

Section 8.0

RESPONSE TO COMMENTS

8.0 RESPONSE TO COMMENTS

The Final EIR is structured in response to the Secretary's Certificate on the Draft EIR. A copy of the Certificate is included in this section.

This section responds to comment letters submitted by government agencies and individuals on the Draft EIR filed on April 30, 2012. Each letter has been assigned an abbreviation, listed below in Table 8-1. The comment letters are reprinted in this section, and specific comments within each letter are noted in the margin with this abbreviation and a sequential numbering. Following the letter is a summary of the comments accompanied by a response to each.

Table 8-1 Secretary's Certificate and Comment Letters

<i>Commenter</i>	<i>Abbreviation</i>
EEA Secretary's Certificate on the Draft EIR	MEPA
Massachusetts Department of Environmental Protection	MassDEP
Massachusetts Department of Transportation	MassDOT
Massachusetts Department of Energy Resources	DOER
Massachusetts Historical Commission	MHC
Massachusetts Division of Marine Fisheries	DMF
Metropolitan Area Planning Council	MAPC
Robb Ross	Ross



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June 22, 2012

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : New Quincy Center Redevelopment
PROJECT MUNICIPALITY : Quincy
PROJECT WATERSHED : Boston Harbor
EOEA NUMBER : 14780
PROJECT PROPONENTS : City of Quincy/Hancock Adams Associates, LLC
DATE NOTICED IN MONITOR : May 9, 2012

Pursuant to the Massachusetts Environmental Policy Act (MEPA) (M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I hereby determine that the Draft Environmental Impact Report (DEIR) submitted on this project **adequately and properly complies** with MEPA and its implementing regulations. The Proponents should prepare a Final Environmental Impact Report (FEIR) as detailed in the Scope below.

Project Description

As described in the DEIR, the proposed project entails the redevelopment of the central business district of Quincy into a mixed-use, high density urban redevelopment. The project will be constructed on approximately 31 acres, mostly contained within the City of Quincy's 55-acre Urban Revitalization District. The project involves the proposed demolition of many buildings, which will be replaced with a high density, mixed-use development program. The existing uses in the area proposed for redevelopment are as follows: approximately 297,000 square feet (sf) of retail space; 98,715 sf of restaurant; a 21,170 sf movie theater; 652,500 sf of office space; and 2,212 parking spaces. The proposed redevelopment program includes:

- 252,250 sf of retail space;
- A 54,215 sf supermarket;
- 130,753 sf of regional shopping/superstore;
- 89,255 sf of restaurant space;

- 901,930 sf of general office space,
- 103,628 sf of medical office space
- a 33,709 sf health club,
- 159,466 sf of classroom space for Quincy College,
- a 88,493 93 sf (3,210-seat) movie theater,
- a 95,890 sf (173-room) hotel,
- 1,735,081 sf of residential apartments (1,882 units), and
- ± 4,746 parking spaces.

At full-build, the project would total 3,733,207 sf of development space and also include additional streetscape improvements, new public open space elements, pocket parks, and traffic calming measures at key intersections designed to create a more pedestrian-friendly environment. The building program presented in the DEIR represents an eight percent increase from the development program presented in the Expanded Environmental Notification Form (EENF). The project area is bounded by Burgin Parkway and the MBTA rail to the west, the Hancock Cemetery and the United First Parish Unitarian Church to the north, Chestnut Street and Dennis F. Ryan Parkway to the east, and the Concourse Roadway to the south.

The project also includes the construction of the Burgin Parkway Access Bridge to facilitate safe access to the proposed redevelopment area and to channelize vehicles away from pedestrian areas on Hancock Street, Adams Green, and the National Parks Service Visitor Center and attractions. The bridge will improve access to the parking structures proposed as part of the project and provide an alternative access point for pedestrians and emergency vehicles. In the previously reviewed Expanded Environmental Notification Form (EENF), the project Proponents requested a waiver to proceed with Phase 1 of the project, which entails design and permitting (but not construction) of the proposed Burgin Parkway Access Bridge. The waiver request was granted in a Final Record of Decision issued by me on October 7, 2011.

MEPA Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to preparation of a mandatory EIR pursuant to 301 CMR 11.03(6)(a)(6), and 11.03(6)(a)(7) because it requires a State Agency Action and it will result in the generation of 3,000 or more new adt on roadways providing access to a single location, and the construction of 1,000 or more new parking spaces at a single location. The project is also undergoing MEPA review pursuant to 301 CMR 11.03(1)(b)(6), 11.03(1)(b)(7), 11.03(5)(b)(4)(a), and 11.03(10)(b)(2) because it requires: approval in accordance with M.G.L. c. 121A of a new urban redevelopment project for a project consisting of 100 or more dwelling units or 50,000 or more sf of non-residential space; approval in accordance with M.G.L. c. 121B of a new urban renewal plan; new discharge to a sewer system of 100,000 or more GPD of sewage; and the demolition of a Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth.

The entire project requires: an Order of Conditions from the Quincy Conservation Commission (and on appeal only, a Superseding Order of Conditions (SOC) from the Massachusetts Department of Environmental Protection (MassDEP)); a Sewer Connection Permit from MassDEP; approval of the Urban Development Project/Urban Renewal Plan from

the Department of Housing and Community Development (DHCD); a Vehicular Access Permit from MassDOT. The project also requires Section 106 review by the Massachusetts Historical Commission (MHC) and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the United States Environmental Protection Agency (US EPA). The project is subject to the EEA/MEPA Greenhouse Gas Emissions Policy and Protocol.

Because the Proponentss are seeking approval of the Quincy Center URDP in accordance with M.G.L c.121B, and because the Proponentss are seeking Financial Assistance from the Commonwealth for the 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.

REVIEW OF THE DEIR

Wetlands and Stormwater Management

The DEIR indicates that no work will be conducted within the Riverfront Areas associated with Town Brook because I have designated a portion of downtown Quincy as a Densely Developed Area (DDA) in accordance with the Rivers Protection Act. Therefore, the extent of the Riverfront Area within the DDA is 25 feet, rather than 200 feet, away from the mean annual high-water line of any perennial rivers and streams.

The DEIR indicates that the project will expand areas of open space but that ultimately, the project area will remain approximately 80 percent impervious after the project development program has been completed. I acknowledge the Proponents's commitment to include 1.2 acres of green roofs throughout the project.

Wastewater

The DEIR indicates that the project will generate a net increase in wastewater flows of 384,207 gallons per day (gpd) and that the project will include construction of approximately 4,900 feet of new sewer lines. The City of Quincy is a member of the Massachusetts Water Resources Authority's (MWRA) Regional Sewer System and is required to assist in the ongoing coordinated efforts of MassDEP and MWRA in reducing infiltration and inflow (I/I) to ensure that the additional wastewater flows generated by the project will be offset by the removal of I/I flows. The DEIR indicates that the Proponents has committed to eliminating four gallons of I/I for each gallon of new flow generated, resulting in I/I mitigation of 1,536,828 gpd. While the DEIR did not identify specific I/I removal projects, the Proponents anticipates three phases of I/I removal corresponding to the three phases of project construction.

Transportation

According to the DEIR, the project at full build is expected to generate 61,280 unadjusted vehicle trips on an average weekday, which represents an increase of 26,553 vehicle trips per day over the trip generation calculated for the existing uses. The trip generation was estimated based on the Institute of Transportation Engineers (ITE) Trip Generation Land Use Codes 820

(Shopping Center), 814 (Specialty Retail), 850 (Supermarket), 931 (Quality Restaurant), 932 (High-Turnover (Sit-Down) Restaurant), 445 (Multiplex Movie Theater), 710 (General Office), 720 (Medical Office), 540 (Junior/Community College), 492 (Health/Fitness Club), 310 (Hotel), and 220 (Apartments).

The Draft EIR (DEIR) includes a transportation study prepared in conformance with the EOEEA/ MassDOT Guidelines for EIR/EIS Traffic Impact Assessments. The transportation provides a comprehensive evaluation of the project's transportation impacts within the study area. It includes analysis of all the modes for both existing and future conditions, and identifies appropriate mitigation measures for areas where the project will have an adverse impact on mobility. The DEIR includes a draft Section 61 Finding that provides a clear commitment to implement these mitigation measures and also describe the timing of their implementation based on the phases of the project.

The project is located in a busy transit corridor that includes two MBTA stations, a commuter rail station, several bus lines, and a dense urban street network with sidewalks that also provides good accessibility and connectivity for pedestrians and bicyclists. Because the project would be located in such a dense urban district, there are ample opportunities for access to the project via public transportation, walking, and bicycling. Finally, the mixed-use nature of the development creates the opportunities for a significant number of internal trips among the different land uses. Accordingly, the DEIR includes a comprehensive summary of backup documentation to support credits for internal trips, transit trips, pedestrian trips, and bicycle trips.

The transportation analysis assumes a 10-year horizon period analysis. Future years analysis for No-Build and Build conditions were conducted based on the 10-year horizon. As requested, the DEIR provided tabular summaries and composite illustrations of intersection levels-of-service, lane group/movement levels-of-service, average queues, and 95th-percentile queues. However, the DEIR did not provide results of a traffic flow simulation model to portray network peak-hour conditions, as MassDOT had requested.

Traffic Operations and Proposed Mitigation Measures

The transportation study includes a comprehensive evaluation of traffic operations condition with the study area. As requested in MassDOT comment letter on the EENF, three additional intersections along Burgin Parkway were added to the study area of the project. The DEIR presented capacity analyses and a summary of average and 95th percentile vehicle queues for each intersection for the existing, No-Build, Build, and Build with mitigation conditions. A comprehensive mitigation program of intersection improvements, traffic signal modifications, traffic signal optimization, and signal coordination is proposed in the DEIR. These improvements are, for the most part, located on the City of Quincy local roadway system. However, the following mitigation measures are proposed on state-controlled roadways, and would therefore require a Vehicular Access Permit from MassDOT:

- The construction of the Burgin Parkway Access Bridge;
- Traffic signal timing optimization at the following locations: Burgin Parkway/Quincy Street and Burgin Parkway/Lowe's Driveway/Quincy Adams MBTA Station; and
- Geometric modifications and traffic signal upgrades at the Burgin Parkway/Hannon Parkway intersection

Overall, MassDOT believes that the proposed mitigation program would adequately address the additional increase in traffic associated with the project. For the most part, the intersections would operate at level-of-service (LOS) D or better, or would experience delays no worse than the existing and/or No-Build conditions.

The DEIR includes sufficiently detailed conceptual plans for the proposed roadway improvements that demonstrate the feasibility of constructing these improvements. The conceptual plans are generally consistent with a Complete Streets design approach and provide adequate and safe accommodation for all roadway users, including pedestrians, bicyclists, and public transit riders.

Alternative Travel Modes

The DEIR provides a thorough inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site using transportation modes other than single-occupancy vehicles, including provisions for future expansion of bus, private shuttle, bicycle, and pedestrian options in the vicinity of the project. The Proponents has worked with the MBTA and documented the existing capacity of the different transit modes with the study area. According to these discussions, the transit system can accommodate the increase in ridership to be generated by the project, based on the project's 10-year horizon. The Proponents will continue to work with the MBTA to address the potential bus route changes that may result from the changes in traffic patterns associated with the proposed Adams Green roadway improvements. The Proponents has also committed to work with the MBTA and the City of Quincy to evaluate traffic signal priority along some of the bus routes within the study area.

The DEIR transportation study includes an inventory of the existing sidewalks and bicycle facilities within the project area. It also includes a trip generation estimate, mode split, and trip distribution of the pedestrian and bicycle trips associated with the redevelopment program. The assumptions included in the analysis for the projection of pedestrian and bicycle volumes and the completion of an operations analysis for these modes for both existing and future conditions are acceptable. As part of the Adams Green Improvement Project, project site improvements, and other projects within the study area, a number of facilities will be upgraded to improve existing and future conditions for pedestrian and bicycle travel. These improvements are expected to improve overall mobility for bicycle and pedestrians.

Transportation Demand Management

The DEIR includes a comprehensive Transportation Demand Management (TDM) program to reduce vehicle trips and manage traffic with the study area. The TDM program consists of transit measures, pedestrian and bicycle treatments, parking measures, and other measures.

Transportation Monitoring Program

The Proponents has committed to conduct a transportation monitoring program that will be undertaken twice per year for five years from the full build-out of the project. The goals of the traffic monitoring program will be to evaluate the assumptions made in the DEIR and the adequacy of the transportation mitigation measures, as well as to determine the effectiveness of the transportation demand management program.

Air Quality

The DEIR includes an air quality mesoscale analysis that compares the indirect emissions of volatile organic compounds (VOCs), noxious oxides (NOx), and carbon dioxide (CO₂) from transportation sources under the 2012 Existing, 2022 No Build, 2022 Build, and 2022 Build with Mitigation conditions. The analysis predicts that the project will result in increased emissions and predicts only slight emissions reductions under the 2022 Build with Mitigation condition.

The DEIR describes the project's mobile source air quality mitigation primarily in terms of benefits to be derived from infrastructure improvements, primarily traffic signal optimization and intersection lane management. Trip reduction will rely on mostly site-based TDM measures and reliance upon nearby public transit services. The DEIR contains a list of TDM commitments, including on-site bicycle and pedestrian facilities, but no specific bicycle accommodations on city streets such as designated bicycle lanes, detection loops at intersections, "share the road" signage, and countdown pedestrian signals. In its comments, MassDEP states that it believes that the project has the potential to generate substantially more bicycle and pedestrian trips, thereby reducing vehicular trip generation.

Greenhouse Gas Emissions

As stated in the DEIR, the Proponents has committed to constructing the project with the target of achieving a Silver Rating under the US Building Council's Leadership in Energy and Environmental Design (LEED) for a Neighborhood Development (ND). Additionally, the City of Quincy has adopted the Massachusetts Energy Stretch Code. Pursuant to the code, all buildings that are larger than 100,000 sf must demonstrate a reduction in the overall site energy usage intensity (EUI) of at least 20 percent between the baseline and proposed cases using building performance simulation models that are developed and run in conformance with ASHRAE 90.1 Appendix G. Based on the DEIR, it is anticipated that many, if not most, of the planned buildings will be larger than 100,000 sf. The DEIR used a prescriptive method for the modeling of these buildings and, for this reason, the Division of Energy Resources (DOER) has determined that the analysis presented in the DEIR is not compliant with the GHG Policy and Protocol.

The analysis presented in the DEIR indicates that the Preferred Alternative will reduce stationary source GHG emissions by 4,442.7 tpy, an approximate 25.8% reduction. It will reduce mobile sources by approximately 109.3 tpy, or six percent. Measures to avoid, minimize and mitigate stationary source emissions are modeled for each building and include: centralized chillers, albedo roofing, high efficiency HVAC systems, EnergyStar appliances, and energy efficient lighting, windows and building envelopes. However, because the modeling is not compliant with the GHG Policy and Protocol, DOER cannot comment on the overall results of the modeling except to state that it is likely that performance of the energy modeling in accordance with Appendix G would produce results that will be significantly different from those included in the DEIR.

Historical and Archaeological Resources

The DEIR includes a comprehensive survey of the historic buildings in Quincy Center. As recommended by MHC, the DEIR generally details the nature of the project's impacts to

historic properties. In its comments, the Massachusetts Historical Commission (MHC) indicates that it understands that the project is a work in progress and that the Proponents has not yet identified definitive proposals concerning the height, massing or other exterior characteristics of the proposed new buildings. Additionally, since the review of the Expanded ENF, the geographic scope of the project has increased to include several properties to the north and northeast of Chestnut Street.

The majority of the existing buildings within the project area are proposed to be demolished and replaced by new buildings that will generally be taller. The DEIR indicates that the Granite Trust Company Building at 1400 Hancock Street is proposed to be renovated, and the Greenleaf Building, located at 1419 Hancock Street, is no longer part of the project. Both of these buildings are individually listed on the State and National Registers of Historic Places.

Given the preliminary stage of project design, MHC is not able to accurately evaluate the visual effect to historic properties. MHC's comments list individual buildings located within Quincy Center Local Historic District and listed on the State Register of Historic Places that are proposed to be demolished as part of the project.

SCOPE FOR FEIR

General

The Proponentss should prepare the FEIR in accordance with the general guidance for outline and content found in Section 11.07 of the MEPA regulations, as modified by this Scope. The FEIR should include maps and plans at a reasonable scale, a project summary and schedule, a description of impacts and mitigation associated with each phase of the project, a list of all permits required or potentially required, funding, or approvals, and a description of any changes since the filing of the DEIR.

MEPA 01

Wetlands and Stormwater Management

The DEIR indicates that no work will be conducted within the Riverfront Areas associated with Town Brook. In its comments, MassDEP states that it is not possible to confirm this with certainty without detailed project plans. The FEIR clarify this potential issue and preferably provide plans, if even at a conceptual level, that either demonstrate that no impacts will occur or that any impacts will be minimized and mitigated.

MEPA 02

As requested by MassDEP in its comments, the FEIR should explain whether there are any proposed changes to the proposed drainage system since review of the DEIR, including changes in volume or rate of flow, particularly in the area of the Burgin Parkway and the MBTA tracks. The FEIR should include a tabular summary of pre- and post-peak discharge rates and volumes for all drainage areas.

MEPA 03

MEPA 04

The FEIR should address MassDEP's questions, as noted in its comments, related to the effects the project will have on stormwater base flows and peak flows, particularly for the proposed new discharge outfall at Revere Road that will consolidate many of the existing outfalls in the former Town Brook alignment into a single discharge point. The FEIR should

MEPA 05

MEPA 06

demonstrate that the stormwater management system will control runoff volumes to maintain adequate base flows in the relocated stream while minimizing potential impacts during storm events.

As proposed, groundwater flow from the MBTA lift station would be combined with stormwater from the project drainage area and conveyed through a culvert to a large outfall at the downstream end of the relocated Town Brook near Revere Road. The FEIR should address MassDEP's and the Division of Marine Fisheries' concerns regarding the downstream relocation of these flows, especially potential impacts the re-establishment of a smelt run and to banks and channels resulting from scouring and erosion.

MEPA 07

The FEIR should consider alternatives to the proposed design presented in the DEIR, including separate conveyance of flows from the MBTA lift station and their release further upstream. The FEIR should also include a revised plan and sufficient information for MassDEP to understand the proposed changes in the hydrology of Town Brook. The hydraulics of the proposed consolidated discharge through the Revere Street outfall should be analyzed for erosion, sedimentation and backwater effects and any adverse effects should be minimized.

MEPA 08

MEPA 09

Wastewater

The DEIR did not identify specific I/I removal projects to be undertaken by the Proponents as mitigation for new wastewater flows to be generated by the project. To the extent possible, the Proponents should identify specific I/I removal projects in the FEIR based on consultation with MassDEP, and in support of its application for a Sewer Connection/Extension Permit.

MEPA 10

Transportation and Air Quality

The DEIR did not present the results of a traffic flow simulation model to portray network peak-hour conditions, as requested by MassDOT. The Proponents should complete this traffic simulation and include a summary of the results in the FEIR.

MEPA 11

The Proponents committed to undertake a traffic monitoring program upon completion of the project, which is expected to occur after 2020. However, MassDOT may require that monitoring be initiated prior to full build-out and occupancy. The Proponents should consult with MassDOT to discuss an appropriate timeframe or commit to initiate the monitoring program upon request in the FEIR.

