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November 2, 2006

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFIARS ON THE FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Quincy High School
PROJECT MUNICIPALITY : Quincy
PROJECT WATERSHED : Boston Harbor
EOEA NUMBER : 12982
PROJECT PROPONENT : The City of Quincy
DATE NOTICED IN MONITOR : September 26, 2006

As Secretary of Environmental Affairs, I hereby determine that the Final Environmental Impact Report (FEIR) submitted on this project **adequately and properly complies** with the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00).

The proposed project consists of construction of a new 330,000 square-foot high school, as well as reconstruction of approximately 350 parking spaces and existing athletic and recreational fields. The project involves demolition of the existing Center for Technical Education (CTE) building and the rear and side portions of the historic Quincy High School (QHS) building. The main portion of the QHS complex on Coddington Street will be retained by the City of Quincy. The City will endeavor to adaptively reuse the remaining portion of the historic QHS for municipal purposes. The project will also include closure of Woodward Avenue, which will become part of the new high school site.

The project has changed substantially since the filing of the Draft Environmental Impact Report (DEIR). The Central Middle School is no longer a component of the project and the location of new high school construction has been moved to the southwest. In addition, the project no longer involves enlargement of athletic fields and parking areas, but will instead replace existing facilities. These changes have resulted in avoidance of the majority of wetlands impacts previously anticipated. The project as proposed in the DEIR would have resulted in approximately 4 acres of vegetated wetlands alteration in the Faxon Field portion of the site. The current proposal, as described in the FEIR, involves less than 5,000 sf of wetlands resource area alteration. The project as proposed in the FEIR is being designed to match existing impervious

coverage to the maximum extent possible, and will result in an increase of approximately 0.8 acres of impervious area compared with existing conditions. The project will be located mainly on previously altered land associated with existing buildings, parking areas and athletic and recreation fields. The project will adversely affect a state-listed historic structure due to demolition of portions of the historic Quincy High School.

The project requires a Sewer Connection Permit from the Massachusetts Department of Environmental Protection (MassDEP). A Superseding Order of Resource Area Delineation (SORAD) and a Superseding Determination of Applicability (SDA) for on-site wetlands were issued by MassDEP (March 22, 2005). The project is currently under review by the Commonwealth Division of Administrative Law Appeals (DALA) due to appeal of the SORAD and SDA, and a final adjudication on the appeals has yet to be made. The project requires an Order of Conditions from the Quincy Conservation Commission (and, on appeal only, a Superseding Order of Conditions from MassDEP). The project requires a 401 Water Quality Certification (as provided for under 314 CMR 9.00, the Order of Conditions may serve as the 401 Water Quality Certification for projects involving less than 5,000 sf of wetlands alteration in lieu of an individual application to MassDEP). The project is subject to review by the Massachusetts Historical Commission, the U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (EPA). The project requires a Programmatic General Permit, Category 1 under Section 404 of the Clean Water Act, from USACE and a National Pollutant Discharge and Elimination System (NPDES) Permit from the EPA. The project is also subject to review and requires various permits and approvals from the City of Quincy.

The project, as proposed in the DEIR, was subject to a mandatory EIR because it required a Variance from the Wetlands Protection Act from MassDEP for alteration of more than 5,000 sf of Bordering Vegetated Wetlands (BVW). The requirement for a Variance is no longer applicable to the project as proposed in the FEIR. A Chapter 91 License and Massachusetts Coastal Zone Management Federal Consistency Review, which were also applicable at the time of the DEIR filing, are no longer required. The project is under MEPA review pursuant to Section 11.03 (10)(b)(2) because it will involve demolition of portions of a Historic Structure located in an historic district and listed in the State Register of Historic Places.

The proponent is seeking cost reimbursement from the Massachusetts School Building Authority for the proposed new high school. Therefore, MEPA jurisdiction is broad and extends to all aspects of the project with the potential to cause damage to the environment as defined in the MEPA regulations.

Alternatives

The FEIR discusses alternatives considered at the ENF and DEIR stage, which included a larger project with a middle school, alternative project locations, and site layout options with varying levels of wetlands and impervious area impacts. Additional alternatives considered in the FEIR include:

- Rehabilitation and reuse of all, or part of, the existing Quincy High School (QHS);
- Relocation of QHS to a location other than Faxon Field;

- Relocation of QHS to another area within Faxon Field (Southern Artery location); and
- The preferred alternative, which involves construction of a new high school complex on the site of the existing CTE building and Industrial Arts and Business and Educational wings of the QHS.

