



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Deval L. Patrick
GOVERNOR

Timothy P. Murray
LIEUTENANT
GOVERNOR

Ian A. Bowles
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1181
<http://www.mass.gov/envir>

October 10, 2008

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

PROJECT NAME : Southwest Service Area Redevelopment Program at
Boston-Logan International Airport
PROJECT MUNICIPALITY : Boston
PROJECT WATERSHED : Boston Harbor
EEA NUMBER : 14137
PROJECT PROPONENT : Massachusetts Port Authority
DATE NOTICED IN MONITOR : July 9, 2008

As Secretary of Energy and Environmental Affairs, I hereby determine that the Draft Environmental Impact Report (DEIR) submitted on this project **adequately and properly complies** with the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62I) and with its implementing regulations (301 CMR 11.00). The proponent may prepare and submit for review a Final Environmental Impact Report (FEIR). This Certificate outlines the issues pertaining to the project presented in the DEIR.

Project Description

As described in the DEIR, the proponent, the Massachusetts Port Authority (Massport), is proposing a two-phase project to redevelop the Southwest Service Area (SWSA) at Logan International Airport. The SWSA is presently occupied by the taxi pool, a bus/limousine pool, a flight kitchen and six rental car businesses. A seventh car rental agency will soon relocate to the airport with an eighth moving once the project is operational.

The total 2.7 million gross feet (gsf) project, now at five percent design, is construction of

a five-level, 50-foot +/- high garage to house car rental facilities and up to 3,000 commercial parking spaces. The project will include 270,000 square feet (sf) of space for a car rental customer service center (CSC) and maintenance and storage areas for rental car operations, which are referred to as quick turnaround areas (QTAs), which provide fueling, car washing and cleaning facilities, and vehicle storage. The DEIR also describes as part of the project a shared shuttle bus system, rather than the existing eight individual shuttles, a reconfigured taxi pool, roadway and intersection improvements, site access improvements, landscaped buffers, and new pedestrian and bicycle facilities. To accommodate the project, the taxi pool and limousine pool will be relocated (the taxi pool will be increased) to the north of Porter Street within the SWSA. The flight kitchen and bus pool will be moved to another area on the airport. Bicycle access and parking will be provided. Vehicle trips per day (VTD) will increase by about 7,570 from about 24,180 to 31,750.

MEPA Background

In its annual (EEA #3247) Environmental Status and Planning Reports (ESPRs) and Environmental Data Reports (EDRs) for the airport dating back to 1993, Massport has contemplated making the SWSA more efficient through the development of enhanced transportation facilities, including a consolidated rental car facility (the "ConRAC") and commercial parking. Data reported shows that the project should prove to have significant positive environmental impacts. However, at the same time, I have received comments which have expressed concerns with the impacts upon the existing transportation infrastructure, air quality issues, and impacts of massing upon adjacent neighborhoods. To facilitate development of an FEIR that adequately avoids, minimizes and mitigates impacts to environmental resources, I expect the proponent will continue to work closely with the state and city agencies and authorities, as well as neighbors and neighborhood organizations that have provided detailed comments on the DEIR.

MEPA Jurisdiction and Permitting Requirements

The project is undergoing review and subject to the preparation of a mandatory EIR pursuant to section 11.03 (6)(a)(6) and section 11.03 (6)(a)(7) of the MEPA regulations, because the project involves the generation of 3,000 or more new additional trips on roadways providing access to a single location and the construction of more than 1,000 new parking spaces at a single location. Because the proponent is an Authority of the Commonwealth, MEPA jurisdiction extends to all aspects of the project that may cause significant Damage to the Environment as defined in the MEPA regulations.

The project will require an Order of Conditions from the Boston Conservation Commission for work within the buffer zone to wetlands resources (if the local Order were appealed, the project would require a Superseding Order from the Department of Environmental Protection (MassDEP)). I note that as of January 12, 2007, a certification statement with

MassDEP is required for new sewer connections where flows exceed 15,000 gallons per day (gpd) and are less than 50,000 gpd. Because the wastewater flow from the project is estimated to be less than 50,000 gpd, the proponent does not require a sewer extension/connection permit from MassDEP. However, the Massachusetts Water Resources Authority (MWRA) has indicated that a MWRA Sewer Use Discharge Permit will be required for wastewater discharges to the sanitary sewer system. Currently, Logan International Airport holds a USEPA-NPDES General Permit for its construction activities. For the SWSA Redevelopment Project, Massport must comply with Logan International Airport's USEPA-NPDES General Permit for Stormwater Discharges from its construction activities.