MEPA 12

The FEIR should address MassDEP's comments regarding the project's potential to generate substantially more bicycle and pedestrian trips if the TDM program included more and better on-road accommodations, thereby further reducing vehicular trips and emissions to be generated by the project. The FEIR should respond to MassDEP's detailed list of suggested bicycle and pedestrian accommodations and identify specific measures that will be incorporated into the project.

MEPA 13

Greenhouse Gas Emissions

The FEIR should present a best estimate of the number of buildings that will likely be larger than 100,000 sf and these should be modeled in accordance with ASHRAE 90.1 2007

MEPA 14

Appendix G. While I acknowledge that, at this early stage of project design, many of the details regarding individual proposed buildings and their mechanical systems have not been established to permit final modeling with certainty, the FEIR should present a revised analysis based on the Proponents's best estimates of the layout of each of the buildings with the space usage allocations as shown in the program table to develop models which apportion the use classes within the buildings, and the probable size, scope and type of building envelope and systems. Where unregulated loads and schedules have not yet been determined, default input values from AHSRAE tables G-E though G-O in Section G (Building Performance Rating Method) of the ASHRAE 90.1 2007 User's Manual can be used.

MEPA 15

In addition to the measures the Proponents has committed in the DEIR to implement, the Proponents is strongly encourages to consider other measures ti improve the energy efficiency of the project including air-side economizers, supply fan speed controls, cooling capacity controls, water source heat pumps (WSHPs), combined heat and power (CHP), and on-site renewable energy, such as solar photo-voltaic (PV) panels on building rooftops, as recommended by MassDEP and DOER in their comments. The Proponents should continue to consult with DOER and MassDEP on these matters and present the results of these discussions in the FEIR, along with any revised commitments to implement energy efficiency measures.

MEPA 16

In order to ensure that all GHG emissions reduction measures adopted by the Proponents as the preferred alternative are actually constructed or performed by the Proponents, it is required that Proponentss provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been implemented upon completion of their project, or their constituent phases. Specifically, as a condition of a Certificate approving the FEIR, the Proponents must provide a certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that the all of the mitigation measures adopted by the Proponents as the preferred alternative have been incorporated into the project. Alternatively, the Proponents may certify that equivalent emissions reduction measures that collectively are designed to reduce GHG emissions by the same percentage as the measures outlined in the FEIR, based on the same modeling assumptions, have been adopted. This certification should be supported by plans that clearly illustrate where GHG mitigation measures have been incorporated. For those measures that are operational in nature (i.e. TDM, recycling) the Proponents should provide an updated plan identifying the measures, the schedule for implementation and how progress towards achieving the measures will be obtained. The commitment to perform this self-certification in the manner outlined above should be incorporated into the revised draft Section 61 Findings included in the FEIR.

MEPA 17

Historical and Archaeological Resources

MHC submitted detailed comments on the DEIR identifying historic properties within the project area. MHC indicates that additional properties included in the Inventory and State and National Registers of Historic Places will likely be identified as MHC is notified with more detailed information regarding each of the steps within Phase 2. In its comments, MHC continues to recommend careful consideration of the potential effects of the project to significant historic resources early in the planning process urges the Proponents to explore the feasibility of using historic tax credits to rehabilitate older buildings rather than demolish them, or otherwise incorporate historic building facades into the project.

MEPA 18

In order to determine the project’s impacts to historic properties, and whether they meet the criteria for listing in the National Register of Historic Places, MHC requests that the Proponents provide current original photographs of the interiors and exteriors of the following buildings keyed to a sketch map:

MEPA 19

- Loran Smith Barber Shop/Brown Gift Shop at 17-19 Chestnut Street;
- George Richards Building at 24 Cottage Avenue;
- 27-29 Cottage Avenue; and
- Alpha Hall at 1-13 Cottage Avenue.

I encourage the Proponentss to continue to work with MHC and the Quincy Historical Commission to develop appropriate mitigation that will include interpretation of the site’s history and to ensure adequate documentation of the site’s buildings and structures. The FEIR should present an update on the Proponentss’ consultations with MHC and any measures that have been proposed to mitigate project impacts to historic properties. In particular, the FEIR should report on any changes to the project since the DEIR to the extent that they would adversely or beneficially affect historic properties and allow MHC to reach conclusions regarding the project’s visual impacts.

MEPA 20

Mitigation and Section 61 Findings

The FEIR should include a separate chapter on final mitigation measures for all phases of the project, which should summarize in a table all mitigation commitments, as well as detailed draft Section 61 Findings for all State Agency Actions. The draft Section 61 Findings should describe proposed mitigation measures, contain clear commitments to mitigation and a schedule for implementation, based on the construction phases of the project, and identify parties responsible for funding and implementing the mitigation measures. The draft Section 61 Findings will serve as the primary template for permit conditions.

MEPA 21

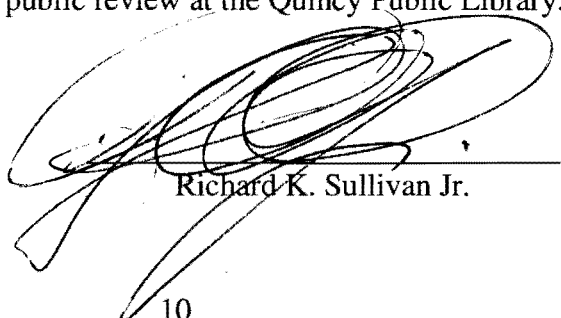
Responses to Comments/Circulation

The FEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the DEIR should respond fully to the comments received to the extent they are within MEPA jurisdiction. The FEIR should present additional technical analyses and/or narrative as necessary to respond to the comments received. This directive is not intended to and shall not be construed to enlarge the scope of the FEIR beyond what has been expressly identified in this Certificate. I recommend that the Proponents use either an indexed response to comments format, or a direct narrative response. The FEIR should be circulated in compliance with Section 11.16 of the MEPA regulations. Copies should be sent to those parties that submitted comments on the DEIR and to each State Agency from which the Proponents will seek permits or approvals. A copy of the FEIR should be made available for public review at the Quincy Public Library.

MEPA 22

MEPA 23

June 22, 2012
DATE



Richard K. Sullivan Jr.

Comments Received:

06/05/2012 Robb Ross
06/06/2012 Division of Energy Resources
06/08/2012 Division of Marine Fisheries
06/08/2012 Department of Transportation
06/08/2012 Massachusetts Historical Commission
06/12/2012 Metropolitan Area Planning Council
06/15/2012 Department of Environmental Protection

RKS/RAB/rab

SECRETARY'S CERTIFICATE ON THE ENF

MEPA 01 **The FEIR should include maps and plans at a reasonable scale, a project summary and schedule, a description of impacts and mitigation associated with each phase of the project, a list of all permits required or potentially required, funding, or approvals, and a description of any changes since the filing of the DEIR.**

Section 1.4 describes the changes in the Project since the Draft EIR was filed on April 30, 2012, and Section 1.7 describes the Project schedule. The updated Project description in Section 1.2 includes existing and proposed site plans. The anticipated permits, reviews, and approvals required for the Project are identified and described in Section 1.5. Project impacts and mitigation are addressed in Section 7.0, which also includes proposed Section 61 Findings for State agencies.

MEPA 02 **The FEIR should clarify [whether work will be conducted within the Riverfront Area associated with Town Brook] and preferably provide plans, if even at a conceptual level, that either demonstrate that no impacts will occur or that any impacts will be minimized and mitigated.**

To clarify the limits of work area in relation to the Project site, Riverfront Area associated with Town Brook (assuming completion of the separate Town Brook Enhancement Project) is shown in Figure 2.3. In addition, limits of the DDA Designation have been identified to clearly demarcate the area of the 25-foot-wide versus the 200-foot-wide Riverfront Area. Figure 2.4 depicts the Riverfront Area under proposed conditions.

No work is proposed within the Riverfront Area. Figure 2.4 shows the limit of the 25-foot Riverfront Area within Revere Road, which does not extend into the Project area. See Section 2.1 for additional details.

MEPA 03 **The FEIR should explain whether there are any proposed changes to the proposed drainage system since review of the DEIR, including changes in volume or rate of flow, particularly in the area of the Burgin Parkway and the MBTA tracks.**

An updated discussion of stormwater is provided in Section 2.2.

Through additional research, discussions, and coordination with DCR since filing the Draft EIR, the Proponents discovered that in addition to various existing stormwater infrastructure improvements in the vicinity of Quincy Center that were previously identified and accounted for, a diversion structure exists that was constructed as part of the Local Flood Control Project in 1987. This structure diverts stormwater flows away from the Project area which had previously been analyzed to be tributary to the area's stormwater system. MDC constructed this structure to divert stormwater flows from an existing 48-inch stormwater culvert located within

the MBTA right-of-way to the Burgin Parkway Culvert, which in-turn flows to the Deep Rock Tunnel and bypasses the Project area completely. The Proponents have revised the Project area's direct local watershed tributary to reflect this flow diversion, which results in a reduced peak runoff and volume of flow for existing as well as proposed conditions when compared to the rates of flow as noted in the Draft EIR.

Section 2.2 contains a detailed discussion of stormwater conditions for the Project area prior to completion of the Town Brook Enhancement Project, conditions as they will exist following realignment of Town Brook, and proposed conditions. Figures 2.6 through 2.11 reflect these analyses. The Project does not involve any changes to the existing Burgin Parkway Sediment Chamber or MBTA Lift Station.

MEPA 04 The FEIR should include a tabular summary of pre- and post-peak discharge rates and volumes for all drainage areas.

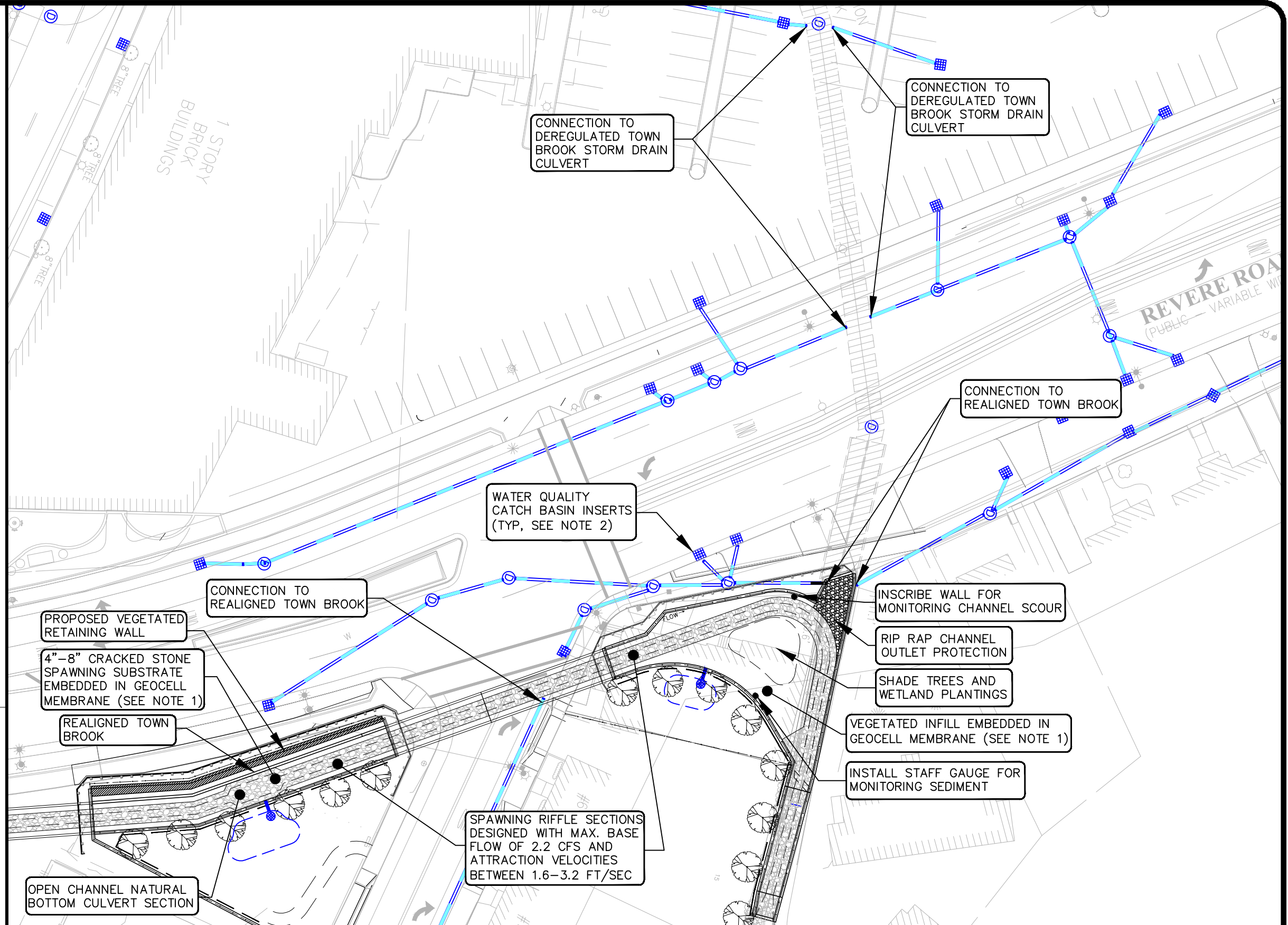
An updated discussion of stormwater is provided in Section 2.2. Tables 2-5 and 2-6 summarize the pre- and post-peak discharge rates and volumes for all drainage areas included in the hydrologic analysis.

MEPA 05 The FEIR should address... the effects the project will have on stormwater base flows and peak flows, particularly for the proposed new discharge outfall at Revere Road that will consolidate many of the existing outfalls in the former Town Brook alignment into a single discharge point.

The Project has been designed in accordance with MassDEP Stormwater Management Standards. Under proposed conditions, there will be no increase in peak discharge rates as a result of the Project. Table 2-5 summarizes the Project area's peak stormwater runoff rates from the 2-, 10-, 25- and 100-year storm events for existing conditions prior to the realignment of Town Brook, "existing" (i.e., baseline) conditions after the realignment of Town Brook (i.e., completion of the separate Town Brook Enhancement Project), and for proposed conditions. In addition, the Project will have no negative impact on the hydraulic performance of the stormwater system at the stormwater confluence at the Revere Road outfall, which will remain unchanged as a result of the Project when compared to existing conditions (see Figure 8.1). Similarly, the Project will have no impact on base flows in Town Brook, as Project construction will not affect base flow conveyance and will only improve the overall quality of the base flow through incorporation of stormwater quality structures and a comprehensive stormwater management system for Quincy Center. Section 2.2 contains additional discussion of the stormwater and base flow for the Project.

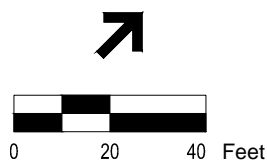
NOTES:

1. ADDITIONAL MATERIAL FROM THE GEO-CELL MANUFACTURER HAS BEEN INCLUDED IN THE APPENDIX DETAILING THAT IT IS CAPABLE OF WITHSTANDING PEAK FLOW VELOCITY UP TO 15 FT/SEC WITH A DURATION OF PEAK FLOW LESS THAN 48 HOURS FOR SOIL INFILL WITH GRASS COVER, AND PEAK FLOW VELOCITY UP TO 10 FT/SEC WITH A MEDIAN STONE SIZE OF 5-INCHES OR GREATER, AND 6.6 FT/SEC WITH MEDIAN STONE SIZE OF 1.5-INCHES OR GREATER.
2. WATER QUALITY CATCH BASIN INSERTS ARE TO BE INSTALLED AS PART OF TOWN BROOK ENHANCEMENT PROJECT IN ACCORDANCE WITH FINAL ORDER OF CONDITIONS (MASSDEP #59-1261)
3. PROJECT IMPACTS HAVE BEEN CALCULATED ASSUMING THE PROPOSED ALIGNMENT OF THE TOWN BROOK ENHANCEMENT PROJECT (EEA #14725) IS CONSTRUCTED PRIOR TO CONSTRUCTION ACTIVITIES ASSOCIATED WITH THIS PROJECT.
4. PROPOSED TOWN BROOK ALIGNMENT AND RESOURCE AREAS SHOWN FOR REFERENCE ONLY. THE ENHANCEMENT OF TOWN BROOK IS NOT A PART OF THIS PROJECT.



LEGEND

- EXISTING CATCH BASIN
- EXISTING DRAINAGE MANHOLE
- EXISTING STORM DRAIN
- TOWN BROOK PRIOR TO REALIGNMENT (DEREGULATED STORMWATER CULVERT)
- REALIGNED TOWN BROOK LOW FLOW CHANNEL



This Figure Prepared in Coordination With:



Hancock Adams Associates
 1400 Hancock Street
 Quincy, MA 02169



Figure 8.1
 October 31, 2012
 Revere Road Stormwater Confluence
 Post Realignment Town Brook
 Final Environmental Impact Report
 New Quincy Center Redevelopment
 Quincy, Massachusetts

MEPA 06 **The FEIR should demonstrate that the stormwater management system will control runoff volumes to maintain adequate base flows in the relocated stream while minimizing potential impacts during storm events.**

The Project has been designed in accordance with the MassDEP Stormwater Management Standards, and the stormwater conveyance system has been designed to adequately convey stormwater flows for the 25-year storm event. Since the Project will increase pervious area relative to existing conditions, the Project will not increase stormwater runoff volumes or peak rates of flow (see Tables 2-5 and 2-6). In addition, the Project will not modify the conveyance of base flows or impact the total rate of base flows within the realigned Town Brook per the Town Brook Enhancement Project. Section 2.2 provides an expanded discussion of stormwater management and base flows for the Project.

MEPA 07 **As proposed, groundwater flow from the MBTA lift station would be combined with stormwater from the project drainage area and conveyed through a culvert to a large outfall at the downstream end of the relocated Town Brook near Revere Road. The FEIR should address MassDEP's and the Division of Marine Fisheries' concerns regarding the downstream relocation of these flows, especially potential impacts to the reestablishment of a smelt run and to banks and channels resulting from scouring and erosion.**

The Project will not modify the conveyance of base flows or impact the total rate of base flows within the Project area, and the Project does not include any base flow modifications that would adversely affect the fish run. With completion of the separate Town Brook Enhancement Project, base flows from upstream reaches of Town Brook will be conveyed within the realigned Town Brook through 171 net new additional linear feet of enhanced open channel relative to existing conditions. Please refer to the Final EIR for the Town Brook Enhancement Project for a complete discussion of the impacts and mitigation associated with realignment and enhancement of Town Brook.

In addition, the proposed redevelopment Project will convey stormwater from within the Project area through a closed culvert system designed to the 25-year storm event. There will be no scour or erosion within the stormwater conveyance system within the Project area, and there will be no change to the stormwater peak rates of runoff of volumes when compared to existing conditions at the discharge to Town Brook at Revere Road. Section 2.2 contains an expanded discussion about stormwater.

