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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME	: Quincy Bus Maintenance Facility
PROJECT MUNICIPALITY	: Quincy
PROJECT WATERSHED	: Boston Harbor
EEA NUMBER	: 16267
PROJECT PROPONENT	: Massachusetts Bay Transportation Authority
DATE NOTICED IN MONITOR	: September 9, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project d**oes not require** an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the Massachusetts Bay Transportation Authority (MBTA) is proposing to construct and operate a new bus maintenance and storage facility (BMF) in Quincy at 599 Thomas Burgin Parkway to replace the existing facility on Hancock Street. This project is identified as an operational priority and the first component of the Bus Facility Modernization Program which involves construction, renovation, and expansion of BMFs throughout the MBTA service area to expand capacity for newer buses, including the ability to support battery electric buses (BEBs), provide a modern workspace and support the MBTA goals for resiliency and sustainability. According to the ENF, the MBTA does not have any BMFs that can accommodate a fleet of BEBs and the Hancock Street BMF is becoming functionally obsolete and cannot be upgraded to accommodate a new and modern bus fleet. The BMF will be designed to support diesel-hybrid buses and to allow for future conversion to a BEB fleet informed by results from MBTA's BEB pilot program and advances in bus electrification technology.

The project proposes construction of a 351,000-square feet (sf) two- to three-story BMF to support up to 135 MBTA buses including 75,000 sf of warehouse and office space; an exterior bus queuing area for 30 buses; gated access from Quincy Adams MBTA station for employees; 235 employee surface parking spaces; and stormwater improvements. The BMF will provide industrial spaces for interior bus storage, maintenance, fueling, washing, and office space for administration and management to support the fleet and other purposes. All transit-vehicle maintenance and storage functions will be performed indoors to minimize bus idling and protect buses from the elements. The project also proposes to extend Columbia Street (Columbia Street Extension) to provide secondary access for MBTA buses and employees; signalize the intersection of the new Columbia Street Extension and Burgin Parkway for use by buses and adjacent businesses; and construct a shared-use path on-site to connect neighborhoods west and north of the site to Burgin Parkway and the Quincy Adams MBTA station. The project will require approximately 0.32 acres of acquisitions by MBTA through permanent land takings or easements including 0.29 acres at 84 Penn Street as part of the development of the Columbia Street Extension and an approximately 0.02-acre area associated with the adjacent Deco Apartments to support changes to Penn Street and the retaining wall in association with the proposed shared-use path.

Project Site

The 13.13-acre project site is comprised of the 12.81-acre parcel previously developed as a Lowe's store located at 599 Thomas Burgin Parkway in addition to approximately 0.32 acres which will be acquired by MBTA (0.29 acres at 84 Penn Street and 0.02 acre at the Deco Apartments property). The project site is generally bounded by Thomas Burgin Parkway to the east; Grasso Park and Columbia Street to the west; Columbia Street, Penn Street and commercial properties to the north; and Penn Street and the Deco Apartments to the south. The southern portion of the site abuts the northern and western boundary of the Deco Apartments. The project site contains a former Lowe's Home Improvement Store (steel framed, one-story building) that occupies the eastern portion of the site and associated parking and infrastructure. According to the ENF, the Lowe's ceased operations in 2019; the building will be demolished as part of this project. The project site contains open channel and culverted segments of the Town Brook which flows generally north to south through the site. The southern portion of the site includes approximately 2.59 acres of woods and wetlands associated with Town Brook. The Quincy Adams Station is located south of the site across Burgin Parkway.

Wetland resource areas located on-site include Bordering Vegetated Wetlands (BVW) and its 100-foot Buffer Zone, Land Under Water (LUW), Bordering Land Subject to Flooding (BLSF), Bank and its 100-foot Buffer Zone, and Riverfront Area (RFA) associated with Town Brook. According to the ENF, the site is located within a Zone AE (100-year flood or one percent annual chance flood probability), as shown on the FEMA Flood Insurance Rate Map (FIRM) (Map No. 25021C0207E, effective July 17, 2012), and a regulatory floodway is associated with the open channel portion of Town Brook. The site is located within the City of Quincy's Flood Plain Overlay District (FPOD).

Previous MEPA Review

The Lowe's Home Improvement Store project (EEA #14222) previously underwent MEPA review in 2008 on the project site. As described in the Expanded Environmental Notification Form (EENF) for EEA #14222, the project involved redevelopment of a 16.3-acre parcel of commercial and

industrial property in Quincy with an approximately 154,000-sf Lowe's home improvement retail store with attached garden center. The project site also contained a 2.3-acre parcel located in the southeasterly corner of the site, which would remain vacant for potential future development. The project categorically required submission of an EIR pursuant to 301 CMR 11.03(6)(a)(6) for generation of more than 3,000 average daily trips (adt). The EENF included a request to submit a Single EIR. The Single EIR (submitted for MEPA review in September 2008) included a discussion of the project's impacts regarding wetlands (in particular, floodplain) and stormwater management, and identified mitigation commitments.

The Certificate on the Single EIR was issued on October 31, 2008 and indicated that it adequately and properly complied with MEPA and its implementing regulations. The Lowe's store was constructed subsequent to MEPA review. As previously mentioned, the Lowe's store ceased operations in 2019, and the building remains vacant.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include alteration of 0.04 acres of land; permanent and temporary alteration of 205 sf of BLSF, 23,700 sf of RFA, and 820 sf of Buffer Zone to Bank;[1] and use of an additional 7,308 gallons per day (gpd) of water (total of 15,800 gpd). The project will generate 1,092 fewer adt (total of 2,358 adt including employee trips and bus trips), construct 164 fewer parking spaces (total of 235 spaces), and generate 920 less gpd (total of 6,800 gpd) as compared to existing conditions when factoring in prior operations at the Lowe's store.

Measures to avoid, minimize and mitigate Damage to the Environment include reduction of 424 sf of impervious area from existing conditions; implementation of compensatory storage for loss of flood storage; construction and management of an upgraded stormwater management system; construction of pedestrian and bicycle accommodations; and implementation of construction-period best management practices (BMPs). MBTA does not propose mitigation for impacts associated with traffic and noise.

Jurisdiction and Permitting

This project is subject to MEPA review and preparation of an ENF pursuant to 301 CMR 11.03(3)(b)(1)(e) and 301 CMR 11.03(3)(b)(1)(f)[2] because it requires Agency Actions and will involve new fill or structure or expansion of existing fill or structure in a velocity zone or regulatory floodway, and will alter one-half or more acres of other wetlands (RFA). The project requires a Sewer Use Discharge Permit from the Massachusetts Water Resources Authority (MWRA).[3]

The project will require an Order of Conditions from the Quincy Conservation Commission (or, on appeal only, a Superseding Order of Conditions from the Massachusetts Department of Environmental Protection (MassDEP)), a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA), Section 7

[1] Supplemental information submitted by MBTA on October 21, 2020 provides revised impact estimates for BLSF and RFA.
[2] The ENF does not identify 301 CMR 11.03(3)(b)(1)(f) as a threshold exceeded by this project.
[3] The ENF erroneously identifies that the project requires a Direct Master Permit – Sewer Connection Permit or Amendment from MWRA. Supplemental information confirms that the project, instead, requires a Sewer Use Discharge Permit.

Consultation (Endangered Species Act (ESA)) from the U.S. Fish and Wildlife Service (USFWS), and review by the Federal Transit Administration (FTA) and Massachusetts Historical Commission (MHC) State Historic Preservation Office pursuant to the National Historic Preservation Act of 1966 and M.G.L. Ch. 9, as amended by Ch. 254 (950 CMR 71.00). The project may require review and/or coordination with U.S. Army Corps of Engineers (ACOE).

Because MBTA is the Proponent proposing to undertake the project, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the ENF

The ENF provides a description of existing and proposed conditions, project plans, a discussion of project alternatives (including a site selection matrix), and identifies measures to avoid, minimize, and mitigate project impacts. It also includes a transportation study, air quality analysis, and noise impact study. MBTA provided supplemental information during the MEPA review period on October 8, and 21, 2020 to address questions regarding bus electrification and BEB performance including its BEB pilot program; respond to comments on the ENF including clarification regarding impacts to wetland resource areas and the approach to analyzing impacts to floodplain based on more accurate site data, flood control improvements and evolving FEMA mapping; and to describe MBTA's compliance with the Global Warming Solutions Act (GWSA). For purposes of clarity, all supplemental materials provided by the Proponent are referred to herein as the ENF unless otherwise referenced.

I acknowledge the numerous comments received from residents of Massachusetts, the City of Quincy (City), the Zero-Emission Vehicles Coalition (ZEV)[4], A Better City, members of the Quincy Climate Action Network and others which request that MBTA address climate change and facilitate meeting the targets of the GWSA by designing and constructing the proposed BMF to accommodate a complete fleet of BEBs in 2024; immediately converting some of the fleet to BEBs; and developing a plan to increase the number of BEBs in the fleet once the BMF is constructed and completely eliminate the use of diesel buses. Comments from the City, ZEV, and others express concern that the City and surrounding communities are subject to high amounts of particulates and greenhouse gas (GHG) emissions based on the use of the current BMF on Hancock Street to maintain the oldest diesel MBTA buses where other communities benefit from more fuel efficient less polluting hybrid buses. Comments emphasize that MBTA should commit to maintaining a sizeable number of BEBs, which are even less polluting than hybrids, in 2024 based on the rapid advances in technology that are improving operations of BEBs and decreasing their cost.

Based on a review of the ENF, supplemental information provided by MBTA, consultation with State Agencies, and review of comment letters, I do not find that a discretionary EIR is warranted. While I acknowledge the concerns expressed regarding the proposed transition to BEBs, supplemental information summarizes the operational challenges associated with MBTA's current pilot program of five BEBs operating on its Silver Line routes including the long time required for charging, the short

[4] Participants of ZEV include Conservation Law Foundation, Massachusetts Public Interest Research Group, Massachusetts Sierra Club, Transit Matters, Alternatives for Community & Environment, Union of Concerned Scientists, The Transportation Working Group of 350 Mass, Institute for Transportation and Development Policy, and Green Energy Consumers Alliance.

operating range (decreases as battery degrades and in colder temperatures), and short operating time. In addition, transition to a larger fleet of BEBs would require significant operational changes to locate charging infrastructure and coordinate the scheduling and charging of BEBs. MBTA indicates that it plans to present, in an upcoming board presentation, near-term and long-term strategies to support the bus fleet and facilities, including a recommendation on the best approach to expanding its BEB fleet incrementally over time as technology advances. As described in supplemental information, MBTA and the Massachusetts Department of Transportation (MassDOT) are engaged in statewide efforts to reach the Commonwealth's GHG reduction goals under the GWSA, including compliance with regulatory requirements under 310 CMR 60.05 and employment of transportation demand management (TDM), energy efficiency, and renewable energy strategies at its facilities. MassDOT is a partner in the Commonwealth's efforts to reduce transportation emissions on a statewide scale. Given these factors, and the limited application of other MEPA review thresholds, further MEPA review is not warranted.

MBTA indicated at the consultation session that it will work closely with National Grid to ensure that there is sufficient electrical power at the site to service a large fleet of BEBs. Comments from the City indicate that MBTA should ensure that the electric demand of a fleet of BEBs is not a limiting factor to their adoption and notes bus storage within the proposed BMF will allow batteries to be charged more fully in cold weather). Commenters encourage MBTA to also explore options to address concerns regarding range, including considering of en-route charging or auxiliary heating.

The issuance of this Certificate with a determination that an EIR is not required does not signify the conclusion of public engagement. MBTA has indicated a commitment to continuing an active and robust stakeholder engagement process through subsequent permitting. I encourage the MBTA to continue to engage the public in review of this project through final design and permitting.

Alternatives Analysis

The purpose of the project is to replace an antiquated facility with a modern BMF to accommodate newer buses and expand maintenance and storage capacity including future conversion to a BEB fleet. MBTA considered on-site alternatives that would use the existing 3.76-acre site at 954 Hancock Street in Quincy which is limited to 86 buses including replacement of an existing building on same parcel (Alternative 1) and expansion of the existing site (Alternative 2). Alternative 1 would accommodate a modernized fleet and be equipped to transition to BEBs but it would not meet the project purpose because it would not accommodate proposed growth in the fleet size nor improve maintenance capabilities due to limited areas on the parcel for building expansion and site constraints associated with grades and wetlands. Alternative 2 would require acquisition of adjacent parcels totaling 4.5 acres to enlarge the site, which was still deemed too small to accommodate the project purpose because MBTA determined that ten or more usable acres are needed to accommodate the expanding MBTA fleet, improved maintenance capabilities, and circulation on the site. Alternative 2 was also deemed infeasible because of the complexity of construction required to upgrade the facility.

MBTA evaluated eight alternative locations to meet the project purpose including: 599 Burgin Parkway (Preferred Alternative), 1800 Crown Colony Drive and 465 Centre Street in Quincy; and 360 Wood Road, 10-40 Plain Street, 125 Union Street, 257 Ivory Street, and combined 125 Union Street/257 Ivory Street in Braintree. It identified selection criteria which would address aging infrastructure, accommodate a modernized fleet, and improve system operations. Potential sites were screened using the following criteria to meet the project purpose: vacant or available for lease/sale; parcel size

(minimum of 10 useable acres) and ability to accommodate the bus fleet; deadhead (non-revenue) miles to Quincy Center; access to/from the site, including adjacent road network and traffic control; internal site circulation; environmental impacts; consistency with land use; and site development risk. The ENF includes a site selection evaluation matrix which provides a comparison of the alternative locations.

The ENF indicates that the Crown Colony Drive, Wood Road and Plain Street sites were encumbered by environmental constraints and the developable area of the Crown Colony Drive and Wood Road sites would not accommodate the project without structured parking or a program reduction. The Union Street and Ivory Street sites were too small to accommodate the project. Sites with active businesses, including Centre Street (The Home Depot) and Ivory Street (Braintree transfer station) were deemed undesirable and impractical for MBTA to pursue. In addition, use of the Wood Road and Plain Street locations would result in higher operating costs due to the distance from the Quincy Center busway. The combined Union Street/Ivory Street site was dismissed because of the challenge to internal circulation based on the irregular parcel shape, site grading and existing landfill infrastructure; distance from Quincy Center; and the presence of an active business on the site.