Coordinated MEPA/FAA/NEPA Review

In addition to the EIR requirement, the project is undergoing review pursuant to the Federal Aviation Administration (FAA) and the National Environmental Policy Act (NEPA) in an Environmental Assessment (EA). Both NEPA and MEPA regulations allow (and encourage) the preparation of joint EIR/EA documents. As noted at the outset of this review process, I believe coordinated review is a good government practice, both in terms of allowing for maximum public and agency understanding of the project and to ensure that review by regulatory agencies is as efficient as possible. I hereby authorize and encourage the preparation of a joint Final EIR/Final EA for the proposed project.

Review of the DEIR and Scope of FEIR

I am allowing the proponent to proceed to the preparation of an FEIR; however I note the requests by commenters for additional information and clarification to assist State agencies with future permitting processes. I have received numerous comments on the project from both project supporters and project opponents. While I appreciate the thoughtful comments submitted by all of the commenters, MEPA is not a zoning process, nor is it a permitting process. Rather, it is a process designed to ensure public participation in the state environmental permitting process, to ensure that state permitting agencies have adequate information on which to base their permit decisions and their Section 61 Findings¹ and to ensure that potential environmental impacts are avoided, minimized, and mitigated to the maximum feasible extent. The FEIR should therefore be responsive to the Scope set forth below, and as referenced above, I expect that the proponent will continue to work closely with agencies and the public on other aspects of the project outside this Scope.

I anticipate that the FEIR will respond to the scope outlined below with sufficient detail

¹ In accordance with M.G.L. c. 30, section 61, any Agency that takes Agency Action on a Project for which the Secretary required an EIR shall determine whether the Project is likely, directly or indirectly, to cause any Damage to the Environment and make a finding describing the Damage to the Environment and confirming that all feasible measures have been taken to avoid or minimize the Damage to the Environment.

to satisfy State agencies. I retain my authority to require further review issues outlined in this Scope and in comments in the form of a Supplemental Final Environmental Impact Report if those issues are not thoroughly addressed in the FEIR. The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Certificate.

Project Description & Regulatory Environment

The FEIR should include a detailed description of the project with a summary/history of the project. It should provide an existing and a proposed site plan. The FEIR should repeat the description of each state agency action required for the project that is contained in the DEIR and include any updates. It should show that the project is consistent with the applicable performance standards. The FEIR should contain sufficient information to allow the permitting agencies to understand the environmental consequences related to the project.

Response to Comments

In order to ensure that the issues raised by commenters are addressed, the FEIR should include a response to comments. I recommend an indexed response to comments approach, although I will defer the final choice of format to the proponent. This directive is not intended to, and shall not be construed to, enlarge the scope of the EIR beyond what has been expressly identified in the initial scoping certificate or this certificate.

Alternatives

The proponent has filed this project with MEPA early in the design process and has committed to continue public meetings to address issues such as parking and traffic circulation, building architecture, and buffer and streetscape design.

The Preferred Alternative presented in the DEIR combines a ConRAC facility and commercial parking into one five-level structure. The ConRAC is limited to the lower three levels. Commercial parking would be located on two levels above the ConRAC and would share the common shuttle bus for access to and from the Terminals. The DEIR proposes that to keep common shuttle bus traffic away from the airport property edges along the community and closer to the airport roadway network and within the SWSA to reduce community impacts. The Preferred Alternative proposes a five-level combined/consolidated garage for both activities. The combined structure increases operational efficiencies and has less visual impact to the nearby community.

In addition to the proponent's Preferred Alternative, the DEIR analyzed the no-build alternative to establish baseline conditions. The alternative would continue current and future rental car operations in SWSA with each rental car agency in a separate location with individual

shuttle bus and customer service facilities. The DEIR also analyzed “Alternative 1” a six-level ConRAC structure on the north side of the SWSA away from Maverick Street with direct operational flow from the garage with a separate five-level commercial garage located in the eastern section of the SWSA across Jeffries Street. Under Alternative 1, the shuttle bus route exiting to Porter Street would create a poor level-of-service at the Porter Street/Harborside Drive intersection. “Alternative 2” proposed two, smaller six-level ConRAC structures with a separate five-level commercial parking structure on the eastern portion of the SWSA across Jeffries Street. Alternative 2 would circulate common bus shuttle traffic at the Maverick Street edge and results in inefficient on-site circulation

The DEIR also discussed additional alternative site locations that included relocating all rental car operations to other on-airport locations including:

- The Robie Parcel which was not adequate in size or location to accommodate the current and future rental car needs and would likely add vehicle miles traveled (VMTs) if used in connection with rental car operations.
- North Service Area which was not adequate in size or location to accommodate the current and future rental car needs and was not accessible to roadway and highway system.
- North Cargo Area which was not adequate in size or location to accommodate the current and future rental car and currently accommodates air cargo and essential airline support services such as hangars.
- Bird Island Flats/South Cargo Area which was not adequate in size or location and could interfere with primary cargo area with secured airside access

The FEIR should continue to provide updated information on transportation and buffer streetscape design to the surrounding neighborhood in relation to the Preferred Alternative.

