



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

OFFICE OF THE
REGIONAL ADMINISTRATOR

November 25, 2008

David Mohler

c/o South Shore Tri-Town Development Corporation (Attn: Mary Cordiero)
223 Shea Memorial Drive
South Weymouth, Massachusetts 02190

RE: Environmental Assessment for the Parkway and Multimodal Center at the Former South Weymouth Naval Air Station in Abington, Rockland and Weymouth, Massachusetts

Dear Mr. Mohler:

The Environmental Protection Agency-New England Region (EPA) has reviewed the Federal Transit Administrations' (FTA) Environmental Assessment (EA) prepared in consultation with the Federal Highway Administration (FHWA) for the parkway and multimodal center proposed at the former South Weymouth Naval Air Station (SWNAS)--now known as SouthField. We submit the following comments on the EA in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The project includes the construction of an east-west parkway through SouthField that will provide a connection between Route 3 and Route 18. The parkway and Route 18 will access the proposed multimodal center at SouthField. The multimodal center will include a redesigned commuter rail station with increased parking, improved amenities (as compared to the current commuter rail station stop) and the facility will be designed to accommodate users of the proposed SouthField shuttle bus system as well as drivers, bicyclists and pedestrians.

EPA has been actively involved in the process to develop a reuse plan for the former SWNAS and continues to work with the Navy and the South Shore Tri-Town Development Corporation on issues related to the cleanup of contaminated areas of the former base. Our review of the redevelopment has focused on the avoidance of environmental impacts and support of a redevelopment project consistent with smart growth principles. We are pleased with the redevelopment planning to date and continue to believe that the SouthField project has great potential to serve as a model smart growth development for the region.

617-918-1010

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Based on our review of the EA we support the development of the proposed parkway and multimodal center but question whether a more compact roadway layout could be effective at meeting the project objective of providing functional local and regional access. Our comments on this issue and related to the characterization of contamination/cleanup issues on the former base are offered in the attachment to this letter.

We look forward to reviewing responses to our concerns and working with the FTA/FHWA and Massachusetts Executive Office of Transportation on the ongoing review and planning of the parkway and multimodal center. Please feel free to contact me at 617-918-1025 should you have any questions concerning our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy Timmermann", written in a cursive style.

Timothy L. Timmermann
Environmental Scientist
Office of Environmental Review

Enclosure

Attachment: Comments on the Environmental Assessment for the Parkway and Multimodal Center at the Former South Weymouth Naval Air Station in Abington, Rockland and Weymouth, Massachusetts

Parkway Design

As we noted during the recent public hearing on the EA, we recommend that a two-lane parkway be more fully evaluated to determine whether it will function adequately from a transportation perspective, and whether it can also reduce environmental and community (both within and out side of SouthField) impacts. The EA explains that a two-lane section is planned for the eastern portion of the parkway due to environmental concerns. We support the two-lane section as a way to avoid impacts and believe that the analysis should include full consideration of a two-lane cross section throughout the entire length of the project site. A two-lane section will produce less stormwater runoff than a four-lane parkway, and would be more in keeping with the adjacent pedestrian-friendly, transit-oriented, dense development that will occur on the base. The EA does not provide a complete explanation as to why a full length two-lane parkway was not considered. We note some Level of Service (LOS) numbers on page 5-7 that suggest that the two-lane section in the east will operate at lower LOS than the four-lane section in the west. However, it is our understanding that LOS D or even E may be acceptable in an urbanized area under some circumstances. Further, in Table 5.3-2 we find it puzzling that Volume/Capacity (V/C) ratios of .59 and .80 receive a LOS of E since by definition a V/C ratio less than 1.00 shows the road is not operating at full capacity.

Parking Supply Alternatives

We are concerned that Parking Alternative C (a satellite parking lot) was selected over Alternative A (structured parking) or Alternative B (adequate footings for structured parking), since structured parking has a smaller footprint and produces less stormwater runoff per vehicle than surface parking lots. Structured parking also frees up land that could be used for other purposes. We recognize that the satellite parking lot would be located over a portion of the cap over the Westgate Landfill, and that some uses of the site would not be allowed, but it could be used as open space in the transit village area.