MEPA 08 **The FEIR should consider alternatives to the proposed design presented in the DEIR, including separate conveyance of flows from the MBTA lift station and their release further upstream.**

Figure 2.12 illustrates an alternative that would involve conveying pumped groundwater and stormwater flows from the MBTA Lift Station to upstream reaches of Town Brook. As described in Section 2.2, the alternative routing would present certain practical and engineering challenges that would need to be addressed to make such an alternative feasible. In addition, pumping characteristics would need to be reviewed by DMF to determine whether the introduction of sporadic discharges farther upstream would have clear scientific benefits to smelt habitat. Additional coordination with the MBTA, which owns the property and pump and is ultimately responsible for discharges from the pump, would also be required. The Proponents are prepared to further evaluate the alternative routing of the MBTA pump discharges, to the extent practicable, should the MBTA be amenable to: (1) accepting any additional maintenance responsibilities that may result; and (2) allowing the routing of such a discharge pipe across portions of MBTA property. It should be noted that the overall quantity and conveyance of base flows from upstream reaches of Town Brook will remain unchanged as a result of the Project, and the Project will improve overall stormwater quality through the installation of water quality structures throughout the Project area (see Section 2.2).

MEPA 09 **The FEIR should also include a revised plan and sufficient information for MassDEP to understand the proposed changes in the hydrology of Town Brook. The hydraulics of the proposed consolidated discharge through Revere Street outfall should be analyzed for erosion, sedimentation and backwater effects and any adverse effects should be minimized.**

The stormwater discussion in Section 2.2 and accompanying figures have been revised to clarify the hydrologic analysis for the Project and to provide the requested details regarding any Project effects on the Town Brook realignment as proposed by the Town Brook Enhancement Project. There will be no change to the stormwater peak rates of runoff or volumes when compared to existing conditions at the discharge to Town Brook at Revere Road. Section 2.2 contains an expanded discussion about stormwater.

As discussed during preliminary meetings with MassDEP, for purposes of clarification the existing conditions prior to the realignment of Town Brook have been included in the analysis, although the Town Brook Enhancement Project will be completed prior to the proposed redevelopment Project (see Section 2.2).

MEPA 10 **To the extent possible, the Proponents should identify specific I/I removal projects in the FEIR based on consultation with MassDEP, and in support of its application for a Sewer Connection/Extension Permit.**

Please see Section 3.0 for a discussion of I/I mitigation projects and commitments, for which the Private Redeveloper consulted with City of Quincy departments and MWRA.

MEPA 11 **The Proponents should complete [the traffic flow simulation model to portray network peak-hour conditions] and include a summary of the results in the FEIR.**

As requested by MassDOT, TEC (the Proponents' transportation consultant) has prepared a traffic simulation model using SimTraffic 7.0 analysis software. TEC consulted with MassDOT to determine the scope and study area for the analysis, results of which are provided in Section 4.1. Simulation files were provided to MassDOT at a meeting on October 26, 2012.

MEPA 12 **The Proponents committed to undertake a traffic monitoring program upon completion of the project, which is expected to occur after 2020. However, MassDOT may require that monitoring be initiated prior to full build-out and occupancy. The Proponents should consult with MassDOT to discuss an appropriate timeframe or commit to initiate the monitoring program upon request in the FEIR.**

The Proponents expect that the Project's traffic monitoring program will begin six months after initial occupancy of any portion of the Project. Monitoring will continue for five years following full occupancy. A detailed description of the traffic monitoring program is provided in Section 4.7 of the Final EIR.

MEPA 13 **The FEIR should address MassDEP's comments regarding the project's potential to generate substantially more bicycle and pedestrian trips if the TDM program included more and better on-road accommodations, thereby further reducing vehicular trips and emissions to be generated by the project. The FEIR should respond to MassDEP's detailed list of suggested bicycle and pedestrian accommodations and identify specific measures that will be incorporated into the project.**

The Private Redeveloper is committed to providing significant pedestrian and bicycle accommodations throughout the Project area. Where possible, sidewalks will be widened to improve pedestrian travel and provide amenities for pedestrians and bicyclists. Bicycle parking will be provided in a variety of locations, and will include covered and secured parking in many of these areas. Bicycle facility improvements such as striped bicycle lanes, bicycle pavement markings (i.e., sharrows), and Share-the-Road signage along key bicycle routes will also be constructed on Project area roadways. A detailed discussion of proposed pedestrian and bicycle facility improvements is included in Section 4.4.

MassDEP also provided a list of suggested TDM measures in their comment letter on the Draft EIR. Most of those measures were already incorporated into the Project's TDM Program as discussed in the Draft EIR. Additional TDM measures have been

incorporated into the revised TDM program as described in Section 4.6. The proposed Section 61 Finding included in Section 7.0 has been updated to reflect the additional TDM measures.

MEPA 14 The FEIR should present a best estimate of the number of buildings that will likely be larger than 100,000 sf and these should be modeled in accordance with ASHRAE 90.1 2007 Appendix G.

Since all but one of the proposed buildings will be larger than 100,000 square feet, all buildings were modeled in accordance with ASHRAE 90.1-2007 Appendix G in the revised GHG analysis provided in Section 5.0.

MEPA 15 The FEIR should present a revised [GHG] analysis based on the Proponents' best estimates of the layout of each of the buildings with the space usage allocations as shown in the program table to develop models which apportion the use classes within the buildings and the probable size, scope and type of building envelope and systems. Where unregulated loads and schedules have not yet been determined, default input values from ASHRAE tables G-O in Section G (Building Performance Rating Method) of the ASHRAE 90.1 2007 User's Manual can be used.

The revised GHG analysis is provided in Section 5.0. Appendix G modeling began by specifying the "baseline buildings" in each development block. Since the Project is still in a conceptual design stage, default input values were used in many cases. Most buildings have a residential component, and thus the HVAC system per ASHRAE Table G-A has heating provided by a hot-water fossil-fuel boiler and cooling provided by a package air conditioner unit and DX coils. For the non-residential redevelopment blocks 8 through 11 where redevelopment will exceed 150,000 square feet, Table G-A specifies for the baseline building that heating is provided by a hot-water fossil-fuel boiler and cooling is provided by a central chiller, chilled water coils, and VAV with hot-water reheat. Loads and schedules from ASHRAE Tables G-B, and G-E through G-O in Section G of the ASHRAE 90.1-2007 User's Manual, were employed, and consistent with the requirements of a Stretch Code analysis the Base Case assumed the ASHRAE 90.1-2007 energy code.

MEPA 16 In addition to the measures the Proponents have committed to implement in the DEIR, the Proponents are strongly encouraged to consider other measures to improve the energy efficiency of the project including air-side economizers, supply fan speed controls, cooling capacity controls, water source heat pumps (WSHPs), CHP, and on-site renewable energy such as solar PV panels on building rooftops... The Proponents should continue to consult with DOER and MassDEP on these matters and present the results of these discussions in the FEIR, along with any revised commitments to implement energy efficiency measures.

The Proponents held a consultation meeting with MEPA, DOER, and MassDEP on August 20, 2012 to discuss energy efficiency measures. The revised GHG analysis in Section 5.0 includes discussion of these measures, although some measures require further study at the stage of detailed building design. Details are provided in Sections 5.1.5 and 5.2.

MEPA 17 In order to ensure that all GHG emissions reduction measures adopted by the Proponents as the preferred alternative are actually constructed or performed by the Proponents, it is required that Proponents provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been implemented upon completion of their project, or their constituent phases. Specifically, as a condition of a Certificate approving the FEIR, the Proponents must provide a certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the mitigation measures adopted by the Proponents as the preferred alternative have been incorporated into the project. Alternatively, the Proponents may certify that equivalent emissions reduction measures that collectively are designed to reduce GHG emissions by the same percentage as the measures outline in the FEIR, based on the same modeling assumptions, have been adopted. This certification should be supported by plans that clearly illustrate where GHG mitigation measures have been incorporated. For those measures that are operational in nature (i.e., TDM, recycling) the Proponents should provide an updated plan identifying the measures, the schedule for implementation and how progress towards achieving the measures will be obtained. The commitment to perform this self-certification in the manner outlined above should be incorporated into the revised draft Section 61 Findings included in the FEIR.

Self-certification regarding GHG mitigation measures has been incorporated into the revised proposed Section 61 Findings in Section 7.6 and Table 7-1.

MEPA 18 MHC continues to recommend careful consideration of the potential effects of the project to significant historic resources early in the planning process and urges the Proponents to explore the feasibility of using historic tax credits to rehabilitate older buildings rather than demolish them, or otherwise incorporate historic building facades into the project.

The Proponents will continue to consider the Project's potential effects to significant historic resources, and will explore the feasibility of using historic tax credits to rehabilitate older buildings that are potential candidates for such credits, rather than demolish them. The Proponents have considered, and will continue to consider, incorporating historic building facades into the Project.

MEPA 19 In order to determine the project's impacts to historic properties, and whether they meet the criteria for listing in the National Register of Historic Places, MHC requests that the Proponents provide current original photographs of the interiors and exteriors of the following buildings keyed to a sketch map:

- ◆ Loran Smith Barber Shop/Brown Gift Shop at 17-19 Chestnut Street;
- ◆ George Richards Building at 24 Cottage Avenue;
- ◆ 27-29 Cottage Avenue; and
- ◆ Alpha Hall at 1-13 Cottage Avenue.

The Proponents were able to photograph the building at 17-19 Chestnut Street and provided the MHC with these photographs on October 15, 2012. Arrangements are underway with the Key Realty Company to gain access to the other three buildings to photograph the exteriors and interiors. The Proponents expect to gain access by early November 2012 and photographs will be taken, keyed to a sketch map, and submitted to the MHC for National Register eligibility criteria review.

MEPA 20 I encourage the Proponents to continue to work with MHC and the Quincy Historical Commission to develop appropriate mitigation that will include interpretation of the site's history and to ensure adequate documentation of the site's buildings and structures. The FEIR should present an update on the Proponents' consultations with MHC and any measures that have been proposed to mitigate project impacts to historic properties. In particular, the FEIR should report on any changes to the project since the DEIR to the extent that they would adversely or beneficially affect historic properties and allow MHC to reach conclusions regarding the project's visual impacts.

The Proponents are engaged in ongoing consultations with the MHC and the Quincy Historical Commission to develop appropriate mitigation that will include interpretation of the site history and ensure adequate documentation of the Project area buildings and structures. Sections 6.3 and 6.4 present an update on these consultations and measures proposed to mitigate Project-related impacts to historic properties. The sections also provide information about the Block 4 redevelopment, the schedule for which has changed since the Draft EIR (see Section 1.4).

MEPA 21 The FEIR should include a separate chapter on final mitigation measures for all phases of the project, which should summarize in a table all mitigation commitments, as well as detailed draft Section 61 Findings for all State Agency Actions. The draft Section 61 Findings should describe proposed mitigation measures, contain clear commitments to mitigation and a schedule for implementation, based on the construction phases of the project, and identify parties responsible for funding and implementing the mitigation measures.

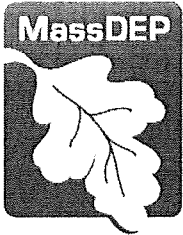
Section 7.0 contains proposed Section 61 Findings and a discussion of mitigation measures, which are summarized in Table 7-1.

MEPA 22 **The FIER should contain a copy of this Certificate and a copy of each comment letter received... The FEIR should respond fully to the comments received to the extent they are within MEPA jurisdiction.**

This section contains a copy of the Certificate as well as each comment letter submitted on the Draft EIR, and contains responses to each of the comments.

MEPA 23 **The FEIR should be circulated in compliance with Section 11.16 of the MEPA regulations. Copies should be sent to those parties that submitted comments on the DEIR and to each State Agency from which the Proponents will seek permits or approvals. A copy of the FEIR should be made available for public review at the Quincy Public Library.**

Attachment A contains a Circulation List for this Final EIR.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

LAURIE BURT
Commissioner

June 15, 2012

Richard K. Sullivan Jr., Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

Attn: MEPA Unit

RE: Quincy
New Quincy Center
Redevelopment
Bounded by Burgin Parkway,
Granite Street, Chestnut Street,
and Concourse Roadway
EEA # 14780

Dear Secretary Sullivan:

The Department of Environmental Protection Northeast Regional Office has reviewed the Draft Environmental Impact Report (DEIR) submitted by The City of Quincy/Hancock Adams Associates LLC for the redevelopment of a 30.8 acre area of the 55 acre central business district of Quincy, the Quincy Center Urban Revitalization District (EEA# 14780). The proposed project has increased in size from about 3.44 to 3.73 million square feet. This new development is planned to increase office space by 535,841 sf, medical office space by 103,628 sf, supermarket space by 46,270 sf, residential space by 1,735,081 sf, hotel space by 95,890 sf, movie theater by 67,323 sf, restaurant space 15,185 sf, and 33,709 sf increase for a health club. Parking availability space is estimated to increase by 3,896 spaces. Existing retail space is expected to be reduced to 250,250 sf from 261,399 sf. The Department provides the following comments.

Wastewater

The DEIR indicates that there will be a net increase in wastewater flows of 384,207 gallons per day (gpd), and that the project will include construction of approximately 4,900 feet of new sewer pipe. Under the current regulatory framework, this project will require a MassDEP sewer extension permit, since over 1,000 feet of new sewer pipe is being proposed. Since the project also exceeds the threshold for an Environmental Impact Report, the project is subject to MassDEP's policy on I/I mitigation in MWRA communities (available at <http://www.mass.gov/dep/water/laws/mwraii09.pdf>), and I/I mitigation will be a required element of a MassDEP sewer extension permit issued for this project. The DEIR acknowledges that elimination of 4 gallons of infiltration and inflow (I/I) will be removed for each gallon of new flow generated, resulting in an I/I mitigation requirement of 1,536,828 gpd. The proposal is

MassDEP 01

to remove the I/I in three phases of work, correlating to the three phases of the project construction.

According to Sewer System Evaluation Survey (SSES) work that has been done in Quincy, there are considerable volumes of both infiltration and inflow into the sewer system, although discrete projects have not been identified for mitigation for this project, and “future” I/I projects will be defined to meet the mitigation requirement. To the extent possible, the specific projects should be described in the FEIR. The proponent should continue to work with MassDEP in the development of a final I/I mitigation plan, and in support of a MassDEP sewer extension permit application.

Town Brook Hydrology

The system for treating and conveying runoff from the watershed that includes the proposed project will be altered as a result of redeveloping Quincy Center. The Department has reviewed the stormwater information in the DEIR to evaluate the changes in hydrology and has questions regarding the effects of these changes on base flows and peak flows, particularly as they relate to the new discharge outfall at Revere Road that consolidates many of the existing outfalls in the former Town Brook alignment into a single discharge point. In a meeting with representatives for the City of Quincy, MassDEP discussed these issues in greater detail and requested that the FEIR provide a more complete demonstration that the stormwater management system will control runoff volumes to maintain adequate baseflows in the relocated stream while minimizing the potential impacts during frequent and infrequent storm events.

MassDEP 02

As proposed, groundwater flow from the MBTA lift station would be combined with stormwater from the project site drainage area and conveyed through a 4 foot x 7 foot culvert to a large outfall at the downstream end of the relocated Town Brook, near Revere Road. The MBTA lift station contributes a significant flow of approximately 1 cubic foot per second currently to Town Brook, several times a day, effectively doubling base flows. In previous submittals during the MEPA review of the Town Brook realignment, the prospective plans for handling flows from the lift station and stormwater were not known, and from our review of the DEIR, it is unclear what effect relocating this flow downstream will have. The Department has significant concerns that proposed alterations to the existing diversion of groundwater and stormwater into Town Brook could adversely affect the banks and channels of the reconstructed brook as a result of scouring and erosion. In order to further support the re-establishment of a smelt run in the realigned and daylighted section of the river (EEA #14725), and to protect the stream banks and channel downstream of the proposed outfall, it appears, from information available that flows from the lift station could be conveyed separately and released further upstream in the realigned section of the stream. As discussed with the City’s representatives, the FEIR will analyze the changes and consider alternatives to the proposed design (Figure 6.7) to address these issues.

MassDEP 03

In addition, the MBTA Lift Station flows are groundwater derived and generally clean¹. Since this flow does not need to be treated through the stormwater system, it will be less costly

¹ The MA Division of Marine Fisheries has evaluated the water quality of the MBTA Lift Station flows to determine if Town Brook water quality was degraded by the Lift Station flow spikes (see Appendix H12 of the “Preliminary Design of Flow Restoration in Town Brook” prepared by Gomez & Sullivan). DMF concluded that the [water quality] “deployment did not show alarming changes in water quality during spike flows”. Subsequently,

to design and treat a smaller volume of runoff if the lift station flows are segregated from stormwater flows.

A review of the stormwater drainage plans in the DEIR indicates that under existing conditions, stormwater from the 84 acre watershed, the Burgin Parkway sediment chamber, and flow from MBTA lift station discharge into Town Brook through many outfalls along the length of the stream to be decommissioned (Figures 6.2). The plan for the proposed drainage system in Figure 6.7 shows consolidation of those outfalls. However, this plan does not show the decommissioned Town Brook, which according to the City's representatives will continue to convey stormwater through an outfall at Revere Road. As discussed, the FEIR will include a revised plan and additional information to understand the changes in hydrology of the decommissioned Town Brook.

MassDEP 04

As has been mentioned, the proposed drainage system routes stormwater from much of the contributing watershed through a single outfall near the downstream limit of the relocated Town Brook, which appears to be adjacent to the proposed daylighted section. The Department is requesting a better understanding of the watershed contributions to the proposed stormwater outfalls, upstream and downstream of the realigned Town Brook. The hydraulics of the consolidated discharge through the Revere Street outfall during peak storm events also should be analyzed for erosion, sedimentation, and backwater effects. Plans at a reasonable scale should be presented, showing this outfall into Town Brook and nearby features, such as other outfalls, the stream junction with the decommissioned Town Brook, and the daylighted section. Any adverse impacts identified as a result of the additional analysis will need to be minimized as much as possible.

MassDEP 05

Stormwater

The reduction of imperviousness in redevelopment projects such as the New Quincy Center Redevelop is highly recommended as a low impact development measure for stormwater management. A review of the DEIR suggests that the project is expanding open space areas. However, the site imperviousness will remain at 80 percent impervious after the development is complete, according to information provided in Stormwater Appendix D. The existing 83.72 acre project site is reported to have 67 acres of imperviousness with 16 acres considered pervious².

MassDEP 06

The Department applauds the City for proposing to add 1.2 acres of green roofs, including 0.97 acres in subcatchment area 1 and 0.23 acres in area 4. In capturing rainwater, green roofs eliminate the need for structural stormwater management controls, and it is reported that green roofs add habitat and thermal, heat-island effect relief in an urban environment, such as downtown Quincy.

The DEIR indicates that the Burgin Parkway stormwater system would be maintained. A comparison of the existing and proposed figures (Figure 6.1, 6.2 and 6.6, 6.7), would appear to show the Burgin Parkway sedimentation basin to be moved to the opposite side of the Burgin

it does not appear necessary to treat this large volume of flow to the level of the MA Stormwater Management Standards.

² Only 7.3 acres of the 16 acres are described as grass covered (App.D).