Traffic/ Vehicular Transportation

The DEIR was prepared in conformance with the EOEA/EOTC Guidelines for EIR/EIS Traffic Impact Assessment. It analyzed traffic impacts by determining the Level-of-Service (LOS) at the intersections required in the ENF Certificate and the Boston Transportation Department (BTD) comment letter. The DEIR identified the potential Transportation Demand Management (TDM) measures that the proponent will commit to implementing.

Vehicle trips per day (VTD) will increase by about 7,570 from about 24,180 to 31,750 attributed the increase to the projected growth in air passengers. The DEIR analyzed how the proposed common shuttle bus system will improve customer service, reduce curbside traffic congestion, and reduce vehicle-miles-traveled (VMT). Specifically, VMTs for rental car shuttles are projected to be reduced by approximately 50 percent with a common shuttle bus system compared to running separate shuttles for seven rental car companies and the commercial parking. This equates to a savings of approximately 2,470 miles daily and over 215,000 gallons

per year of fuel (bus fuel efficiency of 4 miles per gallon). Analysis in the DEIR shows that without the SWSA Redevelopment Program and associated ground access improvements, the projected growth for most of the major current uses in the SWSA (rental cars, taxis, limousines) would lead to an overload of the surrounding airport roadway and traffic congestion during 2012 and 2017 No-Build/No-Action Conditions. Also, with the relocation of the Bus and Limousine Pools and shuttle bus consolidation into a common bus system, the projected Build traffic volumes entering and leaving the SWSA would be between six and ten percent less than the traffic volumes associated with 2012 and 2017 No-Build/No-Action Conditions. Proposed ramp, roadway and intersection improvements will result in peak hour traffic volumes and daily VMTs that are better than 2012 and 2017 No-Build/No-Action Conditions. The DEIR states that existing designated, overflow and economy commercial parking will be consolidated within the SWSA while remaining within the requirements of Logan Airport Parking Freeze. This action will not therefore increase traffic to and from the airport, but will consolidate this parking-related traffic in one location.

The DEIR predicts the number of air passengers using Logan Airport will grow at a rate of 2.3 percent per year and assumes that the percentage of taxi, rental car, and limousine traffic entering and exiting the SWSA will increase accordingly. Under the SWSA-Build condition, trip generation will increase from 26,080 - 30,680 AWDT in 2012 and 28,905 - 33,985 AWDT in 2017. The DEIR estimates the proposed project achieves an overall trip volume reduction of 6 to 10 percent of traffic entering and exiting the SWSA site. However the relocation of the bus and limousine pool will increase vehicle trips to the North Service Area (NSA). In the FEIR, the project proponent should take into account the shift in trips from the SWSA to the NSA. The FEIR also should indicate how Logan Airport air passenger and ground service peak activity periods, such as Sunday afternoon and evening arrival periods are accounted for in the traffic analysis. Also Massport has committed to comply with the Massachusetts Idling regulation (310 CMR 7.11). The proponent should post idling restriction signs in all loading and drop-off areas within the site to remind all drivers, patrons, and delivery personnel of the state's idling regulation.

The FEIR should use the study methodology contained in the detailed BTM comment letter to govern the remaining traffic analysis and issues that are still outstanding. The FEIR should continue to working with BTM, EOT and the community to identify further mitigation measures for areas where the project will have a significant impact on traffic operations. The FEIR should include clear commitments to implement the mitigation, and describe the timing and any phasing of the mitigation.

Pedestrian/Bicycle

The DEIR described design standards for plantings, street furniture, signage, and sidewalk and crosswalk widths and paving to ensure that the pedestrian environment generally is appealing and efficient. The FEIR should continue to discuss methods of improving pedestrian

safety and facilities, and limiting pedestrian-vehicular conflicts. Within the DEIR Massport has committed to improving pedestrian and bicycle connections to the SWSA, the community, and the airport. I expect the proponent to continue to work closely with the City of Boston and other local neighborhood groups, agencies and landowners to coordinate streetscape design and the Airport Buffer Program described in the DEIR. The FEIR should describe with more detail the plans to ensure that these areas especially are designed as pedestrian corridors and attractive urban open spaces.

Parking

The proposed project is a two-phased (2012 Phase 1 and 2017 Phase 2) redevelopment of the Southwest Service Area (SWSA). MassDEP has stated in its comment letter that while rental car storage spaces are not regulated under the Parking Freeze, the provisions of the Parking Freeze allow Massport to manage its parking space inventory on Logan Airport property as operational needs require so long as Massport does not exceed the inventory limiting number of 17,319 commercial and 3,373 employee parking spaces. The FEIR must address the specific comments that have raised questions related to the Parking Freeze and detail how each phase of the project will comply with the mandates of the Parking Freeze.