Wetlands and Stormwater

Supplemental information provided revised impact estimates for alteration of wetland resources areas. The project will permanently impact approximately 820 sf of Buffer Zone to Bank, 205 sf of BLSF and 23,290 sf of RFA and temporarily impact 410 sf of RFA (total of 23,700 sf of impact within RFA). The project proposes to decrease impervious area at the project site by 424 sf. The Quincy Conservation Commission will review the project to determine its consistency with the Wetlands Protection Act (WPA), the Wetlands Regulations (310 CMR 10.00), and associated performance standards, including the Massachusetts Stormwater Management Standards (SMS).

MassDEP comments indicate that the ENF does not provide an adequate evaluation, explanation or description of the impacts of the project on wetland resource areas, nor demonstrate how the project will meet applicable performance standards for RFA, BLSF, or stormwater Management. The ENF does not provide plans identifying the location of RFA or the area of impact, or locations and elevations of proposed fill in BLSF or compensatory flood storage. The ENF indicates that improvements will be made to the existing stormwater system located on-site but does not describe them nor provide information regarding use of BMPs and how they will meet performance standards for redevelopment.

The ENF indicates that impacts to floodplain are associated with widening Penn Street to provide internal site circulation. Penn Street would be widened west of Deco Apartments into the floodplain and a portion of the retaining wall along Penn Street would be reconstructed. Supplemental information attempts to explain the complexity in floodplain evaluation on-site based on previous studies associated with the Lowe's project, in which that proponent (Lowe's Home Centers, Inc.) performed an assessment and conducted calculations that took into account new flood-control improvements that were implemented by the City and ACOE as part of the Town Brook Flood Control Project. These improvements, as described in the Lowe's MEPA filings and its NOI, resulted in a reduction in the incidence of flooding on the site and a lowering of the floodplain elevation significantly, as compared to the 1988 FEMA mapping based on the extensive ACOE drainage and flood study (July 1985). Supplemental information indicates that based on the Lowe's calculations, a small portion of the proposed BMF project will result in approximately 205 sf of permanent impact to BLSF representing 150 cubic feet (cf) of fill below the calculated 100-year floodplain elevation. However, according to the

supplemental information, based on the 2020 Preliminary FEMA FIRM map that is due for publication in 2021, no work would be proposed within the floodplain. The new Preliminary FIRM map identifies the 100-year flood elevation to be at 27.3 feet NAVD88. Given the changing conditions associated with the definition of the floodplain on-site, MBTA will work with the City to gain a better understanding of this issue and will incorporate floodplain considerations into the ongoing design development. MBTA commits to developing the required compensatory storage relative to the ultimate determination of the extent of BLSF fill to comply with the WPA. MBTA intends to prepare a request for a Letter of Map Revision and to submit data to support a No-Rise Certification for the floodway, if necessary, based on the most current information that can be obtained from DCR and the City. I anticipate that this issue will be resolved in permitting.

According to supplemental information, impacts to RFA include alteration of an undeveloped area to improve the Penn Street turning radius by relocating the retaining wall slightly further into the RFA which will alter approximately 450 sf of undeveloped RFA and 410 sf of additional temporary impact for wall construction. This area falls within the inner riparian area and is associated with the need to provide safe internal site vehicular circulation. To accommodate the turn on Penn Street, coming in from Burgin Parkway, Penn Street would bow out into the RFA and a retaining wall would be constructed to minimize grading and impact. As part of the Notice of Intent (NOI), MBTA will present a more detailed, engineered on-site alternatives analysis of work in RFA. The remaining 22,840 sf of impact to RFA is within areas of existing parking lot, building, and travel ways.

The Lowe's project included construction of a stormwater management system within the last decade to comply with the SMS. The eastern portion of the site drains into a series of BMPs before discharging to Town Brook. While the existing stormwater management system may be able to accommodate the proposed project because there is no increase in impervious area, MBTA commits to further upgrading the system to comply with the WPA including the SMS to improve stormwater quality and manage volume. Currently the design of the proposed stormwater management system is at a conceptual level (15 percent). MBTA will address design comments as the project design advances and coordinate with the City Engineer and Conservation Agent. Specific details will be identified, including calculations and design specifications, and submitted as part of the NOI for the project. Preliminary design includes a reduction in pavement, raingardens, potential for a green roof, landscaping plantings, detention and retention of stormwater dependent on site constraints, and removing the direct discharge of parking lot drainage to Town Brook and redirecting it through a new water quality structure and underground detention system.

Supplemental information provided by the MBTA describes the project's consistency with the SMS and indicates that the stormwater management system will meet the SMS for a redevelopment project. The project will improve existing discharges to Town Brook; reduce post-construction discharge rates; incorporate environmentally sensitive site design including low impact development (LID) techniques. It is the MBTA's intent to meet TSS standards to the maximum extent practicable, using BMPs. There will be no contributing drainage from activities (e.g., bus wash, steam bay, or general maintenance) from inside the BMF building since those will be captured and be part of the facility wastewater, not stormwater. The project would meet requirements in stormwater discharge for oil and grease, TSS, and other water quality parameters, and is incorporating a substantial underground storage component to address peak runoff attenuation requirements. Since the existing site already consists of a large building, parking lot, and roadway, the fundamental characteristics of stormwater are not anticipated to change significantly, but the MBTA's commitment is to improve current design

performance, reflecting the MBTA's commitment to sustainability and protecting the environment.

I refer MBTA to comments from DCR regarding floodplain management and associated permitting requirements. DCR's Flood Hazard Management Program (FHMP), under agreement with the FEMA, is the state coordinating agency for the National Flood Insurance Program (NFIP) and provides technical assistance to communities that participate in the NFIP. Communities that participate in the NFIP, such as Quincy, are required by FEMA to regulate development within the 100-year floodplain to meet or exceed minimum standards established by FEMA (44 CFR 60.3) and are required to adopt the NFIP requirements through locally enforceable measures. Many of the requirements contained in 44 CFR 60.3 are enforced through state regulations such as the State Building Code and WPA regulations; the City also has a zoning ordinance that includes a Floodplain District section.

MBTA intends to prepare a request for a Letter of Map Revision (LOMR) and to submit data to support a No-Rise Certification for the floodway. Compliance with the requirements of several federal and state measures related to floodplain development will be required; the extent of regulatory impact cannot be established until MBTA provides FEMA documentation of the exact nature of the floodplain post-LOMR to demonstrate that the project will not result in any increase in flood levels during the occurrence of the one-hundred year flood, in a floodway.

Proposed structures located in the floodplain will be required to meet the standards of applicable sections of the State Building Code for construction in floodplains including Section 1612, Flood Loads, and ASCE 24-14, Flood Resistant Design and Construction. Designs for structures in floodplains must be certified by a registered design professional. If the finished structure will not be elevated above the base flood, designs for dry-floodproofing must comply with the State Building Code.

Traffic and Transportation

MBTA will work with the City to review and receive input on all traffic and roadway-related mitigation as the project design is advanced. The ENF includes a Traffic Analysis which indicates traffic impacts associated with the project are generally expected to be less compared to the former Lowe's store, which generated higher trip generation for retail use. For this project, the majority of trips (employee and buses) will occur outside the peak hours of background traffic. Traffic counts were collected for 10 intersections in the Study Area. Data from the existing BMF were used to project bus and employee trips at the proposed BMF. The traffic analysis was based on potential full build out of 135 buses at the project site. All intersections are expected to experience no change in Level of Service (LOS) associated with the project except the Burgin Parkway/Penn Street/MBTA driveway which decreases from an overall LOS A to B in both peak hours between the 2027 No-Build and Build conditions creating a slight delay. This change is based on elimination of one of the two northbound left-turn lanes on Burgin Parkway at Penn Street/MBTA driveway to improve safety by increasing the width of the median to accommodate pedestrians who may be stopped mid-crossing and will also reduce the pedestrian crossing distance.

The project will create a new access point at the north end of the site for buses and other vehicles by extending Columbia Street to Burgin Parkway. This new intersection of Columbia Street/Burgin Parkway will be signalized with a left-turn pocket to allow northbound traffic to turn safely. The ENF estimates that 40 percent of the employee vehicles will access the site using this entrance, and 60 percent will use the Penn Street access (buses will primarily use the Penn Street/Burgin Parkway intersection to

access the BMF). This new access point will be restricted to MBTA and adjacent businesses only, while improving circulation of vehicles into and out of the site. The new access location is designed to better serve transit trips that originate to the north of the site and to provide secondary access to address emergencies. In response to the City's comments regarding restricting movements at the new access location to right-in/right-out, MBTA indicates that it proposes full access to avoid limiting its operational usefulness (because buses and commercial vehicles require access north on Burgin Parkway). Construction of the new intersection will include work along Burgin Parkway to develop turn lanes, add traffic signals and new pavement markings, relocate an existing overhead directional sign, construct new Americans with Disabilities Act (ADA)-compliant curb ramps, and connect to the sidewalk just north of the new intersection. The pedestrian crossing will include crosswalks and a concurrent pedestrian phase. Traffic signals will be coordinated for the intersections in the project area.

MBTA will construct/reconstruct sidewalks and crossings through and adjacent to the project site (including the site frontage along Burgin Parkway) to connect to the existing sidewalk network and maintain and enhance connectivity between surrounding neighborhoods, Burgin Parkway, and the Quincy Adams Station. In addition, a separate shared-use path will be constructed along the retaining wall on the southernmost section of the parking lot to provide a pedestrian and bicycle connection from Columbia Street to Penn Street, Burgin Parkway and the Quincy Adams MBTA Station. The proposed Project includes crossing improvements to the Burgin Parkway/ Penn Street/MBTA Quincy Adams Station intersection to promote safety for pedestrians. Bike racks are proposed near building entrances. Bicycle infrastructure such as bike storage facilities, bike lanes, or paths connecting the facility to adjacent streets and other bicycle networks will be provided, to the extent practicable.

Wastewater

The site is served by the municipal sanitary sewer system that conveys flows to MWRA's High Level Sewer and ultimately to the Deer Island wastewater treatment plant. Sections of both sewer systems can surcharge in large storms, due to high levels of infiltration and inflow (I/I) that enter tributary community systems. MBTA should investigate all on-site drainage and sewer systems to ensure that stormwater does not enter the sanitary sewer system and on-site sewer service pipes (existing, rehabilitated or replaced) are free from excessive I/I.

The project will increase water use by 7,308 gpd and decrease wastewater generation by 920 gpd compared to estimates associated with the former Lowe's store. The ENF provides a breakdown of sanitary wastewater and industrial wastewater; it does not provide additional information on water use. The ENF indicates that the design of the new BMF will incorporate water reuse, to the extent feasible, to minimize the generation of wastewater. According to MWRA comments, MBTA provided additional information to MWRA to clarify that the project will lower industrial wastewater generation from an estimated 12,000 gpd to 1,800 gpd by recycling 85 percent of the water needed for the bus wash system. Total wastewater generation estimated for the project is approximately 4,400 gpd which includes an additional 2,600 gpd of sanitary wastewater.[5]

MBTA is prohibited from discharging groundwater or stormwater to the sanitary sewer system associated with this project. The ENF indicates that the project will require a Direct Master Permit or Amendment from MWRA; however, MBTA submitted additional information to MWRA to clarify that

[5] The ENF indicates that the project will generate 6,800 gpd.

this permit/amendment references the requirement for a Sewer Use Discharge Permit from MWRA. The project will require a new Sewer Use Discharge Permit from MWRA prior to discharging bus washing and maintenance wastewater associated with the project into the MWRA sanitary sewer system because the new facility is proposed in a different location than the existing MBTA bus facility in Quincy. Any gas/oil separators in parking garages associated with the project must comply with 360 C.M.R. 10.016 and State Plumbing Code. Installation of the proposed gas/oil separator(s) may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector.

Environmental Justice

A significant portion of Quincy is characterized as an EJ area (47 percent). The Massachusetts Geographic Information System (MassGIS) Environmental Justice (EJ) Viewer identifies the project site within and adjacent to minority, low-income, and English-language isolation EJ areas including neighborhoods in North Quincy, South Quincy, Quincy Point, and Germantown. According to the ENF, the City of Quincy has a diverse population with approximately 31 percent foreign-born. While the project did not formally trigger the requirements for enhanced EJ outreach or review under EEA's EJ policy,[6] the ENF addressed measures taken to conduct targeted outreach to EJ communities and address the potential for adverse impacts to these communities as part of MBTA's requirements pursuant to Title VI. Title VI is a law that prohibits discrimination by recipients of federal funding, such as the MBTA, on the basis of race, color, or national origin, which includes the denial of language access to limited English proficient (LEP) persons.

The proposed BMF is intended to increase reliable bus service locally and allow MBTA to initially support hybrid buses and transition its fleet to BEBs. These improvements would minimize impacts associated with future traffic increases on the existing transportation network due to the predicted rate of growth in Quincy and surrounding communities. The ENF maintains that an increase in capacity will benefit EJ populations by improving connectivity, creating a more resilient transportation network for travel within the Greater Boston region, meeting the demand for affordable mobility, and providing better access to cleaner transit service. The project will not displace any residents or businesses in EJ areas, nor separate EJ neighborhoods. The ENF indicates that the project will not result in long-term air quality, water quality, noise, or hazardous waste impacts that will impact EJ populations. Furthermore, it asserts that the project will not include disproportionately high and adverse impacts to EJ populations.

According to the ENF, approximately 20.3 percent of the population in the project area have limited English proficiency, and the majority of this group speaks Chinese. The ENF describes MBTA's public engagement process for this project. Meeting notices and announcements were published in English, Cantonese, and Vietnamese, and translation was provided at public meetings upon request. Public involvement events associated with the project will continue to provide opportunities for involvement in the environmental review process, including for EJ communities. MBTA will communicate with the public and abutters before and during construction and will seek public input regarding potential construction-period impacts that require mitigation. Measures to minimize construction impacts on the local community will be implemented to the greatest extent practicable, including maintaining access from the neighborhood to the Red Line Station and other surrounding areas during construction, minimizing disruption to the traveling public and local residents, and utilizing

[6] See https://www.mass.gov/files/documents/2017/11/29/2017-environmental-justice-policy_0.pdf.

