 when it became an emergency water supply. Now it is pumped to Great Pond regularly to provide adequate drinking water for the residents of Weymouth.

2.11.2.2 Interim Abington-Rockland Supply

This section states the Abington / Rockland Joint Water Works has committed to provide up to 250,000gpd. This is not true. 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 250,000gpd temporarily until a permanent water supply is in place.

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? Will the wastewater infrastructure be bonded and by whom was well?

Mary A. Parsons,
Citizen Advisory Committee member for MEPA# 11085 and #11085R
Redevelopment of the former NAS South Weymouth
Former Rockland Selectman
Former Executive Director ARAWH
754 Union Street
Rockland, MA 02370
maryaparsons@verizon.net

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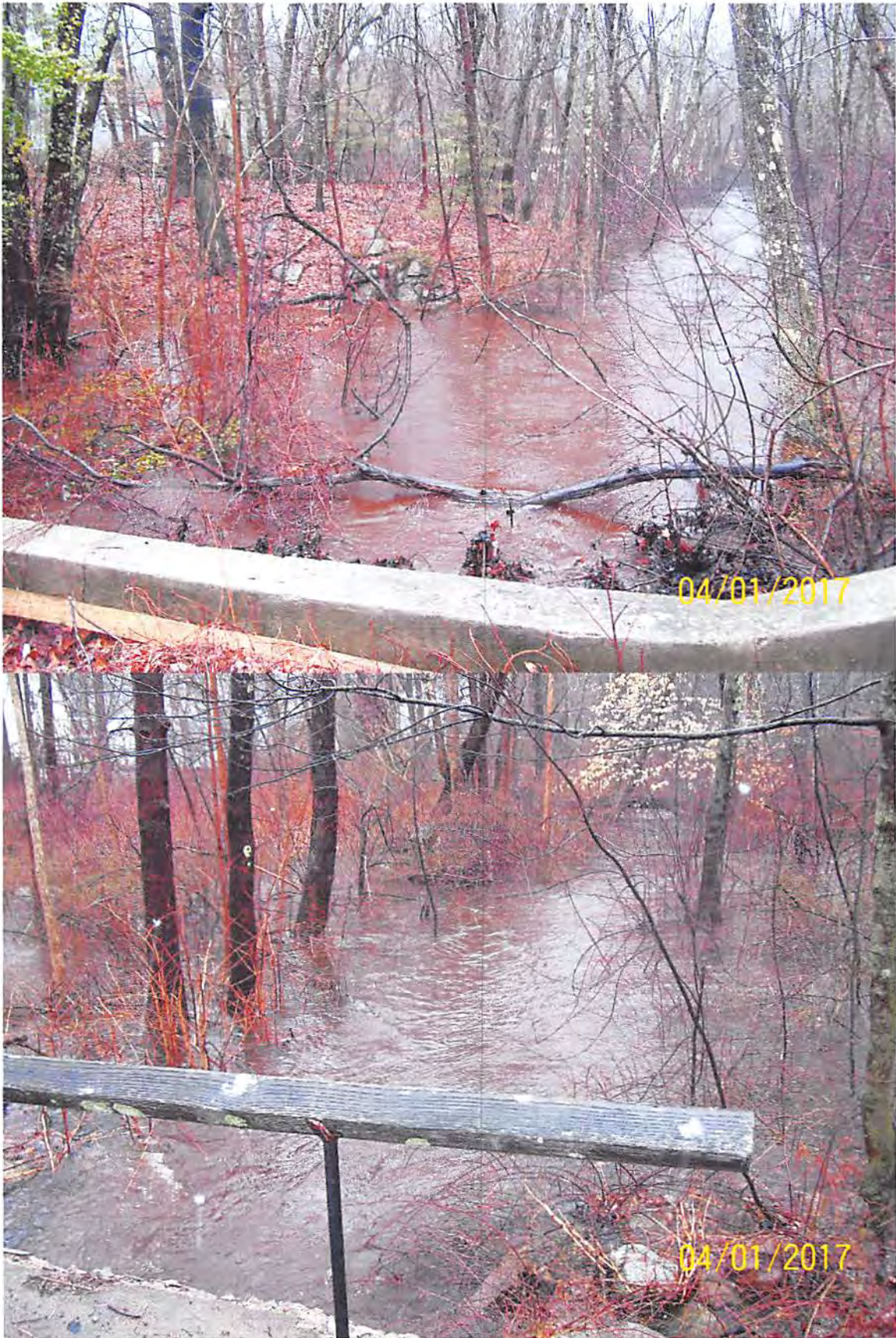
I did not see MWRA #OP 10 mentioned in this NPC. According to the agreement with Weymouth, LStar has agreed to pay the MWRA fees. Will this be bonded and by whom? Will the wastewater infrastructure be bonded and by whom was well?

