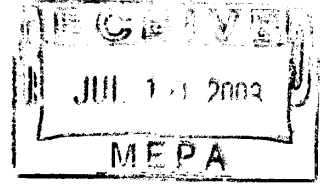


# South Shore Tri-Town Development Corporation

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223 Shea Memorial Drive, South Weymouth, MA 02190

July 8, 2003



Secretary Ellen Roy Herzfelder  
Attn: MEPA Office  
251 Causeway Street  
Boston, MA 02114

Attn: James Hunt, Esq.

**RE: *Proposed EA/Report on the Widening of Route 18 for the Redevelopment of the Naval Air Station and Associated Transportation Improvements- EOE # 11085R***

Dear Secretary Herzfelder:

We are writing to follow up on the April 3, 2003 meeting in the MEPA office with representatives of the South Shore Tri-Town Development Corporation (the Corporation), Lennar Partners, and MassHighway. As discussed at that meeting, pursuant to the Special Review Procedure established for the above project, the Corporation plans to prepare and file with MEPA and the Federal Highway Administration (FHWA), an *EA/Report on the widening of Route 18 for the redevelopment of the Naval Air Station* located in South Weymouth Massachusetts. This report will address the widening of Route 18 to four lanes, from West/Middle Street in Weymouth to Route 139 in Abington, a distance of 4 miles. The purpose of this letter is to explain the background, and describe the anticipated scope of the *EA/Report*.

## **Background: Naval Air Station Redevelopment Project.**

In July, 2000, an Environmental Notification Form (ENF) was filed by the Corporation for the redevelopment of the Naval Air Station. The ENF identified MassHighway as a Cooperating Agency for the transportation improvements. The ENF addressed separately the redevelopment of the Base, and the transportation infrastructure components of the project.

In October, 2000, the Secretary issued a Scope and a Special Review Procedure (SRP), and established a CAC. The Scope identified five transportation-based alternatives:

1. No-Build Alternative
2. Existing Infrastructure Alternative

3. Route 18 Improvements Alternative:: the level of development supportable by Route 18 widened to four lanes between Route 53 and the Whitman town line, with additional intersection improvements.
4. Transit Improvements Alternative. (Improved mass transit, parking, bus service)
5. Route 3 Access Road Alternative

In May, 2002, a Phase I Report was filed, pursuant to the SRP. This report studied the impacts of a limited amount of Base development (Stage 1) accessible to existing Route 18, with intersection improvements along Route 18 from Route 3 to Route 139. (The ENF for the intersections and a widened Route 18 between Route 3 and the Middle/West Streets intersection (EOEA # 12858 was filed in July 2002.).

In August, 2002, the Secretary issued a Certificate on the Phase I Report, which emphasized Smart Growth, transit-oriented development, and access to Route 3 via existing roadways and interchanges. That Certificate also required the filing of a Phase I Status Update Report which was submitted to MEPA on July 1, 2003. (A Draft Phase I Status Update Report was filed with the CAC and agencies on Feb. 7, 2003).

As was described in the ENF, the widening of Route 18 is required by the redevelopment of the Naval Air Station. Federal transportation funding for design and permitting of the Route 18 widening will be contracted through MassHighway to the Corporation (the proponent) for the preparation of a federal Environmental Assessment (EA) under NEPA which we propose to combine with the MEPA document. MassHighway will provide guidance and advice to the Corporation on the preparation of the combined NEPA/MEPA document *EA/Report on the Widening of Route 18 for the Redevelopment of the Naval Air Station* (EA/Report).

The preparation of the *EA/Report* dovetails nicely with the SRP expectation that phased development of the project be addressed in a matrix “that would identify different levels of development that could occur based upon different levels of infrastructure capacity, either existing or proposed”, as noted in the SRP Certificate dated October 11, 2000. In this case, the widening of Route 18 will allow a level of development on the base that will be addressed in future MEPA filings as the third alternative specified in the MEPA scope: the *Route 18 Improvements Alternative*. This is a land use alternative that will address the impacts of the level of development to be mitigated by the additional traffic capacity created by the widening of Route 18.

## Contents of the EA/Report

The *EA/Report on the Widening of Route 18* will describe the proposed widening of Route 18 to a uniform 4-lane section, from Route 3 south to the Whitman-Abington town line. Contents of the *EA/Report* will generally track MEPA regulation 301 CMR 11.07(6) (a-k), Form and Content of EIR. The *EA/Report* will discuss the change in the project limits from that included in the MEPA Certificate which specified Route 18 would be widened from Route 53 to the Whitman Town Line, instead of the currently proposed project limits from Middle/West Streets to Route 139. The current project limits were developed in the MassHighway South Weymouth Access Study.

The proposed contents of the *EA/Report* will include the following key components for addressing impacts and proposed mitigation measures for the project.

**Traffic.** Traffic analysis for 2010 and 2025 conditions will be completed to satisfy MEPA requirements. The proposed traffic study area includes the Route 18 corridor from Route 53 to the Whitman Town Line in accordance with the MEPA certificate. Background growth and traffic from other projects in the area currently proposed for development will be included in the traffic modeling, which will then identify traffic capacity available from the widening of Route 18 that will be mitigation for the future development of the former NAS site beyond Stage 1. Stage 1, the Existing Infrastructure Alternative, will be mitigated by the Route 18 Intersection Improvements. Traffic impacts within the larger study area outside of the Route 18 corridor that may be caused by the development-based Route 18 improvements will be addressed in future MEPA filings.

I would also like to point out that, at current time, Shea Memorial Drive is the only proposed access to the NAS site through Stage 1. At Trotter Road, only emergency access will be allowed through the gated access point at Trotter Road as is currently the case.