Pedestrian Safety

On page 3-2, the EA indicates that there are only 4 access points to the parkway on base, and that in general, pedestrian and bicycle crossings will be located at roadway intersections. A greater number of pedestrian crossings along a parkway of this length is advisable, especially in the portion adjacent to dense development, since crossing 4 lanes of traffic traveling at 40 mph or higher is potentially very dangerous. Figure 3-2 shows two locations that are labeled "Proposed Pedestrian Signal" but we can't find any information in the text of the EA about these. It is imperative that safe pedestrian crossing be provided at more than the 4 vehicle interchanges through the use of pedestrian-activated signals or other measures. In addition, Figure 3-2 shows

1 roundabout and 3 traffic signals, whereas on page 3-2 of the document it indicates there will be 2 roundabouts and 2 signals. This discrepancy should be addressed. Roundabouts in general are safer and provide for smoother traffic flow and reduced air quality impacts when compared to a conventional signalized intersection and we believe they should be used where feasible.

Discrepancies in the Dimensions of the Parkway

There are several places in the document where parkway design information provided in the EA is not consistent. For example, on page 3-1, the third paragraph indicates that the East-West Parkway is 2.6 miles from Route 18 to Weymouth Street, while in the fourth paragraph it indicates that it is 3.6 miles (2.9 + .7 miles) from Route 18 to Weymouth Street. This discrepancy should be corrected. Also, on page 3-2 (second paragraph), two 11' travel lanes, two 4' shoulders, and a 10' multiuse path separated from the travel lane by 6' are labeled as a 41' section. We believe that this is a 46' cross-section.

Hazardous Waste Cleanup Related Issues

For ease of reference our comments in this section are arranged by page number reference.

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| Page 1-2, ¶3 | This paragraph makes reference to a “brownfields remediation.” The former South Weymouth Naval Air Station is a federal Superfund site. It was listed on the National Priorities List on May 31, 1994. |
| Page 2-2, §2.2.2 | The EA does not clearly explain how 1460 square feet of wetland impacts will be mitigated. This figure provided is not compatible with the areas reported in Table 2-1 (150 square feet for W2B and 3330 square feet for EC-Revised). |
| Table 2-1 | Clarification of what is meant by “taking of undeveloped parcels” should be provided and it should be explained how this action relates to the Navy’s plans to transfer parcels to the South Shore Tri-Town Development Corporation. |
| Page 2-6 & 2-7 | The description of the number of parking spaces provided here is confusing. Should 201 be 290? If the U.S. Coast Guard Buoy Depot property will be used, this should be made clear. |
| Page 2-8 | Completion of a landfill cap by early 2010 may be ambitious. At the current time, EPA does not have sufficient design documents to review the cap to ensure that it is compliant with the 2007 Record of Decision (ROD). |

- Page 3-5, Table 3-1 The EA should explain whether the U.S. Coast Guard Buoy Depot property has already been acquired. The ROD for the U.S. Coast Guard Buoy Depot requires institutional controls and monitoring. Information should be provided to explain how the new property use will comply with the restrictions set forth in the ROD or explain when a new remedy will be selected and implemented. EPA is still awaiting a complete remedial action report for the U.S. Coast Guard Buoy Depot property.
- Page 3-6, #6 Will construction of a “superstructure” result in any excavation within the U.S. Coast Guard Buoy Depot property? If so, this would not be consistent with the ROD.
- Page 4-1 It is unclear why “soils and geology” are not “Y” for possible impacts.
- Page 5-1, §5.1, ¶2 No transfers occurred in September 2008. It also appears unlikely that any property transfer will occur this year.
- Page 5-5, §5.3.2 Please explain whether increased truck traffic associated with the environmental remediation efforts at the South Weymouth Naval Air Station have been considered in the traffic and air quality analysis.
- Page 5-34, §5.7.1 EPA supports the proposal to excavate lead-contaminated soil at the U.S. Coast Guard Buoy Depot property. However, EPA does not support placing these soils at the West Gate landfill (*see also* bottom of page 5-35 and the second paragraph of page 5-36).
- Page 5-36, §5.7.3 The Hangar 1 site incorporates several Review Item Areas (99, 11, 10C, and Building 1). Please clarify which site is discussed here. There are numerous other sites under investigation on the base property that has not yet been transferred.