The FEIR should provide additional information relative to the fuel use and emissions reductions expected from the common shuttle bus operation. Consistent with the requirements of the Parking Freeze, the FEIR should provide information on Massport's plans and efforts to relocate any remaining East Boston based rental car facilities or operations that serve Logan Airport and are not part of the proposed consolidation onto Logan Airport.

Air Quality

The DEIR contains an air quality assessment with a microscale analysis of localized carbon monoxide (CO) and particulate matter (PM2.5 and PM10) conditions, a mesoscale analysis of volatile organic compounds (VOCs) and nitrogen oxides (NOx) emissions in the project study area, and a greenhouse gas analysis to quantify carbon dioxide (CO2) emissions. The greenhouse gas analysis, as described in detail in the next section of the Certificate, compared the direct and indirect emissions from the combined stationary and transportation sources under the respective 2007 existing condition and respective Build and No Build conditions for 2012 and 2017.

As stated in its comment letter, MassDEP approved the modeling parameters used in the microscale and mesoscale analyses and accepts the modeling assumptions of the greenhouse gas analysis and accuracy of the analyses' results. Several commenters have raised concerns about the methodology used which MassDEP has approved. The FEIR should clarify the issues raised by those letters and further detail and justify the approved modeling parameters and analyses. This additional discussion should include, but not be limited to, further description of how the

approved methodology accounts for the impact of cold starts and the extent to which the impacts of ultrafine particulates have been analyzed.

The microscale analysis within the DEIR applied atmospheric dispersion modeling for CO and PM_{2.5} and PM₁₀ and “hotspot” modeling for roadway/intersections. The atmospheric dispersion modeling was conducted using the US Environmental Protection Agency’s (EPA) AERMOD, Massachusetts-specific MOBILE 6.2 motor vehicle emission factors and meteorological data collected at Logan Airport. The CO “hot-spot” modeling was conducted using the EPA CAL3QHC model combined with Massachusetts-specific MOBILE 6.2 motor vehicle emission factors. I note the comments of EPA seeking clarification with respect to the analysis of CO emissions. Subsequent to the close of the public comment period, the proponent supplied additional information with respect to CO emissions. This additional information and any updates should be included in the FEIR.

The DEIR’s mesoscale analysis predicted VOC and NO_x emissions using the current US EPA emission model (MOBILE 6.2), and traffic flow conditions for the respective 2007 existing condition, and respective Build and No Build conditions for 2012 and 2017. The mesoscale analysis also was used to estimate the indirect emissions from transportation CO₂ emissions associated with the additional project related vehicle trips. The calculation compared CO₂ emissions for the respective 2007 existing condition, and respective Build and No Build conditions for 2012 and 2017.

The results of the atmospheric dispersion modeling and hotspot modeling indicate that the proposed project concentrations are well below NAAQS for CO and PM_{10/2.5}. The mesoscale analysis indicates the proposed project is expected to reduce NO_x emissions by 23.1 and 6.33 tons/year in 2012 and 2017, respectively, when compared to Future No-Build Conditions. The proposed project also is expected to result in reductions of up to three percent in VOC emissions when compared to the 2012 and 2017 No-Build Conditions.

The transportation related air quality benefits associated with the proposed project are largely derived from the reduction of vehicle trips, roadway improvements, and the proposed TDM measures. The FEIR should explore additional TDM measures which may yield further air quality benefits.

Greenhouse Gases

As outlined in the Certificate on the ENF, in accordance with the EEA Greenhouse Gas Emissions (GHG) Policy and Protocol, the DEIR was required to quantify GHG emissions generated by the proposed project and describe all GHG mitigation measures associated with the project. In the DEIR CO₂ emissions associated with the SWSA Build Conditions are reported as 11,927 metric tons of CO₂ /year by 2012, and 12,836 metric tons of CO₂ /year by 2017. These values represent a 17 percent and 15 percent decrease in SWSA-related CO₂ emissions when

compared to the corresponding 2012 and 2017 No-Build Conditions, respectively.

As noted by MassDEP, although the DEIR quantified CO₂ emissions from mobile sources under the Preferred Alternative (as compared to the No-Build conditions) and presented measures to avoid, minimize and mitigate project-related GHG emissions, it did not include a modeling analysis of the energy use and CO₂ emissions from the project's direct and indirect stationary sources which should be included in the FEIR. The DEIR represented that CO₂ emissions would be reduced under the Preferred Alternative as the Preferred Alternative incorporates a number of sustainable design measures beyond a code-compliant building. However, the impact of those measures needs to be quantified in the FEIR.