BMPs for reducing lighting, noise, and dust impacts. The proposed BMF is not expected to result in significant noise impacts at residences along Burgin Parkway or the Deco Apartments because noisy activities (e.g., bus wash) will be enclosed and set back from noise-sensitive areas. Slight noise impacts are anticipated at these locations from bus and employee vehicle trips.

MBTA's Disparate Impact/Disproportionate Burden Policy (2017) is an equity analysis policy centered around three key concepts that MBTA defines with input from the public. According to the ENF, an analysis of the potential for alternative siting locations to have disparate impacts to minority populations and disproportionate burden on low-income populations indicated that none of the potential sites met thresholds for disparate impacts or disproportionate burdens, and none will result in displacements.

Climate Change Adaptation

Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth (EO 569; the Order) was issued on September 16, 2016. The Order recognizes the serious threat presented by climate change and directs Executive Branch agencies to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The Order seeks to ensure that Massachusetts will meet GHG emissions reduction limits established under the Global Warming Solution Act of 2008 (GWSA) and will work to prepare state government and cities and towns for the impacts of climate change. The MEPA statute directs all State Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and other effects, when issuing permits, licenses and other administrative approvals and decisions pursuant to M.G.L. c. 30, § 61. The Massachusetts Department of Transportation, under which MBTA operates, is engaged in efforts to assess the potential impacts of climate change on State transportation infrastructure. I expect that MassDOT and MBTA will consider the impacts of climate change, including increased frequency and intensity of precipitation events when designing project elements. Based on the Preliminary FEMA FIRM, the site would be located in a low risk flood area and would not be directly impacted by sea level rise.

The ENF indicates that the project will prioritize sustainability and resiliency. MBTA commits to design the facility to meet the goals and standards identified in the Leadership in Environmental and Energy Design (LEED) and Envision rating systems (tracking toward a Gold level in both categories) and Executive Order Number 484 – Leading by Example (LBE). However, it has not yet established a specific target for these programs, each of which requires that the project exceed State Building Code. The proposed BMF and associated site will incorporate best practice sustainability and resiliency design measures that address the environmental, social, and economic needs while protecting its efficiency and functionality long-term in the face of changing climate conditions. MBTA facilities must address regional resiliency threats such as sea-level rise, flooding, increasing intensity and frequency of storms, extreme temperatures, and increased snow and blizzard events to remain operationally efficient and effective. According to supplemental information, based on the Preliminary FEMA FIRM due for publication in 2021, the project will fall outside of the one percent chance flood, and, nonetheless, the Finished Floor Elevation (FFE) will be set above the 0.2 percent (500-year) chance storm to add a factor of safety. MBTA commits to installing the maximum number of solar panels on the facility roof. The generation size will be calculated when the final design of the roof is determined. The same approach will apply for proposed solar canopies on the employee parking lots. In addition, the ENF indicates that MBTA is assessing implementation of green roof or a combination of green roof/solar arrays, water

reclamation, and subsurface stormwater retention. I strongly encourage MBTA to consider climate change data in designing the proposed BMF.

The proposed BMF will be the first facility in the MBTA system that can accommodate BEBs. The facility will house hybrid-electric buses upon opening and will later transition to BEBs when these vehicles are integrated into the MBTA's fleet. The new facility is expected to improve fleet reliability and resiliency by allowing modern vehicles including BEBs to operate on all Quincy facility bus routes. The site's new power substation will be a stand-alone building designed with a high level of redundancy to safeguard facility operations in the case of an emergency. The station is designed around two parallel utility feeds to support full operations. The facility will be served by both emergency power and standby power generators to provide enhanced capacity to support life safety, critical facility operations, and bus service to the public. In addition, MBTA will soon be starting a system wide assessment for battery storage to determine the best sizes and locations based on electrical needs, available real estate, interconnection, financial implications, etc. The proposed BMF will be one of the locations considered in the assessment. As noted, the MBTA has described technological and operational constraints that hinder the immediate deployment of an all-electric bus fleet, and has committed to continuing to partner on statewide efforts to reduce GHG emissions in the transportation sector to meet GWSA goals. I expect and encourage both MBTA and MassDOT to continue in these efforts.

Hazardous Materials

The ENF summarizes past releases of oil and/or hazardous materials (OHM) at the project site pursuant to the Massachusetts Contingency Plan (MCP; 310 CMR 40.00). All Release Tracking Numbers (RTNs) have been closed with permanent solutions. Two Activity and Use Limitations (AULs) exist on the site. An AUL associated with RTN 3-0022158 (filed in 2010) is related to an area of parking lot on-site which includes a protective cover over remaining petroleum-impacted soils and specific restrictions for land use. Any excavation work within the limits of the AUL area will be performed under a Soil Management Plan prepared by a Licensed Site Professional (LSP) and a Health and Safety Plan. The second AUL, associated with RTN 3-0028197 (filed in 2011), identifies restrictions for land uses relating to area that involves historical fill materials with elevated levels of lead and other metals on the south end of the property between Town Brook and the Burgin Parkway overpass for Centre Street. The project does not propose work in this area.

Construction Period

The ENF describes construction sequencing for the project. The proposed BMF will not be constructed in phases; however, the Lowe's parking lot will be used for temporary replacement MBTA commuter parking while two parking garages (Quincy Adams and Braintree) are under construction (unrelated to the BMF project) and while the design of the proposed BMF advances. MBTA will improve the pedestrian crossing at the Burgin Parkway/Penn Street/Quincy Adams Station intersection to connect commuters from the Lowe's parking lot to the Quincy Adams Station, which will also address pedestrian safety across Burgin Parkway. In addition, the Lowe's building will be used by MBTA for storage purposes before it is demolished because existing warehouse space will be expiring soon. Project construction is anticipated to commence in 2022 and operations will commence in 2024.

Construction of the project will include: demolition of the Lowe's building; reconstruction of the parking lot including islands and lighting; construction of a new stormwater management system for the

parking lot and drive aisle; relocation of utilities; relocation of the retaining wall to facilitate vehicular turns (removal/reconstruction of portions of the retaining wall to accommodate a fire lane); extension of Columbia Street to Burgin Parkway through the W.C. Canniff site and realignment/reconstruction of a portion of Columbia Street at Penn Street; installation of a new traffic signal at the new Burgin Parkway/Columbia Street Extension intersection; construction of a new sidewalk along Burgin Parkway to connect the Columbia Street Extension to Penn Street; and landscaping unused open space to provide both vegetated cover and screening.

All construction and demolition (C&D) activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). MBTA will install BMPs on the project site to control erosion and sedimentation during the construction period and will prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES CGP. The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). Consistent with the GreenDOT policy directive, MBTA requires that contractors install emission control devices in all off-road vehicles. MassDOT's Revised Diesel Retrofit Specification also requires that emissions control standards must be met or technology must be used for non-road, diesel-powered construction equipment in excess of 50 horsepower. Contractors will be instructed to limit engine idling and use ultra-low sulfur diesel fuel. If OHM are found during construction, MBTA should notify MassDEP in accordance with the MCP. All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage MBTA to reuse or recycle C&D debris to the maximum extent.

Conclusion

The ENF has adequately described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on review of the ENF and comments received on it, and in consultation with State Agencies, I have determined that an EIR is not required.

K. Theoharides

November 6, 2020
Date

Kathleen A. Theoharides

Comments received:

09/15/2020 Anneli Johnson
09/18/2020 Polly Lev
09/21/2020 Shelly Dein, City of Quincy
09/21/2020 Willa Bandler
09/22/2020 Mike Cotter and Cyndy Roche Cotter
09/24/2020 Robert Kearns
09/24/2020 Anthony Sansevero

09/25/2020 Massachusetts Department of Conservation and Recreation (DCR)
09/25/2020 Andee Krasner
09/25/2020 Annie Rogove
09/25/2020 Asa Hopkins
09/25/2020 Beth Kates
09/25/2020 Brian Mahoney
09/25/2020 Chris Mullin
09/25/2020 Christian Madsen
09/25/2020 D. Meservey
09/25/2020 Jodi Hilton
09/25/2020 Kate Raisz
09/25/2020 Kim Larkin
09/25/2020 Martin Solomon
09/25/2020 Mary Loeken
09/25/2020 Michaela Nielsen
09/25/2020 Montserrat Zuckerman
09/25/2020 Nancy Selvage
09/25/2020 Norah Dooley
09/25/2020 Paul Green
09/25/2020 Peter Katz
09/25/2020 Ruthann Rudel
09/25/2020 Sarah Grant
09/25/2020 Schuyler Laird
09/25/2020 Sean Leach
09/25/2020 Teresa Rodriquez
09/25/2020 Tom McCaughtry
09/25/2020 Amanda Sindel-Keswick
09/25/2020 Andy Gluck
09/25/2020 Breanne Happell
09/25/2020 Eve Sorum
09/25/2020 Heidi Frail
09/25/2020 Lana Carlsson-Irwin
09/25/2020 Susan Hartnett
09/25/2020 Green Energy Consumers Alliance
09/25/2020 Cheryl Greenwald
09/25/2020 G. Landron
09/25/2020 Isabel Carey
09/25/2020 John Bookston
09/25/2020 Karen D'Amato
09/25/2020 Nina Garfinkle
09/25/2020 Renee DeKona
09/25/2020 Robert Bussewitz
09/25/2020 Sophy Tuttle
09/25/2020 Gregory Robben
09/25/2020 Kathryn Hill Schrumpf
09/25/2020 Aaron Geschiere
09/25/2020 Susan Hall

09/25/2020 Judi Gaine
09/25/2020 Paul Campese
09/25/2020 Shawn Szturma
09/25/2020 Stephen Frail
09/25/2020 Catia Confortini
09/26/2020 C. Reid
09/26/2020 Jennifer Marusiak
09/26/2020 Jeremy Cushman
09/26/2020 Ann Malone
09/26/2020 Jim Kempf
09/26/2020 Lisa Treat
09/26/2020 Patrick Joyce
09/27/2020 Emily Lee
09/27/2020 David Reich, Quincy Climate Action Network
09/27/2020 Bill Sloane
09/27/2020 Karen Thomas-Alyea
09/27/2020 Maureen Quinn-Dupont
09/27/2020 Seeta Badrinath
09/28/2020 Carrie Rosenblum
09/28/2020 Elizabeth Spencer
09/28/2020 Jeff Dvorin
09/28/2020 Kris Gusmini
09/28/2020 Patrick Duggins
09/28/2020 Sofia Rose Wolman
09/28/2020 Charles Chester
09/28/2020 Molly Crahman
09/29/2020 Fore River Residents Against the Compressor Station
09/29/2020 Bill Dube
09/29/2020 Elisabeth Dambolena
09/29/2020 Jackie Boni
10/04/2020 Anna Desousa
10/05/2020 Ania Camargo
10/07/2020 Eric Holihan
10/11/2020 Sarah Freeman
10/12/2020 Ross Edwards, Quincy Climate Action Network
10/13/2020 Fay Strigler, Quincy Climate Action Network
10/13/2020 Zero-Emission Vehicles Coalition joint comments – Conservation Law Foundation, Massachusetts Public Interest Research Group, Massachusetts Sierra Club, Transit Matters, Alternatives for Community & Environment, Union of Concerned Scientists, The Transportation Working Group of 350 Mass, Institute for Transportation and Development Policy, and Green Energy Consumers Alliance
10/13/2020 Massachusetts Department of Environmental Protection (MassDEP) – Northeast Regional Office (NERO)
10/13/2020 City of Quincy
10/16/2020 Massachusetts Water Resources Authority (MWRA)
10/26/2020 Mike Zhe
10/27/2020 Mark Holman

10/27/2020 David Chamberlain
10/28/2020 Glen Berkowitz, A Better City

KAT/PPP/ppp

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

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

October 13, 2020

Kathleen A. Theoharides, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

Attn: MEPA Unit

RE: Quincy
Quincy Bus Maintenance Facility
EEA# 16267

Dear Secretary Theoharides:

The Massachusetts Department of Environmental Protection Northeast Regional Office (MassDEP-NERO) has reviewed the Environmental Notification Form (ENF) for the proposed Quincy Bus Maintenance Facility in Quincy. MassDEP provides the following comments.

Wetlands

As described in the ENF, the MBTA is proposing to construct a new Bus Maintenance Facility at 599 Thomas Burgin Parkway in Quincy, MA. The proposed project entails the construction of a new two to three story bus maintenance facility approximately 351,000 square feet in size, parking for the storage of buses and employees and stormwater improvements. The ENF narrative states that the site will also include some "functionally separate office areas." The project site currently contains a former Lowe's Home Improvement store, a steel framed, one story building and associated parking and utilities.

The ENF states that wetland resource areas on the project site include Bordering Land Subject to Flooding (BLSF), Bank and Riverfront Area associated with Town Brook. The ENF states that approximately 810 square feet of Buffer Zone to Bank, approximately 410 square feet of BLSF and 26,671 square feet or Riverfront Area will be permanently impacted.

According to the ENF, the site of the proposed facility is located within a Zone AE, as shown on the FEMA Flood Hazard Map, number 25021C0207E, effective on July 17, 2012.

It is MassDEP's opinion that the ENF does not provide an adequate evaluation, explanation or description of the impacts of the proposed project on wetland resource areas. The ENF does not demonstrate how the project will meet performance standards under 310 CMR 10.58 for Riverfront Area, 310 CMR 10.57(4) for BLSF or 310 CMR 10.05(6)(k) for Stormwater Management.

While the ENF states that improvements will be made to the existing stormwater system located on the site, there is no information outlining what those improvements entail. No information is provided that describes what BMPs will be used and how they will meet performance standards under 310 CMR 10.05(6)(k)(7) for redevelopment.