Parkway and MBTA tracks. It is requested that the FEIR explain whether there are changes to the drainage system, including any proposed changes in volume or rate of flow. **MassDEP 07**

It also is mentioned that the tributary to the MBTA lift station is about eight acres, and that this system would be maintained during redevelopment. A comparison between the existing and proposed drainage system for the lift station (Figures 6.2 and 6.7) show that the existing drainage system and connection to the existing Town Brook would be abandoned and that a new drain line is proposed, including a 24 inch diameter pipe along the MBTA tracks in the vicinity of subdrainage area 5. Additional information on the changes in hydrology in the FEIR would be helpful to understand this drainage system and also to understand the relationship, if any, of this system and the MBTA drainage system in subdrainage area 5. **MassDEP 08**

Lastly, it appears that Tables 6.4 and 6.5 do not include a summary of all the drainage areas comparing pre- and post-peak discharge rates and volumes; only drainage areas 1 through 3 are provided. **MassDEP 09**

Wetlands

The DEIR notes that no work will be associated with the Riverfront Area associated with Town Brook. Without detailed project plans, it is not possible to state with certainty that no work will occur within either the 25-foot or 200-foot Riverfront Areas associated with Town Brook. This should be clarified in the FEIR. **MassDEP 10**

Greenhouse Gas (GHG) Emissions

The proponents are to be commended for targeting 2009 LEED-ND Silver certification under the US Building Council's Leadership in Energy and Environmental Design (LEED-ND). As noted in the DEIR, the project also is subject to the Massachusetts Stretch Energy Code. The proponents are encouraged to set a goal for designing high performance buildings that becomes a model for major urban development projects throughout New England. A project at this early stage of development provides a multitude of opportunities for designing buildings and transportation management measures that reduce energy consumption and substitute renewable energy sources for fossil fuel sources. MassDEP strives to advance the GHG emissions reduction opportunities, recognizing that energy efficiencies also are smart financial investments. With a growing market demand for facilities that have reduced carbon footprints, rents are being driven higher for the US Building Council's Leadership in Energy and Environmental Design (LEED) certified buildings and Energy Star buildings than rents for less energy-efficient buildings, and occupancy rates also are reported to be higher.

The DEIR indicates that the proposed project with energy efficiency measures and transportation mitigation is estimated to reduce CO₂ emissions from stationary sources by a minimum of 25.8 percent (4442.7 tpy) and from mobile sources by about 6 percent (109.3 tpy). The eQuest modeling program was used in the direct and indirect stationary source greenhouse gas analysis to predict the preferred alternative (Mitigation Case), which was compared with the annual CO₂ emissions for a baseline alternative. Many of the potential energy efficient measures listed in the DEIR have the potential to achieve significant energy use and GHG emissions reductions including centralized chillers, high efficiency heating and HVAC systems, high

albedo roof, EnergyStar equipment, and energy efficient lighting, windows, and building envelope.

The proponent is encouraged to consider additional measures in the FEIR to improve upon the energy efficiency. Consideration should be given to heating and cooling equipment that potentially can achieve additional reductions in emissions and costs, such as air-side economizers, supply fan speed controls, and cooling capacity controls, in addition to the proposed demand-controlled ventilation. Correctly sized equipment that is properly installed also has been reported to add about 35 percent energy savings by the Consortium for Energy Efficiency.

MassDEP 11

The net present value financial analysis for photovoltaics estimated a payback period ranging from five to eight years depending on the price of solar energy renewable credits (SRECs). The DEIR indicated that a payback period of four years is typically acceptable, so PV is not presently considered economical for the project.

The Department is very supportive of renewable energy and requests that the FEIR reconsider opportunities to incorporate alternative energy sources into the project. The analyses of both combined heat and power and PV have not taken into consideration the benefits associated with reducing the project's exposure to variable energy costs, electricity price inflation, or the fact that energy efficiency has a higher return on investment than stocks or bonds.

Since the filing of the DEIR, the proponent and the Department opened a dialogue on how the scope and degree of specificity of the proponent's commitment to GHG mitigation can be refined in light of the uncertainties inherent in a large project at this stage of development. MassDEP and DOER will continue to discuss this issue with the proponent with the intent that the results of those discussions will be reflected in the FEIR.

Air Quality Impacts

Mobile source AQ/GHG

The proposed project will generate an estimated 12,321 average daily trips (not including pass-by, transit, shared, pedestrian and bicycling trips). The projected number of vehicle trips exceeds MassDEP's review threshold of 3,000 daily trips requiring the project proponent to include the air quality mesoscale analysis in the DEIR. The purpose of the mesoscale analysis is to determine to what extent the proposed project will increase the amount of indirect emissions from transportation sources and identify measures to reduce mobile source emissions. Specifically, the mesoscale analysis establishes the level of project impacts and the corresponding mitigation on the amount of volatile organic compounds (VOCs), nitrogen oxides (NOx), and carbon dioxide (CO₂) emissions.

The proposed project also is subject to the MEPA Greenhouse Gas Emissions Policy and Protocol (Policy) as amended on May 5, 2010. The Policy requires the project proponent to quantify project-related CO₂ emissions and identify measures to avoid, minimize, and mitigate these emissions.

The DEIR included a mesoscale analysis comparing the indirect emissions from transportation sources under the following conditions: 2012 Existing, 2022 No Build, 2022 Build, and 2022 Build with Mitigation. The mesoscale analysis predicted all project Build scenarios will result in increased VOC, NOx and CO2 emissions when compared to the No Build condition. The 2022 Build with Mitigation conditions predict only slight emission reduction for all pollutants compared to the 2022 Build conditions.

The DEIR describes mobile source air quality mitigation primarily through trip reduction but also benefits derived from improved infrastructure. More specifically, trip reduction relies on a combination of mostly site-based Travel Demand Management (TDM) measures as well as area-wide, road and intersection improvements. Road and intersection improvements address travel supply management by reducing localized emissions associated with traffic congestion. The DEIR also describes further trip reduction and air quality mitigation through the project's proximity to available transit service.

The DEIR contains a list of various TDM commitments, including several TDM measures recommended by MassDEP during the Environmental Notification Form (ENF) review. The DEIR also contains a Traffic Impact and Access Study (TIAS) that compares the 2012 No Build and 2022 Build conditions by evaluating project impacts associated with changes to traffic and transit service, pedestrian access, bicycle operation and safety, and project parking supply and demand. According to the DEIR, the study area is bounded by Burgin Parkway, Hannon Parkway, Washington Street, Revere Road, and Hancock Street and includes 44 intersections. The goal of the study is to determine what offsite mitigation is necessary to provide acceptable, area wide traffic operations. Working with MassDOT and the City of Quincy, the proponent is committed to several roadway and intersection improvements identified in the TIAS, primarily involving signal optimization and intersection lane management. However, the proponent has offered no specific bicycle accommodations on any of these roads or intersections. Although the proponent is committing to on-site bicycle and pedestrian measures, there appear to be no commitments to off-site on-road accommodations, such as bicycle lanes, bicycle detection loops at intersections, "share the road" signage or countdown pedestrian signals. MassDEP believes that with better bicycle infrastructure and pedestrian access, the proposed project has the potential to generate substantially more bicycle and pedestrian trips.

MassDEP 12

Recommendations

MassDEP acknowledges the proponent's commitment to innovative TDM measures and specifically the project's transit oriented development location, the Burgin Parkway Access Bridge, the electric vehicle charging station, tow-behind shopping carts, and the TDM monitoring program. However, MassDEP believes that there are potential additional enhancements with bicycle use to the project through better off site accommodations. The TIAS does not include adequate provision for bicycle detection loops at intersections or on-road bicycle lanes, nor does it include any discussion of on-street parking that could be removed to accommodate such measures. MassDEP recommends that the subsequent environmental review filing address the potential for greater emission reductions through the following additional TDM and road/intersection commitments:

MassDEP 13

- Install proposed bicycle racks in prominent locations to encourage bicycle commuting. These locations should provide adequate security, lighting, and weather protection. Commercial building design should include shower/locker facilities for use by employees. The proponent should ensure that there is adequate bicycle parking to meet the demand. MassDEP also recommends that the bicycle parking supply is in line with future demand rather than current zoning requirements.
- Explore the addition of improved bicycle accommodation on all major routes serving the project site and specifically the MassDOT/City of Quincy Adams Green Transportation Project and City of Quincy Burgin Parkway Safety Improvement Project by working with the City of Quincy and MassDOT.
- Paint sharrows and/or bike symbol stencils with Share the Road signage on roadways when designated bike lanes are not feasible. In addition, Share the Road signage should also be installed on all other established bicycle routes serving the project site.
- Provide additional support for employee transit use to offset recent benefit reductions to commuter tax program and projected MBTA fare increases.
- Create leases where tenants pay for parking separately from building space, (unbundled lease) to encourage use of parking cash-out. Unbundled leases provide tenants with financial incentives to reduce the amount of parking when they pay for parking spaces as a cost separate from rent.
- Consult with *MassRIDES*, the Commonwealth's travel options program provider to provide free assistance to employers, commuters, and employees. *MassRIDES* could help the proponent develop an effective TDM program tailored for their particular project and worksite, including a transit pass program.
- Request the proposed Transportation Management Organization participate with other Boston area Transportation Management Associations (TMA). TMAs are organizations that help multiple employers in a local area to develop and implement incentives that reduce traffic and trips to the worksite. Employers pay a fee for this service to a centralized coordinator to market and implement these incentives on their behalf.
- Request the proposed Transportation Management Organization seek shared parking with other nearby employers directly or through a participating TMA.
- Request the proposed Transportation Management Organization work with the Massachusetts Bay Transportation Authority to adjust bus service schedules or stops to better serve the project site as needed.
- Request the proposed Transportation Management Organization work with the Massachusetts Bay Transportation Authority (MBTA) for additional and improved bicycle storage such as the Bicycle Cage at Forest Hills and Alewife MBTA Stations.
- Commit to transportation shuttle service with links to nearby transit connections as well as other locations based on potential trip demand. Shuttle service should be designed and scheduled to serve the needs of all site employees and patrons.
- Initiate discussions with the MBTA Service Planning for the possibility of additional bus service or enhance current bus service to the site.
- Participate in US EPA's SmartWay program to improve the efficiency of delivery truck trips and site based trucking.
- Provide free or subsidized transit passes to employees or allow transit pass purchases with pre-tax dollars.

Construction Period Air Quality Mitigation Measures

MassDEP applauds the proponent's commitment to mitigating the construction-period impacts of diesel emissions to the maximum extent feasible. Diesel emissions contain fine particulates that exacerbate a number of health conditions, such as asthma and respiratory ailments. Additional information is available on the MassDEP website: <http://www.mass.gov/dep/air/diesel/>. Specific information regarding diesel fuel standards is provided in this webpage by EPA (<http://www.epa.gov/otaq/fuels/dieselfuels/documents/420b11003.pdf>).

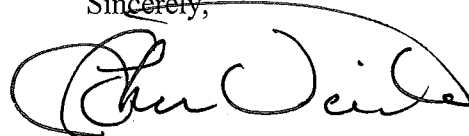
Required Mitigation Measures

Compliance with the Massachusetts Idling Regulation

MassDEP applauds the proponent's commitment to the Massachusetts Idling regulation (310 CMR 7.11) that prohibits motor vehicles from idling their engines more than five minutes unless the idling is necessary to service the vehicle or to operate engine-assisted power equipment (such as refrigeration units) or other associated power. Questions regarding this regulation should be directed to Julie Ross of MassDEP at 617-292-5958.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. Please contact Philip.Weinberg@state.ma.us at (617) 292-5972 for greenhouse gas emissions related issues, Jerome.Grafe@state.ma.us, at (617) 292-5708 for mobile source air quality issues, James.Belsky@state.ma.us, at (978) 694-3288 for stationary source air quality issues related to boilers and stack height, Heidi.Davis@state.ma.us at (978) 694-3255 with wetlands questions, and Kevin.Brandner@state.ma.us at (978) 694-3236 for further information on the wastewater issues. If you have any general questions regarding these comments, please contact Nancy.Baker@state.ma.us, MEPA Review Coordinator at (978) 694-3338.

Sincerely,



John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Phil Weinberg, Jerome Grafe MassDEP-Boston
John Ballam, DOER
Eric Worrall, Kevin Brander, Rachel Freed, Jill Provencal, Heidi Davis, MassDEP-NERO
Eileen Feeney, DMF

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION

MassDEP 01 Under the current regulatory framework, this project will require a MassDEP sewer extension permit, since over 1,000 feet of new sewer pipe is being proposed. Since the project also exceeds the threshold for an EIR, the project is subject to MassDEP's policy on I/I mitigation in MWRA communities, and I/I mitigation will be a required element of a MassDEP sewer extension permit issued for this project... To the extent possible, the specific [I/I removal] projects should be described in the Final EIR. The proponent should continue to work with MassDEP in the development of a final I/I mitigation plan, and in support of a MassDEP sewer extension permit application.

Please see Section 3.0 for a discussion of I/I mitigation projects and commitments, for which the Private Redeveloper consulted with City of Quincy departments and MWRA.

MassDEP 02 MassDEP [requests] that the Final EIR provide a more complete demonstration that the stormwater management system will control runoff volumes to maintain adequate base flows in the relocated stream while minimizing the potential impacts during frequent and infrequent storm events.

Please see the responses to MEPA 05 and MEPA 06.

MassDEP 03 In order to further support the re-establishment of a smelt run in the realigned and daylighted section of the river, and to protect the stream banks and channel downstream of the proposed outfall, it appears from the information available that flows from the lift station could be conveyed separately and released further upstream in the realigned section of the stream.

Please see the responses to MEPA 07 and MEPA 08.

MassDEP 04 As discussed, the Final EIR will include a revised plan and additional information to understand the changes in hydrology of the decommissioned Town Brook.

Please see the response to MEPA 09.

MassDEP 05 The Department is requesting a better understanding of the watershed contributions to the proposed stormwater outfalls, upstream and downstream of the realigned Town Brook. The hydraulics of the consolidated discharge through the Revere Street outfall during peak storm events should also be analyzed for erosion, sedimentation, and backwater effects. Plans at a reasonable scale should be presented...

Please see the response to MEPA 09.

MassDEP 06 The reduction of imperviousness in redevelopment projects such as the New Quincy Center Redevelop is highly recommended as a low impact development measure for stormwater management. A review of the Draft EIR suggests that the project is expanding open space areas. However, the site imperviousness will remain at 80 percent impervious after the development is complete...

The Proponents are committed to maintaining or increasing the open space within the high density urban development, and in accordance with applicable MassDEP Stormwater Management Standards and the City of Quincy Stormwater Ordinance will decrease both the peak discharge rates and volumes for the 2-, 10-, 25-, and 100-year storm events by increasing ground-level pervious areas and including green roof technologies in the Project design.

MassDEP 07 The DEIR indicated that the Burgin Parkway stormwater system would be maintained. A comparison of the existing and proposed figures would appear to show the Burgin Parkway sediment basin to be moved to the opposite side of the Burgin Parkway and MBTA tracks. It is requested that the Final EIR explain whether there are changes to the drainage system, including any proposed changes in volume or rate of flow.

Please see the response to MEPA 03 and Section 2.2 for the detailed discussion of stormwater conditions in the Project area prior to completion of the Town Brook Enhancement Project, conditions as they will exist following realignment of Town Brook, and proposed conditions. Figures 2.6 through 2.11 have been updated to reflect these analyses. The Project does not propose any changes to the existing Burgin Parkway Sediment Chamber of MBTA Lift Station.

MassDEP 08 Additional information on the changes in hydrology in the Final EIR would be helpful to understand this drainage system [tributary to the MBTA lift system] and also to understand the relationship, if any, of this system and the MBTA drainage system in subdrainage area 5.

Section 2.0 describes the functioning of the MBTA Lift Station during dry periods as well as during storm events, and includes a discussion of the interaction with the Quincy Center stormwater drainage system. The subdrainage area identified as Drainage Area 5 currently slopes down from the rear of the existing buildings to the existing MBTA retaining wall, contributing to the MBTA drainage system within the tracks below. Under proposed conditions, due to restrictions on the ability to alter the existing MBTA retaining wall, a small portion of the area behind the proposed buildings will continue to contribute to the existing MBTA drainage system within the tracks below. This area will drain under both existing and proposed conditions to the MBTA pump at Granite Street.

MassDEP 09 It appears that Tables 6.4 and 6.5 do not include a summary of all the drainage areas comparing pre- and post-peak discharge rates and volumes; only drainage areas 1 through 3 are provided.

Tables 2-5 and 2-6 summarize the pre- and post-peak discharge rates and volumes for all drainage areas as analyzed at the three design points included in the Stormwater Technical Appendix (see Attachment D). Table 2-1 summarizes existing hydrologic conditions in the Project area prior to completion of the Town Brook realignment per the ongoing Town Brook Enhancement Project. Table 2-2 summarizes hydrologic conditions in the Project area following completion of the Town Brook Enhancement Project, and Table 2-3 summarizes proposed hydrologic conditions.

MassDEP 10 Without detailed project plans, it is not possible to state with certainty that no work will occur within either the 25-foot or 200-foot Riverfront Areas associated with Town Brook. This should be clarified in the Final EIR.

Please see the response to MEPA 02.

MassDEP 11 The proponent is encouraged to consider additional measures in the Final EIR to improve upon the energy efficiency... The Department is very supportive of renewable energy and requests that the Final EIR reconsider opportunities to incorporate alternative energy sources into the project.

Please see the response to MEPA 16.

MassDEP 12 Although the proponent is committing to on-site bicycle and pedestrian measures, there appear to be no commitments to off-site on-road accommodations such as bicycle lanes, bicycle detection loops at intersections, “share the road” signage or countdown pedestrian signals. MassDEP believes that with better bicycle infrastructure and pedestrian access, the proposed project has the potential to generate substantially more bicycle and pedestrian trips.

Please see the response to MEPA 13.

MassDEP 13 MassDEP recommends that the subsequent environmental review filing address the potential for greater emission reductions through additional TDM and road/intersection commitments [listed in the letter].

Most of TDM measures listed in the MassDEP comment letter were already incorporated into the Project’s TDM Program as discussed in the Draft EIR. Additional TDM measures have been incorporated into the revised TDM program as described in Section 4.6. The proposed Section 61 Finding included in Section 7.0 has been updated to reflect the additional TDM measures.



Deval L. Patrick, Governor
Timothy P. Murray, Lt. Governor
Richard A. Davey, Secretary & CEO

massDOT
Massachusetts Department of Transportation

June 8, 2012

Richard K. Sullivan, Jr., Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Quincy – New Quincy Center Redevelopment – DEIR
(EEA #14780)

ATTN:MEPA Unit
Rick Bourré

Dear Secretary Sullivan:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the proposed New Quincy Center Redevelopment project in Quincy, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please call J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (617) 973-7341.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

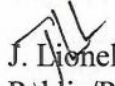
DJM/jll

www.mass.gov/massdot

cc: Francis A. DePaola, P.E., Highway Administrator, Highway Division
Thomas F. Broderick, P.E., Acting Chief Engineer, Highway Division
Walter Heller, P.E., Acting District 6 Director, Highway Division
Neil Boudreau, State Traffic Engineer
PPDU files
MPO Activities files
Metropolitan Area Planning Council
Boston Region Metropolitan Planning Organization
Planning Department, City of Quincy
Massachusetts Bay Transit Authority
MassRIDES

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TRANSPORTATION
OFFICE OF TRANSPORTATION PLANNING
MEMORANDUM**

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

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

DATE: June 8, 2012

RE: Quincy – New Quincy Redevelopment - DEIR
(EEA #14790)

The Public/Private Development Unit has reviewed the Draft Environmental Impact Report (DEIR) for the proposed New Quincy Center Redevelopment project in Quincy. The proposed project entails the redevelopment of the central business district of Quincy into a mixed-use, high density urban redevelopment. The project will be constructed on approximately 31 acres, mostly contained within the City of Quincy's 55-acre Urban Revitalization District. The project involves the demolition of many deteriorated buildings, which will be replaced with a high density, mixed-use development program. The existing uses in the area proposed for redevelopment are as follows: approximately 297,000 square feet (sf) of retail space; 98,715 sf of restaurant; a 21,170 sf movie theater; 652,500 sf of office space; and 2,212 parking spaces.