As recommend by MassDEP and DOER, the energy modeling for stationary sources in the FEIR should reflect all of the specific mitigation measures selected for the building design, including the following:

- Interior natural daylighting through clearstory windows and/or skylights;
- High-efficiency lighting and lighting system controls, including motion sensors; The FEIR needs to identify specifically the lighting that will be used and reflect it in the energy modeling.
- Efficient, directed exterior lighting;
- High-albedo roofing materials;
- Energy-efficient mechanical systems and high-efficiency HVAC systems; The FEIR needs to specify the systems that will be used and reflect it in the energy modeling.
- Architectural elements on the façade that accommodate natural ventilation; Window glazing; and
- Independent building control systems.

The DEIR states that the project will strive to meet the Mass LEED Plus program. The Mass LEED Plus standard established by the Sustainable Design Roundtable calls for energy performance in buildings greater than 20,000 sq ft, "to exceed MA Energy Code requirements by at least 20 percent." Meeting this standard would be in keeping with the MEPA GHG Policy which states that the project baseline for energy usage should be based on code-compliant buildings. Therefore, energy mitigation measures for the project must extend beyond meeting the MA State Building Code. However, the FEIR also needs to clarify the standard the project intends to meet. According to the Department of Energy Resources (DOER) the MA LEED plus requirement of 20 percent energy cost savings or as 20 percent energy efficiency over the baseline is not the same as the MA LEED Plus standard issued by the Sustainable Design Roundtable.

As the project design advances, I strongly encourage the proponent to consider the feasibility of incorporating additional measures to reduce GHG emissions. In particular, the DEIR mentions that the proponent is investigating rooftop photovoltaic (PV) systems for the Customer Service Center and micro-wind on the parking structure. In addition, the proponent

has indicated an interest in evaluating the use of PV systems on the parking structure as well. New installation technologies allow for PV units to be arrayed above parking spaces, maximizing utilization of space and solar exposure as well as additional shading of the building below. The proponent should work with the Executive Office of Energy & Environmental Affairs and DOER to assess the feasibility of these measures at the ConRAC parking facility. The proponent's analysis of the feasibility of these measures should take into consideration the likely continued rise in the electricity prices, the continued reduction in the cost of PV, opportunities for third party PV arrays with power purchase agreements, new opportunities for utility ownership of solar installations, and the new requirements and standards in the Green Communities Act, Chapter 169 of the Acts of 2008.

Finally, the proponent should consider the additional energy use required to provide water and wastewater treatment for the project when evaluating the overall GHG reductions that can be obtained through mitigation efforts. The FEIR should include an update on any additional measures incorporated to the project that will help reduce project-related GHG emissions. I encourage the proponent to consult with the MEPA Office concerning the additional analysis required by this section.

Sustainable Design

A development the size of the proposed project presents a host of opportunities for incorporating sustainable design elements and sustainable construction into project design, consistent with the goals of Executive Order 484 and Executive Order 385. Sustainable design elements, over the course of the project design life, can both prevent environmental impacts and reduce operating costs to the proponent. The DEIR states that the site design will:

- Follow sustainable principles/LEED criteria for siting/sustainable sites (e.g., walking distance to public transportation).
- Complete the Phase 2 SWSA Landscape Edge Buffer;
- Enhance pedestrian and bicycle path connections for the community to airport facilities and public amenities such as Memorial Park and the Airport T-Station;
- Locate the garage and support structures to shield the adjacent neighborhoods from airport roadways and aircraft noise;
- Commit to incorporate principles of sustainable design in all aspects of design, construction, and operations; and
- Strive to achieve a LEED Silver level rating and the goals of the MA LEED Plus program.

I remind the proponent that stormwater regulations require that consideration be given to low impact development (LID) and the use of integrated management practices (IMP) for control of stormwater, either alone or in combination with conventional drainage control measures. LID is an approach to stormwater management that minimizes runoff impacts by maintaining and mimicking existing hydrologic functions through site design techniques such as disconnecting

runoff flow pathways and dispersing stormwater control across the site, reducing imperviousness, and minimizing clearing and grading while preserving natural resources and drainage patterns. When combined with pollution prevention measures, LID can be less costly than conventional gutter and pipe drainage system and can provide redundancy for stormwater control.

