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February 9, 2024

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

PROJECT NAME : South Weymouth Naval Air Station Redevelopment Project
PROJECT MUNICIPALITY : Abington, Rockland, and Weymouth
PROJECT WATERSHED : Weymouth & Weir, North & South Rivers, Taunton
EEA NUMBER : 11085R
PROJECT PROPONENT : BPD Union Point LLC c/o New England Development
DATE NOTICED IN MONITOR : December 22, 2023

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62L) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project change requires the preparation of an Environmental Impact Report (EIR). The Proponent submitted a Notice of Project Change (NPC) that was intended to respond to a Scope for a Draft Supplemental EIR (DSEIR) issued in 2017, and to identify changes to the project made since that time; however, the required DSEIR was not submitted with the NPC. As discussed below, the NPC discloses substantial changes to the proposed land uses with attendant consequences for environmental impacts. In addition, numerous comments raise concerns about the viability of water and wastewater solutions for the project; without resolution of these issues, the NPC fails to present a clear Preferred Alternative for the project. MEPA review procedures have been updated since 2017 to require a more robust consideration of climate change and environmental justice (EJ) outreach and analysis. For these reasons, I am denying the Proponent's request to effectively accept the NPC as a DSEIR, and to allow the project to move to the Final EIR stage. The Proponent should file an DSEIR that responds to the revised Scope included in this Certificate, which includes, among other items, a comprehensive alternatives analysis of the project's water and wastewater needs, updated transportation analyses and mitigation, a robust climate change and EJ evaluation, and other information to document the impacts of the project change and proposed mitigation measures. I note, in particular, that the NPC did not document the extent of diesel truck traffic

that will be generated by the warehousing and other proposed uses; if the average daily truck trips exceeds 150, the DSEIR should document efforts to conduct EJ outreach and should include EJ analysis over a 5-mile radius around the project site.

Procedural History

The South Weymouth Naval Air Station (“SWNAS” or “project site”) was constructed in the early 1940s during World War II. After the war ended, the site was used primarily for storage until 1953, then expanded with runways for use by jet aircraft. The SWNAS was recommended for closure in 1995 as a result of the Defense Base Realignment and Closure Act passed by the U.S. Congress in 1990. According to the Proponent, the Towns of Abington, Rockland, and Weymouth, within which the SWNAS is located, requested that the Governor of Massachusetts establish a Naval Air Station Planning Committee (NASPC) to develop a reuse plan. The NASPC submitted an Environmental Notification Form in March 1997 (the “1997 ENF”) which proposed the mixed-use redevelopment of the project site with approximately 2 to 3 million square feet (sf) of commercial space, 500 to 700 residential units, a golf course, open space and supporting roadways and other infrastructure. A Certificate on the 1997 ENF was issued on May 27, 1997 and required the filing of an EIR. The EIR was never submitted.

2000 Development Plan

To facilitate redevelopment of the site, the Massachusetts Legislature enacted Chapter 301 of the Acts of 1998 (“1998 Act”), which established the South Shore Tri-Town Development Corporation (SSTDC) as a Local Redevelopment Authority (LRA) to succeed the NASPC as the entity responsible for acquisition and redevelopment of the SWNAS. According to the NPC reviewed herein (the “2023 NPC”), the purpose of the 1998 Act was to promote the redevelopment of the base for nonmilitary uses 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.” The SSTDC submitted a new ENF (EEA# 11085R) in July 2000 (the “2000 ENF”). The 2000 ENF described a redevelopment program similar to the one proposed in the 1997 ENF, except that most of the commercial space was proposed for retail use, as well as off-site roadway improvements, including widening of Route 18 and construction of a new access road to the site from Route 3. The 2000 ENF requested the establishment of a Special Review Procedure (SRP) to allow for 1) the long-term phased review of the site build-out, 2) review of the off-site roadway improvements under a separate EIR review process which would potentially be combined with a National Environmental Policy Act (NEPA) review of the redevelopment of the SWNAS; and 3) construction of Phase 1 of the project prior to the filing of the DEIR for the full development program. An SRP Certificate was issued on October 11, 2000 which formalized the review procedure described above and formed a Citizens advisory Committee (CAC). The SRP Certificate required that Phase 1, which was anticipated to include up to 300,000 sf of office/Research & Development (R&D) space, 300 units of senior housing, and up to 12 playing fields, be described in a Phase 1 Report to be submitted for MEPA review. A Certificate on the 2000 ENF was issued on October 20, 2000 which included a Scope for both site redevelopment and the transportation improvements. A Request for an Advisory Opinion (RAO) was submitted on January 16, 2002 to request approval to include approximately 20,000 sf of retail in the Phase 1 Report; this request was approved in an Advisory Opinion dated January 23, 2002. The Phase 1 Report was submitted in May 2002 and a Certificate was issued on August 9, 2002. The Certificate on the Phase 1 Report granted a Phase 1 Waiver and required the filing of a Phase 1 Status Update to provide updates on the status of

transportation, wastewater and water infrastructure studies and improvement projects, additional information on open space and rare species habitat, and revised draft Section 61 Findings. The Phase 1 Status Update was submitted by SSTITDC on June 26, 2003 and provided an update on the status of the implementation of roadway improvements by MassDOT and wastewater system upgrades to be undertaken by the Town of Weymouth, reviewed potential on-site and off-site drinking water sources, reported on the findings of rare species habitat investigations, and identified areas of the site to be set aside as open space.

2005 Revised Master Plan

The SSTITDC submitted an NPC on December 2005 (2005 NPC) that described a revised “Village Center Master Plan” to supersede the full site buildout plan described in the 2000 ENF. The 2005 NPC proposed up to 2,850 residential units, 2 million sf of commercial/industrial space, 9 to 13 playing fields, an 18-hole golf course, and institutional space (including sites for a school and civic/community facilities). It also included an on-site wastewater treatment facility, water supply infrastructure, roadway improvements (including construction of an east-west parkway across the site), and expansion of the Massachusetts Bay Transportation Authority’s South Weymouth commuter rail station adjacent to the site to provide multi-modal transportation services. The 2007 FEIR identified the preferred water supply source as a direct connection to the Massachusetts Water Resources Authority (MWRA) water system, with an on-site well to supply some of the project’s needs; the Town of Weymouth was to supply up to 150,000 gpd until the MWRA connection was operational. The Town of Weymouth was also to accept 120,000 gpd of wastewater, which would be conveyed through the Town’s wastewater collection system to the MWRA’s sewer system until commencement of operation of the on-site treatment facility. The project was proposed to be constructed in 3 to 4 phases over a period of 12 years. A Certificate on the 2005 NPC was issued on February 19, 2006 and included a revised Scope for a DEIR. The DEIR was submitted in October 2006; the Certificate on the DEIR was issued on December 15, 2006 and included a Scope for the FEIR. The FEIR was submitted in May 2007 with an updated Village Center Master Plan consisting of 2,855 residential units, 1,825,000 sf of commercial space and other uses.

To ensure that the project would provide a mix of uses, the Village Center Master Plan linked the build-out of housing to construction of commercial space. As described in the 2007 FEIR, 150,000 sf of commercial space was required for every 500 residential units in Phase 1; a minimum of 300,000 sf of commercial space was required to be constructed by the end of Phase 2; and 150,000 sf of commercial space was required for every 425 residential units in Phase 3. The FEIR identified a set of mitigation measures to be implemented by the Proponent to increase capacity and improve operations of the roadway system. These measures were to have been completed in conjunction with the amount of land uses constructed, based on square footage. The Proponent was also required to conduct traffic monitoring and provide reports to MassDOT. The Certificate on the FEIR was issued on July 18, 2007 concluding that the project adequately and properly complied with MEPA and its implementing regulations. The FEIR Certificate also ended the CAC’s role in reviewing the project.

In 2008, an NPC (2008 NPC) was filed proposing changes to the interim water supply and wastewater treatment options for the project that were described in the 2007 FEIR. The Town of Weymouth’s interim water supply was to increase from 150,000 gpd (as proposed in the 2007 FEIR) to 245,000 gpd, and the Town was to accept 187,000 gpd of wastewater (an increase of 67,000 gpd from

the 2007 FEIR) until the on-site treatment facility became operational. A Certificate on the 2008 NPC was issued in April 2008 which did not require additional MEPA review; however, the Certificate noted that there were outstanding issues concerning the construction, operation, and maintenance of the water supply system and infrastructure that the Proponent needed to resolve with MassDEP.

In 2010, MassDOT submitted an RAO which requested that the Route 18 Widening Project be allowed to proceed through the MEPA process by filing a Supplemental EIR which would describe the environmental impacts of the project. An Advisory Opinion was issued on February 22, 2010 which noted that the joint MEPA/NEPA review of the roadway widening project had not occurred as originally anticipated in the SRP, and that the transportation impacts were addressed in the 2006 DEIR and 2007 FEIR filed for the redevelopment of the project site. The Advisory Opinion granted MassDOT's request to allow a Supplemental EIR be filed for the Route 18 project. The Supplemental EIR for the widening of Route 18 was filed in August 2012. A Certificate was issued on September 28, 2012 concluding that this Supplemental EIR adequately and properly complied with MEPA and its implementing regulations. The Route 18 Widening Project was completed in 2022.

2017 Revised Master Plan

In 2014, Chapter 291 of the Acts of 2014 was passed (the 2014 Act), which created the Southfield Redevelopment Authority (SRA) to replace the SSTTDC in the role of the LRA for site redevelopment. The 2014 Act reinforced municipal control over land use and development decisions affecting areas of the SWNAS within each of the host communities (Abington, Rockland, and Weymouth). Consistent with the 2014 Act, the SRA developed a Revised Master Plan (RMP) and the zoning bylaws in each of the host communities were amended to facilitate the RMP. The bylaws created overlay zoning districts which allow additional density and mixture of uses while minimizing demands on municipal services. The 2014 Act did not require any linkage between residential and commercial development.

In April 2017, the Proponent filed an NPC (2017 NPC) with MEPA which proposed a new development program as described in the RMP, including:

- A total of 3,855 residential units, including 355 single-family homes, 2,000 apartments/condominiums, 500 townhomes, and 1,000 age-restricted units;
- 8 million sf of commercial uses, including 2.8 million sf of life sciences uses, 1.6 million of manufacturing space, approximately 2.85 million sf of office space, 348,000 sf of retail uses, a 120,000-sf conference center, a 171,000-sf hotel with 285 rooms, a 270,000-sf stadium with 15,000 seats, a 120,000-sf hockey rink, and an 85,000-sf fitness/wellness center;
- Relocation of neighborhoods and the commercial district proposed in the 2007 FEIR;
- An increase in overall project density;
- Elimination of a planned golf course;
- Reconfiguration of and increase in permanently protected open space
- Potential preservation and repurposing of Hangar 2;
- Modifications to proposed water supply and wastewater treatment alternatives, including elimination of on-site wastewater treatment option due to incompatible soils.

The first phase of the RMP described in the 2017 NPC was similar in size, land uses and balance of land uses as the 2007 FEIR (Village Center Master Plan). The first phase was proposed to include 2,855 residential units and 2,060,00 sf of development, including: 565,000 sf of life sciences uses, 200,000 sf of manufacturing uses, 575,000 sf of office space, 300,000 sf of retail uses, a hotel, a stadium and a hockey rink. Subsequent phases would add approximately 6 million sf of life sciences, office, industrial, retail, hotel and other uses. A Certificate on the 2017 NPC was issued on April 28, 2017 and required the filing of a Draft Supplemental Environmental Impact Report (DSEIR).

A second NPC was filed in 2017 (2nd 2017 NPC) which did not propose any changes to the development plan described in the 2017 NPC, but requested changes in the phasing of previously-proposed transportation mitigation. The changes included elimination of the linkage between residential and commercial development identified in the 2007 FEIR to allow for more residential development prior to constructing required levels of commercial use, and that implementation of transportation mitigation be linked to environmental impacts rather than to the number of residential units and the square footage of commercial space. The Certificate on the 2nd 2017 NPC did not require further review of the proposed mitigation phasing and did not change the Scope for the DSEIR included in the Certificate on the 2017 NPC.

According to the Proponent, construction of initial infrastructure to support development of the northwest part of the site, including upgrades to Shea Memorial Drive and construction of Memorial Grove Avenue and Parkview Street (along with related utility systems), commenced in 2007 and have been completed. Construction of residential and commercial uses began in 2011. To date, the western part of the site north of Trotter Road has been developed with 1,274 residential units, 73,000 sf of commercial space (33,000 sf of retail space and a 40,000-sf senior living facility), a 25-acre sports and recreation facility, and a parking lot adjacent to the MBTA commuter rail station. In addition, the Bill Delahunt Parkway was constructed in an east-west orientation across the middle of the site.