The ENF states the project will fill approximately 410 square feet of BLSF and provide approximately 197,525 cubic feet of compensatory flood storage. Yet, no information is provided in the ENF showing where on the project site filling will take place or show where compensatory flood storage will be provided. No cut and fill chart is provided showing the elevations where fill is proposed and at what amount and at what elevation compensatory flood storage will be provided.

The ENF states that impacts will occur within Riverfront Area, but provides no plans showing the location of the inner and outer Riverfront Area or a narrative explaining how the project meets performance standards under 310 CMR 10.58(4) and 310 CMR 10.58(5).

Unfortunately, based on the lack of information contained in the ENF and on the attached plans, MassDEP is unable at this time to provide any constructive technical comments, guidance or feedback.

The MassDEP appreciates the opportunity to comment on this proposed project. Please contact Rachel.Freed@mass.gov at (978) 694-3258 for further information on wetland issues. If you have any general questions regarding these comments, please contact me at John.D.Viola@mass.gov or at (978) 694-3304.

Sincerely,

John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Eric Worrall, Rachel Freed, John MacAuley, MassDEP-NERO

MASSACHUSETTS WATER RESOURCES AUTHORITY
Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Frederick A. Laskey
Executive Director

Telephone: (617) 242-6000
Fax: (617) 788-4899
TTY: (617) 788-4971

October 16, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Purvi Patel
Boston, MA 02114

Subject: EOEEA #16267 – Environmental Notification Form
Quincy Bus Maintenance Facility, Quincy, MA

Dear Secretary Theoharides,

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted by Massachusetts Bay Transportation Authority (the "Proponent") for Quincy Bus Maintenance Facility (the "Project") in Quincy, Massachusetts. The Project site currently contains a former Lowe's Home Improvement Store, a steel framed, one-story building occupying the eastern portion of the site and associated parking and infrastructure. The Project involves construction of a new Bus Maintenance Facility for up to 135 MBTA buses, to replace the existing facility on Hancock Street in Quincy. The ENF reports that the Project will be designed to meet current and future transit demands, future electrification and expansion of the bus fleet, and future deployment of more efficient and cleaner energy technologies. MWRA's comments on the ENF relate to wastewater and Discharge Permitting from the Toxic Reduction and Control (TRAC) Department.

Wastewater

The Site is served by a sanitary sewer system owned and operated by the Town of Quincy that conveys flows to MWRA's High Level Sewer for ultimate conveyance to the Deer Island wastewater treatment plant. Sections of the City and MWRA sewer systems can surcharge in large storms, due to high levels of infiltration and inflow that enter tributary community systems. MWRA requests that the Proponent investigate all onsite drainage and sewer systems to ensure that 1) stormwater does not enter the sanitary sewer system and 2) on-site sewer service pipes, whether existing, rehabilitated or replaced, are free from excessive infiltration/inflow.

The ENF notes an estimated increase in water use of 7,308 gpd compared to preexisting water use estimated in the former Lowe's store's previous MEPA filings. The ENF notes a decrease in wastewater generation by 920 gpd, again compared to preexisting use based on Lowe's past MEPA filings. The Wastewater Section of the ENF identifies a breakdown of

sanitary wastewater and industrial wastewater, while the Water Section of the ENF provides no additional detail. The Wastewater Section of the ENF's Supporting Text mentions that "the design of the new Bus Maintenance Facility is incorporating water reuse, to the extent feasible, to minimize the generation of wastewater." In response to MWRA inquiry, the Proponent provided more information explaining that while water use will increase, the MBTA plans to lower industrial wastewater generation from an estimated 12,000 gpd to 1,800 gpd by recycling 85% of the water needed for the bus wash system. An additional 2,600 gpd wastewater will be generated from sanitary uses, for a total wastewater generation of 4,400 gpd.

TRAC Discharge Permitting

MWRA prohibits the discharge of groundwater and stormwater into the sanitary sewer system, pursuant to 360 C.M.R. 10.023(1) except in a combined sewer area when permitted by the Authority and the local community. The Project site has access to a storm drain and is not located in a combined sewer area. Therefore, the discharge of groundwater or stormwater to the sanitary sewer system associated with this Project is prohibited.

A Sewer Use Discharge Permit is required prior to discharging bus washing and maintenance wastewater associated with the Project into the MWRA sanitary sewer system. The ENF states that a "Direct Master Permit or Amendment from MWRA" will be required for the Project. More information provided by the Proponent clarified that this statement is in reference to the need for a Sewer Use Discharge Permit from MWRA. A new Sewer Use Discharge Permit will be required for the Project because the new facility will be in a different location than the existing Quincy MBTA bus facility. For assistance in obtaining this permit, a representative from the Project should contact Dennis Capraro, Industrial Coordinator, in the TRAC Department at 1 (617) 305-5620.

Any gas/oil separators in parking garages associated with the Project must comply with 360 C.M.R. 10.016 and State Plumbing Code. Installation of the proposed gas/oil separator(s) may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For assistance in obtaining an inspection, the Proponent should contact John Feeney, Source Coordinator, in the TRAC Department at 1 (617) 305-5631.

On behalf of the MWRA, thank you for the opportunity to provide comments on this Project. Please do not hesitate to contact me at 1 (617) 788-4958 with any questions or concerns.

Sincerely,

Beth Card
Director
Environmental and Regulatory Affairs

cc: John Viola, MassDEP

dcr
Massachusetts

September 29, 2020

Secretary Kathleen A. Theoharides
Executive Office of Energy and Environmental Affairs
Attn: Alex Strysky, MEPA Office
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: MEPA File No. 16267 – Quincy Bus Maintenance Facility

Dear Secretary Theoharides:

The Department of Conservation and Recreation ("DCR" or "the Department") is pleased to submit the following comments in response to the Environmental Notification Form ("ENF") filed by the Massachusetts Bay Transportation Authority ("MBTA") for the proposed Bus Maintenance Facility (the "Project") in Quincy.

As proposed, the Project involves activities on a site that is located within four FEMA floodplains: the 100-year floodplain, the 500-year floodplain, a regulatory floodway, and the X zone as delineated on the current effective Flood Insurance Rate Map ("FIRM") for Norfolk County, dated July 17, 2012 (FEMA FIRM panel #25021C0207E.) In its role as the state coordinating agency for the National Flood Insurance Program ("NFIP"), DCR submits the following comments.

DCR's Flood Hazard Management Program ("FHMP"), under agreement with the Federal Emergency Management Agency ("FEMA"), is the state coordinating agency for the NFIP. As such, the FHMP provides technical assistance to communities that participate in the NFIP related directly to the program and also related to floodplain management in general. Communities that participate in the NFIP are required by FEMA, as a condition of their participation, to regulate development within the 100-year floodplain in a manner that meets or exceeds the minimum standards established by FEMA, located at 44 CFR 60.3. Participating communities such as Quincy are required to adopt the NFIP requirements through locally enforceable measures. In Massachusetts, many of the requirements contained in 44 CFR 60.3 are enforced through existing state regulations such as the State Building Code (780 CMR) and Wetlands Protection Act regulations (310 CMR 10.00). Communities typically adopt the remainder of the requirements as part of a zoning ordinance or other locally enforceable measure. Quincy has a zoning ordinance that includes a Floodplain District section which has been accepted by FEMA as meeting their requirements under the NFIP.

In our role as NFIP coordinator, the FHMP offers comments on the proposed Project's relationship to many of the above regulations and requirements. The FHMP does not directly administer any of these requirements and therefore does not provide official determinations as to compliance with them or the local ordinance's applicability to an MBTA project; rather, our comments are provided as an overview of the requirements and the documentation necessary to demonstrate compliance with these requirements, as applicable.

The Project includes demolition of an existing building and new construction of a 350,000 sq. ft. facility, including fill, in the floodplain, which consists of AE zone and regulated floodway. Based on information submitted with the ENF, the MBTA intends to prepare a request for a Letter of Map Revision ("LOMR") and to submit data to support a No-Rise Certification for the floodway. Compliance with the requirements of several federal and state measures related to floodplain development will be required; the extent of regulatory impact cannot be established until the Proponent provides FEMA documentation of the exact nature of the floodplain post-LOMR. Per Quincy's floodplain overlay district ordinance: *"All encroachments, including fill, new construction, substantial improvements to existing structures and other development, are prohibited unless certification by a registered professional engineer is provided by the applicant demonstrating that such encroachment shall not result in any increase in flood levels during the occurrence of the one-hundred-year flood, in a floodway."* [Zoning Ordinance, Section 8.1.6.1]

Proposed structures located in the floodplain will be required to meet the standards of applicable sections of the State Building Code for construction in floodplains. For non-residential structures, these sections include Section 1612, Flood Loads, and ASCE 24-14, Flood Resistant Design and Construction. Designs for structures in floodplains must be certified by a registered design professional. If the finished structure will not be elevated above the base flood, designs for dry-floodproofing must comply with the State Building Code, Section 1612, and ASCE 24-14, Chapter 6. For further information see FEMA's Technical Bulletin 3, Non-Residential Floodproofing.

Although the Proponent has conducted an alternative siting analysis, projects within the 100-year floodplain involving any federal action (e.g., permit, funding) must also comply with federal Executive Order 11988, Floodplain Management. This executive order requires an eight-step decision-making process which includes analysis of alternatives, avoiding impacts when possible, and minimizing impacts when avoidance is not possible. Because this project requires a National Pollutant Discharge Elimination System ("NPDES") and Construction General Permit, compliance with this process is necessary.

DCR appreciates the opportunity to comment on the ENF. If you have any questions regarding these comments, or to request additional information or coordination with DCR, please contact Eric Carlson at eric.carlson@mass.gov.

Sincerely,

Jim Montgomery
Commissioner

cc Joy Duperault, Eric Carlson

Energy & Environmental Affairs
Public Comments Portal

purvi.patel@mass.gov

View Comment

Comment Details

EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Staci	--	Conservation Law Foundation
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
10/13/2020	Rubin	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	--	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	srubin@clf.org	--	

Comments

Topic: Joint Comments EEA No. 16267, MBTA Bus Maintenance Facility Environmental Notification Form

Dear Secretary Theoharides and Purvi Patel: Please accept the attached joint comments from participants of the Zero-Emission Vehicle Coalition regarding the MBTA's proposed Quincy Bus Maintenance Facility.

Attachments

Quincy Bus Facility ZEV Coalition Comments.pdf(null)

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Status

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Joint Comments of Participants in the Zero-Emission Vehicles Coalition

October 13, 2020

Via Online Comment and E-mail

The Honorable Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Attn: MEPA Office, Purvi Patel
Boston, Massachusetts 02114
purvi.patel@mass.gov; MEPA@mass.gov
https://eeaonline.eea.state.ma.us/EEA/PublicComment/Landing/

Subject: MBTA Quincy Bus Maintenance Facility Environmental Notification Form, EEA No. 16267

Dear Secretary Theoharides:

The nine undersigned organizations and individuals are participants of the Zero-Emission Vehicles Coalition and we enthusiastically submit the following comments on the Environmental Notification Form ("ENF") for the proposed Quincy Bus Maintenance Facility ("Quincy Garage BMF" or "the Project"). The Project, submitted by Massachusetts Bay Transportation Authority ("MBTA" or the "Proponent"), would replace the existing 90-year-old bus maintenance facility in the same municipality and has the potential to support public transit electrification in Greater Quincy. We submit the following comments to inform the scope of the ENF review and any future environmental impact report that the Proponent is required to complete pursuant to the Massachusetts Environmental Policy Act ("MEPA").

I. The Project Should Spur the Conversion of the MBTA Bus Fleet From Fossil-Fuel Powered Buses to Zero-Emission Buses to Meet Rider Needs.

a. The Project Will Provide New and Necessary Bus Maintenance Capacity.

The Quincy Garage BMF will provide much-needed capacity for the MBTA by increasing the number of buses serviced in Quincy from 86[1] to 135.[2] The additional capacity will increase the MBTA's ability to offer reliable and frequent bus service. The MBTA's service standards are hamstrung by the size of its vehicle fleet; without addressing the bedrock issue of the MBTA's bus fleet size and garage facilities, all riders will continue to be underserved.[3] The MBTA has a pressing need to upgrade or replace its eight bus maintenance and storage facilities.[4] Of the

[1] ENF Attachment A, Project Narrative, at 1, PDF page 32.
[2] ENF at 3.
[3] Livable Streets Alliance, "64 Hours: Closing the Bus Equity Gap," at 9, (September 2019), https://d3n8a8pro7vhmx.cloudfront.net/livablestreetsalliance/pages/6582/attachments/original/1569205099/lsa-better-buses-2019-v9-20sep19.pdf.
[4] MBTA Integrated Fleet and Facilities Plan, Part Three: Bus, (December 4, 2017), https://cdn.mbta.com/sites/default/files/fmcb-meeting-docs/2017/december/2017-12-04-fmcb-

eleven MBTA bus maintenance facilities, the existing Quincy facility is one of the oldest at 90 years old.[5] In addition to being one of the oldest maintenance facilities at the MBTA, the existing Quincy garage is also in marginal condition, at best.[6] Using the Federal Transit Administration's 1-5 Asset Condition Rating Scale (5 = Excellent, 1 = Poor), the existing Quincy garage rated 2.4, which is not in good repair.[7] The existing Quincy garage has a low roof and door size limiting the size of buses that can be serviced at the facility to the current size of 10 feet, 3 inches and cannot physically accommodate new buses, which are 10 feet, 8 inches or taller.[8] The existing Quincy facility is not only becoming obsolete, but it also contains poor working conditions.[9] Consequently, the existing facility is in need of replacement especially for the purpose of accommodating zero-emission buses.

b. The Project Should Be Designed to Serve A Complete Fleet of Zero-Emission Buses in 2024.

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iffp-part3-bus.pdf. *See* Focus40: The 2040 Investment Plan for the MBTA. State of the System Report: Bus. (Massachusetts Department of Transportation [MassDOT]/MBTA, 2018) (Key findings include: (1) "Four of the MBTA's maintenance facilities are over 70 years old, with the oldest built in 1930."; (2) "Most [facilities] are near, at, or above practical storage capacity."; (3) "Many bus maintenance facilities are outmoded in key ways."; (4) "Most [facilities] in need of replacement…[or] major upgrades;" and (5) "Inadequate maintenance facilities are a barrier to providing more bus service for riders.") *See also* MBTA Bus Maintenance Efficiency Study, CH2M HILL, Inc., 2016) (Key findings include that the "MBTA maintenance facilities are old and over capacity. The MBTA's aging facilities with widely varying conditions and capacities, are not in line with peer agencies. In most cases, the facilities are over capacity with no room for expansion.")