Drainage/Stormwater

The existing stormwater system for the project consists of catch basins and underground piping that flow to Maverick Street and Porter Street Outfalls. The DEIR states that the project is expected to improve the quality of runoff by upgrading stormwater management facilities site-wide, replacing uncovered vehicle surface parking with buildings and decreasing paved area. The DEIR states that the project will reduce almost three acres of impervious surface area due to new landscape buffer area, along with new and upgraded stormwater facilities would be included as part of the SWSA Redevelopment Program, thus improving the overall stormwater runoff quality from the site. Under Existing Conditions, portions of the SWSA discharge stormwater to the BWSC Porter Street Outfall. The proposed new stormwater system will reduce combined sewer overflow (CSO) discharge volumes and all stormwater will be conveyed to the existing Maverick Street Outfall, which has sufficient capacity for anticipated flow. I note that the NPDES permit (No. 0000787) was issued jointly by USEPA and MassDEP. Therefore, MassDEP's review of the proposed stormwater drainage system for compliance with the stormwater management standards extends to the entire 49 acres of the Southwest Service Area.

The stormwater drainage from the proposed Southwest Service Area is being directed to the Maverick Street outfall, where it may be necessary to attenuate drainage rates sufficiently to avoid CSO overflows, unless a credible and conservative stormwater analysis demonstrates that peak runoff rate controls are unnecessary. In this application, the Rational Method, as described in MassDEP's comment letter, is not appropriate to estimate potential flow attenuation to the CSO outfall. In order to properly evaluate the likelihood of unanticipated CSO occurrences, the FEIR must evaluate the runoff rate using TR20/TR55 method described in MassDEP's comment letter as well as the flow model required to be developed by the NPDES permit for Outfalls 001, 002, and 004.

The MassDEP Stormwater Standard 3 in conjunction with Stormwater Standard 7 requires recharge to be provided to the maximum extent practicable. Given the DEIR indicates the tidally influenced high groundwater is about 6 to 8 below grade, it would appear to be practicable to induce groundwater recharge. Although the DEIR mentions drywells are being investigated, a greater commitment to provide stormwater recharge must be made in the FEIR. In addition, the stormwater management system needs to be designed to treat one inch of runoff multiplied by the impervious area because the project site is a land uses with higher potential pollutant loads (LUHPPL), and stormwater will be discharged to a critical area.

The criteria for compliance with Standard 7 for redevelopment projects are more detailed

under the stormwater regulations than the Stormwater Management Policy. The Stormwater Management Handbooks require submittal of a complete set of computations to demonstrate that the structural best management practices (BMPs) meet standards 2 through 6, in addition to demonstrating that existing conditions have been improved. Because of the requirements for calculations, it cannot be affirmed that the stormwater management system design described in the DEIR is in conformance with the redevelopment standard. This information must be provided in the FEIR.

Wastewater

The DEIR included estimates of project water use and wastewater generation, and it demonstrated that adequate infrastructure exists or will exist to support the water supply and wastewater demands. The DEIR also described the infrastructure improvements necessary to accommodate projected wastewater flows.

The SWSA currently receives potable water from the City of Boston Water and Sewer Commission (BWSC) which obtains water from the Massachusetts Water Resources Authority (MWRA) system. The MWRA handles the wastewater generated from the SWSA, which is ultimately treated at the Deer Island Sewage Treatment Plant in Boston Harbor. The SWSA Redevelopment Program would require 108,300 gallons per day (gpd) of potable water and would generate 89,553 gpd of wastewater (based on DEP Title 5 guidelines). There will be a small increase in water usage and wastewater generation under the 2012 and 2017 Build Conditions due to the increase in vehicles and passengers accessing the consolidated rental car and commercial parking garage. In accordance with the goals of the MA LEED Plus program, the DEIR states that the project will reduce water use demand through the utilization of high-efficient, low flow plumbing fixtures, car wash water reclamation systems, and water efficient landscaping (e.g., use of low-water demand vegetation and native plantings). In addition, the design of the new sanitary and stormwater drainage systems would result in an overall reduction in combined sewer overflow volumes from the Porter Street Outfall and Maverick Street Outfall Drainage Areas.

MWRA is currently completing final design of the federally court ordered East Boston Branch Sewer Relief project intended to bring CSO discharges along the East Boston shoreline into compliance with the federal Clean Water Act and state water quality standards. Any increase in flow to the East Boston system may contribute to greater surcharging and overflows during wet weather. MassDEP, in cooperation with MWRA and its member communities (including Boston), are implementing a flow control program in the MWRA regional wastewater system, to remove extraneous clean water (e.g., infiltration/ inflow (I/I)) from the system.

Pursuant to 360 C.M.R. 10.023(1), the MWRA prohibits the discharge of groundwater to the sanitary sewer system, except in a combined sewer area when permitted by the Authority and the municipality. The proposed construction site of the SWSA Redevelopment Project at Logan

International Airport has access to storm drains and it is not located in a combined sewer area; therefore, the discharge of groundwater to the sanitary sewer system associated with this project is prohibited. Currently, Logan International Airport holds a USEPA-NPDES General Permit for its construction activities. For the SWSA Redevelopment Project, I reiterate as stated in the ENF certificate that Massport must comply with Logan International Airport's USEPA-NPDES General Permit for Storm Water Discharges from its construction activities.