2023 Project Change

The NPC currently under review, referred to herein as the “2023 NPC,” is the fifth NPC filed for the project. The 2023 NPC describes yet another substantial revision to the master development plan (referred to herein as the “2023 Modified Development Program”). The revised plan would generally maintain the gross square footage of buildings proposed in the 2017 NPC (13 million sf). However, upon full build-out of the site, the number of residential units would increase from 3,855 to 7,274 units (an addition of 6,000 units to the previously-constructed 1,274 units) and the total commercial space would be reduced from 8 million sf to 2 million sf (the 2 million sf includes 73,000-sf of retail space previously constructed). Approximately 885 acres of the 1,440-acre project site will be maintained as open space, including: a perimeter open space buffer between the site and adjacent neighborhoods; over 500 acres of permanently protected rare species habitat in the southern portion of the site; “core” open space areas with parks, playgrounds and other passive and recreational open space; and linear north-south greenways through the development area to be created by restoring currently paved runways and taxiways to connect perimeter open space areas and provide multi-use paths.

According to the 2023 NPC, the uses and space allocations presented for review were developed based on current market conditions, including a demand for housing, in order to assess the impacts and mitigation measures of the Preferred Alternative. Based on market conditions over the long build-out

period, the Proponent proposes to vary the relative amount of residential and commercial space to be constructed over time, so long as the impacts are no greater than those described in the 2023 NPC and the infrastructure can support the change. As discussed below, the DSEIR and future filings should identify worst-case scenarios (i.e., highest potential environmental impact) and attendant infrastructure needs (including water and wastewater infrastructure); however additional information on programming will be necessary to conduct meaningful review. If this is not achievable, future NPCs or a Special Review Procedure (SRP) may be necessary to ensure adequate review of future project components for which the viability of the necessary supporting infrastructure cannot yet be substantiated through the current MEPA review.

Project Area

The approximately 1,440-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. Several buildings, as well as runways, taxiways, and infrastructure associated with the former base are present at the site. As noted above, the northwest part of the site has been developed with 1,274 residential units, 33,000 sf of retail space, a 40,000-sf senior living facility), a sports recreational facility and roadways

Approximately 27% of the site (390 acres) of the site are comprised of wetland resource areas, including Bordering Vegetated Wetlands (BVW), Bank, Land Under Water (LUW) and Riverfront Area. According to the Federal Emergency Management Agency's (FEMA's) National Flood Hazard Layer, two small portions of the site are located within the 100-year floodplain (Zone A) with no Base Flood Elevation established, including an area associated with the Mill River in the northwest corner of the site in Weymouth and the areas adjacent to the West Branch of French's Stream in the southwestern part of the site in Abington. The Old Swamp River, which runs across the eastern side of the site is an Outstanding Resource Water (ORW) because it is a tributary to Weymouth's public water supply reservoir. A small area of the site adjacent to Old Swamp River is located within a Zone A1 surface water supply protection zone. The project site includes *Priority Habitat* for state-listed rare or endangered species or species of special concern as designated by the 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 170 acres of the project site contain farmland soils that are classified as prime, state, or local importance; however, no part of the site is in active agricultural use and only one acre of agricultural soils will be impacted by the project (a reduction of approximately 50 acres compared to the 2017 NPC).

The project site is located within EJ populations designated as Minority and Minority and English Isolation (both of which are located in Weymouth) and within one mile of 4 additional EJ populations, including an EJ population designated as Minority in Weymouth, and three EJ populations in Rockland, including two designated as Minority and one designated by Income. The site

is located within 5 miles of additional EJ populations designated as Minority; Income; Minority and Income; Minority and English Isolation; and Minority, Income and English Isolation located in Avon, Braintree, Brockton, Hanover, Hingham, Holbrook, Randolph, Rockland, and Weymouth.

Environmental Impacts and Mitigation

The following impacts were identified in the 2017 NPC in connection with the full buildout of the site described therein: alteration of approximately 663 acres of land; creation of 425 acres of impervious area; alteration of 21,448 sf of wetlands, including 5,990 sf of BVW; generation of 79,000 total average daily trips (adt); construction of 19,500 to 43,900 parking spaces; use of 2.7 million gallons per day (mgd) of water; generation of 2.3 mgd of wastewater; and impacts to an unspecified area of rare species habitat.

According to the 2023 NPC, the project as again revised will alter 555 acres of land; add 400 acres of impervious area; potentially alter an unspecified amount of on-site and off-site wetland resource areas; generate 53,438 adt, construct 11,050 to 20,500 parking spaces; use 2.1 mgd of water; generate 1.6 mgd of wastewater; and impact 156 acres of rare species habitat. As discussed below, while overall impacts of the revised development are reduced when compared to the project as described in the 2017 NPC, a DSEIR was never filed for the prior project to fully describe impacts and mitigation measures. The upcoming DSEIR should provide this information for the revised project, in accordance with the Scope.

Measures to avoid, minimize and mitigate environmental impacts of the project change identified in the 2023 NPC include additional roadway improvements beyond those previously constructed, including the construction of turning lanes and signal timing changes; protection of 519 acres of rare species habitat on the project site; restoration of on-site grassland habitat; monetary contribution to fund off-site rare species habitat preservation and management; construction of a new stormwater management system compliant with the Massachusetts Stormwater Management Standards (SMS); implementation of Transportation Demand Management (TDM) measures to reduce single occupancy vehicle (SOV) trips to the site; implementation of a Transportation Monitoring Program (TMP); creation of an open space network throughout the site; all-electric heating systems in all buildings except warehouses, which will use hybrid electric/gas heating systems; and development of a Construction Management Plan. The DSEIR should provide an updated mitigation program based on the Scope below.

Permits and Jurisdiction

Both the project described in the 2017 NPC and the project change are subject to review and mandatory preparation of an EIR because the project will require 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.

Also, as with previously reviewed master plans, the project as revised will 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 revised project will require numerous Agency Actions including:

- A Vehicular Access Permit from MassDOT;
- An Interbasin Transfer Act (ITA) Approval from the Water Resources Commission (WRC);
- 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;
- A new or amended Conservation and Management Permit (CMP) from NHESP; and,
- Potentially a Groundwater Discharge Permit, Section 401 Water Quality Certification (WQC), and Chapter 91 (c.91) License or Permit from MassDEP;

The water supply and wastewater options described below may require the SRA, municipalities, and/or water and sewer service providers to obtain new or amended approvals pursuant to the ITA from the WRC and/or approvals of modifications to water and wastewater infrastructure and system operations from MassDEP. The project is subject to MEPA's Greenhouse Gas Policy and Protocol (the GHG Policy) dated May 5, 2010.

The project will require Orders of Conditions from the Conservation Commissions of Abington, Rockland, and Weymouth, or in the case of an appeal, one or more 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) and requires a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the United States Environmental Protection Agency (EPA).

Because the Proponent received Financial Assistance for the construction of Bill Delahunt Parkway to support this project, MEPA jurisdiction 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.

SCOPE

General

The 2023 NPC reviewed the project's MEPA review history, the status of previously-reviewed development plans and compliance with permitting requirements, and planning and zoning efforts undertaken since the 2017 NPC. It described existing site conditions, provided an updated project description and conceptual plans and analyzed alternative development programs. It included estimates of the impacts of the project change with respect to transportation, water and wastewater infrastructure and stormwater management and identified potential measures to mitigate these impacts. The 2023 NPC identified EJ populations within five miles of the site, described the Proponent's public engagement efforts and listed potential benefits the Proponent believes the project will offer to EJ populations. As detailed below, additional analysis of water supply and wastewater disposal options are necessary to fully evaluate the impacts of the project change. The DSEIR should also provide comprehensive analysis of all other project impacts, including potential impacts to EJ populations over a 1 or 5 mile radius as applicable, and mitigation measures.

The DSEIR should follow Section 11.07 of the MEPA regulations for outline and content and provide the information and analyses required in this Scope. It should clearly demonstrate that the Proponent will avoid, minimize and mitigate Damage to the Environment to the maximum extent practicable through project alternatives and design.

Project Description and Permitting

The DSEIR should identify any further changes to the project change since the filing of the 2023 NPC. It should identify and describe state, federal, and local permitting and review requirements associated with the project change and provide an update on the status of each of these pending actions. The DSEIR should include a description and analysis of applicable statutory and regulatory standards and requirements, and a discussion of the project change's consistency with those standards. Many commenters provided detailed recommendations and identified issues requiring additional analysis, many of which are included in the Scope. As detailed below, the Proponent should provide a substantive responses to each comment rather than providing a reference to a section of the DSEIR.

The DSEIR should include detailed site plans for existing and post-development conditions at a legible scale. Plans should clearly identify buildings, interior and exterior public areas, impervious areas, transportation improvements, pedestrian and bicycle accommodations, and stormwater and utility infrastructure. The DSEIR should provide detailed plans, sections, and elevations to accurately depict existing and proposed conditions, including proposed above- and below-ground structures, on- and-off-site open space, and resiliency and other mitigation measures. The DSEIR should provide conceptual

plans, review potential impacts of off-site water, sewer, and transportation impacts, and discuss any additional permitting for those structures and the entity responsible for seeking permits and approvals.

As requested by MassDEP, the DSEIR should include an organization chart depicting the relationships, authorities, roles, and responsibilities, including but not limited to the three municipalities, the SRA, and any other relevant entities. The DSEIR should review how the Proponent will coordinate construction of infrastructure, including but not limited to roadways, stormwater, water supply, and wastewater collection systems, that will become the property of any municipality or other quasi-municipal authority to ensure the design and construction meet the standards of that entity.

Alternatives Analysis

The 2023 NPC reviewed three development alternatives: a No Build/Existing Condition Alternative, the 2017 NPC Development Alternative, and the Preferred Alternative proposed in the 2023 NPC. The alternatives and associated impacts are summarized in Table 1.

Table 1. Comparison of the Existing Condition/No Build, 2017 NPC, and Preferred Alternatives. The impacts associated with the Existing Condition/No Build Alternative are included in the totals for the 2017 NPC and Preferred Alternatives. (Table 4-1 in the 2023 NPC)

Impact	Existing Condition/No Build	2017 NPC Alternative	Preferred Alternative
Residential Units	1,274	3,855	7,274
Commercial Space	73,000 sf	8,000,000 sf	2,000,000 sf
Daily trips	No new trips	79,000 adt	53,438 adt
AM Peak trips	No new trips	4,984	4,148
PM Peak trips	No new trips	7,227	4,835
Parking spaces	2,525	19,500 – 43,900	11,050 – 20,500
Water use	116,000 gpd	2.7 mgd	1.8 mgd
Wastewater demand	100,000 gpd	2.3 mgd	1.6 mgd
Land Alteration	131 acres	663 acres	555 acres
Rare Species Habitat impact	16.5 acres	185 acres	156 acres

The Existing Condition/No Build Alternative would maintain the existing uses constructed at the site as part of prior development plans, but no additional development. The existing residential units include a mix of single-family homes, townhouses, condominiums, and age-restricted residences. The commercial space includes 33,000 sf of ground-floor retail, and a 40,000-sf senior living facility. In addition, existing conditions include the Bill Delahunt Parkway, a 25-acre sports and recreation facility, and a parking lot adjacent to the South Weymouth commuter rail station. Under the Existing Condition/No Build Alternative, the remainder of the site would remain in its current condition, which includes paved runways and other aviation areas, unused former military buildings, and debris piles. According to the 2023 NPC, the Existing Conditions/No Build Alternative would not provide residential units to help address the Commonwealth’s housing shortage or meet the development and economic objectives of the 1998 Act and subsequent legislation, and would leave the existing impervious area and unused buildings in place. For this reason, this alternative was dismissed.

The 2017 NPC Development Alternative would include full build-out of the previous development plan as presented in the 2017 NPC, including construction of an additional 2,581 residential units (for a total of 3,855 units) and an additional 7,927,000 sf of commercial space (for a total of 8 million sf of commercial uses), including life sciences, manufacturing, office, retail, hotel, conference room, fitness/wellness center, a sports stadium, and a hockey rink. The 2017 NPC Development Alternative would have a similar gross square footage as the Preferred Alternative, but fewer residential units and more commercial space. As shown in Table 1, the 2017 NPC Development Alternative would have greater impacts than either the Existing Condition/No Build or Preferred Alternatives. According to the 2023 NPC, the Proponent does not believe that market conditions currently exist for the level of commercial space proposed in the 2017 NPC Development Alternative. In addition, zoning requirements for the location of residential and commercial uses as proposed in the 2017 NPC would not make it possible to provide large contiguous open spaces or the north-south greenways included in the Preferred Alternative.