The proposed redevelopment program would include a total of approximately:

- 252,250 sf of retail space,
- 54,215 sf of supermarket space,
- 130,753 sf of regional shopping/superstore,
- 89,255 sf of restaurant space,
- 901,930 sf of general office space,
- 103,628 sf of medical office space
- a 33,709 sf health club,
- 159,466 sf of classroom space for Quincy College,
- a 88,493 93 sf (3,210 seats) movie theater,
- a 95,890 sf (173-room) hotel,
- 1,735,081 sf of residential apartments (1,882 units), and
- ± 4,746 parking spaces.

At full-build, the project would total 3,733,207 sf of development space and also include additional streetscape improvements, new public open space elements, pocket parks, and traffic

calming measures at key intersections designed to create a more pedestrian-friendly environment. The building program presented in the DEIR represents an eight percent increase from the EENF development program. The project area is bounded by Burgin Parkway and the MBTA rail to the west, the Hancock Cemetery and the United First Parish Unitarian Church to the north, Chestnut Street and Dennis F. Ryan Parkway to the east, and the Concourse Roadway to the south.

The project would also include the construction of the Burgin Parkway Access Bridge to facilitate safe access to the proposed redevelopment area and to channelize vehicles away from pedestrian areas on Hancock Street, Adams Green, and the National Parks Service Visitor Center and attractions. The bridge would improve access to the parking structures proposed as part of the Redevelopment project, and provide an alternative access point for pedestrians and emergency vehicles. In the previously reviewed Expanded Environmental Notification Form (EENF), the project proponent requested a waiver to proceed with Phase I of the project, which would consist of the design and permitting of the proposed Burgin Parkway Access Bridge. The waiver request was granted in a Final Record of Decision issued by the Secretary of Energy and Environmental Affairs on October 7, 2011.

Based on information provided in the DEIR, the project at full-build is expected to generate a total of approximately 26,553 new vehicle trips on an average weekday. The project categorically requires the preparation of an Environmental Impact Report (EIR). The project is anticipated to be constructed in several phases over a seven to 10 year period.

The Draft EIR (DEIR) includes a transportation study prepared in conformance with the EOEEA/MassDOT Guidelines for EIR/EIS Traffic Impact Assessments. The transportation study provides a comprehensive evaluation of the project's transportation impacts within the study area. It includes analysis of all the modes for both existing and future conditions, and identifies appropriate mitigation measures for areas where the project will have an adverse impact on mobility. The DEIR includes a draft Section 61 Finding that provides a clear commitment to implement these mitigation measures and also describes the timing of their implementation based on the phases of the project. In response to our EIR scope, the DEIR addresses the following issues.

Trip Generation

According to the DEIR, the project at full build is expected to generate 61,280 unadjusted vehicle trips on an average weekday, which would be an increase of 26,553 vehicle trips per day over the trip generation calculated for the existing uses. The trip generation was estimated based on the ITE Trip Generation Land Use Codes 820 (Shopping Center), 814 (Specialty Retail), 850 (Supermarket), 931 (Quality Restaurant), 932 (High-Turnover (Sit-Down) Restaurant), 445 (Multiplex Movie Theater), 710 (General Office), 720 (Medical Office), 540 (Junior/Community College), 492 (Health/Fitness Club), 310 (Hotel), and 220 (Apartments).

The project is located in a busy transit corridor that includes two MBTA stations, a commuter rail station, several bus lines, and a dense urban street network with sidewalks that also provides good accessibility and connectivity for pedestrians and bicyclists. Because the project would be located in such a dense urban district, there are ample opportunities for access to the project via public transportation, walking, and bicycling. Finally, the mixed-use nature of the development creates opportunities for a significant number of internal trips among the different land uses.

Accordingly, the DEIR includes a comprehensive summary of backup documentation to support credits for internal trips, transit trips, pedestrian trips, and bicycle trips. These assumptions were previously discussed with MassDOT and the City of Quincy and agreed upon during the preparation of the DEIR. However, the DEIR's aggressive assumptions about non-single-occupancy vehicle travel necessitate that the proponent implement a strong mitigation and transportation demand management (TDM) program in order to ensure that these aggressive targets are met.

Horizon Year

The transportation analysis assumes a 10-year horizon. Analysis of future No-Build and Build conditions were conducted based on the 10-year horizon. As requested, the DEIR provided tabular summaries and composite illustrations of intersection levels of service, lane group/movement levels of service, average queues, and 95th-percentile queues. However, the proponent did not use a traffic flow simulation model to portray network peak-hour conditions for the DEIR, as MassDOT had requested. The proponent should complete this traffic simulation, present the simulation to MassDOT staff during the preparation of supplemental analysis for the FEIR, and include a summary of the results in the FEIR.

MassDOT
01

Traffic Operations

The transportation study includes a comprehensive evaluation of traffic operations conditions within the study area. As requested in the MassDOT comment letter on the EENF, three additional intersections along Burgin Parkway were added to the study area of the project. The DEIR presents capacity analyses and a summary of average and 95th percentile vehicle queues for each intersection for the Existing, No-Build, Build, and Build with Mitigation conditions. A comprehensive mitigation program of intersection improvements, traffic signal modifications, traffic signal optimization, and signal coordination is proposed in the DEIR. These improvements are for the most part on the City of Quincy local roadway system. However, the following mitigation measures are proposed on state-controlled roadways, and would therefore require a Vehicular Access Permit from MassDOT.

- The construction of the Burgin Parkway Access Bridge
- Traffic signal timing optimization at the following locations: Burgin Parkway/Quincy Street and Burgin Parkway/Lowe's Driveway/Quincy Adams MBTA Station
- Geometric modifications and traffic signal upgrades at the Burgin Parkway/Hannon Parkway intersection

Overall, the mitigation program has adequately addressed the additional increase in traffic associated with the project. In the Build with Mitigation condition, most intersections are projected to operate at LOS D or better, or else they are expected to experience delays no worse than in the No-Build conditions.

The DEIR includes sufficiently detailed conceptual plans for the proposed roadway improvements that demonstrate the feasibility of constructing such improvements. The conceptual plans are generally consistent with MassDOT's Complete Streets design approach, and the designs provide adequate and safe accommodation for all roadway users, including pedestrians, bicyclists, and public transit riders.

Pedestrian/Bike/Transit Access

The DEIR provides a thorough inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site using transportation modes other than single-occupant vehicles, including provisions for future expansion of bus, private shuttle, bicycle, and pedestrian mobility options in the vicinity of the project. The Proponent has worked with the MBTA and documented the existing capacity of the different transit modes with the study area. According to these discussions, the transit system would accommodate the increase in ridership generated by the project, based on the project's 10-year horizon.

Some of the roadway changes proposed as part of this project or the Adams Green project will affect MBTA bus routing. The Proponent should include an analysis of these changes, proposals for new MBTA bus route circulation, and an evaluation of the impacts to MBTA operations in the FEIR. The Proponent should continue to work with the MBTA to manage the potential bus route changes in a manner that ensures continued acceptable bus operations and customer service. The Proponent has also committed to work with the MBTA and the City of Quincy to evaluate transit signal priority along some of the bus routes within the study area. The FEIR should include a summary of the substance and outcomes of this coordination on transit signal priority, as well as other measures that could improve transit operations in the study area, such as transit real-time countdown signs, bus shelters, way-finding signage, and other transit system amenities.

MassDOT
02

MassDOT
03

The DEIR transportation study includes an inventory of the existing sidewalks and bicycle facilities within the project area. It also includes a trip generation estimate, mode split, and trip distribution of the pedestrian and bicycle trips associated with the redevelopment program. The assumptions included in the analysis for the projection of pedestrian and bicycle volumes and the completion of operations analysis for these modes for both existing and future conditions are acceptable. As part of the Adams Green Improvement Project, site improvements for the New Quincy Redevelopment, and other projects within the study area, a number of facilities will be upgraded to improve existing and future conditions for pedestrian and bicycle travel. These improvements are expected to improve overall mobility for bicycle and pedestrians. The FEIR should identify any outstanding pedestrian and bicycle access issues, and propose means of addressing them.

MassDOT
04

Transportation Demand Management

The DEIR includes a comprehensive Transportation Demand Management (TDM) program to reduce vehicle trips and manage traffic with the study area. The TDM program consists of transit measures, pedestrian and bicycle treatments, parking measures, and other measures that are summarized as follows.

- Transit Measures:
 - Locate development in close proximity to MBTA commuter rail and rapid transit
 - Coordinate with MBTA to improve bus service on local roadways
 - Provide priority treatments for buses at intersections
 - Provide transit passes for residents included in the rent
 - Offer transit subsidies for employees

- Pedestrian and Bicycle Treatments:
 - Provide an ample supply of bicycle racks within the Project Area (the proponent should research appropriate supply of bicycle parking, and include proposals for publicly-accessible and accessory bicycle parking in the FEIR)
 - Provide bicycles and equipment for residents and employees
 - Provide showers for employees
 - Reconstruct sidewalks along study area roadways to improve pedestrian access, and provide enhanced sidewalks where there is space to accommodate them and/or where demand requires
- Parking Measures
 - Provide preferential parking for ridesharing and carpooling
 - Provide free parking for vanpools
 - Provide charging stations for electric vehicles
 - Implement parking fees in parking lots to discourage vehicle trips
 - Reduce parking provisions for residential units
 - Implement real-time information system to direct drivers to open parking spaces
 - Implement dynamic parking fees for on-street parking spaces
- Other Measures
 - Provide a Transportation Coordinator on-site
 - Provide free parking for car-sharing, such as Zip Car, to enable residents to minimize automobile ownership
 - Encourage vanpool and carpooling programs
 - Provide and update a monthly Commuter Bulletin
 - Facilitate events through coordination with MassRides, the Commonwealth's travel options service
 - Provide delivery services to retail patrons
 - Provide tow-behinds and shopping carts for residents
 - Provide a monitoring system to evaluate TDM goals

**MassDOT
05**

Transportation Monitoring Program

The project proponent has committed to a transportation monitoring program that will be conducted twice per year for five years from the full build-out of the project. The goals of the traffic monitoring program will be to evaluate the assumptions made in the DEIR and the adequacy of the transportation mitigation measures, as well as to determine the effectiveness of the transportation demand management program. The Proponent should coordinate with MassDOT to determine an appropriate schedule for the transportation monitoring program, or to commit to initiate the monitoring program upon request. Due to the size of the project, we anticipate the need to monitor and update as necessary the TDM program before the project reaches full occupancy.

**MassDOT
06**

The FEIR should provide an update of the local permitting processes for the proposed project, particularly with respect to any state highway issues being discussed. We strongly encourage the proponent to consult with MassDOT before any transportation issues are discussed in local meetings or hearings.

**MassDOT
07**

We encourage the proponent to continue consultation with appropriate MassDOT units, including the Public/Private Development Unit, the District 6 Office, Highway Design and Traffic Operations during the preparation of the FEIR for the full project.

If you have any questions regarding these comments, please contact me at (617) 973-7341.

MassDOT 01 The proponent should complete [a traffic flow simulation model to portray network peak-hour conditions], present the simulation to MassDOT staff during the preparation of supplementary analysis for the FEIR, and include a summary of the results in the FEIR.

As requested by MassDOT, TEC has prepared a traffic simulation model using SimTraffic 7.0 analysis software. TEC consulted with MassDOT to determine the scope and study area for the analysis, results of which are included in Section 4.1. SimTraffic analysis files have been provided to MassDOT for review. Simulation files were provided to MassDOT at a meeting on October 26, 2012.

MassDOT 02 Some of the roadway changes proposed as part of this project or the Adams Green project will affect MBTA bus routing. The Proponent should include an analysis of these changes, proposals for new MBTA bus route circulation, and an evaluation of the impacts to MBTA operations in the FEIR. The Proponent should continue to work with the MBTA to manage the potential bus route changes in a manner that ensures continued acceptable bus operations and customer service.

MBTA bus routes 215, 225, 230, 236, and 238 travel through the Project area. On their inbound routes to the Quincy Center Station, all of these buses travel northbound on Hancock Street between School Street and Granite Street, then turn left onto Granite Street and right onto Burgin Parkway. On their outbound routes, these buses all travel southbound on Hancock Street from the Quincy Center Station through the Project area. As part of the proposed redevelopment Project, Hancock Street and Granite Street will continue to provide bus access through the Project area, and no changes in these routes are anticipated as a result of the Project. The Proponents have begun consultations with MBTA to discuss the provision of bus stops and bus shelters within the Project area along these routes (see Section 4.2 for additional details).

MBTA bus routes 214, 215, 216, 220, 221, 222, 225, 230, 236, and 238 currently travel through the Adams Green area. Bus routes 214, 216, 220, 221, and 222 travel westbound on Washington Street toward Hancock Street on their inbound routes, while traveling southbound on Hancock Street and turning left onto Temple Street to access Washington Street or Coddington Street. With the improvements proposed as part of the Adams Green Transportation Improvement Project, which will create two-way traffic flow on Washington Street, these buses will be able to continue traveling southbound on Hancock Street to access Washington Street or Coddington Street without having to loop around on Temple Street. This route change will slightly decrease the travel time along these bus routes. Bus routes 215, 225, 230, 236, and 238 do not travel through the Adams Green area on their

inbound routes, but travel southbound on Hancock Street through Adams Green on their outbound routes from Quincy Center Station. These routes will be moderately adjusted as part of the Adams Green Transportation Improvement Project as the existing Hancock Street between Washington Street and Temple Street will be discontinued. Only minor increases in headways and travel times are anticipated along these routes as a result of the Adams Green project.

- MassDOT 03** The Proponent has also committed to work with the MBTA and the City of Quincy to evaluate transit signal priority along some of the bus routes within the study area. The FEIR should include a summary of the substance and outcomes of this coordination on transit signal priority, as well as other measures that could improve transit operations in the study area, such as transit real-time countdown signs, bus shelters, way-finding signage, and other transit system amenities.

The Proponents are committed to upgrading transit facilities within the Project area to improve transit access to and from the Project and Quincy Center. These improvements include such measures as installing bus shelters and improving way-finding signage (see Section 4.2). The Proponents are coordinating with MBTA staff to identify measures for improving transit service.

- MassDOT 04** The FEIR should identify any outstanding pedestrian and bicycle access issues, and propose means of addressing them.

Section 4.4 provides a detailed description of the pedestrian and bicycle accommodations proposed as part of the Project, including an analysis of the anticipated bicycle parking demand.

- MassDOT 05** The Proponent should research an appropriate supply of bicycle parking and include proposals for publicly-accessible and accessory bicycle parking in the FEIR.

TEC has researched a variety of sources providing guidance on the supply of bicycle parking that should be provided for various land uses. These sources include documents published by the Association of Pedestrian and Bicycle Parking Professionals as well as local zoning regulations from multiple communities that are labeled as leaders in the industry for provision of bicycle accommodations. Section 4.4 summarizes this research and the recommendations for bicycle parking supply within each redevelopment block in the Project area, and contains a detailed discussion of the type and location of bicycle parking within each redevelopment block.

MassDOT 06 The Proponent should coordinate with MassDOT to determine an appropriate schedule for the transportation monitoring program, or to commit to initiate the monitoring program upon request. Due to the size of the project, we anticipate the need to monitor and update as necessary the TDM program before the project reaches full occupancy.

Section 4.7 discusses the proposed traffic monitoring program, including a schedule for implementation.

MassDOT 07 The FEIR should provide an update of the local permitting processes for the proposed project, particularly with respect to any state highway issues being discussed.

Section 1.5 identifies the anticipated permits and approvals required for the Project.

Conformance with MEPA GHG Policy and Protocol (the Protocol):

The City of Quincy has adopted the Mass Energy Stretch Code (the code) , and, as is correctly stated in the submittal, the current version of the code is to be used per the Protocol in the EIR for the quantification of the projected GHG emissions and reductions. Per the code, all buildings that are larger than 100,000 sf must demonstrate a reduction in the overall site energy usage intensity (EUI) of at least 20 % between the baseline and as-proposed cases using building performance simulation models that are developed and run in conformance with ASHRAE 90.1 Appendix G.

Per Fig 1.5 “Proposed Redevelopment Blocks” in the DEIR submittal, the development summary table and the massing of the buildings as shown indicates that many, if not most, of the as planned buildings will be larger than 100,000 sf. For a project of this size and potential GHG emissions, a best effort estimate should be made of the number of buildings that will likely be larger than 100,000 and these should be modeled strictly in accordance with ASHRAE 90.1 2007 Appendix G. For this reason, the use of the prescriptive method to the modeling of the proposed project buildings as submitted in the DEIR is not compliant with the Protocol

DOER 01

Whereas the DOER recognizes that at this stage of the project many of the details regarding as-proposed individual buildings and systems have not been established to permit final as-designed modeling of each of the conceptual buildings as are represented in Fig. 1.5, the DOER suggests that the FEIR Appendix G modeling be based on the proponent’s best estimate combining the layout of the buildings as shown with the space usage allocations as shown in the program table to develop models which apportion the use classes within the buildings, the probable size, scope and type of building envelope and systems. Where unregulated loads and schedules have not yet been determined, default input values from AHSRAE tables G-E though G-O in Section G (Building Performance Rating Method) of the ASHRAE 90.1 2007 User’s Manual can be used. The DOER suggests that the proponent review the GHG related sections and appendices in the DEIR submitted for the Seaport Square development project (South Boston EEA # 14255, which is a redevelopment project of comparable scope and complexity.

DOER 02

Overall Performance:

Due to the fact, as discussed in the previous paragraphs, that the modeling is not compliant with the Protocol, the DOER cannot comment on the overall results of the modeling, except to state that the it is likely that performance of the energy modeling per Appendix G as is required will produce results that will be significantly different from those included in this DEIR.

Mitigation Measures:

The DOER commends the project on the number and effectiveness of the energy use mitigation design measures included in the submittal.

In addition to the measures as shown the DOER would like to recommend that the proponent consider these additional measures for inclusion into the project:

Water Source Heat Pumps (WSHPs):

For any of the proposed buildings that will include a high percentage of residential units, the DOER recommends consideration of water source heat pumps as a cost-effective method of dramatically reducing both gas and electric heating energy usage and associated GHG emissions.

DOER 03

WSHP systems consist of terminal WSHP units, low temperature hot water generators, and either chilled or cooling tower water. During the heating season this highly efficient system can reduce gas usage by as much as 35% when compared with a conventional boiler or furnace. During the cooling season, use of chilled or cooling tower water as a heat sink dramatically increases the operating efficiency of the WSHP when operating in the air conditioning mode in comparison with a chiller based or DX air conditioning system

WSHP allows for the use of small diameter water piping instead of large diameter ductwork which both saves valuable space and provides a system that is more easily sealed.

In addition, buildings with WSHP based heating cooling can be readily integrated into a district combined heat and cooling system supplied by a central CHP plant and results in a overall approach which maximizes efficiency while minimizing GHG emissions.

Combined Heat and Power (CHP) :

CHP supplied district heating and cooling can provide many benefits, not the least of which is the ability to combine buildings which have diversified thermal and electrical loads and usage profiles to be fed by a CHP Central Plant unit, whereas if evaluated as loads for individual stand-alone loads, inclusion of a dedicated CHP unit would not be feasible. Since typically a CHP system can generate useful electricity, heating and cooling unit with 15% to 18% annual reduction in source GHG emissions, as well as an opportunity to control energy costs, this is an option which should be carefully evaluated.