[5] MBTA Integrated Fleet and Facilities Plan, Part Three: Bus, at 8 (December 4, 2017), https://cdn.mbta.com/sites/default/files/fmcb-meeting-docs/2017/december/2017-12-04-fmcb-iffp-part3-bus.pdf.

[6] *Id.*

[7] A Better City, "New MBTA Bus Maintenance Facilities & Evolving Battery Electric Bus Technology, Case Study: Albany Street Garage," at 2, March 2019, https://www.abettercity.org/assets/images/ABC%20--%20New%20MBTA%20Bus%20Maintenance%20Facilities%20&%20Evolving%20Battery%20Electric%20Bus%20Technology%20-%20Final%20Report_%20March_31_2019-compressed.pdf#:~:text=The%20Massachusetts%20Bay%20Transportation%20Authority%20%28MBTA%29%20has%20a,conducted%20by%20the%20Commonwealth%20and%20MBTA%20since%202003.

[8] MBTA Integrated Fleet and Facilities Plan, Part Three: Bus, at 9, 13 (December 4, 2017), https://cdn.mbta.com/sites/default/files/fmcb-meeting-docs/2017/december/2017-12-04-fmcb-iffp-part3-bus.pdf.

[9] Adam Vaccaro, Boston Globe, "MBTA Workers Protest Maintenance Staffing Levels," (March 9, 2020), https://www.bostonglobe.com/2020/03/09/metro/mbta-workers-protest-maintenance-staffing-shortfalls/.

The MBTA plans to design the Quincy Garage BMF to accommodate diesel-hybrid buses and allow for future conversation to a battery electric bus fleet.[10] We strongly recommend that the MBTA plan to accommodate zero-emission buses as soon as the Project becomes operational in 2024 to achieve improved air quality, get closer to the Commonwealth's greenhouse gas ("GHG") emissions reduction target, and provide clean, safe, and reliable public transit.

The Intergovernmental Panel on Climate Change Special Report predicts that global warming will "reach 1.5°C between 2030 and 2052 if warming continues at the current rate."[11] Combating this change requires reaching net zero emissions by 2050.[12] This gives us a short window to ratchet down emissions and the MBTA's fleet is a key opportunity for transitioning to zero-emission technology.

Recognizing the long-term threat of climate change, Massachusetts passed the Global Warming Solutions Act ("GWSA") in 2008.[13] The Massachusetts GWSA requires an 80 percent reduction in GHG emissions by 2050.[14] It further requires coordinated state agency actions to achieve these limits.[15] In January 2020, Governor Baker during his State of the Commonwealth address announced a commitment for Massachusetts to achieve net-zero GHG emissions by 2050.[16] Further, you issued, on April 22, 2020, a determination to achieve net zero emissions by 2050 defined as "a level of statewide greenhouse gas emissions that is equal in quantity to the amount of carbon dioxide or its equivalent that is removed from the atmosphere and stored annually by, or attributable to, the Commonwealth; provided, however, that in no event shall the level of emissions be greater than a level that is 85 percent below the 1990 level."[17]

The transportation sector is the largest contributor of GHG emissions in Massachusetts. In 2017, transportation accounted for 42 percent of GHG emissions in the state.[18] Per Governor Baker's Commission on the Future of Transportation, "[w]ithout further action, transportation sector

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[10] ENF at 3.
[11] The Intergovernmental Panel on Climate Change, *Summary for Policymakers*, at 4 (2018), https://www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf.
[12] *Id.* at 12.
[13] St. 2008, c. 298, https://malegislature.gov/Laws/SessionLaws/Acts/2008/Chapter298.
[14] M.G.L. c. 21N, § 3(b).
[15] M.G.L. c. 21N, § 2-3.
[16] Governor Charles Baker, State of the Commonwealth Address (January 21, 2020). Available at: https://www.mass.gov/news/governor-baker-delivers-2020-state-of-the-commonwealth-address.
[17] Secretary Theoharides Determination of Statewide Emissions Limit for 2050, April 22, 2020, https://www.mass.gov/doc/final-signed-letter-of-determination-for-2050-emissions-limit/download.
[18] Mass.gov, MA GHG Emission Trends: MA and US GHG by Sector, https://www.mass.gov/doc/appendix-c-massachusetts-annual-greenhouse-gas-emissions-inventory-1990-2017-with-partial-2018/download.

GHG emissions are projected to increase."[19] The Commission on the Future of Transportation recommended that "bus service, in particular, needs to be reinvented.[20] The Commission on the Future of Transportation also concluded that all buses purchased with state resources should be zero emissions by 2030.[21] The Commonwealth is not the only entity focused on improving the transportation system as the Quincy City Council issued a resolution earlier this month calling for the Project to be all-electric in 2024 when the Project opens.[22]

The Quincy Garage BMF has the opportunity to be the first MBTA bus maintenance facility that can support a zero-emission bus fleet. MBTA buses have an average service life of 12-15 years.[23] The existing MBTA fleet of buses served by the Quincy facility will reach the end of its serviceable life by 2023.[24] As the MBTA plans its future procurements to replace the fleet that will cease operations at the existing Quincy garage in 2023, 100 percent of the procurements should be for zero-emission buses and the Project should be designed to fully accommodate a zero-emission fleet.

c. If the Project Cannot Serve A Complete Fleet of Zero-Emission Buses in 2024, then the MBTA Should Design A Plan for When It Can Support An Entire Fleet of Zero-Emission Buses No Later Than 2030.

During the virtual MEPA site visit, MBTA representatives acknowledged an interest in working towards bus electrification but stated the performance limitations of battery electric buses would make it challenging to commit to an all-electric fleet at the Project in 2024. There are multiple battery electric buses that perform well in cold temperatures and we think that the MBTA's concerns about performance of the existing Silver Line battery electric bus pilot should not prohibit the plan for an all-electric fleet at Quincy in 2024. We note that the Silver Line pilot involved storing the battery electric buses outside, which likely exacerbated cold weather impacts and would not be the case with the new Quincy fleet at the Project. Further, most of the range loss that did occur with the Silver Line pilot was due to heating; auxiliary heating can mitigate this concern. We anticipate that the electric bus technology will continue to improve by the time the MBTA procures the new Quincy fleet for service and storage at the Quincy Garage BMF.

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[19] Commission on the Future of Transportation, *Choices for Stewardship: Recommendations to Meet the Transportation Future: Executive Summary*, 3 (December 2018), https://www.mass.gov/files/documents/2018/12/14/FOTC-ExecutiveSummary.pdf.
[20] Commission on the Future of Transportation, *Choices for Stewardship: Recommendations to Meet the Transportation Future: Volume 1*, at 36 (December 2018), https://www.mass.gov/doc/choices-for-stewardship-recommendations-to-meet-the-transportation-future-volume-1/download.
[21] *Id.* at 54.
[22] Quincy City Council Order No. 2020-134, Resolution of the Quincy City Council to the MBTA to replace its Quincy bus fleet with Battery Electric Buses when it opens the facility, October 5, 2020, https://www.quincyma.gov/civicax/filebank/blobdload.aspx?BlobID=37109 (PDF page 67).
[23] ENF Attachment A, Project Narrative, at 1, PDF page 32.
[24] *Id.*

At a minimum, we urge the MEPA Office to require that the MBTA develop a plan with detailed timelines for when it plans to support 135 zero-emission buses at the Project. We urge that the MBTA commit to installing a sufficient number of charging stations and electrical capacity by the Project's operation date in 2024 to allow for future charging of all 135 buses. We call on the MBTA to commit that it will commence operation of the Project with a minimum of 25 zero-emission buses and achieve 135 zero-emission buses by 2030. The MBTA should also commit to an analysis of in-route charging and in-motion charging opportunities. The 2030 timeline is at the recommendation of the Commission on the Future of Transportation.[25]

As of today, there are numerous zero-emission buses manufactured and in operation throughout the United States, with numerous options for battery electric buses.[26] The lifecycle costs of an electric bus are lower than that of diesel buses due to reduced fuel costs, fewer maintenance costs, and avoided healthcare expenses.[27] Not only are electric bus lifecycle costs lower, they also are quieter and produce zero tailpipe emissions. The Zero-Emission Vehicles Coalition advocates that the Proponent does not limit the future Project operation to a particular technology, such as a battery electric bus. Instead of rejecting the notion of a full transition to zero-emission buses by 2024, we recommend that the MBTA consider additional alternatives such as in-motion charging, in-route charging, electric trolleybuses, and auxiliary heating. In-motion charging technology lets buses charge on electric lines like existing trolley buses. Additionally, in-route charging, where buses quick charge using an overhead charger during short breaks, is already being tested in Worcester. The MBTA should consider which technologies will work with operations and service needs both to ensure a reliable and frequent schedule for bus riders and maximize opportunities for emissions reductions.[28]

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[25] Commission on the Future of Transportation, *Choices for Stewardship: Recommendations to Meet the Transportation Future: Volume 1*, at 54 (December 2018), https://www.mass.gov/doc/choices-for-stewardship-recommendations-to-meet-the-transportation-future-volume-1/download.

[26] A Better City, "New MBTA Bus Maintenance Facilities & Evolving Battery Electric Bus Technology, Case Study: Albany Street Garage," at 5-9, March 2019, https://www.abettercity.org/assets/images/ABC%20--%20New%20MBTA%20Bus%20Maintenance%20Facilities%20&%20Evolving%20Battery%20Electric%20Bus%20Technology%20-%20Final%20Report_%20March_31_2019-compressed.pdf#:~:text=The%20Massachusetts%20Bay%20Transportation%20Authority%20%28MBTA%29%20has%20a,conducted%20by%20the%20Commonwealth%20and%20MBTA%20since%202003

[27] U.S. PIRG, "Paying for Electric Buses: Financing Tools for Cities and Agencies to Ditch Diesel," at 7-8 (2018), https://uspirg.org/sites/pirg/files/reports/National%20-%20Paying%20for%20Electric%20Buses.pdf. See Environmental and Energy Study Institute, "Battery Electric Buses Fact Sheets: Benefits Outweigh Costs," (October 2018), https://www.eesi.org/files/FactSheet_Electric_Bus_Benefits_Outweigh_Costs_1018.pdf.

[28] Burns McDonnell, "Electrifying the Nation's Mass Transit Bus Fleets," https://info.burnsmcd.com/electrification/electrifying-the-nations-mass-transit-bus-fleets?hsCtaTracking=69fccf59-ee8e-4343-bb8a-b81351ea7ec8%7C474d453c-88c4-4451-b524-37ad64cf785.

II. The MBTA Should Operate Zero-Emission Buses With A Priority On Routes That Serve Environmental Justice Populations.

Environmental justice (EJ) populations disproportionately suffer the negative impacts of transportation emissions. Environmental justice populations are, at present, defined as neighborhoods that meet a specific threshold for low-income residents, people of color, or limited English proficient residents.[29] The Project is located in close proximity to EJ populations in North Quincy, South Quincy, Quincy Point, and Germantown.[30]

On average, residents of color in Massachusetts are exposed to $PM_{2.5}$ concentrations from vehicle emissions that are 26 to 36 percent higher than the exposure of white residents.[31] More than 372,000 Latino, 283,000 African Americans, and 231,000 Asian Americans in Massachusetts are residents of communities where pollution is above the state average.[32] In the United States, while communities of color bear the impact of air pollution, that same pollution is predominately caused by the consumption of goods and services by white residents.[33] As temperatures rise, so will rates of asthma and respiratory disease in neighborhoods through the Commonwealth as increased heat exacerbates the impacts of air pollution.[34]

In addition to reducing climate-warming emissions, the elimination of fossil fuels from public transit buses can have enormous co-benefits for air quality and public health. Diesel fuel, in particular, – the fuel that will be used in the majority of MBTA buses at the Project when it opens in 2024 – is a recognized hazard to human health.[35] Pollution control technologies, such as those that could be deployed on diesel-hybrid buses, do not entirely eliminate diesel exhaust, and leave behind ultrafine particles containing soot and heavy metals that are a serious threat to

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[29] Massachusetts Executive Office of Energy and Environmental Affairs Environmental Justice Policy at 3, 2017, https://www.mass.gov/files/documents/2017/11/29/2017-environmental-justice-policy_0.pdf (issued pursuant to Executive Order 552 (2014), M.G.L. c. 21A, § 2). Note that the Massachusetts House unanimously approved H.4933 on July 31, 2020, which would establish statutory definition of "environmental justice population" that differs from the version in the EEA Environmental Justice Policy.

[30] ENF, Attachment A, Project Narrative, at 12, PDF page 43.

[31] Union of Concerned Scientists: *Inequitable Exposure to Air Pollution from Vehicles in Massachusetts: Fact Sheet*, 1 (June 2019), https://www.ucsusa.org/sites/default/files/attach/2019/06/Inequitable-Exposure-to-Vehicle-Pollution-MA.pdf.

[32] *Id.* at 2.

[33] *See generally* Christopher W. Tessum et al., *Inequity in Consumption of Goods and Services Adds To Racial–Ethnic Disparities in Air Pollution Exposure*, 116 Proceedings of the Nat'l Acad. of Sci. of the U.S. 6001 (2019).

[34] *See* H. Orru et al., *The Interplay of Climate Change and Air Pollution on Health*, 4 Current Envtl. Health Report 504, 504 (2017) ("In general, climate change is expected to worsen air quality in several densely populated regions by changing atmospheric ventilation and dilution, precipitation and other removal processes and atmospheric chemistry.")