Attachments: photos of French's Stream flooding before it leaves former NAS South Weymouth

Strom drain on former NAS South Weymouth, Weymouth section sending stormwater into French's Stream at stream level next day.

Mary A. Parsons,
Citizen Advisory Committee member for MEPA# 11085 and #11085R
Redevelopment of the former NAS South Weymouth
Former Rockland Selectman

754 Union Street
Rockland, MA 02370
maryaparsons@verizon.net





Johnson, Holly (EEA)

From: Mary Parsons <maryaparsons@verizon.net>
Sent: Thursday, April 20, 2017 6:45 PM
To: Johnson, Holly (EEA)
Subject: Comment to Notice of prjoect Change Union Point EEA #11085R

Hi Holly,

I have corrected my grammar in my comments to the NPC #EEA 11085R and i have added a photo of a house being flooded.

Mary P

Mary A. Parsons
754 Union St.
Rockland, MA 02370
March 9, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Subject: Notice of Project Change Union Point, EEA #11805R

Dear Secretary Matthew A. Beaton,

These are my comments to the Notice of Project Change for the redevelopment of the former Naval Air Station South Weymouth, formerly know as Southfield and recently renamed Union Point.

I find there are some inaccuracies and omissions in this Notice of Project Change (NPC). Through no fault of the current Master Developer, much of the mitigation for this project has not been done to date and I find this NPC listing the same alternatives as are in the 2007 FEIR. The previous developers did nothing.

Page 2 which state Agency Permits will the project require?

Please name the DOT Street needing an Access Permit for opening. The Delahunt Parkway and the Patriot Parkway are not MASS state highways. These private roads were paid for with state funds.

Page 3 Summary of Project Change Parameters and impacts

Footnote 1 states the full development program is shown in Table 1.6.1 **there is no table 1.6.1 in the NPC**

LAND

Total site acreage states 1,386 acres of land. This acreage includes the 64 acre Coast Guard land that is not transferred to the Southfield Redevelopment Authority (SRA) and not transferable to the Master Developer, LStar. Please detail where this extra acreage is in the EIR.

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.

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. There is no map showing the location of the change and the explanation for the change.

1.0 PROPOSED PROJECT CHANGE

PAGE 1-9

Table 1.3-1 Union Point Development Program

Open Space

The golf course was reduced in size to 156 acres per the Certificate dated July 28, 2007. 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 204 acres here are actually listed on the zoning maps as Golf Course/ Open Space District (GOSD).

Reconfiguration of Open Space and Habitat Preservation

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? Was a Notice of Project Change submitted for the change in status since the golf course has been eliminated? The trail system is outside of the golf course area.

PAGE 1-10

1.3.4. Infrastructure Improvements

1.3.4.1 Water Supply

Seventeen years after the ENF for the redevelopment of NAS South Weymouth was first filed, we are still commenting on 3 alternatives to supply water (some are the same) to the former Naval Air Station. The MWRA, through a dedicated eight-mile pipeline is the preferred. A new connection point (M-166) is being evaluated. There isn't any mention of needing to meet #10 of the MWRA requirements for entrance to the MWRA and what has been initiated to start the process. There needs to be a timeline when the permanent water supply will be at Union Point/ former NAS South Weymouth.

Page 1-11

Interim water supply

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 250,000gpd." The two towns have **not committed** to supply 250,000gpd. They have agreed to review and analyze the Myers Avenue well to see if it could provide 250,000gpd.

Page 1-13

1.3.4.3 Transportation

1.3.5 Bill Delahunt Parkway Construction Status

Reservoir Park Drive was left out of this statement in sentence 1. The Delahunt Parkway connects to Hingham Street indirectly through Reservoir Park Drive. The parkway (named the Patriot Parkway) from the Delahunt Parkway to Trotter Rd. was completed and opened on November 23, 2016.

Page 15

1.4 Status of MEPA review

1.5 Previously Proposed Project

Next to last paragraph, “The Legislation, enacted in 1998 by the Massachusetts General Court as Chapter 310” should be **Chapter 301**.

Page 1-17

1.6 2014 Legislation

The Acts of 2014, chapter 291, reformed the SSTITDC into a new governing board of the former NAS South Weymouth. This Act made changes to the previous 1998 legislation, but did not change its public corporation status. It called for the new board, Southfield Redevelopment Authority, (SRA) to name a Master Developer for the redevelopment project of the former Naval Air Station South Weymouth. A Citizen Advisory Committee was formed and reviewed the environmental impacts to this project from 2001 to 2007. 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. I still have my FEIR volumes.