Water Conservation

Although the main sources of GHG from this project are associated with building heating and cooling, lighting, and vehicle travel, the energy required to provide potable water and treat wastewater also will be a source of GHG, and in particular CO₂. The DEIR states that Massport's goal is to reduce water use by about 20 percent and landscape irrigation by 50 percent. The DEIR also indicates that for compliance with MA LEED Plus criteria, water use demand will be reduced by installing high-efficiency low flow plumbing fixtures, car wash water reclamation systems, and water efficient landscaping. As noted above, the FEIR also should quantify the effect of the low-flow fixtures and equipment that will be installed to reduce water demand. To achieve water and energy savings goals, consideration also should be given to using HVAC equipment with advanced evaporator coils, which have been reported to reduce water loss by about 50 percent and energy demand by up to 25 percent. Other mitigation measures appropriate for reducing energy use for water and wastewater are water distribution system improvements to eliminate un-accounted for water losses and infiltration and inflow (I/I) removal from sewer mains, which also is required to offset wastewater generated by the project which has the potential to increase sewer and combined sewer overflows.

Wetlands

The majority of the 49-acre site is not within a wetlands resource area or buffer zone. Wetlands jurisdiction extends to a small section of Harborside Drive within a buffer zone to wetlands, for which a Notice of Intent (NOI) is required to be filed. It also appears that the replacement of tidegates and stone dissipators at the outfall would entail work within coastal bank and land under water. A plan (C-2) in Appendix G (Sheet 2 of 3) shows replacement of tidegates at and/or near the Maverick Street outfall, which should be explained in the FEIR, because there is no mention of this work in the DEIR.

Noise

The DEIR contained an assessment of project-related noise impacts on appropriately sited nearby residential receptors. By consolidating and improving the efficiency of existing rental car operations, the DEIR states that the project will help to reduce overall future noise levels in adjacent neighborhoods. The project would result in the relocation of several existing noise sources away from the adjoining neighborhoods. The relocation of existing Bus and Limousine

Pools to the North Service Area would eliminate the current use of buses on Tomahawk Drive/Hotel Drive Extension and Jeffries Street. The number of shuttle buses serving the facility would be reduced because individual buses for each rental car company would be consolidated into a common shuttle system. In addition, shuttle bus traffic would be relocated farther from the airport property edge and the community in a shielded location on the opposite side of the parking structure and improved traffic-flow patterns for the shuttle buses would reduce or eliminate occurrences of shuttle bus back-up alarms.

Wind Impacts

The DEIR contained an analysis of pedestrian level wind impacts as it relates to air quality impacts associated with the project. The DEIR concludes that the results of a wind analysis demonstrate that the proposed SWSA Redevelopment Program (including the ConRAC facility and associated parking structure) is not expected to have any significant effect on pedestrian-level winds near the project or in the adjoining neighborhoods. The only predicted exception to this is near the corners of the garage structure and only under high wind conditions where planned landscaping in these areas will help minimize these potential effects. The FEIR should provide where available more details to the planned landscaping that will minimize wind conditions.

Visual Impacts

The DEIR contained an analysis of the visual impacts of the proposed project, including elements as viewed from nearby residential areas. The visual impacts are being reviewed by the City of Boston for building design. The FEIR should contain any updates of the visual analysis that occur.

Massachusetts Contingency Plan (MCP)/M.G.L. Chapter 21E

The DEIR contained an update on the status of the clean up efforts on the Release Tracking Numbers (RTN) areas for the site and the additional investigations in accordance with the Massachusetts Contingency Plan (MCP). I note that this project site is being regulated under MGL c. 21E (3-1611). Activities within the SWSA, particularly storage and transfer of petroleum products, have resulted in releases to the subsurface. Releases of Oil and Hazardous Material (OHM) by tenants were reported to MassDEP. According to the DEIR all but one of the RTNs have been closed out, with three resulting in the filing of an Activity and Use Limitation (AUL). The other RTN was assigned in August 2007 and the area is still under investigation. The three AUL areas will require that a soil management plan be developed by a Licensed Site Professional (LSP) and submitted to MassDEP prior to construction within those areas. The DEIR states that decommissioning of the existing rental car facilities will include the removal of older fueling systems and associated tanks (in accordance with applicable public safety regulations), which will be replaced with new state-of-the-art systems. The project will also

include the remediation of subsurface contamination encountered during tank removals or other excavation activities. The DEIR also projects that replacing open surface parking areas with a parking structure would reduce the runoff from parking lots and its incidental hydrocarbon loading. The FEIR should contain any updates on the status of the clean up efforts on the RTN areas for the site.