**Air Quality.** The Route 18 Widening Project has been included in the Boston MPO's transportation model used for air quality conformity analysis. The total emissions from this and other projects, when combined with the results from the rest of the Eastern Massachusetts Non-attainment Area, fell below the budget levels for VOC and NOx for all milestone years. Accordingly, this project – combined with all other regionally significant projects – was found to be consistent with the motor vehicle emissions budgets in the State Implementation Plan, thereby meeting the requirements of the conformity regulations. No additional analysis is required in the *EA/Report on the Widening of Route 18*.

**Noise.** A noise study will be prepared that identifies existing noise levels, models future noise levels, and evaluates the feasibility and cost-effectiveness of noise mitigation at sensitive receptors where existing or projected noise levels exceed applicable criteria for outdoor noise.

The TNM noise model will be utilized, and mitigation will be evaluated in compliance with FHWA and Mass Highway Noise Policies. Construction noise and vibration will also be addressed.

**Wetlands.** The *EA/Report* will identify wetland impacts associated with the widening of Route 18, and present conceptual plans for any required mitigation. A current list of permits required for the Route 18 widening will be included in the report.

**Drainage and Water Quality.** The *EA/Report* will describe the proposed stormwater management system for Route 18, identify the locations of major features of the system, and document the system's consistency with DEP's Stormwater Management Policies.

**Cultural Resources.** The *EA/Report* will include an assessment of potential cultural resource impacts, prepared by or through MassHighway's Cultural Resources Section.

**Hazardous Materials.** The *EA/Report* will include an Environmental Site Assessment (Phase II) for the presence of Hazardous Materials along Route 18.

**Construction Impacts.** The *EA/Report* will address construction phasing and mitigation.

**Executive Order 385.** The *EA/Report* will demonstrate the Project's consistency with E.O 385 – Planning for Growth.

**Mitigation / Section 61 Findings.** The *EA/Report* will describe mitigation measures proposed to compensate for the environmental impacts of the Route 18 Widening Project. The Route 18 Widening Project constitutes mitigation for traffic impacts of the *Route 18 Improvements Alternative*. Therefore, no additional traffic mitigation will be included in the Report/EA on the Route 18 Widening for the Redevelopment of the Naval Air Station.

### **Other Transportation Improvements for the Naval Air Station Redevelopment Project.**

As you know, planning for the Naval Air Station Redevelopment Project had included a future connection from the Base to Route 18, in the vicinity of Trotter Road or at the so-called W3 location farther to the south adjacent to the Abington/Weymouth Town line. The Corporation and its private development partner, Lennar Partners, are continuing their planning on this issue, including assessment of Smart Growth opportunities as mandated by the Secretary in the EOECA Certificate on the Phase I Report. Other access points and transportation improvements on and off base will be the subject of future MEPA and NEPA filings as the redevelopment of the base advances.

## Public Involvement

In addition to meeting with the CAC during the preparation of the *EA/ Report*, a general public meeting is planned, as well as coordination meetings with the Towns of Abington, Weymouth and Rockland. A public hearing to present the Preliminary plans (25%) will be scheduled by MassHighway for the Route 18 Widening Project at the appropriate time. Pursuant to the SRP and MEPA regulation 11.09(3) (e), the CAC will receive copies of the preliminary *EA/Report* at least 30 days before MEPA filing. CAC comments will be incorporated in the *EA/Report* at the time of its filing.

In conclusion, SSTTDC would like to request a confirmation letter from your office that acknowledges and supports our approach for preparing a joint NEPA/MEPA filing (*EA/Report*) to address environmental, social and economic impacts associated with the widening of Route 18. Should you wish to discuss the Route 18 widening or the proposed *EA/Report*, contemplated Phase II Report, please contact my office directly.

Thank you for your attention to this matter.

Sincerely,



~~Dan DeSantis~~  
Executive Director  
South Shore Tri-Town Development Corporation

cc: John McVann, FHWA  
Rick Marquis, FHWA  
Josh Grzegorzewski, FHWA  
Sen. Edward M. Kennedy  
Sen. John Kerry  
Congressman William Delahunt  
Rep. Ronald Mariano, Weymouth  
Rep. Kathleen Teahan, Abington  
Rep. Robert J. Nyman, Rockland  
Rep. Garrett Bradley, Hingham  
John Rogers, Chairman, SSTTDC  
James Lavin, SSTTDC  
John Ward, SSTTDC  
Robert Lundquist, SSTTDC

John Burke, SSTTDC  
Mayor David Madden, Town of Weymouth  
David Hall, Lennar Partners  
Ken Miller, MHD  
Greg Prendergast, MHD  
Kevin Walsh, MHD  
Diane Madden, MHD  
Steve Pepin, MHD  
MHD District No. 4  
MHD District No. 5  
Hingham Conservation Commission  
Hingham Health and Human Services  
Hingham Planning and Development  
Hingham Board of Selectmen  
Stephen Smith, SRPEDD  
Ed Ionata, Rizzo Associates, Inc.  
Jeff O'Connell, Rizzo Associates, Inc.  
Sam Mygatt, Epsilon Associates  
Jim Clark, Weymouth DPCD  
Weymouth Conservation Commission  
Weymouth Historical Society  
Abington Board of Selectmen  
Abington Planning Board  
Abington Conservation Commission  
Rockland Board of Selectmen  
Rockland Planning Board  
Rockland Board of Health  
Eric Worrall, MA DEP  
Pat Huckery, MA Division of Fisheries and Wildlife  
Massachusetts Historical Commission  
Metropolitan Area Planning Council  
Old Colony Planning Council  
Terry Fancher, South Shore Chamber of Commerce, Chairman of the CAC  
Members of the CAC  
Massachusetts Audubon Society  
Massachusetts Bay Transportation Authority