Next to last paragraph:

“In response to the Act, the Proponent created a development plan that retains many of **the goals of the 2007 FEIR project** and provides significantly greater benefit to the Host Communities.” **The FEIR is not about project goals**; it is about environmental impacts and the solutions to mitigate those impacts not goals. Goals are an objective, and end result, you strive to achieve but does not have to happen. Currently the widening of Reservoir Park Drive and Hingham Street in Rockland has not been done and is not mentioned in this NPC. The Proponent has incorporated the old Navy perimeter roads into the trail system and the previous area of Thompsons’ Pond outside the NAS South Weymouth was purchased by the former Master Developer, LNR, in 2006. Please state the Conservation Restriction book page and number and whether or not it is a deed restriction or a Grant of Restriction.

1.7.2 Rockland

The newly created chapter 291 allowed the town to zone their respective area of the former NAS South Weymouth. The amendment for the Annual Rockland Town Meeting was created by the Rockland Open Space Committee, The Proponent and the zoning sub-committee. The selectmen placed the amendment on the Town Warrant and 730 people voted unanimously to approve the zoning overlay district in May 2016.

1.7.3 Weymouth

Weymouth has a mayoral form of government and an 11 member Town Council who approved the zoning change in that town. The towns people did not vote the change in zoning.

Page 1-21

The parkway (Patriot Parkway) is now complete to Trotter Rd.

Page 2-1

2.0 Potential Impacts

2.1 Transportation

3rd paragraph, Table 2.1.1 does not show any other phase than phase 1.

2.1.4 Study Area

Table 2.1.2 Study Area intersections

Rockland # 31, Union St. and Market St. (Market St. is also Rte. 123).

Rte. 123 Webster St. and E. Water Street is left out of study Area.

Weymouth

#'s 39, 40 and 41 Why are these Weymouth town roads under Mass DOT jurisdiction?

Page 2-7

2.1.5 Traffic Volumes

Table 2.1.3 Study Area intersections Volumes

One Street only was studied for the Town of Rockland – Hingham St.

This is a list of streets a traffic study was not done in Rockland and should have been done. The month of June is not the best month for traffic studies here. After school activities are done and some people are away for vacation. A better time for study is October or April.

None of the streets listed below were studied:

Weymouth St. North and south of the Delahunt Parkway.

Hingham St. North and south of Reservoir Park Drive.

Reservoir Park Drive.

VFW Drive

Union St. south of VFW Drive and north of North Ave.

North Ave. east and west of Salem and Plain St. Rte. 139

Salem St.

Spruce St. Rockland

Union St. south of North Ave.

Union St. at the center of town.
Union St. north and South of Taunton Ave. at 2:30 p.m.
Webster St. (Rte. 123) at Hingham St. both east and west
Abington St. Rockland at Weymouth St. Rockland
East Water St. (Rte 123) at Liberty St. Rockland

The Bill Delahunt Parkway intersects with Weymouth St. and Reservoir Park Drive in Rockland yet there is no traffic study for this street or Weymouth Street and VFW Drive.
Does the difference in traffic volume on Hingham Street north of Commerce Road end up on Reservoir Park Drive?

The mitigation in the FEIR for Reservoir Park Drive and Hingham St. has not been done as of this NPC.

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. Opening that gate will not disperse traffic from Union Point since the parkway does not disperse traffic, it only takes traffic from one heavily congested roadway (Rte 18) to another heavily congested roadway (Reservoir Park Drive to Hingham St.), and it will not revitalize downtown Rockland. It will destroy a large residential neighborhood, which includes Greenwood Ave. Oregon Ave., Salem St. Spruce St. Forest St. West Pleasant St., Lincoln Rd.; all become cut-thru streets for rush hour traffic. The area inside the former NAS South Weymouth fence is rare specie habitat and was received by the SRA board through the Federal Lands to Parks Program through the National Park Service for use by the general public. The SRA Board cannot sell this land. We could use a sign stating it is the Federal Lands to Parks Program through the National Park Service that is currently at the Spruce Street trail system for the former NAS south Weymouth.

The New Master Developer (the proponent of this NPC) has started the work on walking trails and protected rare species space. The Federal Lands to Parks Program acreage at the Union St. Gate is also protected rare species land with specific infrastructure in place.

This Master Developer has started to physically make improvements to this project which is a plus to the area surrounding the former military base.