As noted above, the Preferred Alternative includes approximately the same gross square footage of building development, but with more residential units and less commercial space, than the 2017 NPC Development Alternative. According to the 2023 NPC, the Preferred Alternative has been designed to concentrate development on previously developed portions of the site.

As detailed below, there is currently inadequate drinking water supply and wastewater capacity to support the full buildout of the site as proposed in the Preferred Alternative. The 2023 NPC identified long-term and interim solutions to increase the supply of water to the site and address the insufficient wastewater capacity of the sewer systems in the three communities in which the site is located. Specifically, the 2023 NPC described an interim buildout of the site with up to approximately 3,320 residential units over a period of 12 to 15 years using the 600,000 gpd of water available from the Town of Weymouth's water supply. However, the DSEIR did not identify a preferred alternative to support the water/wastewater needs of the project, and Agency comments raise serious concerns about groundwater and water quality impacts that may result from a full buildout of the project. The lack of clear documentation supporting a viable solution for water/wastewater needs and the lack of a preferred alternative for this critical infrastructure component precludes the advancement of this project to a Final EIR. As discussed below, the Proponent may wish to request the establishment of an SRP to allow for phased review of the project over the expected 10-15 year buildout period.

The DSEIR should provide a full alternatives analysis to support a preferred alternative as related to water/wastewater needs, as detailed in the Water Supply and Wastewater sections below. The alternatives analysis should be adequate to support an ITA application to the WRC, as referenced in WRC comments. To the extent the selected alternative for water supply is the MWRA connection, the Proponent should coordinate with the Town of Weymouth to present information consistent with disclosures to be provided in the upcoming filing by the Town. The two projects shall be deemed related to one another with coordinated EEA numbers, or, alternatively, brought under the same number through an SRP, similar to the approach taken for roadway infrastructure improvements previously implemented by MassDOT. As noted, numerous comments from reviewing agencies and surrounding municipalities have questioned whether the available resources are adequate to supply water and wastewater needs for the full build project. To the extent full documentation cannot be provided to justify a preferred water/wastewater solution for the full build project, the Proponent may wish to phase review of the project through an SRP as suggested by MassDOT with regard to transportation impacts.

The DSEIR should provide an analysis of all impacts associated with the level of development proposed by the project, and clearly document that the project will take all feasible measures to avoid, minimize and mitigate impacts commensurate with the proposed level of development.

Environmental Justice

The project site is located within EJ populations designated as Minority and Minority and English Isolation (both of which are located in Weymouth) and within one mile of 4 additional EJ populations, including an EJ population designated as Minority in Weymouth, and three EJ populations in Rockland, including two designated as Minority and one designated by Income. The site is located within 5 miles of additional EJ populations designated as Minority; Income; Minority and Income; Minority and English Isolation; and Minority, Income and English Isolation located in Avon, Braintree, Brockton, Hanover, Hingham, Holbrook, Randolph, Rockland, and Weymouth. _____ Within the census tracts containing the above EJ populations within one mile of the site, there are no languages identified as those spoken by 5% or more of residents who also identify as not speaking English very well; within 5 miles of the site, the following languages are identified as those spoken by 5% or more of residents who also identify as not speaking English very well: Spanish, Spanish Creole, French Creole, Portuguese, and Portuguese Creole.

Effective January 1, 2022, all new projects in Designated Geographic Areas (“DGA,” as defined in 301 CMR 11.02, as amended) around EJ populations are subject to new requirements imposed by the Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* (the “Climate Roadmap Map”) and amended MEPA regulations at 301 CMR 11.00.¹ Two related MEPA protocols—the MEPA Public Involvement Protocol for Environmental Justice Populations (the “MEPA EJ Public Involvement Protocol”) and MEPA Interim Protocol for Analysis of project Impacts on Environmental Justice Populations (the “MEPA Interim Protocol for Analysis of EJ Impacts”)—are also in effect for new projects filed on or after January 1, 2022.² Under the new regulations and protocols, all projects located in a DGA around one or more EJ populations must take steps to enhance public involvement opportunities for EJ populations, and must submit analysis of impacts to such EJ populations in the form of an EIR. As the 2023 NPC describes changes to a previously proposed project, it is not a new project filing subject to the new EJ regulations and protocols. Nonetheless, given the scope and scale of this revised development plan, the MEPA Office has determined that these new rules shall apply to this review. The Proponent has agreed to undertake outreach and analysis consistent with these new rules. The 2023 NPC indicated that the DGA for the project is one mile; however, as noted below, the DGA should be confirmed in the DSEIR and outreach/analysis extended to five miles as appropriate.

According to the 2023 NPC, the Proponent has participated in numerous formal and informal public meetings since being selected as Master Developer in 2019. These have included group tours and meetings with residents, neighborhood associations, homeowner associations, and boards and committees from the three towns within which the site is located. The currently proposed development framework was presented at a community information meeting at Weymouth High School in October

¹ MEPA regulations have been amended to implement Sections 55-60 of the Climate Roadmap Act, and took effect on December 24, 2021. More information is available at <https://www.mass.gov/service-details/information-about-upcoming-regulatory-updates>.

² Available at <https://www.mass.gov/service-details/eea-policies-and-guidance>.

2022. Many of the meetings were advertised in the three municipalities and broadcast on local cable television. The Proponent has created a project website (www.reimaginethebase.com) which provides information about the project, an opportunity to sign up for updates, and contact information to communicate with the Proponent. Additional information about the project, including copies of the 2023 NPC and local zoning and permitting documents are available on the SRA's website (www.southfieldra.com). The 2023 NPC did not provide a formal plan for public engagement during the MEPA review process or subsequent design, permitting, and construction phases of the project.

The Proponent should establish a public involvement plan to engage EJ populations located within the identified DGA for the proposed development. The DSEIR should describe the components of the public involvement plan and should contain a full description of measures the Proponent intends to undertake to promote public involvement by such EJ populations during the remainder of the MEPA review process, including a discussion of any of the best practices listed in the MEPA EJ Public Involvement Protocol that the Proponent intends to employ. The DSEIR, or a summary thereof, should be distributed to all CBOs and tribes included in the "EJ Reference List" provided by the MEPA Office, and the Proponent should obtain an updated list from the MEPA Office to ensure that outdated contacts are removed and new ones added. The Proponent is encouraged to consult with the EEA EJ Director and the MEPA Office regarding community engagement strategies appropriate for the project change, well before the filing of the DSEIR. If appropriate, the MEPA Office, in consultation with the EEA EJ Director, may designate the project change development as warranting a higher level of community engagement as contemplated in Part II.C. of the MEPA EJ Public Involvement Protocol. Prior to filing the DSEIR, the Proponent should conduct at least one public informational meeting targeted to residents within EJ populations within the DGA. To facilitate public participation, the Proponent should work with neighborhood and civic groups within the DGA to plan and schedule the meeting and provide refreshments, childcare, travel subsidies and/or other accommodations to promote attendance. I received comments which noted particular concerns with water/wastewater planning for the project. I am aware that the Town of Weymouth is planning a separate MEPA filing in relation to a potential application for ITA approval to facilitate water connections for this project and other planned uses. The Proponent is directed to coordinate with the Town of Weymouth to hold joint public informational sessions on this project and water supply issues, prior to filing the DSEIR.

The DSEIR should include a separate section on "Environmental Justice," and should include a baseline assessment of any existing "unfair or inequitable Environmental Burden and related public health consequences" impacting EJ Populations in accordance with 301 CMR 11.07(6)(n)(1) and the MEPA Interim Protocol for Analysis of EJ Impacts. The DSEIR should also include an analysis of the impacts of the proposed development to determine whether the project may result in disproportionate adverse effects, or increase the risks of climate change, on the identified EJ population, in accordance with 301 CMR 11.07(6)(n)(2) and the MEPA Interim Protocol for Analysis of EJ Impacts. The DSEIR should analyze impervious surfaces added by the project and the extent of tree removal, including implications for potential stormwater flooding and heat effects in the surrounding neighborhoods. Given that the project site is located within several EJ census blocks, analysis of the stormwater management system should specifically assess whether flooding risks may be exacerbated for nearby EJ populations, including under future climate conditions. The DSEIR should analyze any other relevant short-term and long-term environmental or public health impacts of the project, including construction period activities and impacts of off-site water withdrawals on environmental and recreational resources. If any disproportionate adverse effects or increased risks of climate change are identified, the DSEIR must

include a discussion of proposed mitigation and include such measures in draft Section 61 findings. I note that generalized project benefits should not be analyzed to “net out” project impacts, unless the benefit serves to mitigate the specific impact analyzed, or to or reduce any existing Environmental Burdens identified for the EJ population. Particular focus should be given to benefits that serve to promote the equitable distribution of Environmental Burdens and Environmental Burdens, in accordance with “Environmental Justice Principles” as defined in 301 CMR 11.02.

Because total traffic generation is well over mandatory EIR thresholds, the DSEIR should provide a supplemental air quality analysis consistent with the *MassDEP Guidelines for Performing Mesoscale Analysis of Indirect Sources (1991)*, as indicated in the Mobile Source/Air Quality Scope below. The DSEIR should also identify any air quality related indicators in EPA’s EJ Screen that are elevated at or above the 80th percentile of statewide average and provide these data for any EJ populations that may be impacted by the project’s traffic impacts. As minimum, this documentation should include all EJ populations within 1 mile of the project site, and, to the extent a 5-mile DGA is applicable, those populations adjacent to anticipated routes of travel for project-generated truck traffic over a 5-mile radius (including travel along state and interstate highways). The DSEIR should specifically assess the distribution of diesel-generated vehicle trips during the course of the day (both weekday and weekend) and analyze routes of travel around the project site and proximity to EJ populations. If, based on the trip distribution analysis to be provided in the DSEIR, truck trips are likely to travel along local roadways through and adjacent to EJ populations, the DSEIR should discuss what potential measures could be deployed to reduce impacts, including re-routing of truck trips or limiting the times of day for travel. The DSEIR should indicate whether any of the identified EJ populations described above are located adjacent to any of the intersections analyzed in the traffic study, and indicate the level of service changes, if any, at those locations. To the extent any identified locations are outside the traffic study area for the project, the DSEIR should provide analysis to estimate the increase in traffic at those locations relative to existing conditions, and a discussion of whether the increase will materially impact air quality. The analysis could take the form of review of existing traffic volumes and air monitoring data at the specified locations, or other quantitative modeling. This analysis should include figures with accompanying narratives. The DSEIR should discuss the extent to which proposed or already implemented roadway mitigation and Transportation Demand Management (TDM) measures will serve to reduce vehicle traffic, including delivery trucks, associated with project operations. The DSEIR should also discuss other potential mitigation measures, such as early adoption of federal and state clean truck mandates for any fleet vehicles. The project should make all feasible efforts to incentivize the use of electric vehicles.

Given that high trip generation of the project and the 800,000 sf of warehouse use proposed, it appears likely that the project will generate 150 or more diesel truck trips per day during project operations and during the construction period. The DSEIR should confirm the number of diesel truck trips anticipated for the project and, if over 150 adt, expand public outreach activities over a 5 mile radius. The analysis of EJ impacts should also include all EJ populations within the 5 mile DGA.

Public Health

The DSEIR should include a separate section on “Public Health,” and discuss any known or reasonably foreseeable public health consequences that may result from the environmental impacts of the project change. Particular focus should be given to any impacts that may materially exacerbate

“vulnerable health EJ criteria,” in accordance with the MEPA Interim Protocol for Analysis of EJ Impacts. In addition, other publicly available data, including through the DPH EJ Tool, should be surveyed to assess the public health conditions in the immediate vicinity of the project site, in accordance with 301 CMR 11.07(6)(g)10. All environmental indicators from the EPA EJ Screen (including air quality related factors, wastewater discharge, and proximity to Superfund sites) should be reviewed for a 1-mile radius around the project site, and a comparison of percentile rankings as between EJ and non-EJ census block groups should be presented.