[35] California Office for Environmental Health Hazard Assessment (2001). Health Effects of Diesel Exhaust, https://oehha.ca.gov/air/health-effects-diesel-exhaust.

human health.[36] Diesel fuel is also a documented occupational hazard for fuelers, garage and maintenance workers subjected to routine exposure.[37] The complete removal of diesel exhaust from the air we breathe is of paramount importance. Massachusetts' communities, especially those most impacted by pollution, should benefit from electric buses. Thus, we strongly recommend that the MBTA include in its Project plan a goal to begin operating at least 25 zero-emission buses in 2024 on routes that serve EJ populations.

III. The Quincy Bus Garage Should Use Solar Power and Energy Storage to Support Electric Buses.

The Proponent claims that the Project location is well suited for sustainability components, such as rooftop solar arrays or a green roof.[38] The former Lowe's building that will serve as the location of the Project has existing rooftop solar panels. We recommend that the Proponent commit to operating rooftop solar panels, regardless of whether the existing solar panels are functional, and construct a solar canopy in the parking area to maximize the opportunity for renewable electricity generated at the Project. The Fiscal and Management Control Board recently authorized a new MBTA contract to procure 70 percent of its electricity needs from renewable sources.[39] The MBTA should continue this trend toward relying on renewable resources by committing to operate the Project using renewable resources.

In addition to operating solar panels, we urge the Proponent to plan to install an energy storage system on site to maximize the gains for solar power. Energy storage systems can transport electricity over time and distance; it can act as a generator or a load and can integrate renewables into the grid.[40] An energy storage system at the project would allow for peak demand reduction or peak shifting, which benefits the electric grid. Additionally, there are non-energy benefits of storage, such as resiliency, reduced outages, job creation, and reduced land use.[41]

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[36] DPF Solution Sheffield, UK. (2016). New DPF Filter Effectiveness Queried by Scientists. https://www.dpfsolutionsheffield.co.uk/uncategorized/new-dpf-filter-effectiveness-queried-by-scientists/; Lane, K.J., et al. (2016). Association of modeled long-term personal exposure to ultrafine particles with inflammatory and coagulation biomarkers. Enviro. Int. https://www.researchgate.net/publication/301611510.

[37] National Council for Occupational Safety and Health (n.d.). Diesel Hazards. https://www.coshnetwork.org/node/358.

[38] ENF Attachment A, Project Narrative, at 2, PDF page 33.

[39] https://commonwealthmagazine.org/transportation/mbta-embracing-renewable-energy/; "Electricity Procurement" Presentation to the Fiscal and Management Control Board, (Oct. 5, 2020), https://cdn.mbta.com/sites/default/files/2020-10/2020-10-05-fmcb-M-electricity-procurement-accessible.pdf.

[40] Todd Olinsky-Paul, Clean Energy Group, "Energy Storage: The New Efficiency, How States Can Use Energy Efficiency Funds to Support Battery Storage and Flatten Costly Demand Peaks," at 5, (April 2019), https://www.cleanegroup.org/wp-content/uploads/energy-storage-the-new-efficiency.pdf.

[41] *Id.* at 6.

IV. Mitigation Measures Should Prioritize Air Monitoring, Noise Reduction, and Early Tree Planting.

The Project will require demolition and construction that will impact air quality and noise. Since the facility is located near multiple EJ populations, it is critical to monitor air quality before, during, and after construction. We urge the MBTA to install air monitors prior to construction to get baseline measurements and maintain those air monitors during and after construction. The Secretary's determination should require specific noise mitigation procedures that will limit the construction activities to daytime hours and require operation of all zero-emission buses by 2030 to ensure noise minimization during Project operation. We encourage the Proponent to commit to using construction equipment with diesel particulate filters or other pollution reduction technology to limit the impacts of construction activities on air quality.

The Proponent intends to plant 100 trees around the perimeter of the site including maple, birch, cedar, pine, and oak species, plus additional shrub plantings. The Proponent should analyze the long-term viability of these tree species in light of climate change impacts including extreme climate change impacts including extreme precipitation, extreme heat, and higher wind speeds. We further request that the Secretary's determination require tree planting at the start of construction to help with noise mitigation as early in the Project timeline as possible. Locations for tree plantings shall avoid locations with gas leaks so as to limit the potential for newly-planted trees to be harmed or killed by gas leaks. Finally, the Proponent should post a two-year landscape establishment bond prior to the issuance of a Certificate of Occupancy to be released upon determination that new trees and landscaping are healthy and have a reasonable chance of surviving to maturity.

V. The Project Should Maximize Climate Resiliency Options.

The Project is located within the inland flood zone area.[42] The ENF indicates the Proponent's plan to work with the City of Quincy to address potential flooding concerns related to the Upper Town Brook to ensure that the Project does not exacerbate flooding in the community.[43] The MBTA and the City of Quincy have the opportunity to not only preclude additional flooding, but to also work collaboratively to reduce flooding in the community. The Proponent claims it will construct a retaining wall on Penn Street and add 410 square feet of fill below the 100-year floodplain elevation, which will result in a loss of flood storage.[44] As a result, the MBTA will create an equal amount of compensatory flood storage in compliance with the Massachusetts Wetlands Protection Act.[45]

The ENF suggests that the Proponent is focused on flood impacts from climate change for 2030.[46] The Quincy BMF will be around well beyond 2030. The Proponent should be planning for approximately 40 inches of sea level rise, which is a reasonably conservative estimate for

[42] ENF, Attachment A, Project Narrative at 17, PDF page 48.
[43] ENF, Attachment A, Project Narrative at 18, PDF page 49.
[44] *Id.*
[45] *Id.*
[46] ENF, Attachment A, Project Narrative at 16-18, PDF pages 47- 49.

2070. The Proponent should take climate projections into account for the proposed elevation. The Proponent should consider raising the site to an elevation above the FEMA base flood elevation that incorporates sea level rise estimates. We encourage the Proponent to not rely on FEMA base flood elevations for project design knowing that it does not consider climate projections for sea level rise or more extreme precipitation. Trying to reduce the required elevation is extremely short-sighted and the climate analyses falls short of what is required for a facility of this type. The Quincy Garage BMF will be viable for longer than 10 years and the Proponent should be incorporating climate risks out to 2070 in the design. The consideration of impacts in 2030, without looking further into the future, is inconsistent with best practice.

The Project's design must be adaptive and flexible to accommodate rising sea levels and storm surge. We request that the Secretary's determination include detail about proposed elevations at the site, including a map depicting current elevation contours, a discussion of how flood inundation and depths are expected to change over the next 30-50 years, and a description of how the open space will function to absorb and buffer flood waters and maximize use of pervious surfaces. In addition, the Proponent should provide an analysis of how the elevation at this site will affect flood risk at neighboring sites, including any diversion of flood waters. We support the MBTA's plan to make the facility LEED certified, to elevate critical infrastructure, increase structural loading capacity of the roof and outdoor project elements to support extreme snowfall, and ensure subsurface stormwater retention and preservation of natural habitat to absorb extreme rainfall. A green roof and rain gardens will further support flood storage capacity and reduce the heat island effect.

VI. The Proponent Should Request Funding for the Project in the next Capital Investment Plan.

The MBTA has not yet identified a funding source.[47] Though the Proponent notes the possibility of Federal Transit Administration funding,[48] such funding is not a guarantee. The most recent MBTA Capital Investment Plan does not include funding for the Project. To make this Project a reality along with the ability to operate 135 zero-emission buses, the MBTA needs a dedicated source of funds.

[47] ENF, Attachment A, Project Narrative at 20, PDF page 51.
[48] *Id.*

In conclusion, we appreciate the opportunity to submit these comments and participate in a virtual site visit. You may direct any questions about these comments to Staci Rubin at SRubin@clf.org and (617) 850-1781.

Sincerely,

Matt Casale, Environment Campaigns Director, Massachusetts Public Interest Research Group (MASSPIRG)
Veena Dharmaraj, Director of Transportation, Massachusetts Sierra Club
Jarred Johnson, Director, TransitMatters
Mela Miles, Director, TOD/TRU, Alternatives For Community & Environment
Paulina Muratore, Senior Transportation Campaign Coordinator, Union of Concerned Scientists
Sylvia Parsons, Co-Chair, The Transportation Working Group of 350 Mass
Staci Rubin, Senior Attorney, Conservation Law Foundation
Julia Wallerce, Boston Program Manager, Institute for Transportation and Development Policy (ITDP)
Anna Vanderspek, Electric Vehicle Program Director, Green Energy Consumers Alliance

Copy: Andrew Brennan, Senior Director of Energy and Environment, MBTA, abrennan@mbta.com

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THOMAS P. KOCH
Mayor

JAMES J. FATSEAS
Planning Director

October 13, 2020

Secretary Kathleen A. Theoharides
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Purvi Patel, MEPA Analyst (via email to Purvi.Patel@Mass.gov)

Re: Quincy Bus Maintenance Facility, EEA #16267
ENF Public Comments

Dear Secretary Theoharides:

The City of Quincy has reviewed the Environmental Notification Form (ENF) that was published in the Environmental Monitor and submits the following comments.

TRANSPORTATION

The project proposes to relocate the existing Bus Maintenance Facility at 954 Hancock Street to the proposed site at the former Lowe's at 599 Burgin Parkway, increase the fleet of vehicles from 86 buses to 135 buses, and add office space for approximately 200 employees. The proposed site will consequently increase to approximately 450 employees from the 150-employee operation on Hancock Street. The site proposes 236 parking spaces for employee parking, noting that the proximity to the Quincy Adams train station provides both convenient rapid transit access and additional parking availability.

The trip generation estimates for the proposed site were generated in a combination of 1) the fleet of 135 buses, 2) the maintenance facility personnel and supporting services, 3) the proposed office space. The site is expected to generate approximately 2,358 daily vehicle trips, which is a significant reduction from the number of trips the Lowe's site was expected to generate (3,450 daily trips). There is an increase of trips during the weekday morning peak hour, but the afternoon peak hour and other time periods would be expected to generate fewer vehicles.

1. The MBTA and Jacobs have both reached out to Quincy's TPAL department to coordinate signal improvements to the intersection of Burgin Parkway and Penn Street/MBTA Driveway. At the request of the City, one of the two left turn lanes entering the site will be reallocated to a wider median to better serve pedestrians as the two left turn lanes are not needed for the demand of entering vehicles into the site.

2. The site is expected to generate over 1,000 vpd less than the Lowe's facility and generates fewer vehicles during each peak time period with the exception of the morning peak hour. What is the justification of extending Columbia Street to Burgin Parkway and signalizing the intersection?

3. Would there be a benefit to adding a secondary access point via the Columbia Street, but restricting the intersection to a right-turn in/right-turn out condition?

4. Have there been any discussions with abutters on the right of way takings required to create the extension of Columbia Street?

5. Was the larger percentage of buses considered in the traffic analysis?

6. If the Columbia St Extension is included in the project, it should be designed such that it is coordinated with the system of intersections to the south and a northbound left turn bay is provided to mitigate left turn/through movement conflicts.

7. Indicate the limit of MassDOT Highway on the Plan. A State Access Permit will be required if a new intersection is installed near the Ramp.

8. Preserve the pedestrian easement for the abutting neighborhood to get through to the Quincy Adams T station

STORMWATER MANAGEMENT & FLOODPLAIN

The proposed BMF location is a former Lowe's Home Improvement Store that was reviewed and approved by the City in 2008. In order to create the Lowe's site, several former industrial properties were assembled and major stormwater improvements were constructed that needed to connect to the Town Brook Stream and/or Town Brook Flood Control System-Burgin Parkway Relief Conduit.

In the time since the Lowe's Home Improvement Center was permitted and constructed, the City of Quincy has experienced several major precipitation events that have caused flooding in the City and has highlighted the enormous challenge the City will continue to face in conveying stormwater especially when rainfall is coupled with a storm surge or other high tide event. The

ENF acknowledges the recent 2018 update to the City's 5-year Hazard Mitigation Plan where for the first time climate change projections for sea-level rise and precipitation are analyzed. Over the last two years, Quincy's Engineering Office is creating a City-wide Drainage Capital Plan and has aggressively pursued the development of a Flood Inundation Model that seeks to identify the risk of flooding from of both precipitation and sea-sea level rise. The Town Brook watershed was the first area to be modeled and is now being used for engineering analysis.

9. The FEMA Flood Hazard Maps referenced by the Proponent in the ENF (Map 25021C0207E, effective on 7/17/2012) were replaced by FEMA on 6/9/2014 and have since been adjusted by two Letters of Map Revisions. The City is currently engaged with FEMA and the USGS in the final issuance of new FIRMS in 2021. The new FIRM panel for this section will include an accurate depiction of the floodway on the site. The MBTA is strongly encouraged to contact the City of Quincy Engineering Office to understand the current and pending status of the flood plan and floodway on this site.

10. The project is close to the Town Brook and Centre Street Diversion Culvert, the City is very concerned the pollutants of the Stormwater collected, during and after the construction, to these two drainage facilities. We request that the Applicant provide a detailed narrative to document the design intent for the on-site stormwater drainage system.

11. The ENF states that the Proponent will use the same calculations for stormwater that were used for the development of the Lowe's site in 2008. The MBTA is strongly encouraged to coordinate its final stormwater design with the City of Quincy Engineering Office and use the City's most recent stormwater analysis for the area.

12. The MBTA engage with the U.S. Army Corps. Of Engineers and the Commonwealth's Department of Conservation and Recreation on the proposed project and provide both agencies with an opportunity to determine if there are any impacts to the Town Brook Stream and the Town Brook Flood Control System.

13. The Stormwater requirements are different for a Bus Facility, compared with the previous Lowes warehouse. The Lowes Development designed for eighty percent (80%) TSS removal, the Bus Facility may require higher removal rate. In addition, the additional rainfall due to the Climate Change may require an upgrade to the existing drainage system. A hydraulic analysis of the drainage system is required to demonstrate the system is adequately to handle the additional flow.

14. The Stormwater Management Report should include a MA DEP Checklist for Stormwater Report demonstrating compliance with the Stormwater Management Standards of the Massachusetts Stormwater Handbook.

15. A comprehensive Operation and Maintenance Plan prepared for during and after the construction to ensure no excessive pollutants will be allowed to enter to the Town Brook and Diversion Culvert, temporarily or permanently. A detailed construction sequence is essential. More inspections and maintenance works should be included in the Operation and Maintenance Plan, both during and after construction. The O & M plan should also provide a section for long term pollution prevention and good housekeeping practices.