Page 2-8

2.1.6 Infrastructure Improvements since the 2007 FEIR

Second paragraph – the first sentence needs to be corrected to state: “the Bill Delahunt Parkway serves as the main thoroughfare connecting Rte. 18 **and Weymouth Street, Reservoir Park Drive** and Hingham Street/Route 3.” **Weymouth Street has been left out as the connection to Hingham Street in more than one place in this NPC.**

South Shore Hospital employees park at 67 Sharp St. daily and have a shuttle service to take the employees to work at the hospital. This is traffic that is on Weymouth Street, since Liberty Street in Weymouth, Sharp Street in Hingham become Weymouth St. in Rockland. It is one roadway. Columbian Square generates traffic on these roads and into Rockland and Hingham. The hospital employees have to travel these roads to park and take the shuttle.

Third paragraph – The parkway between Shea Memorial Drive and Trotter Road has been completed.

Page 2- 9

2.1.7 Proposed Improvements from Section 61 Findings/FEIR

Route # Connection – second sentence, needs correcting to read: “Hingham Street **and Reservoir Park Drive** will be reconstructed to provide a consistent four-lane cross-section between Weymouth Street and Route3.” This is mitigation, in the FEIR, to be done now. The Proponent is responsible for this mitigation. The proponent states they have contributed \$450,000 to advance the design of Columbian Sq. in South Weymouth.

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.

3rd sentence – define the relocation of the South Weymouth Commuter Rail Station Platform.

Page 2-10

Weymouth Street/Sharp Street/ Abington St. (which the intersection is located in Rockland) functions better without the delay a traffic signal would cause.

Page 2-11

Define the reason for relocation of South Weymouth commuter Rail Parking Lot. Where would this be located?

Page 2-16

2.2 Noise

2.3.1 Summary of the Study Presented in the EIR

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 to increased traffic.

Page2-17

2.3.3 Change to the Project

Will an EIR be done for the changes in certain Thresholds to this current project? And will a Citizen Advisory Committee be appointed to review the impacts of the this project since this project has had state funding for the Bill Delahunt / Patriot Parkway, which is not a state road /highway.

Page 2-18

2.4 Wildlife Habitat and Rare Species

2.4.1 Rare Species Protection

Second paragraph, The SRA and the proponent of this NPC were not in existence here when the SSTTDC and the former proponent of the FIER (LNR) implemented measures to protect rare species(eastern box turtle and grasshopper sparrow) inside and outside along the Delahunt Parkway in Rockland in 2011.

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.

The signed CMP, dated March 2, 2009, requested an additional +/-449 acres of Open Space through Grants of Restriction, in addition to the +/-381 acres of Public Benefit Conveyance Land owned by the SSTDTC now SRA board. The 85 acres on the east end of the site has been placed under a CR, but the zoning has not been changed to reflect this. It is still zoned for housing.

Page 2-19

2.4.2 Summary of 2007 FEIR

The 2 year mowing cycle of the grassland in the CMP had not taken place as of this date.

Is there a new CMP for this project?

The last paragraph states there the 280 acre Golf Course was placed under a permanent deed restriction. The actual Golf Course area was reduced before the final EIR to 156 acres.

Page 2-20

2.4.3 Current Status

The 280 acres of golf course included the ripping up of runway to the north of the grassland area. Figure 1.7-1 shows the mixed use development overlay in the proposed grassland CR area in Abington and Rockland. The map also shows the Golf Course / Open Space District (GOSD) as 203 acres and not 280 acres.

Rockland Town Meeting approved a zoning overlay district that covers part of the eliminated Golf Course. How does this affect the 280 acre Golf Course area? Has a new CR been done and where can this be found? What other protections, institutional controls like fencing, for this acreage will be installed to protect the grassland area from people trashing it? Mixed use development will occur in the northern acreage. This does not remove human disturbance from the area. Quite the opposite will happen with mixed use development abutting the grassland. Nothing, to date, has been done to enhance it. A peat pile, consisting of asphalt, concrete, tree stumps, rebar, and brick has been sitting on the runways for the past 10 years, which fragments the grassland. Previous proponents claimed to use the peat for landscaping for Southfield/Union Point. Unfortunately the new proponent has inherited this problem.

Mowing has not happened last year and currently this year. More and More woody product is taking over the grassland. Nothing has been done to remove it. That issue squarely rests with Natural Heritage not enforcing the mowing.

The mowing has recently occurred.

Page 2-21

Table 2.4.1 Comparison of Golf Course Restriction Plans

The Golf Course has been eliminated in the project.

Page 2-21

2.5 Wetland Resources

Page 2-28

Table 2.5.2

There is no map showing the locations of the wetlands areas identified as B,C,D,E,F,Q,I M. The FEIR graphics shows some of the areas. Not everyone has a copy of the graphics from the FEIR.