Any impacts associated with the project that could materially exacerbate existing public health conditions in and around the project site should be analyzed. To the extent any required Permits for the project contain performance standards intended to protect public health, the DSEIR should contain specific discussion of such standards and how the project intends to meet or exceed them. The DSEIR should contain a specific discussion of applicable federal and state cleanup standards, such as M.G.L. 21E Massachusetts Contingency Plan (MCP), intended to protect public health and how the project intends to meet or exceed those standards. It should review all measures that will be implemented during the construction period to minimize impacts to nearby residents through the spread of contaminated materials remediated on-site, including dust control, storage of contaminated water or soil, management of dewatering operations, or transported off-site. The DSEIR should discuss whether the expansion in wastewater usage from the proposed development will result in a material increase in wastewater discharge into state and federal waters, and if so, where those discharges will occur (i.e., at the point of ultimate treatment). The DSEIR should discuss whether air quality in and around the project site will be impacted from the increase in traffic resulting from the project, and focus on any areas where EPA EJ Screen indicators are elevated above 80th percentile of statewide average (for both EJ and non-EJ areas around the site). The DSEIR should discuss what benefits the project will offer to improve the public health of surrounding residents, including environmental remediation efforts, open space and recreational opportunities, multimodal accommodations for biking and walking, and other relevant environmental benefits.

Traffic and Transportation

The 2023 NPC provided a transportation analysis prepared generally consistent with the EEA/MassDOT Transportation Impact Assessment (TIA) Guidelines issued in March 2014. Due to the long build-out period for the project, the TIA provided an evaluation of the condition and operation of area roadways, transit, pedestrian and bicycle facilities for a 20-year planning period, rather than a standard 7-year planning period, in order to allow for an evaluation of the project change’s impacts on the transportation system and effectiveness of proposed mitigation measures. The analysis reviewed transportation conditions in a study area consisting of 73 intersections and roadways located in Weymouth, Abington, Braintree, Hingham, Norwell, Rockland, and Whitman. It included an assessment of the project change’s impacts on vehicular operations and bicycle, pedestrian and transit modes in the study area; a safety analysis; and a review of potential mitigation measures. According to MassDOT, previous reviews of the project used trip generation, trip distribution, mode split, and trip assignment data produced by the regional travel model maintained by the Central Transportation Planning Staff (CTPS). However, because the CTPS model has not been updated, MassDOT concurs with the Proponent’s approach of using standard methodologies outlined in the TIA Guidelines, but using a 20-year planning horizon in lieu of 7 years. This approach modeled existing and future roadway conditions that assume implementation of prior and future roadway improvement projects; however, as noted

below, since future development in the area cannot be projected with precision, future “No-Build” conditions were modeled using assumptions of growth over time and 41 individual development projects that are currently known. Future phases of the project may require additional analysis as full buildout is implemented over the projected 10-15 year construction horizon.

Trip Generation

The project’s trip generation was calculated using rates published in the Institute of Transportation Engineers’ (ITE) *Trip Generation Manual* 11th edition for Land Use Codes (LUC) 140 (Manufacturing), 150 (Warehousing), 210 (Single-Family Detached Housing), 215 (Single Family Attached Housing), 221 (Multifamily Housing (Mid-Rise)), 252 (Senior Adult Housing – Multifamily), 750 (Office Park), 760 (Research and Development Center), 821 (Shopping Plaza), 310 (Hotel), and 822 (Retail). The trip generation was adjusted to account for internal trips (trips taken between on-site uses without travel on area roadways) and diverted link trips associated with proposed retail uses (trips to the site taken by vehicles already on the roadway which then continue on to their original destination). As requested by MassDOT, the DSEIR should provide unadjusted trip generation estimates, including an estimate of the number of truck trips, and document the method used to account for internal and diverted link trips. According to the 2023 NPC, the project will generate approximately 53,438 vehicle trips on an average weekday and 47,476 vehicle trips on a Saturday, with approximately 4,148 vehicle trips expected during the weekday AM peak hour, 4,835 vehicle trips expected during the weekday PM peak hour, and 3,963 vehicle trips expected during the Saturday midday peak-hour. As shown in Table 2, the project change will generate fewer trips than the development program proposed in the 2017 NPC, but more trips than originally proposed in the 2007 FEIR.

Table 2. Trip generation comparison. (Table 7-6 in the TIA provided in the 2023 NPC)

Time Period	Vehicle Trips				
	(A) 2007 FEIR Development Program	(B) 2017 NPC Development Program	(C) 2023 Modified Development Program ^a	Difference	
				C – A	C - B
<i>Average Weekday</i>	34,300	79,990	53,438	+19,138	-26,552
<i>Weekday Morning Peak Hour</i>	2,137	4,984 ^a	4,148	+2,011	-836
<i>Weekday Evening Peak Hour</i>	3,099	7,227 ^a	4,835	+1,736	-2,392

^aEstimated based on the ratio of the respective weekday peak-hour traffic volume to the average weekday traffic volume for the 2007 FEIR development program applied to the average weekday traffic volume for the 2017 NPC development program.

Trip distribution patterns for the proposed residential uses were determined based on a review of Journey-to-Work data obtained from the U.S. Census for persons residing or employed within the vicinity of the SNWAS and trip distribution for commercial uses components of the project given the differing nature and purpose of the trips associated with these uses was determined based on a review of Journey-to-Work data obtained from the U.S. Census for persons employed within the Town of Weymouth. The 2023 NPC did not identify expected mode shares; this information should be provided in the DSEIR.

Traffic Operations

Access to the site is provided from three primary gateways: Shea Memorial Drive off Route 18; Bill Delahunt Parkway, which connects the site to Route 228 and Route 3 in the east; and Patriot Parkway, which connects the western end of Bill Delahunt Parkway to Route 18 via Trotter Road. An internal street grid will be constructed to connect the gateways to the uses throughout the site.

Transportation conditions in the study area were analyzed under Existing 2022, No Build 2043 and Build 2043 scenarios in order to allow for an evaluation of the project change's impacts on the transportation system and effectiveness of proposed mitigation measures. For roadway intersections, the TIA provided capacity analyses and level-of-service (LOS) designations for through traffic and each turning movement for all peak periods. The LOS reflects the overall operations of an intersection, including traffic speed, delay, and capacity. For urban intersections, LOS D reflects an acceptable level of operations; LOS E or F reflect significantly congested conditions and long delays.

Existing 2022 conditions were established by using traffic counts collected in June and July 2022. The traffic data included automatic traffic recorder (ATR) counts, turning movement counts (TMCs), and vehicle classification counts. No Build 2043 conditions were established by adding the trip generation associated with 14 planned development projects in the study area and by increasing traffic volumes by an annual rate of 0.25% to reflect background growth. As noted by MassDOT, the Boston Metropolitan Planning Organization (MPO) and the Old Colony MPO have estimated background growth rates of 0.6% and 0.3% respectively. Prior to completing the DSEIR, the Proponent should consult with MassDOT and CTPS on the appropriate background growth rate to use for this analysis and provide updated volume projections, if necessary. No Build 2043 conditions include eight roadway projects in Abington, Braintree, Rockland, and Weymouth which are independent of the project and are expected to be completed by 2043; these projects include intersection improvements, addition of travel lanes, construction of bicycle and pedestrian facilities, improvements to roadway geometry, and traffic signal improvements. According to the 2023 NPC, optimized traffic signal timing and phasing plans were applied to signalized intersections under the No Build 2043 scenario to account for routine maintenance in addition to the specific roadway projects. Build 2043 conditions include project-generated trips added to No Build 2043 conditions.

The Project is expected to be built over the next 10-15 years in multiple intermediate development phases. For quantifying and assessing traffic operations for locations with the study area, traffic analysis was based on the horizon year 2043. The results of the TIA analysis indicated that the project change is not expected to result in a significant impact (increase) on motorist delays or vehicle queuing over Existing 2022 or No Build 2043 conditions at most locations; 51 of the 73 study area intersections are predicted to continue to operate at an overall LOS D or better during all three the peak hours under Build 2043 conditions. However, conditions at 16 of the 73 intersections will degrade service below LOS D during one or more peak hour as a result of the addition project-generated trips as reflected in the Build 2043 scenario. As described below, the TIA identified mitigation measures to address traffic operations at these intersections which would improve peak hour operations in most cases to LOS D or better. In addition, the Proponent will complete roadway safety audits (RSAs) at five intersections and construct the short-term, low-cost improvements that are identified in the RSAs.

According to MassDOT, several intersections or individual movements will operate at LOS F

under Build 2043 conditions. As detailed below, the DSEIR should review potential mitigation measures to minimize impacts at these intersections. Additionally, the 2023 NPC indicated that project-generated traffic added to a number of intersections may necessitate the installation of a traffic signal in some instances but that the intersections do not appear to warrant a signal at the present time. The DSEIR should include an evaluation of alternative traffic control measures, such as roundabouts at these locations. As noted above, any disproportionate effects on surrounding EJ populations and air quality should be adequately studied, based on assessment of traffic impacts at these locations.

Public Transportation

The project site is located within walking distance of the South Weymouth stop on the MBTA's Old Colony/Kingston Commuter Rail Line, and MBTA subway service is accessible via the Braintree Red Line station is within driving distance of the site. According to the 2023 NPC, the project has been planned and designed with a mix of residential and commercial uses to benefit from the availability of nearby transit. According to MassDOT, the previous CTPS model indicated that development of the site would generate significant non-auto trips and increase transit ridership for the MBTA Red Line, Commuter Rail, and bus routes in the future build conditions. However, the 2023 NPC provided a limited assessment of transit use associated with the build-out of the site and did not evaluate potential impacts to the transit system.

The DSEIR should include an analysis for each transit service based on metrics established by the MBTA Service Delivery Policy (SDP). It should contain an assessment of how riders, particularly during the MBTA peak periods, are expected to access the site via transit, and estimate the additional ridership on the Old Colony Commuter Rail Line 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 DSEIR should include a comprehensive discussion of mitigation measures to address the project change'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. The DSEIR should include 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 Proponent has committed to initially fund an on-site transit shuttle to connect employees, residents, and customers to the MBTA commuter rail. The DSEIR should describe the potential transit shuttle between SWNAS, the MBTA Commuter Rail Station, and the MBTA Red Line, identify the demand for the shuttle service and include a commitment to provide adequate service and frequency to encourage usage. The DSEIR should review how residents, customers or employees using the shuttle bus service will get from the South Weymouth station to the site, including a description of pedestrian accommodations between the station and key locations within the project site. It should evaluate potential measures for managing pedestrian crossings and rail crossings to ensure safe, accessible travel for customers. The Proponent should consult with area regional transit authorities such as the Brockton Area Transit Authority (BAT) to evaluate the feasibility of providing service to the site, which should complement existing and proposed services, such as the shuttle system, to increase service frequency. The DSEIR should review the timing of any proposed improvements relative to the MBTA's Better Bus

Project³ to evaluate whether project implementation will align with the timing of bus electrification in this area.

Pedestrian/Bike Access

According to the 2023 NPC, the project has been designed to promote walking and bicycling, with sidewalks provided along one or both sides of the roadways within the development, pedestrian paths to connect development areas and recreational amenities, and bicycle accommodations that include both on- and off-road facilities. The roadway infrastructure within the site also provides for adequate bicycle infrastructure. The DSEIR should review how the project change will be constructed to create a pedestrian and bicycle network along the gateway roadways (Shea Memorial Drive, Bill Delahunt Parkway and Patriot Parkway/Trotter Road) to connect to Route 18, Weymouth Street and Hingham Street (via Reservoir Park Drive) and in proposed greenways. All intersections within the study should include adequate width, pedestrian signals, and walk/do not walk indicators crossing. The DSEIR should review how pedestrian and bicycle facilities will be accommodated within the proposed open space design, including the linear greenways. It should review nearby existing trail systems and describe potential connections between proposed on-site open space and paths.

Parking

The project change will provide a total of up to 20,500 parking spaces at the site, a reduction of up to 23,400 spaces compared to the 19,500 to 43,900 spaces proposed in the 2017 NPC. The 2023 NPC did not document how the parking supply was determined. According to MassDOT, the *ITE 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 DSEIR should provide an analysis of the anticipated parking demand for each development phase and proposed use; the projected parking demand at different times of day; the expected parking duration; and the type of parking (surface or structured). The DSEIR should summarize parking policies that could be implemented to minimize parking demand and automobile use, such as charging market rates for parking, parking cash-out policies for employees, parking fees for residents with multiple vehicles, unbundling residential parking from rents, shared parking, parking banks/landscape reserves, and other demand-reduction policies for employees and residents of the site. The DSEIR should provide an analysis of the feasibility of implementing a shared parking program and estimate the potential reduction in the number of parking spaces at the site. It should describe a how potential parking areas will be banked and left undeveloped until there is a demonstrated need for additional parking. The proposed parking supply should be adjusted as implementation of TDM measures reduce auto trips and encourage non-auto modes of travel.