The preferred alternative presented in the FEIR minimizes wetlands impacts and avoids the need for off-site recreation field alternatives. According to the FEIR, the preferred alternative meets the requirements of the Massachusetts School Building Authority (MSBA) to maintain the City's position on the wait list to receive \$72 million in school construction funds. As further detailed in the FEIR, reuse of the existing QHS for high school use and relocation of QHS to a location other than Faxon Field were not considered feasible because the City would lose state funding for a new high school. The FEIR also evaluates the Southern Artery location and concludes it is not feasible due to the narrowness of the site, accessibility issues, and other site conditions that pose problems for high school construction and operation.

Wetlands

As further detailed in the comment letter from the Massachusetts Department of Environmental Protection (MassDEP), wetland resources on the project site have been reclassified since filing of the DEIR from Bordering Vegetated Wetlands (BVW) and Bordering Land Subject to Flooding (BLSF) to Land Subject to Coastal Storm Flowage (LSCSF). MassDEP issued Superseding Orders of Resource Area Delineation (SORADs) and a Superseding Determination of Applicability (SDA) that concurred with the Quincy Conservation Commission's (QCC) determination that on-site wetlands were isolated and should be classified as LSCSF. The SORADs and SDA were appealed and are currently under review by the Commonwealth's Division of Administrative Law Appeals (DALA). The vegetated wetlands on-site are regarded as isolated by MassDEP and the QCC, and are therefore subject to Section 401 and 404 of the Clean Water Act, but are unregulated under the Wetlands Protection Act. According to the FEIR, the project is being designed to comply with the standards for any resource area, including the more stringent requirements applicable to BVW and BLSF, and will therefore meet regulatory requirements regardless of the outcome of the DALA review. The project as proposed in the FEIR includes 1:1 on-site wetlands replication as required by the Programmatic General Permit of the Army Corps of Engineers and MassDEP's 401 Water Quality Certification regulations. MassDEP indicates in its comment letter that the FEIR project design appears to comply with the standards for any resource area that may ultimately be determined to exist on site as a result of the final adjudication of the SORAD and SDA appeals. MassDEP also notes that the revised project as described in the FEIR will undergo further review during permitting, which the City indicates it intends to pursue in the near future.

Stormwater

The City's proposed stormwater management plan appears to meet the requirements of MassDEP's Stormwater Management Policy conceptually. The Notice of Intent (NOI) to be filed for the revised project should include more information on soils in the recharge area and specific Best Management Practices (BMPs) such as BMPs to address unit sizing and efficiency, and an operations and maintenance plan. The NOI should also include calculations of the Total

Suspended Solids (TSS) removal and plans of the complete stormwater system to demonstrate compliance with the SMP.

The DEIR included a \$9 million drainage improvement program to address flood storage issues associated with filling over 4 acres of wetlands. This extensive drainage program is no longer proposed in the FEIR because the project has been substantially modified to avoid wetlands impacts. The project as proposed in the FEIR is designed to provide the same volume of flood storage capacity as currently exists on-site. Roof run-off will be collected and directed to underground cisterns to be used for irrigation.

Wastewater

Wastewater flows for the proposed project are estimated on the FEIR at 30,000 gallons per day (gpd), a reduction from the DEIR estimate of 42,000 gpd due to the elimination of the middle school component of the project. The receiving facility for the project's wastewater is the Massachusetts Water Resource Authority (MWRA) Deer Island wastewater treatment plant. According to the FEIR, the City of Quincy has consulted with the MWRA regarding its combined sewer overflow (CSO) control plan, and has been informed that Quincy is not a CSO community and is not subject to mitigation requirements for Inflow/Infiltration (I/I). Project design includes use of low-flow plumbing devices to promote water conservation.

Historical and Archaeological Resources

The Quincy High School (QHS) is located within the Quincy Center Local Historic District and is listed in the State Register of Historic Places. The Massachusetts Historical Commission (MHC) is also of the opinion that the QHS meets the criteria of eligibility for listing the National Register of Historic Places. MHC has determined that the proposed project will have an "adverse effect" (950 CMR 71.05(a)) on the QHS State Register property. The proponent should continue consultations with MHC to identify ways to avoid, minimize or mitigate adverse effects, and to develop a mitigation plan.