Page 2-30

Open Space Program

2.6.1 Summary of Discussion in the EIRs

This paragraph states, “Open Space, thus defined referred not only to woodland, wetland, parkland and playing field, but also sidewalks, lawns, sitting areas, and large areas not regularly occupied by people or machines.”

My comment in the 2007 FEIR:

“Privately owned lawns on residential property, zoning setbacks between commercial/business buildings, public sidewalks are not what the public understood to be open space. The proponent should state how much acreage is taken up by private lawns for housing / business and commercial buildings.”

MAPC is a proponent of stating ‘open space’ is also sidewalks, lawns, sitting areas etc. People, and especially children, think they can park their body on someone else’s lawn etc.

Page 2-31

2.6.2 Proposed Open Space

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?

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.

Page 2-34

2.9 Stormwater

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.

Page 2-36

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.

Page 2-38

2.9.4 Conformance with the 2007 FEIR Master Plan

The 2007 Master plan project included a net increase of 22 acres of impervious area. This new project results in an increase of 75 acres of impervious surface. Stormwater outfalls to one of two rivers on the former NAS South Weymouth, French's Stream or Old Swamp River, an ORW to Weymouth's drinking water supply. The current stormwater system was built by the Navy to drain surface water off the runways as fast as possible. This system is still be used. French's Stream flooded homes and streets even with no Navy presence except for the Navy caretaker since the Base closed in 19997.

Two new detention / retention ponds are built along the bank of French's Stream and discharge into the stream at the water level. French's Stream has an east branch and a west branch that join together on the land outside the fence boundary of NAS South Weymouth that was owned by the former NAS South Weymouth. French's Stream west branch overflows its banks during certain rain events without major changes to the impervious surface. The Rockland section is woods and grassland and will receive flooding from the 75 acres of future build in the Weymouth section of NAS South Weymouth.

Currently the stream overflowed its banks in a small rain event Saturday morning April 2nd. This stream goes back to its normal flow immediately after the rain stops. This time the stream didn't return to normal. Water was still flowing from the new detention / retention ponds into French's Stream the following day. Apparently groundwater was at capacity. Some of these detention / retention ponds never dry up, not even in last years' drought. It is my opinion the Weymouth conservation Commission and the SRA conservation Commission were remiss in the placement of the outfall pipe for the overflow of the detention / retention ponds connected to French's Stream and will cause more flooding to homes and streets(West Water Street floods in sever storms). 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. The Rockland Conservation Commission has consults that have expertise in peak rate of runoff. They have already exhibited this with the TACAN Outfall when a small structure was removed without obtaining MADEP permits. The current SRA conservation agent was responsible for not obtaining permits. I have all the information and was the one who contacted MADEP. The outcome was the then board of directors received a UAO (file #SE273-0363) for not having a valid Order of Conditions. The board members are not knowledgeable in these matters and rely on the current conservation agent to write the proper Order of Conditions.

French's Stream floods home through Rockland.

Page 2-39

2.10 Wastewater

2.10.2.1 All MWRA sewer alternative

The section of the former military base in Weymouth serviced by MWRA sewer is currently in the South Coastal River Basin. The section of Rockland in the former military base to have future sewer service is in the Boston Harbor River Basin. This section references #OP.11 for entrance to the MWRA sewer alternative. Weymouth has already crossed the inter basin from the Boston Harbor River Basin to the South Coastal River Basin and the area in the Rockland section of the former NAS South Weymouth is in the Boston Harbor River Basin.

I understand South Shore industrial Park was looking to sewer through Weymouth. Hingham was also looking to place a pump station between Deerfield Rd. and Recreation Park Drive in Hingham. This section did not mention the 540,000gpd of wastewater generated by future build.

Page 2-242

2.10.2.2 All On-site Treatment Alternative

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Page 2-43

2.11 Water

2.11.1 Water demand

Current Union Point water demand is 49,100gpd average. Water demand changes to 100,000gpd in summertime. Weymouth drinking water currently irrigates the landscaping at Union Point.

The legislation governing the redevelopment of the former Naval Air Station South Weymouth changed in 2014 and requires the master developer to procure, finance, operate and maintain the permanent water supply and wastewater infrastructure for the project per section 15a of chapter 291 of the acts of 2014 of the Commonwealth of Massachusetts.

2.11.2.1 Interim Weymouth water supply

Has MADEP given Weymouth a permit to supply a total of 600,000gpd? Great Pond and Whitman's Pond are 85% of Weymouth's drinking water supply and are significantly drawn down in summertime. Recharge of these two ponds takes longer to recover from the drawdown without a drought. Photos have been sent to MADEP Boston for ten years.