Transportation Demand Management

The 2023 NPC included a Transportation Demand Management (TDM) program based on the project proposal that would implement measures aimed at reducing site trip generation. Proposed TDM measures include subsidizing transit passes for employees and residents, establish a ridesharing program, provide space for car-share providers, providing on-site amenities and conveniences that would reduce the need for automobile travel, and providing a circulating shuttle between transportation hubs, activity

³ <https://www.mbta.com/projects/better-bus-project>

centers, and the MBTA Commuter Rail intermodal center. The Proponent should evaluate options for providing a central location for shuttle bus services with adequate amenities such as bus shelters or near locations with climate-controlled waiting areas. As noted above, the Proponent should consult with BAT other local and regional transportation service providers address any gaps in MBTA weekend transportation services, including connections to the MBTA Red Line.

The DSEIR should describe the full range of TDM measures being considered by the proponent and how those TDM concepts will be incorporated into the operations of the site and its different tenants. It should propose how the effectiveness of the TDM measures can be tracked and evaluated during operations. 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 DSEIR should review the recommendations for minimizing parking supply and encouraging alternative modes of travel provided in the comment letters submitted by MassDOT and the Metropolitan Area Planning Council (MAPC).

Transportation Monitoring Program

As part of the project mitigation program, the project proponent has committed to implementing a transportation monitoring program to be conducted within six (6) months after the earlier to occur of completion of 1,500 new dwelling units or 500,000 sf of new commercial space at the Project and will continue on an annual basis thereafter for a period not to exceed 10-years. The goals of the transportation monitoring program will be to evaluate the assumptions made in the 2023 NPC and the adequacy of the transportation mitigation measures, as well as to determine the effectiveness of the TDM program. The 2023 NPC included a comprehensive list of intersections to be monitored as the Project is developed over time.

In addition, the 2023 NPC identified a list of mitigation measures to be implemented by the Proponent in conjunction with the appropriate parties if the assumptions included in the TIA significantly differ from those documented in the monitoring program. These improvements entail, but are not limited to, 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.

Transportation Mitigation

The 2023 NPC identified over 60 specific roadway improvements, including 28 previously identified in the 2017 NPC, that will be implemented by the Proponent in phases based on the project buildout. The schedule for implementation of the mitigation program is phased as described below to coincide with the anticipated build-out of the Project:

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

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

As previously stated, the project is expected to be built in several phases over the next 10-15 years and the exact mix of uses on the site will likely change over time based on market demand. The development program is therefore used as a baseline condition for the redevelopment of the site and the identified mitigation program could also change over time. According to MassDOT, the project change is likely to cause significant induced demand in the study area or the region, which the TIA may have not have adequately captured using a methodology different from the CTPS or similar model. Reevaluation of mitigation measures over time would allow MassDOT to measure the cumulative impacts of the project change on the transportation network and better align the mitigation with transportation needs of the area. As recommended by MassDOT, a full TIA should be prepared and submitted for review at each of the development tiers identified above so that the project's impacts can be evaluated and the mitigation program reassessed. Future TIAs should use the data from the most recent monitoring report to conduct the analysis. As with water/wastewater, this proposed mitigation approach may warrant establishment of an SRP to enable adequate review over time.

Water Supply

Existing uses at the project site, which are all located in Weymouth, are supplied with drinking water from the Weymouth water system. The project's water demand at full build-out is estimated at approximately 2.1 mgd on an average daily basis (0.6 mgd less than the water demand estimated in the 2017 NPC), including 294,050 gpd attributed to existing uses at the site; consistent with MassDEP's regulations, this estimate of water demand was calculated by adding 10% to the Title 5 estimated wastewater flows, which are described below. However, actual water meter readings for existing uses have indicated water use of an average of 116,000 gpd, which is approximately 40% of the Title 5-based estimate of 294,050 gpd. The 2023 NPC identified options for both a permanent solution to meet the water demand for full build-out of the site, and interim solutions that would accommodate an intermediate level of site development before a permanent solution is implemented. According to the WRC, all of the options for a permanent or interim water supply reviewed in the 2023 NPC would require ITA approval.

As detailed below, Agencies and other commenters have identified potential restrictions which could affect the availability of water from some of the potential sources identified in the 2023 NPC and expressed significant concerns about the environmental impacts on surface and groundwater resources that could result from supplying the project with water from local sources on an interim or permanent basis. The DSEIR should fully address the issues raised in comment letters and describe water supply options that minimize capacity and environmental constraints.

Permanent Water Supply Options

The 2023 NPC reviewed the potential for two water supply sources to provide water on a permanent basis to the site. According to the 2023 NPC, the potential for an on-site source of water has been evaluated through hydrogeological investigations and modeling; however, it is estimated that on-site groundwater wells could only provide up to 150,000 gpd.

i. Connection to MWRA System

According to 2023 NPC, the Town of Weymouth has completed a study of its future water needs to accommodate projected growth to the year 2040. The study estimated that the future water demand, not including development of the project site, would be approximately 5.28 mgd, which exceeds its current withdrawal limit of 5.0 mgd. Based on the Town of Weymouth's study and the Proponent's estimated total water demand of 2.1 mgd under full-build conditions (including existing water use on the site), the total water demand for Weymouth with the project included would be approximately 7.4 mgd average day demand (ADD) or 9.1 mgd maximum day demand (MDD). According to the 2023 NPC, the full future demand could be supplied from the MWRA's South Water System by constructing a transmission main from the South Water System in Quincy to Weymouth. The transmission main would be sized to accommodate 15.6 mgd, which will be the future capacity of the MWRA's South High System. Three potential routes for the transmission main were identified, including one which would follow a route directly from Quincy to Weymouth with a crossing of the Fore River near Route 3A, and two routes that would pass through Braintree. According to the 2023 NPC, all three routes are feasible and would almost entirely follow public ways.

The Town of Weymouth and the SRA have commenced the application process to join the MWRA system and will file an ENF with MEPA in the near future. The Town of Weymouth and SRA's application must be prepared in accordance with MWRA's policy OP#10, *Admission of New Community to Waterworks System*, which requires the applicants to be responsible for the connection and meet other requirements, including obtaining ITA approval. According to the 2023 NPC, if the MWRA connection becomes operational, the Town of Weymouth would abandon its five wells in the Old Swamp River valley and Route 3 corridor and the associated treatment plant; Weymouth would maintain its existing surface water supplies and associated infrastructure.

If Weymouth were to decide not to join the MWRA, the SRA, which was designated as a water district in its legislative authority, could independently petition the MWRA to supply water for this project. Under this scenario, existing uses at the site which are supplied by the Weymouth water system would continue to receive water from Weymouth, and an additional 1.8 mgd ADD and 2.7 mgd MDD would be supplied by MWRA for new development at the site. The transmission routes from the potential MWRA connection points in Quincy would be adjusted to terminate at the site rather than connect to Weymouth's water distribution system. This alternative would require the construction of additional water distribution infrastructure, including a receiving tank and booster pumping station.

ii. Purchase of Water from Aquaria or the City of Brockton

The SRA could use its status as a water district to purchase water from Aquaria, a privately owned and operated company, or from the City of Brockton, which is Aquaria's only customer. Aquaria is permitted to withdraw 10 mgd from the Taunton River in Dighton and produce 5 mgd of finished

drinking water processed at its desalination plant. According to the 2023 NPC, the main piping and pumping systems at Aquaria's treatment facility are in place to produce 5 mgd of water. However, because Aquaria has only one customer, filtering and ion exchange equipment was installed only to the extent necessary to produce the 3.3 mgd that is currently used by the City of Brockton. The water from Aquaria is intended to be a supplement to the City of Brockton's primary water supply, which is Silver Lake in Pembroke, Kingston, Halifax, and Plympton. As a result of reductions in water use from implementation of a leak detection and repair program, meter upgrades and other water saving measures, Brockton uses water from Aquaria only to supplement high summertime demands and during periods of system maintenance. As noted by MassDEP, however, Aquaria's WRC approval requires reduced withdrawals from the Taunton River from April 25 to June 8 to protect fishery resources; therefore, the available water supply for the project would be reduced during that period of time.

According to the 2023 NPC, the maximum daily flow to both the City of Brockton and the SWNAS under full build conditions could be met by upgrading the Aquaria treatment plant to produce 5 mgd and operating the Silver Lake treatment plant at full capacity. Water could be supplied to the project site directly from Aquaria, from a connection to the Brockton water system, or from one of those sources via the Abington Rockland Joint Water Board (ARJWB). Prior MEPA filings identified potential transmission routes between the Brockton water system and the project site. However, the 2023 NPC identified a preferred 4-mile long route along public ways from Aquaria's 36-inch supply line in Whitman which passes through Abington and terminates at the southern end of the SWNAS near the Abington/Rockland town line.

A connection to the Aquaria system, either directly or through Brockton, would require modifications to Aquaria's permit to add a new customer and to construct upgrades to the treatment plant and water transmission line. In addition, an ITA approval may be required to supply water outside of the Taunton River basin.

Interim Water Supply Alternatives

According to the 2023 NPC, it could take 8 to 10 years for the connection to the MWRA system to be established. The Proponent did not indicate how long a connection to the City of Brockton or Aquaria water systems would take; this should be provided in the DSEIR. The 2023 NPC reviewed potential water supply sources to serve an intermediate level of site development before MWRA water is available.

i. Continued Service from the Weymouth Water System

The Proponent anticipates that the initial market demand for development at the site will be primarily for residential units, and estimates a buildout period of between 12 years (approximately 500 units per year) to 15 years (approximately 500 units per year) for the proposed 6,000 units. According to the 2023 NPC, the Town of Weymouth has approximately 700,000 gpd of available supply to meet new demands, of which 600,000 gpd has been allocated to the SWNAS pursuant to a Memorandum of Agreement (MOU) between Weymouth and the SRA. According to the 2023 NPC, 600,000 gpd of water is sufficient to serve approximately 2,350 residential units using Title 5-based design demand estimates of water consumption, or approximately 3,320 residential units based on the actual (lower than design demand estimates) water consumption measured for the existing residential uses on the site. As

shown in Table 3, depending on the buildout period and water use estimate, construction of residential units could proceed for a period of roughly 5 to 8 years before a permanent water supply connection is needed.

Table 3. Water Consumption Scenarios (Table 7-3 in the 2023 NPC).

Buildout period	Title 5 Design Demand	Actual Measured Demand
12 years (2026 to 2038)	4.7 years (2026 to 2031)	6.7 years (2026 to 2033)
15 years (2026 to 2041)	5.9 years (2026 to 2032)	8.3 years (2026 to 2034)

According to MassDEP, it is unclear whether Weymouth’s permitted withdrawal of 5.0 mgd applies to raw water or finished water. If the permitted withdrawal is for 5.0 mgd of raw water, then the available supply in Weymouth’s system for this project may be less than 600,000 gpd. In addition, apportion of the Town of Weymouth’s water supply subject to stream-flow conditions, which could limit the amount of water available to the project. The Proponent should consult with MassDEP and Weymouth prior to filing the DSEIR and provide an updated analysis of this interim water supply option, if necessary.

ii. City of Brockton/Abington Rockland Joint Water Board (ARJWB)

If the Weymouth water supply were to reach its limit before the connection to the MWRA is made, the 2023 NPC indicated that a connection to the Brockton or ARJWB systems could be made to supply water to the Abington part of the SWNAS. This option could involve making upgrades to the water infrastructure in Abington, depending on the length of time the connection would be needed and the volume of water to be delivered to the site. Comments from MassDEP indicate that neither the City of Brockton nor the ARJWB may have a consistently available supply of water for the project site because of water quality issues and potential impacts to surface water bodies from increased withdrawals.

iii. City of Quincy/Fore River

This option would involve the transmission of approximately 800,000 gpd from the Quincy water system, which is supplied by the MWRA, through an existing water main under the Fore River. This option might be available on an interim basis after the Town of Weymouth was fully permitted to join the MWRA system, but before the connection to the MWRA is completed. According to the 2023 NPC, water from Quincy would be supplied to Weymouth’s Low Service Zone, which does not serve the SWNAS; however, this option would free up an equivalent amount of water in Weymouth’s system that could be used at the project site.

iv. Increase Weymouth’s Withdrawal Limit

Under this option, Weymouth would seek MassDEP’s approval to temporarily increase its permitted withdrawal limit of 5.0 mgd prior to the MWRA connection becoming operational. According to the 2023 NPC, the total safe yield of the Weymouth’s groundwater and surface water supply is 6.27 mgd and the operational capacity of the system over 10 mgd. According to MassDEP, determination of the system’s total safe yield requires a thorough analysis of the system’s capacity and the environmental

impacts of increased withdrawals, including water quality and habitat in Whitman's Pond and on-going efforts to maintain the herring run in the Back River System. The Proponent should consult with MassDEP regarding the appropriate analysis to be presented in the DSEIR which addresses this impact.