DOER 04

The statement that a plan for implementing CHP for a phased development such as the Quincy project cannot be financed is made without any supporting facts or other information. Although it is possible that this could be the outcome of an effort to implement this measure, this submittal does not include a discussion or analysis of this conclusion.

Given that there is a 10% federal tax credit available for CHP and that Massachusetts has two incentive programs, the MassSave program and the Alternative Energy Portfolio Standard, which together could provide an additional 20% of the plant capital costs plus a large percentage of the on-going maintenance costs, the DOER recommends that this project undertake a thorough evaluation of this opportunity. It is possible that, with these incentives in combination with the scale and diversity of the proposed development, a third party CHP developer could be interested in providing a central plant based district system for the New Quincy project.

It is not uncommon for a CHP based district system to be implemented in phases in concert with the phased development of a multi-building project. The key to a successful implementation of this scenario is the development of well conceived plan which establishes an overall plan for the phased design and construction of both the CHP capacity and the delivery infrastructure.

The statement that the National Grid energy efficiency program (MassSave) does not include incentives for CHP is incorrect. The Commercial & Industrial program includes an incentive program specific to CHP which provide a cost reduction incentive of up to \$750.00 per kW of capacity. The DOER strongly recommends that the project contact Joseph Dolengo (781) 907-1569

joseph.dolengo@us.ngrid.com to discuss the MassSave CHP incentive and how it could apply to the project, and John Ballam (617- 626 1070) the DOER for the same discussion regarding the DOER administered APS CHP incentive.

Although the DOER commends the proponent on having gone to the effort of using the RETscreen - 4 energy model, an analysis based on a single building as a reason to eliminate CHP as option for district energy. In addition to this comment, the DOER has several reservations:

DOER 05

1. The loads based on the eQUEST modeling results will have to be revised to conform with Appendix g (and the Policy).
2. The statement that the cost of natural gas is high in Mass. indicates that the proponent may not be aware of the steep declined (approx 30%) in the price of natural gas which took place this year.
3. The savings due to reduction of elimination of demand charges may not have been factored into the savings.
4. The cost reduction from the MassSave utility incentive and the APS incentive may have been factored into the economic analysis.

On-site Renewable Energy

The assumed discount rate of 8% used in the submitted economic analysis is too high for an investment which includes 30% federal tax credit and the amount of performance based support as is provided by the RPS. There are very few commercial investments that are available with this amount of risk avoidance, and to use standard corporate discount rates as was done in the submitted analysis is probably not justified.

DOER 06

The DOER strongly recommends that the project meet with third party solar PV system providers well in advance of construction (and let them evaluate the risk/reward).

Tenant Manual:

The DOER commends the proponent on the inclusion of this material in the submittal.

DOER 01 For a project of this size and potential GHG emissions, a best effort estimate should be made of the number of buildings that will likely be larger than 100,000 sf and these should be modeled strictly in accordance with ASHRAE 90.1 2007 Appendix G. For this reason, the use of the prescriptive method to the modeling of the proposed project buildings as submitted in the DEIR is not compliant with the protocol.

Please see the response to MEPA 14.

DOER 02 The DOER suggests that the FEIR Appendix G modeling be based on the Proponent's best estimate combining the layout of the buildings as shown with the space usage allocations as shown in the program table to develop models which apportion the use classes within the buildings, the probable size, scope and type of building envelope and systems.

Please see the response to MEPA 15.

DOER 03 For any of the proposed buildings that will include a high percentage of residential units, the DOER recommends consideration of WSHPs as a cost-effective method of dramatically reducing both gas and electric heating energy usage and associated GHG emissions.

The high-rise residential buildings in the Project may be suitable for WSHPs. WSHPs will be considered in the detailed mechanical design for the high-rise residential buildings.

DOER 04 Since typically a CHP system can generate useful electricity, heating and cooling with 15% to 18% annual reduction in source GHG emissions, as well as an opportunity to control energy costs, this is an option which should be carefully evaluated. The statement that a plan for implementing CHP for a phase development such as the Quincy project cannot be financed is made without any supporting facts or other information... Given that there is a 10% federal tax credit available for CHP and that Massachusetts has two incentive programs... which together could provide an additional 20% of the plant capital costs plus a large percentage of the ongoing maintenance costs, the DOER recommends that this project undertake a thorough evaluation of this opportunity. It is possible that, with these incentives in combination with the scale and diversity of the proposed development, a third party CHP developer could be interested in providing a central plant based district system for the New Quincy project.

The CHP feasibility analysis for the first phase of development was revised to include current costs for natural gas and electricity, including demand charges, and discussions with National Grid regarding a purchase subsidy. All applicable credits were assumed in the CHP analysis, which is provided in Section 5.2. While the economics are not favorable for CHP in the Step 1 of Project construction, the Proponents will study CHP in conjunction with potential hotel tenants in the Step 2.

DOER 05 Although the DOER commends the proponent on having gone to the effort of using the RETScreen-4 energy model, [it is] an analysis based on a single building as a reason to eliminate CHP as an option for district energy.

As stated in the Draft EIR, a CHP strategy involving more than one building, or buildings built in different phases, is not financially feasible for the proposed redevelopment Project. Given that the Project will have multiple tenants and different co-developers, the Proponents will have no financial guarantees from potential customers at the point in time when capital would be needed for construction of such a multi-building CHP, and banks would not offer financing without iron-clad guarantees. After re-examining the issue of a central plant for the entire Project, the Proponents reaffirm this statement.

DOER 06 The assumed discount rate of 8% used in the submitted economic analysis is too high for an investment which includes 30% federal tax credit and the amount of performance-based support as is provided by the Renewable Portfolio Standards (RPS)... The DOER strongly recommends that the project meet with third party solar PV system providers well in advance of construction.

The PV analysis has been revised using a lower discount rate and, more importantly, the latest installed cost data for 100+MW solar installations from the MassCEC website for PV installations (owner installed and 3rd-party) over the past two years (see Section 5.2.4).



The Commonwealth of Massachusetts
William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

June 8, 2012

Secretary Richard K. Sullivan, Jr.
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Boston, MA 02114

ATTN: Richard Bourré, Assistant Director

RE: Quincy Center Urban Revitalization, Quincy, MA; MHC# RC.41344; EOE# 14780

Dear Secretary Sullivan:

The Massachusetts Historical Commission (MHC) has reviewed the Draft Environmental Impact Report (DEIR) submitted by Stephenson Design Group, LLC, received May 9, 2012, concerning the revised proposed project referenced above. After a review of the information submitted, MHC staff have the following comments.

The MHC understands that the proposed project is being revised frequently, with considerable changes from one draft to the next. The MHC also understands that no definitive proposal has been specifically delineated concerning characteristics such as the height, massing, or other exterior characteristics of the proposed buildings. The proposed project has been revised from four stages or "steps" of construction down to three "steps" of construction, which are all part of Phase 2. The geographic scope of the project has increased to include several properties north-northeast of Chestnut Street.

The MHC previously commented in a letter dated September 9, 2011, that the building proposed for demolition to allow for the construction of a bridge MBTA's "Red Line" tracks, involved a building that, in MHC's opinion, does not meet the criteria of eligibility for listing in the National Register of Historic Places (36 CFR 60). The building is at 39R-79 Parking Way (MHC# QUI.1449), which is included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth.

PHASE 2

Phase 2 involves three steps. The MHC understands that proposed project plans are still at the schematic stage and are undergoing frequent revision. The MHC understands that the majority of the buildings within the Phase 2 area will be demolished for new construction that may reach up to twenty stories in height in some areas. It appears that the property at 1400 Hancock Street, historically known as the Granite Trust Company, which is individually listed in the National and State Registers of Historic Places, will be renovated. The MHC understands that the property at 1419 Hancock Street, historically known the Greenleaf Building, which is individually listed in the National and State Registers of Historic Places, is no longer part of the proposed project and that the developers for the proposed project will not be purchasing the property.

The MHC is not able to accurately evaluate the *visual* effect to historic properties within the Area of Potential Effect because the MHC does not have enough information concerning the height, massing, and overall views of the proposed building. Historic Properties within the *direct* Area of Potential Effect appear to include the following:

MHC 01

Step 1

Step 1 of the proposed project appears to include the property at 1545-1555 Hancock Street (MHC# QUI.1440), historically known as Woolworth's Department Store; the property at 1563 Hancock Street (MHC# QUI.1443), the property at 1515 Hancock Street (MHC# QUI.175), historically known as Remick's Department Store; the property at 1517 Hancock Street (MHC# QUI.1439), historically known as the H.M. Faxon Building; which are located within the Quincy Center Local Historic District and are listed in the State Register of Historic Places. Step 1 also appears to include the property at 39R-79 Parking Way, (MHC# QUI.1449), which is included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth. However, it is MHC's opinion that 39R-79 Parking Way does not meet the National Register criteria of significance because of its alterations and loss of integrity.

As currently proposed, the Woolworth's Department Store, Remick's Department Store, the H.M. Faxon Building, and 39R-79 Parking Way will all be demolished as part of the project.

Step 2

Step 2 of the proposed project appears to include the property at 17-19 Chestnut Street (MHC# QUI.1416), historically known as the Loran Smith Barber Shop – Brown Gift Shop; the property at 24 Chestnut Street (MHC# QUI.232), the property at 26 Chestnut Street (MHC# QUI.233), historically known as the Faxon Town House; the property at 28 Chestnut Street (MHC# QUI.234), historically known as Sully's Tavern; and the property at 30 Chestnut Street (MHC# QUI.235), historically known as the Faxon Town House; the property at 32 Chestnut and Foster Street (MHC# QUI.236), historically known as the Richard D. Chase and Company Insurance Company; the property at 24 Cottage Avenue (MHC# QUI.1421), historically known as the George Richards Building; the property at 27-39 (33) Cottage Avenue (MHC# QUI.1417 and 1420); the property at 1400 Hancock Street (MHC# QUI.171), historically known as the Granite Trust Company; the property at 1441 Hancock Street (MHC# QUI.1431), historically known as the Fanny Farmer Candy Shop; the property at 1445 to 1451 Hancock Street (MHC# QUI.1432), historically known as the S. S. Kresge Building; the property at 1486 Hancock Street (MHC# QUI.174), historically known as the Quincy Trust Building; the property at 1495 Hancock Street (MHC# QUI.1436), historically known as the Henry L. Kincaide Block; the property 1546 Hancock Street (MHC# QUI.1441), historically known as the Morris Asper Building; the subject property at 1419 (1415) Hancock Street (MHC# QUI.#172), historically known as the Greenleaf Building; the property at 1429 Hancock Street (MHC# QUI.1430), historically known as the Anastos Building; the property at 1431-1437 Hancock Street (MHC# QUI.1430), historically known as the Durgin and Merrill Block; the property at 1450-1462 Hancock Street (MHC# QUI. 1433 and 1434), historically known as the Norfolk Building; the property at 1453 (1455) Hancock Street (MHC# QUI.1435), historically known as Guay's System Bakery; the property at 1469-1479 Hancock Street (MHC# QUI.173), historically known as Adams Arcade; and the property at 1500 -1518 Hancock Street (MHC# QUI.1437 and 1438), historically known as Alpha Hall / Kincaide Block.

The Loran Smith Barber Shop – Brown Gift Shop is included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth. 24 Chestnut Street, The Faxon Town House at 26 Chestnut Street, Sully's Tavern, the Faxon Town House at 30 Chestnut Street, and the Richard D. Chase and Company Insurance Company are located within the Quincy Center Local Historic District and listed in the State Register of Historic Places. The George Richards Building and 27-39 (33) Cottage Avenue are included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth. The Granite Trust Company is located within the Quincy Center Local Historic District and is individually listed in the National and State Registers of Historic Places. The Fanny Farmer Candy Shop, the S. S. Kresge Building, the Quincy Trust Building, the Henry L. Kincaide Block, and the Morris Asper Building are located within the Quincy Center Local Historic District and listed in the State Register of Historic Places. The Greenleaf Building is located within the Quincy Center Local Historic District, has been determined by the Keeper of the National Register to meet the criteria of eligibility for listing in the National Register of Historic Places (36 CFR 60), and is individually listed in the State Register of Historic Places. The Anastos Building, the Durgin and Merrill Block, the Norfolk Building, Guay's System Bakery, Adams Arcade, and the Alpha Hall / Kincaide Block are located within the Quincy Center Local Historic District and listed in the State Register of Historic Places.

As currently proposed, the Loran Smith Barber Shop – Brown Gift Shop, 24 Chestnut Street, the Faxon Town House at 26 Chestnut Street, Sully's Tavern, the Faxon Town House at 30 Chestnut Street, the Richard.D. Chase and Company Insurance Company, the George Richards Building, 27-39 (33) Cottage Avenue, the Fanny Farmer Candy

Shop, the S. S. Kresge Building, the Quincy Trust Building, the Henry L. Kincaide Block, the Morris Asper Building, the Anastos Building, the Durgin and Merrill Block, the Norfolk Building, Guay's System Bakery, Adams Arcade, and the Alpha Hall / Kincaide Block will all be demolished as part of the project.

Step 3

Step 3 of the proposed project involves the property at 1359 (1342) Hancock Street (MHC# QUI.165), historically known as the Town House / School House, and the property at 1385 (1381) Hancock Street (MHC# QUI.169), and historically as the Quincy Center Plaza. The Town House / School House and the Quincy Center Plaza are both located within the Quincy Center Local Historic District and listed in the State Register of Historic Places. The Town House / School House may be demolished as part of the proposed project and the Quincy Center Plaza will be demolished as part of the proposed project.

At this time, the MHC is unable to determine what effect the proposed project will have on historic properties. The MHC requests the following information. For each of the subject properties indicated below, the MHC requests current original photographs of the interior and exterior, keyed to a sketch map, so that the MHC can determine whether the following subject properties meet the criteria of eligibility for listing in the National Register of Historic Places. Please note that the photographic coverage should be extensive that the MHC can effectively evaluate each property.

MHC 02

<u>Property Address</u>	<u>Historic Name</u>
17-19 Chestnut Street	Loran Smith Barber Shop – Brown Gift Shop
24 Cottage Avenue	George Richards Building
27-29 (33) Cottage Avenue	
1-13 Cottage Avenue	Alpha Hall

The MHC notes that additional properties included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth and the State and National Registers of Historic Places will likely be included in future correspondence as the MHC is notified concerning more detailed information regarding each of the steps within Phase 2.

The MHC encourages careful consideration of potential project effects to significant historic resources as early as possible in the planning process. The MHC looks forward to receiving changes concerning updates to the project scope—including any available plans, elevations, and perspective views—and any changing information regarding funding, licensing, permitting, and approval sources.

MHC 03

The MHC would encourage the project team to look at the different mixed-use buildings and neighborhood developments around the state, in downtowns both large and small in a wide array of economic climates, that have been able to successfully utilize the historic tax credit programs as part of their projects. Buildings in far worse condition and in much more impoverished neighborhoods and areas than this have been able to successfully utilize tax credits. Although the draft Chapter 9 indicates that existing buildings of only a few stories would not be able to be renovated and that the multistory buildings have been compromised, which would therefore not allow retention to meet the financial requirements of the project, the MHC notes that earlier diagrams of the proposal showed buildings with only a few stories and that it is possible that the facades of the historic buildings may have been retained behind their existing modern coverings. Such claddings have been removed in other successful historic downtowns to produce effective tax credit rehabilitations by other proponents.

MHC 04

The MHC recommends that the project team continue to look at all of the Downtown Neighborhood Guidelines in recent years that have been prepared for the City of Quincy, including the version prepared by Goody Clancy, for recommendations concerning how to feasibly incorporate historic buildings with new construction. The MHC remains concerned that the proposed project, which the MHC understands is undergoing considerable frequent revisions, will substantially reduce what historic characteristics remain of this historic downtown and may introduce

MHC 05

shadows and other visual intrusions into buildings that are listed in the National Register of Historic Places, including three nearby National Historic Landmarks.

The MHC looks forward to receiving and reviewing comments from the Quincy Historical Commission. The MHC encourages the project team to incorporate the concerns that the Quincy Historical Commission has indicated thus far into the proposed project. The MHC also looks forward to having further consultation concerning this important project.

MHC 06

These comments are offered to assist in compliance with M.G.L. Chapter 9, Section 26-27C, as amended by Chapter 254 of the Acts of 1988 (950 CMR 71.00), and MEPA (301 CMR 11). Please do not hesitate to contact Ryan Maciej of my staff if you have any questions.

Sincerely,



Brona Simon
State Historic Preservation Officer
Executive Director
Massachusetts Historical Commission

xc: Mayor Thomas Koch, City of Quincy
Jim Timmins, City Solicitor, City of Quincy
Hancock Adams Associates, LLC
Jon D. Stephenson, PE, LEED AP; Stephenson Design Group
Mark Southard, DHCD
Steve Roper, MASS DOT
MASS DOT, District #4
Reverend Sheldon Bennett, United First Parish Church

MHC 01 The MHC is not able to accurately evaluate the *visual* effect to historic properties within the Area of Potential Effect because the MHC does not have enough information concerning the height, massing, and overall views of the proposed building.

At this stage of design, Project plans are not developed enough to provide renderings and plans that will assist the MHC in accurately evaluating the visual effects of the Project to historic properties within the Area of Potential Effect. Renderings and plans will be submitted to MHC when the relevant redevelopment step goes forward.

MHC 02 At this time, the MHC is unable to determine what effect the proposed project will have on historic properties. The MHC requests the following information. For each of the subject properties indicated below, the MHC requests current original photographs of the interior and exterior, keyed to a sketch map, so that the MHC can determine whether the following subject properties meet the criteria of eligibility for listing in the National Register of Historic Places. Please note that the photographic coverage should be extensive so that the MHC can effectively evaluate each property:

- ◆ Loran Smith Barber Shop/Brown Gift Shop (17-19 Chestnut Street);
- ◆ George Richards Building (24 Cottage Avenue);
- ◆ 27-29 (33) Cottage Avenue; and
- ◆ Alpha Hall (1-13 Cottage Avenue.

See the response to MEPA 19.

MHC 03 The MHC encourages careful consideration of potential project effects to significant historic resources as early as possible in the planning process. The MHC looks forward to receiving changes concerning updates to the project scope – including any available plans, elevations, and perspective views – and any changing information regarding funding, licensing, permitting, and approval sources.

The Proponents will continue to consider the Project’s potential impacts to significant historic resources as early as possible in the planning process. The Proponents will provide the MHC and Quincy Historical Commission with updates to the Project scope including plans, elevations, and perspective views as well as updated information on funding, licensing, permitting, and approval sources, as the information becomes available.

MHC 04 The MHC would encourage the project team to look at the different mixed-use buildings and neighborhood developments around the state, in downtowns both large and small in a wide array of economic climates, that have been able to successfully utilize the historic tax credit programs as part of their projects. Buildings in far worse condition and in much more impoverished neighborhoods and areas than this have been able to successfully utilize tax credits.

The Proponents are aware of the successful use of the historic tax credits in many communities, and will consider the feasibility of using historic tax credits to rehabilitate older buildings in the Project area that are potential candidates for such credits.