Whitman's Pond is also a herring run in springtime. The herring spawn in the entire pond, including the section called 'south cove'. Whitman's Pond was a recreational pond only until 1965 when it became an emergency water supply. Now it is pumped to Great Pond regularly to provide adequate drinking water for the residents of Weymouth. I grew up on the 'south cove side' of Whitman's Pond during the drought of 1964-65 and boated on the pond at the time. Also there never were boards or a sluice gate at the bridge at Washington St. (Rte. 53) at Whitman's Pond in East Weymouth.

2.11.2.2 Interim Abington-Rockland Supply

This section states the Abington / Rockland Joint Water Works has committed to provide up to 250,000gpd. This is not true. 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 250,000gpd temporarily until a permanent water supply is in place.

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? Will the wastewater infrastructure be bonded and by whom was well?

Attachments: photos of French's Stream flooding before it leaves former NAS South Weymouth Strom drain on former NAS South Weymouth, Weymouth section sending stormwater into French's Stream at stream level next day.

Mary A. Parsons,
Citizen Advisory Committee member for MEPA# 11085 and #11085R
Redevelopment of the former NAS South Weymouth
Former Rockland Selectman

754 Union Street
Rockland, MA 02370







Johnson, Holly (EEA)

From: Mary Parsons <maryaparsons@verizon.net>
Sent: Thursday, April 20, 2017 9:12 PM
To: Johnson, Holly (EEA)
Subject: Comments 2 to Union Pont NPC

Hi Holly,

These are my comments to the NPC for EEA# 11085R

Mary A. Parsons
754 Union St.
Rockland, MA 02370
March 9, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Subject: Notice of Project Change Union Point, EEA #11805R

Dear Secretary Matthew A. Beaton,

These are my second set of comments to EEA# 11085R

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?

Below are a few dated photos of Great Pond before residents were living in Union Point and after residents moved in. The first resident moved into Southfield/Union Point in July of 2011. We can't make rain and we can't stop rain. We also can't stop a drought. Whitman's Pond will come in a separate comment.













































Johnson, Holly (EEA)

From: Mary Parsons <maryaparsons@verizon.net>
Sent: Friday, April 21, 2017 2:31 PM
To: Johnson, Holly (EEA)
Subject: comments 3 to Union Point NPC

Hi Holly these are photos of Whitmans' Pond part of Weymouth surface drinking water supply.

Mary P

Mary A. Parsons
754 Union St.
Rockland, MA 02370
March 9, 2017

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Subject: Notice of Project Change Union Point, EEA #11805R

Dear Secretary Matthew A. Beaton,

These are comments to the water issue in the Notice of Project Change for EEA# 11085R

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? Great Pond and Whitman's Pond are Weymouth's surface water supply and these ponds make up 85% of Weymouth's water supply. As of the 2008 Certificate on the NPC for EEA # 11085(dated April 11th), Weymouth's allowable withdrawal is 5.0mgd. At the time Weymouth was withdrawing 4.3mgd. Since then, Union Point (formerly Southfield) has grown substantially and is still growing. Below are photos of Whitman's Pond before and after residential growth. These are photos of the 'south cove' side where water is withdrawn and sent to Great Pond to be treated for drinking water supply. When the stone pier is showing, the back of Whitman's Pond is dry. There are pictures of the sluice gate at the Washington St. bridge (Rte. 53) that crosses Whitman's Pond. There wasn't a sluice gate until 1996. This was a recreation pond until 1965 when the great drought turned it into an emergency water supply. Now it is pumped daily to Great Pond in South Weymouth for drinking water. These are photos of the 'south cove' side which is pumped to Great Pond. The pond fills when the sluice gate is down. Between 1965 and 1996 there wasn't a sluice gate and boards at the bridge. The last two pictures are of the bridge on the side of Whitman's Pond that leads to the back river and the herring run.



















































































4/21/17

Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA. 02114

Subject: Notice of Project Change

Union Point, EEA#11085R

Dear Secretary Beaton,

The following are my comments to this NPC.

First, I would like to say that the L-Star Development team are by far the finest group of gents you could meet and would want to be at the helm for this project. Although the complexities of this project are enormous in magnitude, their team is finding solutions to these challenges.

Clearly this project will bring in much needed revenue to the three host communities and create a boost to the regional economy and create jobs in this area for many years to come. The recently released Master Plan appears to be better than ever imagined possible for this closed Naval Air Station.