* * * * *

WRC and MWRA comments indicate that the 2023 NPC, while describing the various options for meeting water supply needs, does not identify a clear permitting strategy or present a preferred proposal to which these permitting agencies can respond. It is also unclear which of the interim solutions, particularly the proposal to increase Weymouth's withdrawal limit, would require ITA approval.

As requested by the WRC, the following information should be provided in the DSEIR to clarify the permitting strategy pursued by the Proponent and provide disclosure to inform a future ITA application:

- A thorough alternatives analysis of water supply and wastewater disposal options, with the preferred alternatives finalized, including a discussion of wastewater reuse and all on-site and in-basin water supply and wastewater disposal options. Information on Weymouth's water conservation measures, including recent residential usage expressed as gallons per capita per day (rgpcd) and unaccounted-for water should be provided, and the DSEIR should specify the source basin(s) of the preferred alternatives.
- A plan of the project site which delineates the municipal and basin boundaries and depicts the areas of the site that will be receiving new water and wastewater service in relation to the municipal and basin boundaries.
- Clarification of the estimated water demand, expressed as both average day demand (ADD) and maximum day demand (MDD).
- The expected maximum day water and wastewater flows for the developable area in each municipality, and further refined by basin if a municipality has SWNAS developable land area in more than one basin.
- Because the method of estimating water demand by using Title 5 estimated flows plus 10% may lead to overestimated residential demand, the DSEIR should provide an estimate of water demand using the current MA Water Conservation Standards and MA WRC Water Needs Forecasting methodology, which assume 65 residential gallons per capita per day (rgpcd); this is higher than the actual rgpcd for both Weymouth and Abington- Rockland Joint Water Works since 2016.
- A discussion on water conservation measures including the use of plumbing fittings, fixtures, and appliances that comply with 225 CMR 9.00: Appliance energy-efficiency standards, testing and certification program (<https://www.mass.gov/regulations/225-CMR-900-appliance-energy-efficiency-standards-testing-and-certification-program>) and a description of any proposed outdoor water use. Please discuss how all applicable MA Water Conservation Standards will be met (<https://www.mass.gov/doc/massachusetts-water-conservation-standards-2/download>).

The Proponent should consult with the WRC prior to preparing these analyses. The DSEIR should present a clear preferred alternative for water supply, and indicate whether interim solutions are also required and what permitting and approval would be needed for such interim solutions. To the extent ITA approval is required, relevant information pertaining to the ITA application should be presented in

the DSEIR, in consultation with the WRC. As noted below, the project may also face constraints with respect to wastewater capacity. To the extent this constraint results in a need to modify project size or design, corresponding changes to water supply needs and permitting strategy should be reflected in the DSEIR. The DSEIR should review potential water-conservation measures, including reuse of grey water and rainwater.

Several commenters, including MassDEP, the Department of Marine Fisheries (DMF), and local watershed associations, expressed concern about potential impacts of increased water withdrawals from surface water reservoirs, including Great Pond, Whitman's Pond and Silver Lake, which would be required under some of the permanent and interim water supply alternatives. According to DMF, the Weymouth Back River/Herring Brook River herring run, which includes Whitman's Pond, is one of the largest river herring runs in the Boston Harbor region and of significant ecological and cultural importance. The DSEIR should review ecological conditions in local water supplies and tributaries and provide an analysis of potential impacts of additional water withdrawals on water quality and aquatic resources, including fish runs. It should review the sustainability of water supplies under future climate conditions.

Wastewater

Existing uses at the site, all of which are located in Weymouth, generate approximately 85,000 to 100,000 gpd of wastewater, which is discharged to Weymouth's wastewater collection system. The Town of Weymouth is an MWRA sewer community. Wastewater from Weymouth is conveyed to the MWRA's system for treatment and disposal. According to the 2023 NPC, the SRA recently repaired the on-site existing sewage pumping station to correct a problem which allowed a large volume of groundwater to flow into the site's sanitary sewers and conveyed to Weymouth's collection system. As a result of the repair, wastewater flow from the site was reduced from approximately 300,000 gpd to no more than 100,000 gpd.

At full buildout, the project will generate up to 1.6 mgd of wastewater (including existing flow), of which approximately 0.8 mgd to 0.9 mgd will be generated by uses on the Weymouth portion of the site, 0.35 mgd to 0.4 mgd by uses on the Abington part of the site, and approximately 0.4 mgd by uses on the Rockland portion of the site. As proposed in the 2023 NPC, wastewater flows from the site will be discharged to the corresponding municipal sewer system, all three of which will require improvements to increase their capacity to accept additional flow. However, the MWRA, MassDEP, and Rockland Sewer Commission have questioned whether adequate capacity is available in the sewer collection and treatment systems and the feasibility of constructing the necessary improvements, including measures to reduce inflow and infiltration (I/I) to accommodate flows from the project site. Depending on the source of water and wastewater disposal option, ITA approval may be required. The Proponent should consult with appropriate agencies prior to filing the DSEIR, and should respond fully to comments from MassDEP and MWRA, which are incorporated by reference herein. As requested by MassDEP, the DSEIR should provide additional details regarding the projected flows that are proposed to go to each treatment facility.

The sewer capacity and conditions of each applicable municipality are reviewed below.

Weymouth

As proposed in the 2023 NPC, wastewater from the site will be discharged to each of the two major trunk sewers (Mill River and Old Swamp River), which in turn discharge to the Lower Central Interceptor (LCI). Flows from the LCI are conveyed to the MWRA system by the Braintree/Weymouth Pump Station and the Intermediate Pump Station. According to the 2023 NPC, the MWRA system downstream of the LCI has capacity to accept additional flows and does not exceed its capacity during wet weather events due to the use of supplemental pumps at the Braintree/Weymouth Pump Station and I/I removal efforts by municipalities contributing flow to the system.

According to the 2023 NPC, the Town of Weymouth prepared a study of wastewater system improvements that are necessary to meet future demands. The study assumed that the SWNAS would generate approximately 2 mgd at full buildout, which is approximately 1 mgd more than currently proposed to be discharged into Weymouth's system. The SRA has already replaced a 900-ft long section of sewer main in Route 18 with a larger pipe to convey flows from the project site and other future development in the area to the Mill River trunk sewer. In the near-term, the Proponent will work with Weymouth to replace two sections the LCI with larger diameter pipes with raised watertight structures to increase capacity and reduce the risk of SSOs by reducing I/I. According to the 2023 NPC, other improvements identified by the Town to increase capacity of local sewers and increase pumping capacity will not be necessary until later stages of the site buildout. However, comments provided by the MWRA express concern with the potential impacts of increasing the capacity of local sewers on the MWRA's system, and therefore the ability of the MWRA's system to accept project flows. The Proponent should consult with the MWRA regarding any modeling that should be performed to assess impacts to its system.

Comments provided by the MWRA express the concern that upsizing any of Weymouth's sewer mains which discharge into the MWRA system may affect downstream conditions and cause an increased number of SSOs. Hydraulic modeling conducted by MWRA in 2016 indicated that the frequency and volume of SSOs would in the MWRA system would increase with modeled flows (1 mgd and 2 mgd) from the project site. Furthermore, the MWRA has ITA approval to transfer up to 73 mgd from the Weymouth and Weir subbasin; any flows which would cause an exceedance of this limit would require a new ITA approval. According to the MWRA, any increase in wastewater discharge to its system from the project site must be evaluated to determine potential impacts resulting in increased volumes of SSOs. The Proponent should consult with the MWRA to determine the analyses that should be provided in the DSEIR. The DSEIR should identify potential mitigation measures that may be necessary to provide capacity for project flows.

Abington

According to the 2023 NPC, the Town of Abington has an agreement with the City of Brockton to send up to 1.5 mgd to the City's treatment plant, which is 0.4 mgd higher than Abington's current average daily flow. As noted above, the design flow from development on the Abington portion of the project site is 0.35 mgd to 0.4 mgd. The Brockton treatment facility has been upgraded and has the capacity to accept additional flow. According to the 2023 NPC, the Proponent has had discussions with Abington regarding capacity upgrades to its wastewater collection system that will be necessary to

accommodate flows from the project site. The DSEIR should confirm the volume of project-generated flows and the existing capacity of Brockton's wastewater treatment facility.

Rockland

According to the 2023 NPC, the Town of Rockland's wastewater treatment plant has a capacity of 2.5 mgd, which is less than the average daily flows of 2.67 mgd. A system analysis recently conducted for Rockland estimated that I/I accounts for approximately 1.22 mgd (45% of the average daily flow). The Town of Rockland is subject to a Compliance Order issued by the EPA in 2022 which requires Rockland to reduce extraneous flows and upgrade its wastewater treatment plant; as a result, there is a moratorium on new sewer connections over 440 mgd. According to the 2023 NPC, the system analysis indicated that significant reductions in I/I flow to the system are feasible. As noted above, development on the Rockland portion of the SWNAS will generate approximately 0.4 mgd; however, this development is anticipated to occur in later stages of the site buildout. The Proponent will work with Rockland to implement I/I reduction measures to free up capacity in the system to accept project-generated flows. Alternately, the SRA could enter into an agreement with the City of Brockton to treat flows from the Rockland portion of the project site.

Comments provided by the Rockland Board of Sewer Commissioners indicate that substantial improvements to its wastewater system beyond I/I reduction are needed to comply with the EPA Order and to provide the necessary capacity in its collection and treatment systems to accommodate flows from the project site. The EPA Order requires I/I removal at a ratio of 11:1, which would require the Proponent to remove 4.4 mgd of I/I in connection with the proposed discharge of 0.4 mgd of wastewater. In addition, the wastewater treatment facility is over 60 years old and has a long history of NPDES permit violations, which continue to this day. The DSEIR should review Rockland's Comprehensive Wastewater Management Plan (CWMP) and any actions required to be implemented in response to the EPA Order. It should evaluate whether the proposed wastewater system improvements will result in adequate capacity for the collection, treatment, and disposal of the 0.4 mgd of wastewater anticipated to be generated by uses proposed in the Rockland portion of the site. It should identify wastewater management improvements that may be necessary for the Proponent to implement to ensure that wastewater capacity is present in this system. The supplemental analysis of this alternative to be provided in the DSEIR should address comments submitted by the Rockland Board of Sewer Commissioners.

Wetlands

According to the 2023 NPC, approximately 27% of the site is comprised of wetland resource areas, including BVW, Bank, Land Under Water (LUW) Riverfront Area, Bordering land Subject to Flooding (BLSF) and Isolated Land Subject to Flooding (ILSF). In addition, there are 16 certified vernal pools (CVPs) and 15 potential vernal pools (PVPs) on the site. Development of the site and construction of roadways already completed impacted 11,650 sf of BVW and 6,535 sf of Isolated Vegetated Wetlands (IVW). According to the 2023 NPC, 14,305 sf of BVW replication areas have been constructed to mitigate wetlands impacts.

As described in the 2023 NPC, proposed activities will have minimal impacts on wetland resource areas and will be limited to construction of components of the stormwater management system

within Riverfront Area and roadway crossings. The Proponent asserted that the roadway crossings will be subject to the limited project provisions of the Wetlands Regulations and that the stormwater improvements will comply with the Riverfront Area standards; however, the 2023 NPC did not include details about the location or nature of potential impacts or provide an analysis of the relevant regulations. The DSEIR should provide a map of all wetland resource areas on the site, including vernal pools, floodplain mapped by FEMA and any unmapped areas subject to flooding, and discuss potential activities that may be constructed in these areas. It should identify all proposed structures and activities within the ORW and address how the project will comply with appropriate wetlands and water quality standards.