Transportation

As further detailed in the FEIR, the project is not expected to significantly impact traffic in the project area because high school enrollment and parking is not expected to change and the middle school component has been eliminated from the project. As a result of this project change, the FEIR no longer includes modification of the traffic signal timing and phasing at the Southern Artery/Coddington Street intersection, which was proposed as mitigation in the DEIR. However, the project does include closure of Woodward Avenue, which will have an effect on local traffic due to redistribution of vehicles that currently use this street. As mitigation for impacts associated with the closure of Woodward Avenue, the proponent will modify signal timing and phasing of lights at the Coddington Street/Woodward Avenue intersection. The FEIR indicates that major streets in the vicinity of the high school (Coddington Street, Hancock Street and Southern Artery) will experience an increase in traffic and that minor streets (including Huntley Street, Whitney Road and Russell Park) will experience reduced flows due to the diversion of cut-through traffic that currently uses Woodward Avenue. Russell Park is expected

to experience an increase in traffic during peak hours (approximately one vehicle per minute), which according to the FEIR will be offset by the overall reduction in cut-through vehicle trips diverted from the neighborhood. The City of Quincy has committed to work with the Department of Public works and Traffic and Parking Department to implement traffic calming measures and improve pedestrian safety in the vicinity of the high school.

The City of Quincy has committed to a Transportation Demand Management (TDM) program which will include:

- Improved access to the MBTA Quincy Center Station subway and commuter rail;
- A rideshare and carpool program;
- Transit subsidies for employees (similar to the existing student discount);
- A secured bicycle storage area;
- Improved pedestrian access and connectivity;
- Parking restrictions;
- Pick-up and drop-off areas to minimize conflicts with Coddington Street traffic.

Sustainable Design

The proposed high school site is located near public transportation and the City currently subsidizes T-passes for students and will consider incentives for staff also. The site is also within walking distance of a public library, YMCA, and other facilities in the downtown area that can support the high school and its students. The new high school is being designed to meet the Massachusetts High Performance Green Schools Guidelines (based on practices recommended by the Collaborative for High Performance Schools (CHPS)). The City is also striving to meet the Advanced Buildings Program (Energy Efficiency-Indoor Air Quality) program as part of the electric and gas utility incentives.

I commend the City of Quincy for its efforts to incorporate sustainable design features as part of the new school construction, and I expect that the Massachusetts School Building Authority (MSBA) will support the City in developing a high performance/green building for the new high school. As further detailed in the August 11, 2006 Bulletin 12 of the Executive Office for Administration and Finance (A&F) regarding minimum standards for sustainable design and construction of new buildings and major renovations, the MSBA is strongly encouraged to adopt to the greatest extent feasible, minimum building standards contained in the MA CHPS for new K-12 schools.

Mitigation

The City of Quincy has committed to a range of mitigation measures including:

Wetlands: on-site wetlands replication and compensatory flood storage will be provided at a ratio of 1:1

Historic Resources: the City of Quincy will work with MHC to develop a mitigation plan and provide opportunities for MHC to review and comment on project design plans.

Mitigation proposed in the FEIR includes photo-documentation, adaptive reuse and rehabilitation of QHS or "mothballing" consistent with recommendations outlined in Preservation Brief 31: Mothballing Historic Buildings.

Transportation: Traffic calming measures and pedestrian safety improvements; signal timing and phasing modification at the Coddington Street/Woodward Avenue intersection

Stormwater: a stormwater management system to meet MassDEP stormwater management policy and guidelines.

Water and wastewater: water conservation measures including low-flow fixtures and collection and use of roof run-off for irrigation.

Sustainable Design: construction of new high school to meet Massachusetts High Performance Green Schools guidelines.

Construction Phase: Erosion and sedimentation controls, re-use and recycling of construction and demolition debris; construction traffic management plan; noise mitigation controls; and participation in MassDEP's Clean air Act Construction Initiative (Diesel Retrofit Program).

I am satisfied that the Final EIR adequately assessed potential project impacts and committed to measures that will avoid, minimize and mitigate adverse impacts. I am satisfied that any outstanding issues can be addressed through the state and local permit and review process. State agencies should forward copies of the final Section 61 Findings to the MEPA Office for completion of the project file. The proposed project requires no further review under MEPA and may proceed to state permitting.

November 2, 2006

DATE

Robert W. Colledge, Jr., Secretary

Comments Received

10/24/06	Ross B. Edwards
10/25/06	Julie Berberan
10/26/06	Massachusetts Department of Environmental Protection, Northeast Regional Office (MassDEP/NERO)
10/26/06	Laurel Blanchard
10/26/06	Massachusetts Historical Commission

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