16. Under the new Building Ordinance in Quincy, the design flood elevation for the AE zone shall be the base flood elevation plus one foot. The MBTA should check whether the existing structures are in compliance with this requirement if major renovation will be done.

17. The Town Brook and Centre Street Diversion Culvert should be protected from any pollutants from the New Bus Facility; a detailed monitoring system to the soil and/or ground water should be set up to monitor any soil contamination in the Facility.

18. Discuss how to control the groundwater during construction and provide details on dewatering process on the site, if any, for the excavation.

19. A snow management plan, including the removal and storage, should also be provided. The plan should include a detailed description on how to remove and store snow to protect the Town Brook and Centre Street Diversion Culvert during the snow season.

20. The daily increase of 7,308 gallons of sewage, making the total site estimated flow 15,800 gallons per day must be reviewed with the City of Quincy Engineering Office and use the City's most recent sewer flow modeling for the sewer collection system flowing to the Fort Square Sewer Pumping Station. The MBTA acknowledges that a separate permit from the MWRA is necessary for a Sewer Connection, however the sewage must flow through over a mile of Quincy mains and a major Quincy pumping station prior to reaching the MWRA system off of Greenleaf Street.

21. The daily increase of 7,308 gallons of drinking water supply to the site will not be an issue for the City to supply, however the MBTA must notify the City Water Department if it wishes to add or modify water service connections including what is needed for fire prevention systems.

BUILDING/AESTHETICS

22. The MBTA has indicated that "As the design of the proposed facility advances, it will be led by sustainability and resiliency principles." In their presentation, they mentioned different possible standards, including LEED, Envision, and they have referenced the Massachusetts Executive Order No. 484: Leading By Example – Clean Energy and

Efficient Buildings. The MBTA should clarify and commit to these standards, and agree that the new facility that will exceed the sustainability and resiliency requirement in the state building code. The MBTA should clarify what its target goals are regarding energy efficiency, renewable energy, and greenhouse gas emissions.

23. It shall be the responsibility of the owner(s) of the site to ensure that all vegetation and landscaping is maintained in a healthy condition and that any dead or dying materials be replaced at the earliest appropriate season.
24. Confirm whether the existing easement for the access and utility can be used for the new development. Locate all the easements on the Plan and set up proper easement documents.

COMMITTMENT TO ELECTRIC BUSES

25. The current Bus Maintenance Facility (BMF) at 954 Hancock Street is used to maintain the oldest diesel MBTA buses, due to limited height restrictions. The City and its surrounding communities have endured higher amounts of particulates and greenhouse gas (GHG) emissions, from the use of these obsolete, polluting diesel buses. Other communities served by MBTA buses, have already benefitted from the interim technology afforded by hybrid buses which are more fuel efficient and less polluting.

    However, technology in the transportation sector has continued to advance, and electric buses are now available and in use in many US communities and countries worldwide, including many cold weather environments. Electric buses are even more fuel efficient, and emit no tailpipe emissions. Rapid advances in vehicle batteries and in charging technology continue to expand the driving range and decrease the time required to charge them, as well as lower the purchase price of e-vehicles.

    The MBTA is presently undergoing a pilot of five e-buses. The design and construction timeline anticipates the new BMF to be completed in mid- to late 2024, a full 4 years away. The MBTA should commit to completely eliminating diesel buses at the new BMF from day one. The MBTA should also commit that at the time it is opened, that a sizable percentage of buses to be maintained at the new facility are e-buses. Without that commitment, conceivably, the larger number of buses at the new facility, even if all hybrid, could emit more GHG emissions than the fewer diesel buses do now. Additionally, by eliminating the use of diesel buses, and reducing the need for hybrid buses, the MBTA will be able to limit the size of any proposed diesel fueling station.

    To be able to service a large fleet of e-buses, the MBTA will need to plan closely with National Grid, to ensure that there is sufficient electrical power at the site. The MBTA should ensure that the electric demand of a fleet of e-buses is not a limiting factor to their

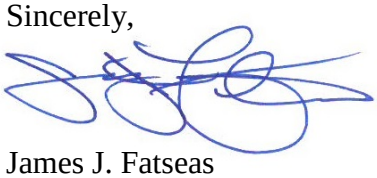
adoption. The MBTA has expressed concerns about the range of e-buses. The new planned BMF enables buses to be stored indoors, which enables vehicle batteries to be charged more fully in cold weather. The MBTA should also explore options to address their range anxiety concerns, including considering en-route charging.

PHOTOVOLTAICS

26. The MBTA indicate that they are exploring incorporating photovoltaic (PV) arrays, either as parking canopies in their surface lot, or on the roof of the new BMF. In addition to the BMF, the lot is expected to include a ~236 space surface parking lot for employees. Given the large demand on electricity, the City encourages the MBTA to explore how much electricity can be generated on-site through PV arrays, and to consider including batteries to store electricity. While the MBTA has indicated that "under consideration include the increased structural loading capacity of the roof to support extreme snowfall and consideration of a green roof", it should also commit to consider the structural consideration of a rooftop PV array, and batteries to store electricity.

Thank you for the opportunity to comment on this very important development project. We look forward to reviewing this project as it moves forward through the MEPA process. Please feel free to contact James Fatseas, Planning Director at (617) 376-1365, or Robert Stevens, AICP, Deputy Planning Director at (617) 376-1411 should you have any questions.

Sincerely,



James J. Fatseas
Planning Director

Cc: Frank Tramontozzi, PE, Mayor's Office
Al Grazioso, DPW Commissioner
Paul Costello, PE, City Engineer
Chris Cassani, TPAL Director
Paul Hines, Public Buildings Commissioner

From: SHELLY DEIN
To: Patel, Purvi (EEA)
Subject: Quincy Bus Maintenance Facility
Date: Monday, September 21, 2020 12:48:02 PM

Hi Purvi,

The presentation was informative, but I needed to 'hop off' the Zoom call periodically, so I didn't always hear responses to questions.

Please provide me with this information:

1. Envision design standard -- I am not familiar with this. Can you provide me with a link to it? Is this a goal or a requirement of the project?
2. Leading By Example - requires 20% better than Mass Energy Code performance. Since Quincy is a stretch code community, is MBTA interpreting this to mean 20% better than stretch energy code?
3. Design Guidelines -- is there a target % for energy-efficiency, renewable energy, and GHG emissions? Please provide.
4. Do MBTA design guidelines include commitment to MAXIMIZE use of renewable energy, or instead, explore developing some renewable energy? Please cite commitment in design guidelines.
5. Please advise what are plans for existing solar array atop Lowe's building?

Thank you.

Shelly Dein
Energy & Sustainability Director
City of Quincy
Public Buildings Department, 58 Saville Ave
Quincy, MA 02169

(o) 617-376-1921
(c) 857-939-6637

From: Anthony Sansevero
To: MEPA (EEA); Patel, Purvi (EEA)
Subject: EEA #16267 QUINCY BUS MAINTENANCE FACILITY
Date: Thursday, September 24, 2020 10:59:41 PM

Good Evening,

This is a response to the acceptance of written comments regarding the proposed bus maintenance facility at the Lowes site in South Quincy. I am a resident and homeowner on Penn St. which directly abuts the project site. I had attended the meeting earlier in the year and viewed the proposal that was sent via email this past week with MEPA. It has been indicated in the design proposal that there will be a new entrance/exit to the site via Penn St. at Columbia St. Currently Penn St. is a dead end. The dead end was created after Lowes was constructed. The back portion of the Lowes Parking lot has an emergency gate that is also used by the plumbing business on Columbia St. via electronic key. It was after many neighborhood meetings and persistence from the Penn St. neighborhood that the gate be kept shut. The dead end of Penn St. has been a nice change from the many years of constant traffic that used Penn St. as a cut through prior to the Lowes building. We still get traffic from people lost on the GPS and anxiously turn around either in my driveway or at the top of the street but nothing like the traffic that persisted prior to Lowes.

The current proposal has a new intersection at Burgin and Columbia along with the current entrance and exit directly across from the Quincy Adams MBTA station. It also appears from the design proposal that vehicles would once again be able to enter and exit Penn St. via the Columbia St exit and drive past the 12 or so homes that currently line this street. As a life-long resident, homeowner, taxpayer and concerned citizen I would say that would be totally unacceptable and be a disservice to the families that reside on Penn St. and disrupt the neighborhood. Traffic should be kept on Burgin Parkway and off of the residential street. I would hope and expect that the MBTA would recognize this and maintain the residential portion of Penn St. as a dead end either with a permanent barrier or an emergency gate like the one that currently exists in the vicinity of the Columbia St. intersection. This would ensure that the business and commercial portion be separate from the residential portion and give some quality of life to the residential homes of Penn St. by eliminating traffic. Thank you for taking the time to read my comments and I hope that the MBTA will work towards accommodating this important request.

Sincerely,

Anthony Sansevero
19 Penn St.
Quincy, MA 02169

From:	Andee Krasner
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 9:45:58 AM

To Whom It May Concern:

Regarding EEA# 16267 Quincy Bus Maintenance Facility:

Over 100 medical and public health organizations have declared the climate crisis a health emergency. And like Covid-19, it deserves a swift and comprehensive response. The Carbon Free Boston report commissioned by the City of Boston states that transportation must be electrified if we are to meet our 2050 carbon reduction goals. Likewise, we must make the same efforts at the state level to meet the targets of the Massachusetts Global Warming Solutions Act.

I ask that you build the Quincy bus garage for all-electric buses, make some of the fleet electric immediately, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Our children deserve a fair shot at a healthy and safe life in Boston. They can't do that without a livable climate. It's our responsibility to do everything we can now to transition to a low-carbon economy.

Sincerely,
Andee Krasner, MPH
Volunteer with Mothers Out Front

From: Annie Rogove
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 11:32:36 AM

To whom it may concern,

I'm a resident of Dorchester, MA and the Quincy bus garage plan has recently come to my attention. As a woman about to have my first child, climate and public health are some of my top concerns and I find the proposal to use buses that are diesel hybrid disturbing - at this point in the ongoing climate crisis, not to mention the increasing affordability and performance of electric vehicles, any proposals for new vehicles should be electric only. Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you,
Anne Rogove
45 Alban St.
Boston, MA 02124

From: Asa Hopkins
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:21:59 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility:
I care about climate and public health!
Please build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.
In my professional analysis of impacts of decarbonization on transit, electric buses are among the highest-impact option, and should be planned from the beginning.
Asa Hopkins

From:	Beth Kates
To:	MEPA (EEA)
Subject:	Re: EEA# 16267
Date:	Friday, September 25, 2020 10:12:43 AM

To whom it may concern:

Fires, floods, hurricanes, drought. There is no doubt that we are feeling the effects of climate change. It is our duty to save our planet and life upon it. We must do everything we can to stop the emissions of greenhouse gases. The MBTA must transition as soon as possible to zero emissions in their facilities and their fleet.Many cities have electric bus fleets and soon there will be electric trucks. There is no reason why the MBTA should build their Quincy garage or any facilities based on fossil fuels. Humankind must make bold decisive steps in order to have a future. The MBTA needs to make its contribution.

Thank you for hearing my comments. Be well,
Beth Kates

Brookline, MA

From:	Brian Mahoney
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 11:20:42 AM

Hi-

It would be great to see more buses be all electric. Please build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

I get my info from the Green Energy Consumers ALliance. My impression is that they're well-informed. Thanks.

Brian Mahoney
Boston Hypnosis
617-542-4444
bostonhypnosis.com

From: Chris Mullin
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 10:29:15 AM

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*R*egarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for **all-electric buses**, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Chris Mullin
Quincy

From:	Christian Madsen
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 10:25:27 AM

Greetings, MBTA!

I have read about the plans to make a new garage in Quincy and use diesel-hybrid buses initially. I believe it's way past due to go all-in on zero-emission vehicles. Please build the Quincy bus garage for all-electric buses, make some of the fleet electric from the beginning, and plan to increase the number of electric buses in the fleet once the garage is built. Public transportation should lead in environmentally sustainable technology.

Thank you,
Christian Madsen
26 Bow Rd, Newton, MA 02459

From:	D. Meservey
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 11:04:55 AM

Re: EEA# 16267 Quincy Bus Maintenance Facility:

It's time to make the change to all-electric buses!! Don't build a garage for outdated technology. Now is a critical time to act on climate, public health, and an economy for the future.
- -Build the Quincy bus garage for all-electric buses,
-- Make some of the fleet electric from the beginning, and
-- Make a plan to increase the number of electric buses in the fleet once the garage is built.

Sincerely,
D. Meservey

From: Jodi Hilton
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:27:24 AM

Please opt for electric buses which are much cleaner. Even if the initial cost is more, we will all win with cleaner air. Air quality affects all of us, but the pandemic has put a spotlight on people with underlying conditions even as common as asthma. Switching to cleaner energy is no longer an option but a necessity. Our government must lead the way.

Please build the Quincy bus garage for all-electric buses with a solid plan to increase the number of electric buses once the garage is built.

Thank you
Jodi Hilton
Cambridge, MA

From:	Kate Raisz
To:	MEPA (EEA)
Cc:	hello@greenenergyconsumers.org
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 10:34:38 AM

Dear all:

I am writing to advocate for all-electric buses at the EEA# 16267 Quincy Bus Maintenance Facility.

I drive an e-vehicle and am thrilled that I have zero emissions. The MBTA can lead the way in making their fleet completely electric! It's a win-win for public health and for Earth's climate.