Stormwater

According to the 2023 NPC, the full-build project will add approximately 400 acres of impervious area, a reduction of 25 acres from the estimate provided in the 2017 NPC. A stormwater analysis was provided in the 2006 DEIR and 2007 FEIR; however, the 2023 NPC included a description of site conditions, a conceptual stormwater management system design (“Stormwater Master Plan” or SMP) and a review of how the project will meet the requirements of the Stormwater Management Standards adopted by MassDEP in 2008. I note that MassDEP has proposed changes to the stormwater regulations; all stormwater management systems must comply with the requirements in effect when they are permitted.

According to the 2023 NPC, the project site is comprised of the four drainage areas listed below, which will be generally maintained under post-construction conditions.

- The central portion of the site drains to the Tactical Air Control and Navigation (TACAN) Outfall Basin, which was constructed when the SWNAS was built 80 years ago. The TACAN basin ultimately discharges to the West Branch of French Stream.
- The western portion of the site drains to the West Branch of French Stream, which flows in a southerly direction adjacent to the runway area in the western part of the site.
- The southeast part of the site drains to the East Branch of French Stream, which flows south and joins the West Branch to form French Stream
- The easternmost part of the site drains to the Old Swamp River. Old Swamp River is an ORW because it is a tributary to Whitman’s Pond, which provides water to Weymouth’s primary surface water source, Great Pond. A portion of Old Swamp River in the eastern part of the site is also within a Zone A surface water supply protection zone, within which new stormwater discharges or stormwater management structures are not allowed.

According to the 2023 NPC, the stormwater management system that will be designed to meet the requirements of the Massachusetts Stormwater Management Standards (SMS), including additional requirements for land uses with higher potential pollutant loads (LUHPPLs) and protection of critical areas such as ORWs. It will incorporate BMPs such as deep-sump hooded catch basins, water quality swales, sediment forebays, water quality units, infiltration basins, and wet basins/created wetlands to maintain or reduce post-development peak discharge rates for the 2-, 10-, 25- and 100-year storm events in comparison to pre-development rates and, where conditions allow, promote infiltration and groundwater recharge. The BMPs will be designed to remove 80% of Total Suspended Solids (TSS) in

runoff prior to discharge; as required for LUHPPLs and discharges to critical areas, the system will remove 44% of TSS prior to discharge to an infiltration structure.

According to MassDEP, the Final 2022 Integrated List of Waters lists Old Swamp River (segment MA74-03) as impaired for the pathogens *Escherichia Coli* (E. Coli) and Fecal Coliform, and French Stream (Segment MA94-03) as impaired for Dissolved Oxygen, E. Coli and Fecal Coliform, Fish Bioassessments, and phosphorus. Both segments have an EPA-approved Total Maximum Daily Load (TMDLs) for pathogens. The proposed revisions to the SMS include a new standard which requires source controls to address stormwater discharges to wetland resource areas with a TMDL. The DSEIR should describe potential stormwater management measures to reduce the impairments of the Old Swamp River and French Stream and meet the requirements of the TMDLs. As described below, the DSEIR should provide additional information regarding the design of the proposed, stormwater management system, potential low-impact design (LID) and green infrastructure measures and the capacity of the stormwater management system under future climate conditions.

Rare Species

According to NHESP, the project site contains Priority Habitat for the Eastern Box Turtle, Upland Sandpiper, Grasshopper Sparrow and a third unnamed grassland-nesting bird for which habitat at the site was not mapped when the project was previously reviewed. A CMP was issued by NHESP (Permit No. 008-125.DFW) on February 12, 2009, under which a portion of Bill Delahunt Parkway was constructed. The CMP, which remains in effect, requires the permanent protection of rare species habitat on the site, construction of barriers to prevent turtles from crossing the East-West Parkway, construction of turtle nesting areas, restoration of grassland habitat, and escrow payments per the CMP for funding off-site protection and maintenance of grassland habitat used by the grasshopper sparrow. According to the 2023 NPC, the turtle barriers and five turtles nesting areas have been constructed and partial payments were made to an escrow account; however, no grassland habitat restoration was completed.

The development program proposed in the 2023 NPC will impact 156 acres of grassland habitat; however, impacts to Eastern Box Turtle habitat will be avoided. The project includes the creation of a minimum of 104 acres of high-quality grassland habitat in runway and taxiway areas, including 12 acres to be restored by the removal of debris piles. A total of 519 acres of land on the site will be permanently protected, an increase of 85 acres compared to what is required in the existing CMP. The Proponent also will provide funding for off-site protection of grassland habitat.

According to NHESP, projects resulting in a Take of state-listed species may only be permitted if the performance standards for a CMP at 321 CMR 10.23 are met. For a project to qualify for a CMP, the applicant must demonstrate that the project has avoided, minimized and mitigated impacts to state-listed species consistent with the following performance standards: (a) adequately assess alternatives to both temporary and permanent impacts to the state-listed species, (b) demonstrate that an insignificant portion of the local population will be impacted, and (c) develop and agree to carry out a conservation and management plan that provides a long-term net benefit to the conservation of the state-listed species. According to NHESP, the project will require a new or amended CMP and will be required to comply with conditions of the existing CMP. The DSEIR should provide an update on any additional consultations with NHESP regarding mitigation measures and permitting. It should describe how the proposed open space and public paths will be designed in coordination with areas of protected rare

species habitat.

Climate Change

Adaptation and Resiliency

The 2023 NPC reviewed the climate resiliency planning efforts of the three communities in which the SWNAS is located, and described measures that will be incorporated into the project design to increase its resiliency. Abington, Rockland, and Weymouth are participants in the Commonwealth's Municipal Vulnerability Preparedness (MVP) program, which assists communities in planning for and implementing strategies to adapt to future climate risks, such as sea level rise/storm surge, flooding caused by extreme precipitation and extreme heat. According to the 2023 NPC, all three communities have identified flooding associated with stormwater runoff as a top hazard. As noted above, the project includes construction of a new stormwater management system that will maintain or decrease peak runoff rates during large storm events. In addition, the project will minimize urban heat island effects by reducing impervious area, using light-colored and reflective materials on outdoor surfaces, maximizing tree canopy, and maintaining 885 acres as open space. The project will include water conservation measures, and energy-efficient buildings which will minimize GHG emissions.

Effective October 1, 2021, all new MEPA projects are required to submit an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool")⁴ to assess the climate risks of the project. While this NPC is not formally subject to this new requirement, in consideration of the scale and long-buildout period of the project, the DSEIR should include an output report from the MA Resilience Design Tool, and review potential climate resilience strategies to be undertaken by the project based on the recommendations provided in the output report. The DSEIR should review the feasibility of constructing the stormwater management system with sufficient capacity to accommodate projected 24-hour rainfall depth over future planning horizons, as reported by the Tool. It should review site exposures associated with riverine flooding, if applicable, and review strategies to minimize extreme heat effects. The DSEIR should review additional measures improve the resiliency of proposed buildings, including but not limited to, minimizing water use and incorporating Low Impact Design (LID) and green infrastructure in the design of exterior areas.

Greenhouse Gas (GHG) Emissions

The 2023 NPC included an analysis of the stationary- and mobile source GHG emissions of the project change associated with the energy use (stationary sources) and transportation-related emissions (mobile sources) of the proposed development. The 2023 NPC outlined and committed to mitigation measures to reduce GHG emissions.

The stationary source GHG analysis used eQuest modeling software to evaluate CO₂ emissions for the buildings under a Base Case and a Proposed Design Alternative. The Base Case was designed to meet the minimum energy requirements of the 10th Edition of the Massachusetts Building Code, including the 2023 Stretch Energy Code (SC). The Proposed Design Alternative included additional

⁴ https://resilientma.org/rmat_home/designstandards/

energy-efficiency measures, as described below. The analysis was based on the following development program:

- 1,427 detached one-story, 2,500-sf single-family homes
- 1,495 two-story, 1,950-sf townhouses in a 6-unit building
- 3,078 residential units with an average size of 1,480 sf, modeled as a prototype 4-story building with 73 units
- A 300,000-sf life science R&D building with 4 stories
- 800,000-sf of warehouse space modeled as a prototype 1-story building with an average gross square footage (gsf) of 160,000 sf
- 800,000 sf of office space modeled as a prototype 4-story building with an average gross square footage (gsf) of 150,000 sf
- 100,000-sf of retail space modeled as a prototype 1-story building with an average gsf of 13,400 sf

The stationary source CO₂ emissions of the project change development were estimated as 35,794.6 tons per year (tpy) under the Base Case. According to the E2023 NPC, the mitigation measures included in the Preferred Design Alternative will reduce GHG emissions to 30,267 tpy, a reduction of 5,527.2 tpy (15.4%). The estimates of GHG emissions were calculated using the CO₂ emission factors of 658 pounds per megawatt-hour for grid electricity published by the Independent System Operator-New England (ISO-NE) in the *2021 ISO New England Electric Generator Air Emissions Report* and 117.1 pounds per million British Thermal Units (MMBtu) for natural gas estimated by the U.S. Energy Information Administration.

The Proposed Design Alternative includes the energy efficiency measures listed below, which meet or exceed baseline Building Code requirements. All buildings will use all electric heating and cooling systems, except for the warehouses, which will have a hybrid electric/gas heating system.

- Single family homes and Townhouses (HERS Index 52): Roof insulation with R60 batts, wall insulation with a value of U=0.054, double-paned windows, low air infiltration, all electric heating and cooling systems with air-source heat pumps and energy recovery ventilation, electric storage-tank hot water heaters, and LED lighting
- Multifamily residential buildings: Roof insulation with value of R40, wall assembly insulation value of U-0.040, double-paned windows, low air infiltration, all electric heating and cooling systems with air-source heat pumps and energy recovery ventilation, electric storage-tank hot water heaters, and LED lighting
- Office and R&D buildings: Roof insulation with value of R40, wall assembly insulation value of U-0.055, double-paned windows, low air infiltration, all electric heating and cooling systems with air-source heat pumps, electric heat pump hot water heaters, and LED lighting
- Retail buildings: Roof insulation with value of R40, wall assembly insulation value of U-0.040, double-paned windows, low air infiltration, all electric heating and cooling systems with air-source heat pumps, electric heat pump hot water heaters, and LED lighting
- Warehouse buildings: Roof insulation with value of R-40, wall assembly insulation value of U-0.0714, low air infiltration, hybrid electric heat pump and gas-fired heating system, electric heat pump cooling systems with air-source heat pumps, electric heat pump hot water heaters, and LED lighting

In addition, each single-family home and townhouse unit will be provided with an electric vehicle (EV)-ready parking space, and 20% of all passenger vehicle spaces at the multifamily buildings and 20% of the spaces at the commercial buildings will be constructed as EV-ready. The commercial buildings will be constructed with solar-ready space on 80% of the rooftops and 50% of the single-family and townhouse roofs will be solar-ready.

I commend the Proponent for committing to efficient building designs and for minimizing use of gas at the site. However, according to the Department of Energy Resources (DOER), the minimum HERS rating for single-family and townhouse building will be lowered to HERS 45. Therefore, the proposed residential buildings designed to meet a HERS rating of 52 will not be permissible under the SC starting in July 2024. Comments provided by DOER indicate that substantial incentives are available from MassSave for constructing buildings meeting a lower HERS rating, as well as for constructing the multifamily residential buildings to the Passivehouse design standard. The DSEIR should provide the analysis of alternative building designs requested in DOER's comment letter, including designs with lower HERS ratings, Passivehouse multifamily buildings, and the use of electric air source heat pumps to supply hot water in all buildings.

Mobile Source GHG Emissions

The 2023 NPC analyzed the project's mobile-source CO₂ emissions using the EPA's MOVES emissions model and data from the traffic study. The MOVES model calculates estimates of emissions for vehicles expressed in a volume per distance travelled. The analysis calculated GHG emissions under the No Build 2043, Build 2043 and Build 2043 with TDM scenarios. The GHG emissions from mobile sources in the transportation study area are expected to increase from 60,958.7 tpy under No Build 2043 conditions to 80,723.2 tpy under Build 2043 conditions, representing an increase of 19,764.5 tpy (25 percent) with the addition of project-generated vehicle trips. According to the 2023 NPC, the TDM measures to be implemented by the project modeled in the Build 2043 with TDM scenario will reduce study area GHG emissions to 79,339.7 tpy (including 18,380.9 tpy associated with project-generated vehicle trips), a 2 percent decrease compared to Build 2043 conditions and an increase of 23% from No Build 2034 conditions. To mitigate the project's impacts on area roadways, the Proponent will implement significant roadway mitigations that will improve traffic operation and intersections and roadways and reduce delays. The 2023 NPC included a qualitative microscale analysis, detailed below, which assessed the benefits of the roadway mitigation measures on traffic operations; however, the mobile-source analysis did not account for a reduction in GHG emissions from those improvements. The DSEIR should include a revised analysis that estimates the mobile-source GHG emissions within the transportation study area with and without the implementation of the proposed roadway improvements and TDM measures. The DSEIR should identify additional mitigation measures to offset the project's mobile-source emissions. At a minimum, the Proponent should commit to a providing EV charging stations and increasing the number of proposed EV-ready spaces.