Recycling Issues

The project includes demolition and reconstruction, which will generate a significant amount of construction and demolition (C&D) waste. By incorporating recycling and source reduction into the design, the proponents would have the opportunity to join a national movement toward sustainable design. The project proponent should be aware there are several organizations that provide additional information and technical assistance, including WasteCap, the Chelsea Center for Recycling and Economic Development, and MassRecycle.

MassDEP commends the proponent in its comment letter for recognizing the importance of materials management within its DEIR filing for the Southwest Service Area redevelopment project. In order to address GHG emissions related to materials management in the FEIR, the FEIR should quantify the GHG impacts of materials management for the project development and projected future operation. By quantifying these impacts, the applicant's GHG mitigation efforts related to materials management can be more clearly identified and targeted appropriately. The FEIR should contain quantification to help guide changes in the project, which provide a comprehensive approach to materials management throughout the design, construction, and operational phases of the project.

Construction Period

The DEIR evaluated construction period impacts, with an emphasis on erosion and sedimentation, evaluation of the existing stormwater system and traffic impacts on adjacent roadways, air quality and solid waste disposal. The DEIR commits to a construction phasing plan that proposes to minimize disruptions in the project area and for the entire airport. Specifically, foundation work, such as pile driving, will be arranged for minimal impact and only occur for a relatively short period of time. Piles will be pre-augured through the upper 60 feet or more of soils, reducing the number of hammer blows required to seat the piles, therefore reducing the noise impact on the community. In order to reduce potential impacts from construction activities, Massport will implement a Construction Management Plan that will include:

- An Erosion and Sedimentation Control Program to minimize construction phase impacts to the nearby water resources.
- A requirement that construction contractors install emission control devices on certain equipment types in order to reduce impacts to air quality.
- Noise attenuation measures such as temporary noise barriers, re-routing traffic and/or

equipment mufflers that may reduce temporary construction noise impacts within the surrounding community. Pile driving will be required to comply with a project-specific noise specification that will reflect the requirements of City of Boston noise ordinances, and will restrict the types of equipment that can be used and may limit the hours when certain activities can take place.

Recycling of the materials resulting from removal of the existing above ground building structures, along with the below-ground foundation slabs and footings, plus all other surface asphalt and concrete that is removed during demolition will divert construction waste from landfills.

I also advise the proponent to require all project contractors to install after-engine emission controls such as diesel oxidation catalysts (DOCs) or diesel particulate filters (DPFs). MassDEP commends the project proponent for committing to installing these devices to reduce engine emissions.

Mitigation/Section 61

The FEIR should include a separate chapter updating commitments to project-related mitigation. This section should include a summary of mitigation commitments as well as draft Section 61 finding language for use by State agencies during each individual permitting process.


The updated Section 61 findings should specify in detail all feasible measures the proponent will take to avoid, minimize and mitigate potential environmental impacts to the maximum extent practicable. Section 61 findings should identify and clarify parties responsible for funding and implementation, and the anticipated implementation schedule that will ensure mitigation is implemented prior to or when appropriate in relation to environmental impacts.

Circulation

The FEIR should be circulated in compliance with Section 11.16 of the MEPA regulations and copies should also be sent to the list of "comments received" below and to Boston officials. A copy of the FEIR should be made available for public review at the Boston Public Library (East Boston Branch), the Revere Public Library, Chelsea Public Library and the Winthrop Public Library.

October 10, 2008

Date



Ian A. Bowles

Comments received:

09/08/2008 Boston Transportation Department

09/08/2008 Susan Parker Brauner
09/23/2008 Avis Budget Group, Dollar Rent A Car, Vanguard Car Rental USA, Dollar Thrifty
Automotive Group, The Hertz Corporation, Enterprise Rent A Car
09/24/2008 Ida LaMattina of Gove Street Citizens Association
09/24/2008 Stacey and Jason Alstrom
09/24/2008 Jeffries Point Neighborhood Association
09/24/2008 Allyson Gray
09/25/2008 East Boston Community Development Corporation
09/25/2008 Environmental Protection Agency
09/25/2008 Richard Salini of East Boston Piers PAC
09/26/2008 Melissa Tyler
09/26/2008 Jonathan Ralton
09/26/2008 Department of Environmental Protection, NERO
09/26/2008 Peter Koff of Engel &Schultz, LLP
09/26/2008 Board of Trustees, Porter 156 Condominium Trust
09/26/2008 Susan Plunkett
09/26/2008 Massachusetts Department of Public Health
09/26/2008 Fred Salvucci
09/26/2008 Response to Comments from the Proponent
09/29/2008 Wig Zamore

IAB/ACC/acc