Subsequent to the filing of this NPC and from watching local presentations by the Master Developer, it appears they have found solutions to a sustainable water supply and the sewer issues for this project. The last major hurdle and probably the most challenging in my opinion is how to deal with the enormous amount of additional traffic generated by the new plan.

I will focus my following traffic comments to the Rockland area.

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.

Please see in the 2007 FEIR, Volume 11- Graphics, FiG 4.2-7 to see the final proposed conditions for this intersection for the 2007 FEIR traffic volume amounts. I would think this intersection would need to be studied even further with the proposed additional traffic.

In my opinion Reservoir Park Drive will certainly need to be widened to two lanes in each direction with an additional right lane at the Hingham Street intersection to accommodate a right turn heading south on Hingham Street..

To my understanding, Hingham Street from Reservoir Park Drive to Route 3 would be at full capacity after being widened to accommodate the additional traffic created by the 2007 FEIR traffic figures. So the question is whether or not Hingham Street can sustain the added traffic volumes included in this NPC. This deserves a thorough review.

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?

Further traffic reviews may be needed at the VFW Drive and Pleasant, VFW Drive and Union Street, Union and Salem and Union and North Ave intersections.

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 SSTITDC).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.

I should probably disclose that I sat as a member on the Citizens Advisory Committee for this project from its inception right up until its ending for the 2007 FEIR.

Thank you for your consideration,

Mike Bromberg
373 Forest Street
Rockland, MA. 02370

April 3, 2017

Executive Office of Energy and Environmental Affairs
100 Cambridge Street Suite 900
Boston, Ma 02114

RECEIVED

APR 06 2017

Executive Office of Energy
& Environmental Affairs

Re: Public Comment to the Notice of Project Change to the redevelopment of the former NAS South Weymouth now Union Point, EEA#11085.

Secretary Matthew A. Beaton;

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).

Within this NPC the proponent consistently speaks to the goal of protecting and preserving; Open Space, Wetlands, and Wild Life Habitat To highlight this point I am focusing on statements within the NPC section 1.6, 1.7, 2.4 and 2.5

- "Union Point is focused on creating a high-quality redevelopment by implementing Smart Growth-derived master planning principles that foster an environmentally sensitive and pedestrian- scale development. The Proponent is expanding on those earlier development goals by providing open space of substantially higher quality and preserving additional high-value habitat for protected species through the elimination of an earlier proposed golf course."
- "The planned acquisition of land abutting the Project site, for conservation purposes, also advances the Proponent's goal of achieving an exceptional level of habitat preservation."
- Plan and zoning amendments described in the NPC, "allow the Proponent to provide additional residential units and commercial space in areas of increased density. The increased density enables Union Point to more efficiently meet redevelopment goals and minimize impacts on the environment and surrounding communities"
- The Project changes "retain the key goals and objectives of the 2007 FEIR project. The refinement of both Smart Growth and Leadership in Energy and Environmental Design for Neighborhood Design (LEED ND) planning principles, now incorporated in the Union Point plan, ensure that the redevelopment will result in a compact and active community that preserves open space, restores and protects habitat, and generates significant financial benefits for the Host Communities and the Commonwealth."

- “Rare species habitat has also been protected through permanent conservation restrictions (CRs). An 11.8-acre parcel east of the site, known as the Rocklands Meadows, was acquired by the Proponent, placed under permanent CR, and transferred to the Town of Rockland. Approximately 85 acres on the east end of the site have been placed under permanent restriction to protect box turtle habitat, and an additional 71 acres of grassland and forest at the south end of the site have also been placed under a CR and transferred to the town of Rockland. Approximately 85 acres on the east end of the site have been placed under permanent restriction to protect box turtle habitat, and an additional 71 acres of grassland and forest at the south end of the site have also been placed under a CR.”
- “Approximately 383 acres of wetland resources were identified and delineated on the Project site. All of the Adjacent Vegetated Wetlands, regulated as Waters of the United States under Section 404 of the Clean Water Act (33 U.S.C. § 1251 et seq.), and listed in Table 2.5-1, are also regulated as Bordering Vegetated Wetland (BVW) under the MWPA. Based on coordination with the United States Army Corps of Engineers (USACE) and additional observations made by USACE staff during a site visit conducted on March 24, 2006, it was determined that all of the Isolated Vegetated Wetlands anticipated to be impacted by the Project are subject to regulation under Section 404 of the Clean Water Act.”

I believe that the opening the Union Street gate would be counter to the principles as stated in the NPC and would have devastating, long lasting affects on the wetlands and wild life in this area.

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 the “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.

Thank you.