Air Quality

The 2023 NPC included the results of a mesoscale analysis of the project's mobile-source air emissions of VOCs and NO_x under Existing 2023, No Build 2043, Build 2043, Build 2043, and Build 2043 with Mitigation conditions using data from the transportation study. The mesoscale study area

included 24 major roadways in Abington, Rockland, and Weymouth. According to the 2023 NPC, emissions of VOCs and NOx within the study area are 66.7 kilograms per day (kg/day) and 108.3 kg/day, respectively, under Existing 2023 conditions. Under No Build 2043 conditions, VOC emissions will decrease to 37.7 kg/day and NOx emissions will decrease to 28.01 kg/day; this is attributed to general improvements in engine technology and associated air emissions from vehicular trips. With the addition of project-generated vehicle trips, emissions of VOCs will increase by 11.7 kg/day (24%) to 49.4 kg/day and emissions of NOx will increase by 9.0 kg/day (25%) to 37.1 kg/day under Build 2043 conditions, as compared to No Build 2043 conditions; however, emissions of both pollutants in the study area will be lower than under Existing 2023 conditions. The implementation of TDM measures, as modeled in the Build 2026 with Mitigation scenario, will reduce VOC emissions by 0.2 kg/day (approximately 0.01%) and NOx emissions by 0.1 kg/day (approximately 0.03%). The analysis did not estimate reductions in emissions due to construction of roadway improvements proposed in the 2023 NPC, which could be expected to minimize emissions as a result of reduced delays; this analysis should be provided in the DSEIR.

The 2023 NPC included a qualitative “microscale” analysis for the 21 intersections in the study area where project-generated traffic was modeled to cause the LOS to deteriorate to LOS E or F. According to the 2023 NPC, a microscale analysis would typically be required in carbon monoxide (CO) non-attainment areas; however, a qualitative analysis was conducted even though Abington, Rockland, and Weymouth have never been designated as non-attainment areas for any pollutants other than ozone. The analysis used changes in average peak hour delay under Existing 2023, No Build 2023, and Build 2023 conditions to represent the vehicle emissions at each intersection. All 21 intersections will experience an increase in delay from Existing 2023 to No Build 2043 conditions and from No Build 2043 to Build 2043 conditions. Increases in delays between No Build 2043 and Build 2043 conditions ranged from 12.8 seconds per vehicle to 5,535.4 seconds per vehicle, with delays of 150 seconds per vehicle or less at a majority of the intersections. Roadway mitigation has been proposed at 17 of the 21 intersections. The analysis compared delays under Build 2043 to Build 2043 with Mitigation conditions to determine the effectiveness of the proposed mitigation measures to reduce delays and, by reference, air emissions from vehicles. The results indicated that all 17 intersections to be mitigated will experience lower delays under Build 2043 with Mitigation conditions compared to the Build 2043 scenario and 8 of the intersections will have lower delay times under Build 2043 with Mitigation conditions than under No Build 2043 conditions for at least one peak period.

The DSEIR should provide an expanded mesoscale analysis which includes pollutants associated with diesel traffic including DPM, PM2.5 and NOx. The DSEIR should whether air quality will degrade at intersections where the LOS will degrade to LOS F. The analysis should review publicly available air monitoring data and data from the DPH EJ Tool to assess whether any EJ areas near those locations have elevated health risks associated with air pollution and elevated risk factors in the EPA EJ Screen tool. The DSEIR should review measures to minimize and mitigate impacts at these intersections.

Hazardous Waste

According to the 2023 NPC, the Navy has conducted investigation and remediation of hazardous materials at the SWNAS in accordance with the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) under the supervision of EPA and MassDEP, and the Massachusetts Contingency Plan (MCP). Land at the base is transferred to the SRA after the Navy

makes a Finding of Suitability for Transfer (FOST) based on its assessment and/or remediation of hazardous substances in soil or groundwater at a parcel to be conveyed. According to MassDEP, there are 10 active CERCLA areas of concern (AOCs) at SWNAS, including one operable unit (OU) for Basewide per- and poly-fluoroalkyl substances (PFAS) in groundwater. In addition, 18 releases of hazardous substances have been assigned Release Tracking Numbers (RTNs) pursuant to the MCP. Most of these releases have been closed under the MCP, but others are listed as Adequately Regulated because they are being addressed under federal regulations (CERCLA). According to the 2023 NPC, asbestos is also present in existing buildings at the site which are proposed to be demolished.

Much of the land at the site has been transferred with Land Use Controls (LUCs), Activity and Use Limitations (AULs), and deed restrictions which limit the use of specific parcels. According to MassDEP, future land use is mostly restricted to commercial and/or residential development. In addition, groundwater use restrictions, including those that prohibit groundwater use for human consumption or prohibit dewatering without the oversight, concurrence and/or approval of EPA, MassDEP and the Navy, are also in place for much of the transferred property to ensure that there is no mobilization and migration of contaminants that would impact downstream/downgradient sensitive receptors.

As noted above, the DSEIR should include a discussion of how the remediation of the site and removal of asbestos will be protective of public health during the construction and post-construction periods. I refer the Proponent to MassDEP's comment letter, which reviews asbestos removal requirements. The DSEIR should describe how asbestos will be removed in accordance with applicable regulations.

Construction Period

According to the 2023 NPC, the Proponent will prepare a Construction Management Plan (CMP) which will specify measures for storage and delivery of materials onto the site, including truck routes; maintaining safe access for pedestrians and bicyclists; minimizing noise impacts; managing solid waste, including construction debris; and minimizing fugitive dust and air emissions from construction vehicles. The DSEIR should supplement the outline of the CMP provided in the 2023 NPC with detailed mitigation measures that will be implemented to minimize construction period impacts. It should review the phasing of the demolition of existing buildings and describe how existing structures will be demolished. The DSEIR should describe measures to vegetate and stabilize disturbed sites until they are developed.

All construction and demolition activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The DSEIR should describe solid waste to be removed from the site, including debris fields, and how these materials will be managed and removed from the site. The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce

emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle construction and demolition (C&D) debris to the maximum extent. The Proponent should review MassDEP's comment letter, which provides additional details on applicable regulations and standards.

Mitigation and Draft Section 61 Findings

The DSEIR should include a separate chapter summarizing all proposed mitigation measures including construction-period measures. This chapter should also include a comprehensive list of all commitments made by the Proponent to avoid, minimize and mitigate the environmental and related public health impacts of the project, and should include a separate section outlining mitigation commitments relative to EJ populations. The filing should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The list of commitments should be provided in a tabular format organized by subject matter (traffic, water/wastewater, environmental justice, etc.) and identify the Agency Action or Permit associated with each category of impact. Draft Section 61 Findings should be separately included for each Agency Action to be taken on the project. The filing should clearly indicate which mitigation measures will be constructed or implemented based upon project phasing to ensure that adequate measures are in place to mitigate impacts associated with each development phase.

Responses to Comments

The DSEIR should contain a copy of this Certificate and a copy of each comment letter received on the 2023 NPC. It should include a comprehensive response to comments on the 2023 NPC that specifically address each issue raised in the comment letter; references to a chapter or sections of the DSEIR alone are not adequate and should only be used, with reference to specific page numbers, to support a direct response. 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.

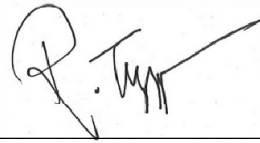
Circulation

The Proponent should circulate the DSEIR to each Person or Agency who commented on the 2023 NPC, each Agency from which the Proponent will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. Per 301 CMR 11.16(5), the Proponent may circulate copies of the EIR to commenters in CD-ROM format or by directing commenters to a project website address. However, the Proponent must make a reasonable number of hard copies available to accommodate those without convenient access to a computer and distribute these upon request on a first-come, first-served basis. The Proponent should send correspondence 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. Copies of the DSEIR should be made available for review at the public libraries of Abington, Rockland, and Weymouth.

February 9, 2024

Date



Rebecca L. Tepper

Comments received:

12/26/2023	Joe Cellini
12/29/2023	Maynard Johnson
01/07/2024	aragonvintage@gmail.com
01/08/2024	David Rubin
01/08/2024	Kathy Swain
01/08/2024	Southfield Neighborhood Association
01/09/2024	aragonvintage@gmail.com
01/09/2024	Joe Cellini
01/09/2024	Rockland Sewer Commission
01/13/2024	H. Richard Coughlin, Weymouth Councilor-at-Large
01/15/2024	George Loring
01/15/2024	Molly and Steve LeMott
01/16/2024	David Payne
01/16/2024	Jennifer Farrell
01/16/2024	Tianshi Wayng
01/17/2024	Martin Katz
01/17/2024	Mary A. and Steven R. LeMott
01/17/2024	Nancy O'Neil
01/17/2024	Philip Lofgren
01/17/2024	Randall Webster
01/18/2024	Back River Watershed Association
01/18/2024	Daniel Gover
01/18/2024	Daniel Mobley
01/18/2024	Fairing Way Resident Council
01/18/2024	Linda Rubin
01/18/2024	Terry Yin
01/19/2024	Mary Darcy
01/20/2024	David Fahey
01/20/2024	Victoria Liu
01/22/2024	Christine Bacigalupo
01/22/2024	Robert Kearns
01/23/2024	Central Plymouth County Water District Commission
01/23/2024	Rachel Skiffington

01/24/2024 Arthur E. Matthews, Weymouth Town Council District 4
01/25/2024 Kathy Swain
01/25/2024 Matt Penella
01/25/2024 Rockland Sewer Commission
01/25/2024 Steven LeMott
01/26/2024 Joe Cellini
01/26/2024 Karen Adams
01/26/2024 Susan and Mike Ostrowsky
01/28/2024 J. Muskan
01/28/2024 Kathy Swain
01/28/2024 Michele Gorab
01/28/2024 Pamela Leskar
01/28/2024 Patricia Hess
01/28/2024 Sandra Delaney
01/29/2023 Paula M. Cedrone
01/29/2024 Ajitha Nuthulapati
01/29/2024 Anonymous
01/29/2024 Debbie and David Epstein
01/29/2024 Debra and David Payne
01/29/2024 Donna Fahey
01/29/2024 Eric Phaneuf
01/29/2024 HOA Trustees of the Cottages
01/29/2024 John Abbott, Weymouth Town Council District 6
01/29/2024 Kathy Kirby
01/29/2024 Mary Ellen Shea
01/29/2024 Mary Parsons
01/29/2024 Rahul Tiwari
01/29/2024 Robert Hedlund, Mayor of Weymouth
01/29/2024 South Shore Chamber of Commerce
01/29/2024 Tak-Chee Chan
01/29/2024 Tricia Pries
01/30/2024 Division of Marine Fisheries (DMF)
01/30/2024 Massachusetts Department of Transportation (MassDOT)
01/30/2024 Jack Egan
01/30/2024 James Cleary
01/30/2024 Jimmy Powell
01/30/2024 Joanne Marques
01/30/2024 Jones River Watershed Association
01/30/2024 Kathy Swain
01/30/2024 Metropolitan Area Planning Council (MAPC)
01/30/2024 Mary Parsons
01/30/2024 Massachusetts Department of Environmental Protection (MassDEP)/Southeast Regional Office (SERO)
01/30/2024 Massachusetts Water Resources Authority (MWRA)
01/30/2024 Natural Heritage and Endangered Species Program (NHESP)
01/30/2024 North and South Rivers Watershed Association

01/30/2024 Rockland Board of Selectmen
01/30/2024 Rockland Open Space Committee
01/30/2024 Southfield Landowners Association
01/30/2024 Ted Langill
01/30/2024 Water Resources Commission (WRC)
01/31/2024 Gary MacDougall, Weymouth Town Council District 5
01/31/2024 Taunton River Watershed Association
02/02/2024 Rockland Board of Selectmen
02/06/2024 Department of Energy Resources (DOER)

RLT/AJS/ajs