MHC 05 The MHC recommends that the project team continue to look at all of the Downtown Neighborhood Guidelines in recent years that have been prepared for the City of Quincy, including the version prepared by Goody Clancy, for recommendations concerning how to feasibly incorporate historic buildings with new construction. The MHC remains concerned that the proposed project will substantially reduce what historic characteristics remain of this historic downtown and may introduce shadows and other visual intrusions into buildings that are listed in the National Register of Historic Places, including three nearby National Historic Landmarks.

The Proponents and their development team have thoroughly reviewed and will use the Downtown Neighborhood Guidelines, including the version prepared by Goody Clancy, for recommendations concerning how to feasibly incorporate historic buildings into proposed new construction. The Proponents and the development team are conscious of the impact from shadows and visual intrusions on nearby historic properties, and will work to minimize such impacts during design planning. Shadow impact studies will be performed and provided to MHC in the Proponents' submissions for each Project phase.

MHC 06 The MHC encourages the project team to incorporate the concerns that the Quincy Historical Commission has indicated thus far into the proposed project.

The Proponents and their development team are considering the Quincy Historical Commission's concerns and have included salvage and reinstallation of the Remick Department Store clock somewhere in the Project as a mitigation measure. The Proponents have provided Project information, including current plans for Block 4 (Merchants Row), to the Quincy Historical Commission and included the Commission in an August 2012 meeting held to discuss Project information.



Paul J. Diodati
Director

Commonwealth of Massachusetts

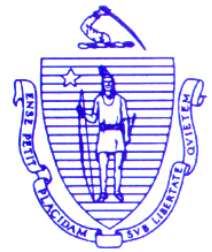
Division of Marine Fisheries

251 Causeway Street, Suite 400

Boston, Massachusetts 02114

(617)626-1520

fax (617)626-1509



Deval Patrick
Governor

Timothy P. Murray
Lt. Governor

Richard K. Sullivan, Jr.
Secretary

Mary B. Griffin
Commissioner

June 8, 2012

Richard K. Sullivan, Jr.
Secretary, Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114
ATTN: Rick Bourre

Re: EEA# 14780

Dear Secretary Sullivan:

The Division of Marine Fisheries (*Marine Fisheries*) has reviewed the Draft Environmental Impact Report by the City of Quincy/Hancock Adams Associates, LLC for the proposed New Quincy Center Redevelopment in the City of Quincy, with respect to potential impacts to marine fisheries resources and habitat. The project purpose is to redesign the stormwater system to reduce stormwater peak runoff rates to be in compliance with DEP Stormwater Management Standards. This project is closely connected to the Town Brook realignment project being designed in part to benefit diadromous resources including rainbow smelt (*Osmerus mordax*) and American eel (*Anguilla rostrata*).

Marine Fisheries offers the following comments for your consideration:

- MBTA station flows have been supplementing Town Brook for years. This clean groundwater flow should be supplied upstream of the newly created spawning habitat (the daylighted section) in the realigned Town Brook. **DMF 01**
- Stormwater flows into this system have been a problem for many years and they negatively impact multiple life stages of the diadromous fish in the Town Brook system. Adequately treating these stormwater flows to minimize pollution and meet performance standards is critical. **DMF 02**
- The realigned Town Brook base flows do not depend on stormwater, but additional flow would benefit the spawning habitat being created. Adequately treated stormwater discharged upstream of the spawning habitat would be beneficial. **DMF 03**

Questions regarding this review may be directed to Eileen Feeney in our New Bedford office at (508) 990-2860 ext. 117.

Sincerely,

Paul J. Diodati

Paul J. Diodati
Director

cc: Quincy Conservation Commission
Jon D. Stephenson, Stephenson Design Group, LLC
Heidi Davis, DEP
Lou Chiarella, NMFS
Robert Boeri, CZM
Ed Reiner, EPA
Ken Chin, DEP
Richard Lehan, DFG
Feeney, Ford, Chase, Sheppard, Evans, Ostrikis, Petitpas, DMF

PD/KF/bc/ef

DMF 01 MBTA station flows have been supplementing Town Brook for years. This clean groundwater flow should be supplied upstream of the newly created spawning habitat (the daylighted section) in the realigned Town Brook.

Please see the response to MEPA 08.

DMF 02 Stormwater flows into this system have been a problem for many years and they negatively impact multiple life stages of the diadromous fish in the Town Brook system. Adequately treating these stormwater flows to minimize pollution and meet performance standards is critical.

The proposed stormwater management system has been prepared in accordance with the MassDEP Stormwater Management Standards. Stormwater conveyances into the Town Brook system will be adequately treated prior to discharge which, since there is little to no stormwater treatment under existing conditions, will enhance water quality.

DMF 03 The realigned Town Brook base flows do not depend on stormwater, but additional flow would benefit the spawning habitat being created. Adequately treated stormwater discharged upstream of the spawning habitat would be beneficial.

After the Town Brook Enhancement Project completes the realignment of Town Brook, the catchment area tributary to the upstream reach will be larger than under existing conditions. Also, in conjunction with the Project, flow from the existing Burgin Parkway Sediment Chamber will be routed to connect to the upstream reaches of the realigned Town Brook and will be conveyed through the enhanced smelt habitat to downstream reaches of Town Brook (see Figures 2.9, 2.10, and 2.11). Also, see the response to MEPA 08 for a discussion regarding the potential routing of MBTA Lift Station flows to upstream reaches of Town Brook. Stormwater from the Project area will be treated prior to discharge into Town Brook. Section 2.2 contains a more detailed discussion of stormwater management.



June 12, 2012

Richard K. Sullivan, Jr., Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office
Rick Bourre, MEPA #14780
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: New Quincy Center Redevelopment, MEPA#14780

Dear Secretary Sullivan:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, MAPC's Smart Growth Principles, and the Commonwealth's Sustainable Development Principles, as well as for their impacts upon the environment.

The vision for redeveloping Quincy Center began in the early 1970s and this location was identified as an area for priority development as part of MAPC's regional planning process almost two decades ago. MAPC acknowledges the strong role that the City of Quincy has played to bring this proposal, at long last, to the point of undergoing a MEPA review process. The project presents a unique opportunity to implement recognized national, state and regional planning and environmental priorities.

The New Quincy Center Redevelopment will be a mixed-use, high density, transit-oriented urban redevelopment. The site, which lies mostly within Quincy's 55-acre Urban Revitalization District (URD), is 31 acres.

Since the filing of the EENF, the building program has increased by 300,000 square feet. Over 730,000 square feet of office, retail, restaurant, and movie theater space are currently on the site. When complete, there will be approximately 3.7 million square feet of new development specifically comprising office, retail, restaurant, health club, classroom, and movie theater space. In addition there will be a 173-room hotel and slightly over 1,880 residential apartments. The amount of proposed parking is 5,273 spaces. The project is estimated to generate approximately 12,321 new primary vehicle trips and 4,828 transit trips on an average weekday. Within the project area, the project is expected to generate 11,763 pedestrian trips and 1,282 bicycle trips on an average weekday.

MAPC is pleased that the majority of the comments and questions raised in our September 9, 2011 comment letter based on review of the Expanded Environmental Notification Form (EENF) have been addressed in the Draft Environmental Report (DEIR), particularly regarding traffic analysis. Included as an attachment to this letter are MAPC's DEIR comments which focus on housing, parking, and project monitoring - all of which should be addressed in the Final EIR. Thank you for the opportunity to comment on this important project.

Sincerely,

Marc D. Draisen
Executive Director

cc: Dennis E. Harrington, Planning Director, City of Quincy

**Metropolitan Area Planning Council (MAPC) comments on
New Quincy Center Redevelopment Project DEIR, MEPA # 14780**

MAPC has the following comments and questions on the New Quincy Center Redevelopment project. We request that the Secretary require these issues to be addressed in the Final Environmental Impact Report (FEIR):

MetroFuture

MAPC concurs that the project as described is largely consistent with the goals and implementation strategies of MetroFuture. MAPC is pleased that the DEIR mentions that this project will provide the opportunity to implement comprehensively many MetroFuture goals and objectives as well as the Commonwealth's Sustainable Development Principles. Several MetroFuture goals and objectives as they apply to this project are specifically identified in the DEIR.

Additional Funding

MAPC appreciates that the proponents have provided an update on Quincy's efforts to obtain public funding to assist in public infrastructure improvements and looks forward reading a continued update in the FEIR.

Residential Units

MAPC applauds the proponents for proposing the construction of 1,882 residential units in a location where there are currently no residential units. Mixing uses and creating greater proximity between homes and jobs is a key component of sustainable development, especially because it can tend to reduce the number and length of auto trips. However, it is important to note that the nature and type of units can influence overall traffic impacts. Alteration of impacts can occur not only in traffic to/from the site itself, but also by relocating households closer to jobs and other services, thereby affecting overall Vehicle Miles Traveled (VMT) within the region.

The proponents acknowledge in the DEIR that a residential developer has not yet been identified for this project and that there are market conditions to take into consideration. We anticipate, however, that the proponents will be able to overcome any market issues by focusing on the relatively strong rental market, and by taking advantage of nationwide trends indicating a growing preference for transit-oriented, walkable neighborhoods. MAPC looks forward to a more detailed response to the following questions which we previously raised in the EENF comment letter, and we encourage the Secretary to request that the following information be included in the FEIR:

- Of the proposed residential units, how many will be affordable (target income groups should be specified)? **MAPC 01**
- What percentage of these residential units will be available for ownership and what percentage will be available for rental? **MAPC 02**
- While the proponents have stated that the current estimate for the average residential unit will be 1.3 bedrooms, how many of the units will serve families with children (i.e., how many units will include three or more bedrooms)? **MAPC 03**
- What efforts will be made to accomplish fair housing goals in marketing these units?

Existing Uses

While existing land uses will be incorporated into the planned mixed use redevelopment plan, existing tenants within Quincy Center are currently being relocated with the assistance of the Quincy Chamber of Commerce and will have the opportunity to return to Quincy Center once the project is constructed. MAPC looks forward to reading more about the specifics of the relocation plans as well as how many tenants will be affected in the FEIR. **MAPC 04**

Parking

The DEIR states that the project will generate a peak parking demand of 4,702 parking spaces, yet mentions drivers typically perceive a parking lot is full when 90 percent of the parking spaces are occupied. Therefore, the available parking supply should exceed the peak parking demand by at least 10 percent to avoid excessive circulation of vehicles looking for an empty space. There is also an assumption that 100 parking spaces are needed beyond the peak demand to increase the attractiveness of the residences to potential residents, and to provide preferential parking spaces for rideshare participants and storage for ZipCar service. MAPC respectfully disagrees with both assumptions that elevate the total number of proposed parking spaces to 5,273, especially since the proponents have noted that there is overflow parking of more than 2,000 parking spaces in the Quincy Center vicinity.

MAPC 05

It is important for environmental and public health reasons that transit-oriented developments encourage residents and shoppers to maximize the use of transit, bicycling, and walking, and to minimize the use of vehicles. It is also critical that such developments encourage residential and commercial tenants who are comfortable with a transit-focused environment. Minimizing the number of parking spaces is the surest way to achieve these goals. This can also have the ancillary benefits of increasing the density of uses, encouraging walking to and within the site, and expanding the amount of rentable space.

We encourage the Secretary to require a stronger justification of the proposed level of parking, while we encourage the proponents and the city to recommend a smaller target. MAPC would like to review a more detailed analysis of the amount of parking allocated for each proposed land use for the completed project. This analysis also needs to address how shared parking will be incorporated.

Transportation Demand Management (TDM) Program

In addition to proposing a comprehensive TDM program, MAPC is pleased the proponents have committed to innovative TDM measures that include:

- Providing transit passes for residents in the rent.
- Implementing an IT system to direct drivers to open parking spaces.
- Implementing dynamic parking fees for on-street parking spaces.
- Coordinating with the MBTA to evaluate providing transit prioritization at signalized intersections within the project area.

Bus Stops and Shelters

MAPC looks forward to a more detailed discussion of existing and proposed bus stops and bus shelters in the FEIR as the site layout is further refined by the proponents.

MAPC 06

Bicycles

MAPC looks forward to reviewing the locations of the proposed bicycle parking spaces in the FEIR as the site layout is further refined by the proponents.

MAPC 07

MAPC is pleased that the proponents have committed to evaluating providing a bicycle sharing program similar to Hubway.

Taxi and Valet Service

An estimate of parking impacts associated with taxi use and valet service, particularly regarding the hotel component of the project, should be included in the FEIR.

MAPC 08

Truck Trips

MAPC looks forward to reviewing a more detailed evaluation of truck traffic patterns, as well as designated truck routes for construction and delivery vehicles in the FEIR. As previously mentioned in MAPC's comment letter regarding the EENF, the volumes and access routes of truck trips associated with both the construction and operation of the project need to be specified. In addition, measures to mitigate the impact of truck trips need to be addressed, including but not limited to:

MAPC 09

- Requiring deliveries to take place during non-peak hours (during project construction and building operation).
- Ensuring trucks of appropriate size access the project site.
- Enforcing the no-idling laws which prohibit unnecessary engine idling of any motor vehicle for a period of time longer than five minutes (MGL, Chapter 90, Section 16A).
- Developing site plans and building designs that have non-conflicting pedestrian and truck access.
- Identifying truck parking and access locations.

Development Monitoring

Since the project will take seven to ten years to complete, MAPC recommends that the Secretary require the proponents to provide annual updates during construction. The annual updates should include, but not be limited to: building construction, roadway improvements, allocation of parking spaces, and agreed-upon mitigation commitments. The annual updates should also be addressed within the framework of the three project phases or "Steps".

MAPC 10

Post Development Monitoring

MAPC commends the proponents for committing to an extensive post-development monitoring program. Appropriate goals for transit mode share, walking, biking, use of rideshare and carpool programs, and other TDM programs need to be clearly defined. This information will be critical to ensuring that the mitigation measures are providing the benefits and performance expected.

MAPC 11

Specifically, unacceptable results of the monitoring program should be defined as any of the following three conditions: 1) traffic volumes exceed vehicular trips by 10% or more; 2) components of the TDM program are not being met; or 3) levels of service at intersections are worse than predicted in the DEIR. When the monitoring shows unacceptable results, modified mitigation measures should be agreed to by the proponents in consultation with EOEEA and MAPC. The monitoring and evaluation plan will assess the accuracy of projected impacts and the effectiveness of mitigation measures, allowing for mid-course corrections if necessary.

MAPC 12

The proponents have noted that intersections along Hancock Street between Dimmock Street to the north and Cottage Avenue to the south, along with Washington Street between Hancock Street and Foster Street, were designated as a Top 10 Pedestrian Crash Cluster by MassDOT. In MassDOT's 2009 Top Crash Locations report published in August 2011, this cluster ranked eighth in the state for pedestrian crashes based on Equivalent Property Damage Only (EPDO). There should be particular focus on data collecting and monitoring for this area as part of the post-development monitoring program.

MAPC 13

In addition, the DEIR has identified several signalized intersections to have an overall Level of Service F for 2022 Build with Improvements:

MAPC 14

- Newport Avenue/Thomas E. Burgan Parkway/Adams Street – *Weekday Evening*
- Thomas E. Burgan Parkway/Centre Street – *Saturday Midday*
- Hancock Street/Dimmock Street/Adams Street/Whitney Street/Johnson Avenue – *Weekday Morning & Evening*
- Hancock Street/Quincy Avenue/School Street/Elm Street – *Saturday Midday*
- Washington Street/Southern Artery – *Weekday Morning*
- Southern Artery/Sea Street/Coddington Street – *Weekday Evening and Saturday Midday*

These intersections also need to be closely monitored as part of the post-development monitoring program.

MAPC is particularly impressed with the suggestion that “as a further measure to ensure that the goals of the TDM program are being met, both the Project Proponents, as well as the employers, business owners, and property managers, could be held accountable for programs not meeting the established goals. For example, the proponents would agree to provide funds to MassRIDES, MassDOT, and/or the MBTA to use toward implementing future TDM projects or transit improvements as a ‘fine’ for not meeting the TDM goals.” MAPC recommends that a specific post-development monitoring commitment be codified in the Section 61 Findings.

MAPC 15

Construction Period

MAPC looks forward to reviewing a more detailed evaluation of the construction period impacts related to traffic operations for each of the three project phases or “Steps” in the FEIR. Specifically, the Construction Period Impacts section should describe activities and their schedule and sequencing, site access, and truck routing.

MAPC 16

METROPOLITAN AREA PLANNING COUNCIL (MAPC)

MAPC 01 Of the proposed residential units, how many will be affordable (target income groups should be specified)?

All residential units will be market rate. In accordance with the City's Inclusionary Zoning Ordinance, the Private Redeveloper will make a contribution to the Affordable Housing Trust Fund.

MAPC 02 What percentage of these residential units will be available for ownership and what percentage will be available for rental?

Although the exact percentages have not yet been determined, the Project will include a mix of residential units available for ownership and rent.

MAPC 03 While the proponents have stated that the current estimate for the average residential unit will be 1.3 bedrooms, how many of the units will serve families with children (i.e., how many units will include three or more bedrooms)?

The exact number of bedrooms per unit has not yet been determined. However, the Proponents expect there will be a mix of studio, one-bedroom, and two-bedroom units available for ownership and rent. Three-bedroom units are not proposed.

MAPC 04 While existing land uses will be incorporated into the planned mixed use redevelopment plan, existing tenants within Quincy Center are currently being relocated with the assistance of the Quincy Chamber of Commerce and will have the opportunity to return to Quincy Center once the project is constructed. MAPC looks forward to reading more about the specifics of the relocation plans as well as how many tenants will be affected in the FEIR.

At this time, specific details regarding the relocation plan are not yet available.

MAPC 05 The DEIR states that the project will generate a peak parking demand of 4,702 parking spaces, yet mentions drivers typically perceive a parking lot is full when 90 percent of the parking spaces are occupied. Therefore, the available parking supply should exceed the peak parking demand by at least 10 percent to avoid excessive circulation of vehicles looking for an empty space. There is also an assumption that 100 parking spaces are needed beyond the peak demand to increase the attractiveness of the residences to potential residents, and to provide preferential parking spaces for rideshare participants and storage for ZipCar service. MAPC respectfully disagrees with both assumptions that elevate the total number of proposed parking spaces to 5,273, especially since the proponents have noted that there is overflow parking of more than 2,000 parking spaces in the Quincy Center

vicinity. It is important for environmental and public health reasons that transit-oriented developments encourage residents and shoppers to maximize the use of transit, bicycling, and walking, and to minimize the use of vehicles... Minimizing the number of parking spaces is the surest way to achieve these goals.

A number of factors contribute to the provision of additional spaces above the projected peak parking demand of 4,702 parking spaces on the site:

- ◆ Standard engineering practice recommends provision of a parking supply that exceeds the peak parking demand by approximately 10 percent, as drivers typically perceive parking facilities as being full when 90 percent of the spaces are occupied and provision of additional spaces reduces excessive recirculation of vehicles looking for empty parking spaces. This is documented in the Institute of Transportation Engineers publication *Parking Generation, 4th Edition*.
- ◆ Although the peak parking demand for the entire Project area will be 4,702 parking spaces, this represents a Project-wide peak. Each redevelopment block will experience its peak parking demand at a different time of the day based on differences in use. For example, blocks 4 through 7 contain large residential components that will experience peak parking demands at night, while blocks 10 and 11 contain large office components that will experience peak parking demands during the day. The parking demand generation calculations included in the Draft EIR superimpose the parking demands of all uses throughout the Project area, assuming that all parking will be available to patrons of all blocks. However, it would be undesirable for residents of blocks 4 through 6 to park in blocks 10 and 11 at night, when parking demand for blocks 10 and 11 will be low. Similarly, it would be undesirable for employees in blocks 10 and 11 to park in blocks 4 through 6 during the day when residential parking demands will be low. As such, parking demands for each block or group of blocks must be satisfied individually. An updated parking analysis is provided in Section 4.5.
- ◆ Similar to satisfying peak parking demands within each block, the Project must also satisfy peak parking demands within each Step (or phase) of the Project. As some blocks are under construction, existing parking facilities will be closed, displacing parking demand to other facilities within the Project area. Section 4.5 evaluates parking supply versus peak parking demand for each Step (or phase) of the Project.