Pamela Titus
864 Union Street
Rockland, Ma. 02370
pjtspirit@gmail.com

RECEIVED

APR 03 2017

Executive Office of Energy
& Environmental Affairs

989 Union Street
Rockland, MA, 02370

Attn: Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge St. Suite 900
Boston, MA 02114

Subject: Notice of Project Change Union Point,
EEA#11085R

Dear Sir:

For many reasons, I oppose the opening of North Union Street onto Union Point. Admittedly some are very personal, others less so.

When the road was blocked off in the early forties, families typically owned one car. If it was like other towns of the time there may still have been the occasional ragsman with a horse and cart. Most houses now already have at least twice the number of vehicles. 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.

When I first moved into the neighborhood in the early seventies North Union Street was quite literally a drag strip until constant patrolling by the state police to get it under

control. There is still the occasional incident of this. If the gate is opened the temptation for this happening again would be great especially for those driving north from Union Point. It looks like a starting ramp even to me.

Driving south on Union Street at six p.m. can be a nightmare already.

I have waited through as many as five or six lights to get on my way south. The cars from the south nearly hook bumpers to make sure they turn before those from the north can move forward. During the day, funerals at Holy Family can also cause traffic difficulties at that corner. There are few other options for those going south. One is to drive the very small roads of Oregon Street and Greenwood Street to Spruce Street, or Spruce Street itself. Neither is set up for that kind of traffic. Or one can go left down Forest Street and across VFW and make ones way to Market Street.

Again these are very residential spaces not designed for heavy traffic. VFW already backs way up during the evening commute so people would be looking for other options.

The North Union Street neighborhood has been a walking kind of neighborhood and has been for my entire seventy one year old life. When I recently had hip replacement surgery I was able to recuperate by walking on the side of the road. The sidewalks are only on one side, in very bad shape and often blocked by overgrown plants. In the winter they not only are often not shoveled, but would also be difficult to shovel because of their condition. Many of us walk for our mental and physical health. I do not want to have to drive somewhere else to walk around and around a track. Many others come here because we have quite safe places to walk or run. In order to get out to drive somewhere else to walk, I would have to get much better at backing my car into my driveway because backing into the

road would become much more difficult.

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.

It is also true that the area between the current end of Union and the rotary at Union Point has been designated as protected by the National Park Service.

Pamela D. Worden

Johnson, Holly (EEA)

From: bouzanboysthree <bouzanboysthree@verizon.net>
Sent: Tuesday, April 18, 2017 10:23 PM
To: Johnson, Holly (EEA)
Subject: Union St

Dear Holly, we have been a resident of the dead end section of Union st. For 17 years. We have three boys who are very active and love to ride bikes, play sports etc in the streets of our fairly quiet neighborhood!! Once in a while we get someone that comes flying down this street!! I can't imagine the traffic that would come through our nice little neighborhood!!! We live in a little town, we are not going to compete with the surrounding bigger towns!! When we moved here we loved (and still do) the cute stores, the quiet neighborhood of friends walking their pets And children down the middle of our dead end!! Please help keep our neighborhood a neighborhood where children can play without worrying about being hit by card 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!!

Thank you,

Patricia and Brian Bouzan

Union st

Sent from my Samsung smartphone, an AT&T 4G LTE smartphone

Johnson, Holly (EEA)

From: trish <onwhitmanspond@gmail.com>
Sent: Thursday, April 20, 2017 11:23 PM
To: Johnson, Holly (EEA)
Subject: Notice of Project Change Union Point, EEA #11805R
Attachments: NPC Comments.odt

Hello -

Below and attached are comments regarding EEA #11805R.

Tricia Pries

15 Woodbine Road

Weymouth, MA 02189

April 20, 2017

Secretary Matthew A. Beaton

Executive Office of Energy and Environmental Affairs

100 Cambridge Street, Suite 900

Boston, MA 02114

Subject: Notice of Project Change Union Point, EEA #11805R

Dear Secretary Beaton:

From the earliest meetings on what the town residents wanted on the former South Weymouth Naval Air Station, there were always comments and concerns on infrastructure capacity including water, sewer and roads.

Pumping water from Whitman's Pond, which are spawning grounds for River Herring, resulted in herring being stranded in the Herring Run ladders in 2010; the Weymouth Herring Run is one one of the largest herring runs in the Commonwealth of Massachusetts.

The sewer main at the intersection of Pleasant St. and Pine St. has been discharged by the Town of Weymouth into Old Swamp River Sewer. Please see pictures and information, that were deliverables for an EPA TASC Grant associated with the Former South Weymouth Naval Air Station, at www.arawh.org.

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?

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.

Thank you for this opportunity to comment.

Respectfully,

Tricia Pries