- ◆ A portion of the parking spaces within the Project area will be designated for preferential parking for carpool or rideshare participants, electric vehicle charging stations, or ZipCar parking. These spaces will not be shared between multiple land uses as efficiently as general public parking spaces throughout the rest of the Project area.
- ◆ Valet service will be provided at the proposed hotel and at some of the restaurants within the Project area. Valet service will require that a certain number of parking spaces are reserved within a parking facility for the valet attendants to park these vehicles. These parking spaces will not be shared with other uses within the Project area to ensure that adequate parking supply is available for the valet service.
- ◆ A portion of the parking spaces within the Project area will be designated for residential parking only to meet demands for residents in the Project Area. These spaces will not be available for shared use with the other land uses in the Project area, increasing the total parking demand for the Project.
- ◆ Prior to leasing or occupying a space, potential retail and office tenants require a certain parking supply ratio scaled to the size of the retail or office space. Therefore, the parking supply has been sized to meet the needs of potential tenants and increase the attractiveness of the Project area.
- ◆ As discussed above, Project construction will be phased, creating an opportunity to assess whether the projected parking demand is being realized as each phase of the Project is constructed. Should it be determined that peak parking demand is significantly lower than predicted, construction of additional parking in future phases may be reduced.
- ◆ Although parking facilities within the Project area have been designed to accommodate more parking than required to meet the peak parking demand, not all of the proposed parking needs to be constructed at once. The Private Redeveloper may construct a portion of the proposed parking supply and leave some parking spaces in “reserve” to be constructed only if the Traffic Monitoring Program (discussed in Section 4.7) indicates there is a need for additional parking spaces within the Project area.

MAPC 06 **MAPC looks forward to a more detailed discussion of existing and proposed bus stops and bus shelters in the FEIR as the site layout is further refined by the proponents.**

Section 4.2 provides a discussion of the proposed bus stops and bus shelters within the Project area based on consultations with MBTA staff.

MAPC 07 MAPC looks forward to reviewing the locations of the proposed bicycle parking spaces in the FEIR as the site layout is further refined by the proponents.

Section 4.4 contains a discussion of the proposed bicycle parking supply, along with the location and type of bicycle parking that should be provided within each block of the Project area.

MAPC 08 An estimate of parking impacts associated with taxi use and valet service, particularly regarding the hotel component of the project, should be included in the FEIR.

An updated parking analysis is provided in Section 4.5, which includes an evaluation of the impacts of valet service on the parking supply within the Project area. The sources used to estimate peak parking demand were either located within urban settings where taxi service is available or were adjusted to account for public transportation services including taxi service. Taxi service is expected to have a negligible impact on parking supply and demand within the Project area.

MAPC 09 MAPC looks forward to reviewing a more detailed evaluation of truck traffic patterns, as well as designated truck routes for construction and delivery vehicles in the FEIR. As previously mentioned in MAPC's comment letter regarding the EENF, the volumes and access routes of truck trips associated with both the construction and operation of the project need to be specified. In addition, measures to mitigate the impact of truck trips need to be addressed, including but not limited to:

- ◆ Requiring deliveries to take place during non-peak hours (during project construction and building operation);
- ◆ Ensuring trucks of appropriate size access the project site;
- ◆ Enforcing the no-idling laws which prohibit unnecessary engine idling of any motor vehicle for a period of time longer than five minutes (MGL, Chapter 90, Section 16A);
- ◆ Developing site plans and building designs that have non-conflicting pedestrian and truck access; and
- ◆ Identifying truck parking and access locations.

Section 4.3 discusses the major truck routes that will be utilized to access the Project area following construction, as well as proposed measures to mitigate the impacts of truck traffic. Section 4.8 discusses truck routing and mitigation measures that will be implemented during each construction phase.

MAPC 10 Since the project will take seven to ten years to complete, MAPC recommends that the Secretary require the proponents to provide annual updates during construction. The annual updates should include, but not be limited to: building construction,

roadway improvements, allocation of parking spaces, and agreed-upon mitigation commitments. The annual updates should also be addressed within the framework of the three project phases or “Steps”.

Regular updates throughout construction will be provided through the City of Quincy’s website and the Street-Works/Beale New Quincy Center website.

MAPC 11 MAPC commends the proponents for committing to an extensive post-development monitoring program. Appropriate goals for transit mode share, walking, biking, use of rideshare and carpool programs, and other TDM programs need to be clearly defined. This information will be critical to ensuring that the mitigation measures are providing the benefits and performance expected.

The traffic monitoring program discussed in Section 4.7 defines goals for transit, walking, bicycling, carpooling, and rideshare as means of travel to and from the Project area.

MAPC 12 Unacceptable results of the monitoring program should be defined as any of the following three conditions: 1) traffic volumes exceed vehicular trips by 10% or more; 2) components of the TDM program are not being met; or 3) levels of service at intersections are worse than predicted in the DEIR. When the monitoring shows unacceptable results, modified mitigation measures should be agreed to by the proponents in consultation with EOEEA and MAPC.

The traffic monitoring program discussed in Section 4.7 defines unacceptable results of the monitoring program.

MAPC 13 The proponents have noted that intersections along Hancock Street between Dimmock Street to the north and Cottage Avenue to the south, along with Washington Street between Hancock Street and Foster Street, were designated as a Top 10 Pedestrian Crash Cluster by MassDOT. In MassDOT’s 2009 Top Crash Locations report published in August 2011, this cluster ranked eighth in the state for pedestrian crashes based on Equivalent Property Damage Only (EPDO). There should be a particular focus on data collecting and monitoring for this area as part of the post-development monitoring program.

The Adams Green Transportation Improvement Project includes significant pedestrian facility improvements for the section of Hancock Street between Dimmock Street and Cottage Avenue and for the section of Washington Street between Hancock Street and Maple Street. These improvements include the following:

- ◆ Closing the existing Hancock Street between Washington Street and Temple Street to create a major pedestrian corridor;

- ◆ Widening sidewalks along Hancock Street, Temple Street, and Washington Street;
- ◆ Realigning the Hancock Street/Granite Street/Chestnut Street/Maple Street intersection and creating bump-outs to reduce pedestrian crossing width; and
- ◆ Installing bump-outs and additional signage at pedestrian crossings.

In addition, the Adams Green project will reduce vehicular traffic volume traveling along Hancock Street near Adams Green. These improvements are expected to decrease the occurrence of pedestrian collisions within these sections of Hancock Street and Washington Street. Monitoring of pedestrian collisions in this area should be completed by the City of Quincy following construction of the Adams Green improvements.

MAPC 14 The DEIR has identified several signalized intersections to have an overall LOS F for 2022 Build with Improvements:

- ◆ Newport Avenue/Thomas E. Burgan Parkway/Adams Street – *Weekday Evening;*
- ◆ Thomas E. Burgan Parkway/Centre Street – *Saturday Midday;*
- ◆ Hancock Street/Dimmock Street/Adams Street/Whitney Street/Johnson Avenue – *Weekday Morning & Evening;*
- ◆ Hancock Street/Quincy Avenue/School Street/Elm Street – *Saturday Midday;*
- ◆ Washington Street/Southern Artery – *Weekday Morning;* and
- ◆ Southern Artery/Sea Street/Coddington Street – *Weekday Evening and Saturday Midday.*

These intersections also need to be closely monitored as part of the post-development monitoring program.

Section 4.7 discusses the Project’s proposed traffic monitoring program. Post-development monitoring of the intersection at Hancock Street/Dimmock Street/Adams Street/Whitney Street/Johnson Avenue is not proposed as part of the monitoring program, since improvements would require reconfiguration that would result in right-of-way impacts. Improvements at this intersection will likely be part of a future City transportation improvement project.

MAPC 15 MAPC is particularly impressed with the suggestion that *“as a further measure to ensure that the goals of the TDM program are being met, both the Project Proponents, as well as the employers, business owners, and property managers, could be held accountable for programs not meeting the established goals. For example, the proponents would agree to provide funds to MassRIDES, MassDOT,*

and/or the MBTA to use toward implementing future TDM projects or transit improvements as a 'fine' for not meeting the TDM goals." MAPC recommends that a specific post-development monitoring commitment be codified in the Section 61 Findings.

Details of the proposed Traffic Monitoring Program are discussed in Section 4.7, and the commitment to perform such monitoring appears in the updated proposed Section 61 Finding included in Section 7.0 (see Table 7-1).

MAPC 16 MAPC looks forward to reviewing a more detailed evaluation of the construction-period impacts related to traffic operations for each of the three project phases or "Steps" in the FEIR. Specifically, the Construction Period Impacts section should describe activities and their schedule and sequencing, site access, and truck routing.

Section 4.8 provides a discussion of the transportation-related construction-period impacts related to each Step of the Project.

Eric Gerade

From: Bourre, Richard (ENV) <richard.bourre@state.ma.us>
Sent: Wednesday, June 27, 2012 1:54 PM
To: Eric Gerade
Subject: FW: Traffic Evaluation in the Quincy Downtown Redevelopment EIR

Rick Bourré
Assistant Director
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(617) 626-1130 (direct line)
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From: Robb Ross [mailto:roross@yahoo.com]
Sent: Tuesday, June 05, 2012 8:39 AM
To: Bourre, Richard (EEA)
Cc: kjohnson@quincyma.gov
Subject: Traffic Evaluation in the Quincy Downtown Redevelopment EIR

Hi Richard,

The Draft EIR for Downtown Redevelopment for Quincy Square needs to better highlight what can, should and will be done to mitigate the increased traffic volume or other traffic related issues directly and indirectly caused by the Quincy downtown redevelopment. Quincy is already very congested as indicated by the poor ratings that most of our intersections have received in the reports. The cure all Hannon Parkway has not had the desired function of easing traffic flow across the downtown. An intuitive evaluation is that the opening of the Hannon Parkway and the re-timing of lights has resulted in longer trip times at most if not all times of day. We need a conclusion for the traffic section of the EIR that has the experts spell out in layman's terms the expected impact of downtown development on area traffic congestion. Most of my concerns are related to congestion. The economic benefits of downtown redevelopment might be out of scope for an EIR but should be considered in the EIR to justify other issues. We see conclusions for some of the other sections in the Draft EIR but it is not clear why downtown redevelopment is overall a good thing for Quincy and the area.

Ross
01

Ross
02

Specific Issues: Reading the Draft Environmental Impact Report and the Adams Green Transportation (July 2010) study highlight the fact that Coddington Street will no longer be an option for cars coming south down Hancock St / Washington St. Forcing all traffic down to McGrath Hwy. Likewise traffic coming up Coddington St will not be able to make the left hand turn at Washington St. this is the situation today but we will no longer be able to round the church to get southbound on Washington St.

I believe these turning restrictions were mentioned in the last city council committee review of the 25% design but the effect on the east bound to and from traffic was glossed over. Restricting the left onto Coddington St. is not going to work given that taking a left at the the Washington St intersection no longer has a left turn light and that the McGrath Hwy is overused already. No longer being able to get from Coddington St to Washington St. needs a fix. Ross
03

A Draft EIR traffic section conclusion should explain to us the real life trip time changes that the Downtown Redevelopment and Adams Green changes will cause. These trip times are needed for current and future models. One can not expect that our residents or our **Representatives** can interpret properly the reams of data involved or even the tables in the EIR. Ross
04

Currently the Hannon Parkway has had a very adverse impact on all traffic in the downtown and surrounding intersections. No things are not getting better from what I encounter! Traffic light re-timing at Granite St. and on Burgin Parkway have now had the desired affect of pushing traffic on to the Hannon Parkway. This change is now causing both ends of the roadway to become major choke points at many times of the day. The intersections on Southern Artery and on the Burgin Parkway are a real mess. Travel via Granite St. is slowed greatly by light timing changes and cars are in constant queue on Burgin Parkway. These changes must be impacting the commute to and from city hall.

Crosstown trip times have increased markedly. Expected trip time changes need to be documented in the plans. With the proposed Adams Green and Downtown redevelopment we will make an already bad Quincy Center traffic situation untenable if more traffic is being funnalled through downtown.

The plans for Downtown and the Adams Green are great improvements but crosstown connections do not seem to be given proper consideration in the planning. Ross
05

All the Draft EIR traffic studies show clearly that the downtown will become a major destination point again. The tables also show that crosstown trips will increase and will be greatly impacted by downtown redevelopment including the Adams Green. The planning does not seem to address through traffic in any substantial manner. The Hannon Parkway is not the fix all for cross town traffic. We need to consider major improvements on Quincy Ave. / Southern Artery, on Furnace Brook Parkway and other points as alternatives to having traffic funnel too and traverse the downtown.

The MBTA Quincy Center garage reconstruction is an essential component that would allow a reconfiguration of this key transportation hub to allow better traffic flow, in and out, from both sides of the tracks. This component needs to be part of the plan from the start. Ross
06

The new turning lanes and intersection reconfigurations are not adequate mitigation as currently proposed.

Ross
07

What new traffic planning can be done to fix the congestion issues?

As a whole the Downtown Draft EIR seems to be very well done. Quincy Downtown Redevelopment is needed and is long overdue. The new city core needs to be executed in such a manner so as not to detract from the rest of our city. Traffic congestion is bad now and is expected to increase even without downtown redevelopment. The Draft EIR and our downtown planning should help Quincy too better deal with these looming issues. The EIR should provide an overall plus minus comparison of the proposed Downtown redevelopment. If this redevelopment is truly good for the city the EIR should explain why this is the case.

Regards, Robb Ross

ROSS 01 **The [Proponents] need to better highlight what can, should and will be done to mitigate the increased traffic volume or other traffic-related issues directly and indirectly caused by the Quincy downtown redevelopment.**

The proposed Section 61 Finding included in Section 7.0 outlines the measures that will be implemented to mitigate Project impacts.

ROSS 02 **The economic benefits of downtown redevelopment... should be considered.**

Section 1.3 discusses the Project's numerous public benefits, including economic benefits. Throughout the process of Project design, the economic benefits of the downtown redevelopment have been vetted by independent market analysis. It is estimated that the proposed redevelopment will create 4,240 construction jobs, 65 permanent hotel jobs, 1,895 permanent retail jobs, and 902 permanent office jobs.

ROSS 03 **Restricting the left onto Coddington Street is not going to work given that taking a left at the Washington Street intersection no longer has a left-turn light and that the McGrath Highway is overused already. No longer being able to get from Coddington Street to Washington Street needs a fix.**

As part of the Adams Green Transportation Improvement Project, left-turns from Washington Street westbound onto Hancock Street/Temple Street and left-turns from Coddington Street southbound onto Washington Street will be prohibited. These turn restrictions will be implemented as part of Adams Green and will be independent of the New Quincy Center Redevelopment Project. The intent of these turn restrictions is to increase capacity at the Hancock Street/Washington Street intersection by eliminating signal phases, and to decrease the volume of vehicles traveling through the Adams Green area. Vehicles headed westbound on Washington Street desiring to turn left onto Hancock Street would be diverted to McGrath Highway/Hannon Parkway. Vehicles traveling southbound on Coddington Street desiring to turn left onto Washington Street would be diverted to Southern Artery to access Washington Street. The basis for these turn restrictions and the resulting intersection capacity and queuing analysis are discussed in the FDR prepared for the Adams Green Transportation Improvement Project.

ROSS 04 **An EIR traffic section conclusion should explain to us the real-life trip time changes that the Downtown Redevelopment and Adams Green changes will cause.**

The transportation section of the Draft EIR contained a detailed analysis of the traffic operations at all study area intersections, including a tabulation of the delay expected at each intersection under Existing, 2022 No-Build, 2022 Build, and 2022 Build with Improvements conditions. In addition, as discussed in Section 4.1, a

traffic simulation model has been prepared to respond to comments from MassDOT. This simulation model provides an evaluation of traffic operations within the Project area on a network-wide basis.

Traffic-related impacts from the Adams Green Transportation Improvement Project have been evaluated within the FDR prepared by Howard/Stein-Hudson for that project, which is independent of the proposed redevelopment Project. Traffic operations following construction of the Adams Green project were evaluated as part of the Draft EIR for the New Quincy Center Redevelopment Project, and results were tabulated in Draft EIR Tables 3.11 and 3.12.

ROSS 05 **The plans for Downtown and the Adams Green are great improvements, but cross-town connections do not seem to be given proper consideration in the planning... The Hannon Parkway is not the fix for all cross-town traffic. We need to consider major improvements on Quincy Avenue/Southern Artery, on Furnace Brook Parkway and other points as alternatives to having traffic funnel to and traverse the downtown.**

The Project is expected to have minimal impacts on traffic volumes along the Southern Artery since much of the Project-generated traffic will be to and from locations outside of Quincy and the Southern Artery is not intended to serve as a major access route to the Project area. As Project mitigation, the Private Redeveloper has committed to implementing improvements at Southern Artery intersections with Washington Street, McGrath Highway/Field Street, Sea Street/Coddington Street, and Quincy Avenue. These improvements are outlined within the proposed Section 61 Finding contained in Section 7.0, as are the Private Redeveloper's proposed signal timing improvements and pedestrian upgrades at the Quincy Avenue/Hancock Street/School Street/Elm Street intersection.

On behalf of the Proponents, TEC prepared a Supplemental Traffic Impact Assessment which examined Project impacts on an additional 36 intersections in the City of Quincy beyond those evaluated in the Draft EIR. The intent of the supplemental study was to allow the City to identify potential improvements that may be needed to meet long-term transportation needs in the area. This study provides an analysis of traffic conditions and recommendations for improvements as part of a future City project for several intersections along the Southern Artery and Furnace Brook Parkway corridors. Copies of this study are available through the City or upon request.

ROSS 06 **The MBTA Quincy Center garage reconstruction is an essential component that would allow a reconfiguration of this key transportation hub to allow better traffic flow... This component needs to be part of the plan from the start.**

Reconstruction of the MBTA Quincy Center parking garage is not part of the New Quincy Center Redevelopment Project. However, reconstruction of the parking garage is critical to the long-term sustainability of Quincy Center to maintain multi-modal transportation to and from the City.

ROSS 07 The new turning lanes and intersection reconfigurations are not adequate mitigation as currently proposed. What new traffic planning can be done to fix the congestion issues?

Wherever practicable, the Private Redeveloper has committed to mitigation measures that will achieve intersection operations equal to or better than No-Build conditions, as is required by industry standard. At some intersections, right-of-way, environmental, or other constraints do not allow for construction of additional improvements to return operations to No-Build conditions. For these intersections, mitigation measures are proposed to improve capacity and operations to the maximum extent possible within the constraints of the location. Proposed mitigation measures are outlined in the proposed Section 61 Finding contained in Section 7.0.