Thank you,
Kate Raisz
e: kateraisz@gmail.com
m: +1 617 522 5225

From: Kim Larkin
To: MEPA (EEA)
Subject: EEA#16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 10:44:12 AM

Dear MEPA,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you for your time,

Kim Larkin

From: Martin Solomon
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:36:32 AM

Hello,

I'm emailing in support of facilities to support a fleet that includes electric busses. I care about climate and public health. Although the electric bus technology may not be where we all want it to be, an increased demand for the technology will spur more innovation. The magnitude and severity of the climate crisis demands that we be innovators in ways that go beyond what is obviously financially prudent in the old way of thinking. We have to take risks and lead, not follow. My request isn't even an extreme one. Please Build the Quincy bus garage to support all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Martin Solomon

From: Loeken, Mary
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 11:40:45 AM

In regard to EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Sincerely,
Mary Loeken
Jamaica Plain, MA 02130

From: Michaela Nielsen
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 10:51:23 AM

To whom it may concern:

Regarding EEA# 16267 Quincy Bus Maintenance Facility:
I think it would be better if the bus garage would be built for all electric buses. Undoubtedly, this will be the way to go in the future. If you want to attract residents, especially those who will commute to work in Boston, and if you want to creat a liveable city and Protect our climate for generations to come, I don't see why you would go with diesel-hybrid. Especially since this will be 4 years out and technology will have improved even more then, be forward-thinking and go electric.

Sincerely,
Michaela Nielsen

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

From: Montserrat Zuckerman
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:59:05 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you for your attention to this important matter for the future of the state, the country and the globe,

Montserrat Zuckerman
4 Gay St.
Arlington, MA 02474

From: Nancy Selvage
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 11:18:27 AM

I sincerely urge you to plan for an all electric fleet of buses as early as possible!!

Nancy Selvage
nancyselvage@gmail.com

www.nancyselvage.com

781-354-9825
781-259-8049

From:	Norah Dooley
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility • Zero-emission public transit:needed yesterday!
Date:	Friday, September 25, 2020 11:15:11 AM

Dear MBTA officials
I am writing regarding EEA# 16267 Quincy Bus Maintenance Facility and the urgent need for zero-emission buses. As a union member, worker safety advocate, a mother of 4 children who will inherit climate chaos and frequent rider of the MBTA I care deeply about climate and public health! And I ride, depend upon and appreciate our MBTA public transit system.

Zero-emission public transit is an idea that was needed yesterday. Half-way measures, in 2020 are unacceptable response to clear and present climate crisis.

I urge you to commit to building the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Zero-emission buses are the sensible, ethical and long-term economical course of action.

Sincerely,
Norah Dooley

Senior Lecturer, Storytelling
Lesley University, GSOE
Steward, SEIU 509
Pronouns: she/her/hers
617.460.3544
norah.dooley@gmail.com
ndooley@lesley.edu

StoriesLive.org norahdooley.com and Young Audiences Artist
Senior Lecturer: Storytelling
Lesley University • Rep GSOE • SEIU509.org
Climate Justice Committee, SEIU509.org

From: Green, Paul
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:56:06 AM

Please, the MBTA should be planning for an all-electric, zero-emission bus fleet rather than "diesel-hybrids." It pays to look to the future.

many thanks
Paul Green
Arlington, MA

From: Peter Katz
To: MEPA (EEA)
Subject: Quincy Buses
Date: Friday, September 25, 2020 11:17:01 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.
Thank you,
Peter Katz
Natick, MA

From: Ruthann Rudel
To: MEPA (EEA)
Subject: Regarding EEA# 16267 Quincy Bus Maintenance Facility:
Date: Friday, September 25, 2020 9:31:01 AM

Dear MBTA planners,
Regarding EEA# 16267 Quincy Bus Maintenance Facility:
I am writing to ask you to build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. This is an important decision for climate and public health! The time to switch to all electric buses is NOW! We are in a climate emergency and must respond as soon as possible! In addition, diesel emissions are a known carcinogen and cause other health effects including making people more vulnerable to respiratory infections like COVID. In Boston, our streets are narrow and so buses often run very close to housing, and the diesel buses blast particulates into everyone's windows and are also very loud! I live on a busy narrow street that has buses and it is a real burden to hear and feel them grinding and chugging and blowing smoke that collects on my windowsills every day!
Thank you,
Ruthann Rudel
205R Rindge Ave, Cambridge, MA

From: Sarah Gant
To: MEPA (EEA)
Subject: EEA#16267
Date: Friday, September 25, 2020 10:55:23 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Be Bold! Think of a future! Please.

Thank you,
Sarah Gant

From: Schuyler Laird
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:59:24 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the start. I hope we can make a plan to make the fleet all electric overtime.

From:	Sean Leach
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 9:50:11 AM

Good morning,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care deeply about climate and public health. Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Hybrids are a half-measure at best, and will simply add complexity and cost to your fleet management. Skip the half measures and move over to all-electric buses entirely. Let's stop running our buses on an expensive and non-renewable energy source. Let's power our fleets off electricity generated right here in MA.

Thank you.

-Sean Leach

From: Teresa Rodriguez
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:41:04 AM

Good morning,

I am writing about your plans to create a Bus Maintenance Facility in Quincy. I would like to request that you create garage that would work for an all-electric bus fleet from the start. This would help you create an all electric fleet of buses. This will be a win for public health. You may be concerned about the performance of electric buses but improvements in technology have been made since the MBTA purchased the five test buses. This will continue to improve between now and 2024, when the Quincy bus garage will be operational. I know that if you look back on this decision in 10 years you will be glad for the investment.

Gratefully,

Teresa Rodriguez
MBTA Rider

From: Tom M
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 9:33:50 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Sincerely,
Tom McCaughtry

From: Amanda Sindel-Keswick
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 12:45:14 PM

Hello,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you,
Amanda Sindel-Keswick
Cambridge, MA

--
Amanda Sindel-Keswick
Mezzo-soprano
Voice Teacher, Whole Tone Music Academy
amandasindelkeswick.com

From: ANDY GLUCK
To: MEPA (EEA)
Subject: Quincy BUS Facility
Date: Friday, September 25, 2020 1:18:29 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: We care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Sincerely,
Kim and Andy Gluck
19 Merton St
Newton MA 02458
617-939-3869

From: Breanne Happell
To: MEPA (EEA)
Subject: MBTA New Quincy Garage
Date: Friday, September 25, 2020 1:08:39 PM

Hello,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

With all of the evidence of climate change; the awful hurricanes, wildfires, high temperatures, and terrible storms we cannot be relying on fossil fuels any longer. Plan for the future to save the future and use electric buses! We have the technology to do so!

Thank you,
-Breanne

Breanne Happell

From: Eve Sorum
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 12:08:49 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility:

I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you for thinking about the future of our children and our planet!

Best,
Eve Sorum
Jamaica Plain, MA

From:	Heidi Frail
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 1:49:38 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Heidi Frail
29 Powers Street
Needham, MA 02492
heidi.frail@yahoo.com

From: Lana Carlsson-Irwin
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility"
Date: Friday, September 25, 2020 12:12:43 PM

Hello,

I live and vote in MA as well as owning a business here.

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you,

Lana Carlsson-Irwin
VP Operations
508-653-8007 ext 11

IRWIN Engineers
CHEMICAL & ENVIRONMENTAL

33 West Central Street, Natick, MA 01760
www.irwinengineers.com

From: Susan Hartnett
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 12:16:12 PM

I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Susan Hartnett

Cambridge MA

From: Cheryl Greenwald
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 4:02:24 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you,

Cheryl R. Greenwald

Somerville, MA

From:	gmlandron
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 5:28:50 PM

Hello.

I am writing to voice my concern. Please plan for an all-electric, zero-emission bus fleet rather than diesel-hybrids. We are long overdue on a transition to clean energy and the technology will only improve each year.

Please do not delay it any longer. I am confident that conservationists and industry can find solutions to resolve the issues that have risen in a beneficial way all and positively impact this and future generations.

I appreciate the MBTA's efforts to move with the times. I wish it can become the company leading the industry into the future.

Regards,

G. Landrón

GREEN ENERGY CONSUMERS ALLIANCE

MEPA Office
100 Cambridge St., Suite 900
Boston, MA 02114

September 25, 2020

To whom it may concern;

Green Energy Consumers Alliance, Inc. is a non-profit organization based in Boston, MA, with a mission to harness the power of energy consumers to speed the transition to a low-carbon future. We respectfully submit these comments in response to EEA# 16267 Quincy Bus Maintenance Facility.

On page 10 of the Environmental Notification Form that the MBTA recently submitted to MEPA regarding the planned bus facility in Quincy, the MBTA writes that "the proposed bus fleet would be diesel hybrid" and that "the proposed project would allow for future conversion to a zero-emission battery electric bus fleet." We urge MEPA to advocate for a swifter incorporation of electric buses into the fleet at the Quincy bus garage to minimize the environmental and public health impacts of the planned garage and the routes it will serve.

We understand that the five electric buses the MBTA piloted on the Silver Line did not meet its performance expectations, particularly in cold weather. While these results are important, they should not delay the incorporation of electric buses into the Quincy fleet for a couple of reasons:

- Technology has already improved since the MBTA purchased the five test buses, and will continue to improve between now and 2024, when the Quincy bus garage will be operational. For the next couple of years, the MBTA should focus on the building itself and monitor advancements in electric bus technology before giving much more thought to buying diesel-hybrids that would last until 2040. The MBTA will not have to put an order in for the buses housed in the new Quincy garage until 2023 or later.
- There are options to mitigate some of the range loss that the MBTA experienced during this pilot: buses that are stored indoors overnight, charge en-route, or use auxiliary heating (electric heat pumps or small propane- or diesel-based heating systems) do not experience as much range loss in the cold.

The Quincy bus barn is just one of nine in MBTA territory. The MBTA has four years to get this right for Quincy; in that time, they should also be figuring out how to shift from diesel buses to electric buses throughout their fleet. Thank you for this opportunity to comment.

Sincerely,

Anna Vanderspek
Electric Vehicle Program Director
Green Energy Consumers Alliance
anna@greenenergyconsumers.org

From: Isabel Carey
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 11:43:04 PM

To whom it may concern:

Please build the Quincy bus garage to accommodate all-electric buses, plan to purchase an initial set of all-electric buses, and commit to increasing the proportion of all-electric vehicles over time. Building the garage to accommodate an electric fleet now will save costs in the future. As I'm sure the MBTA is aware, the technology for electric buses is advancing rapidly, and the MBTA should look to be a leader in greening our public transit systems.

Thank you,
Isabel Carey

From: John Bookston
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility"
Date: Friday, September 25, 2020 3:51:50 PM

Please decommission diesel buses a.s.a.p. even though it has costs associated.

From:	dunster@tiac.net
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Friday, September 25, 2020 10:43:32 PM

Dear MBTA,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: Given escalating climate crises and the COVID 19 pandemic, the time to move toward zero emission is now! I urge you to build the Quincy bus garage for all-electric buses and make some of the fleet electric from the start. You can make a plan to increase the number of electric buses in the fleet once the garage is built. Our health and climate depend on immediate action such as this to reverse the damage of a century of diesel fuel pollution. We can't keep putting off changes that we should have made decades ago and expect breathable air for our grandchildren. Please do the right thing and build the Quincy Bus Maintenance Facility as a model of clean transportation.

Thank you for your time and consideration.

Sincerely,

Karen D'Amato

From: Nina Garfinkle
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility" in the subject line
Date: Friday, September 25, 2020 11:44:26 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility:

I am writing today because I care about climate and public health! Also, as a biker, what buses spew out into the air I breath right behind them, I care about my health! Build the Quincy bus garage for all-electric buses, some electric from the start, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thanking you in advance,
Nina Garfinkle

Nina Garfinkle | Garfinkle Design | www.ninagarfinkle.com
7 Holyoke Street, Boston MA 02116
T: 617.424.9115 | M: 617.733.4321 | nina@ninagarfinkle.com

From: radekona@comcast.net
To: MEPA (EEA)
Subject: EEA#16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 5:08:41 PM

WE NEED TO SHIFT TO ELECTRIC BUSES, overall, but in the meantime....

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thank you!

Renée DeKona
PHOTOGRAPHY
603 South St.
Roslindale, MA 02131
e-mail: radekona@comcast.net
http://www.reneedekona.com

From: RW Bussewitz
To: MEPA (EEA)
Subject: include “EEA# 16267 Quincy Bus Maintenance Facility”
Date: Friday, September 25, 2020 3:48:34 PM

Please move in dir. of all electric busses, not hybrids. Thank you,
Robert Bussewitz
JP

From: Sophy Tuttle
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Friday, September 25, 2020 3:14:14 PM

To Whom It May Concern,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: The current climate crisis has shown us that we need quick and decisive action in order to slow climate change. We have the technology for an electrified bus fleet, we do not need to be investing in diesel hybrids. Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Sincerely,

--

Sophy Tuttle

www.sophytuttle.com
(978)394-1954
@sophytuttle

From:	Ann Eldridge Malone
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Saturday, September 26, 2020 9:57:20 AM

Dear MBTA Decision-makers,

Regarding EEA# 16267 Quincy Bus Maintenance Facility. I am a mother raising my family in metro Boston and I care about climate and public health!

I implore you to build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

I will be following this plan closely and urge you to do the right thing and INCLUDE ELECTRIC BUSES RIGHT AWAY!!!

Thank you,
Ann Malone

--
Ann Eldridge Malone
Mobile tel 617-784-6367
Showing Up for Racial Justice at
www.SURJBoston.org

From:	Jim Kempf
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Saturday, September 26, 2020 10:34:52 AM

Dear MBTA,

I strongly oppose current and future use of diesel and/or diesel hybrid buses by MBTA and particularly with coming decisions regarding the Quincy facility.

Please build the Quincy bus garage to accommodate ALL-ELECTRIC busses, and sart the fleet with as many all-electrics as possible, with planning for continued increase in that fleet side.

It would be a grave mistake to lock into diesel-based vehicles, with their pollution and carbon footprint having terrible effects on both the local community, and our contributions to larger environmental problems.

It is your responsibility to plan the best for now and the future. Please do the right and best thing now for our communities.

Thank you very much for your time, effort and planning.
Sincerely, Jim Kempf. (Arlington, MA)

From:	Lisa Treat
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Saturday, September 26, 2020 12:33:28 PM

Dear MEPA director and staff,

I care about climate and public health! Please build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. **We should be planning for an all-electric, zero-emission bus fleet rather than "diesel-hybrids."** Our health and climate depend upon it.

- Technology has already improved since the MBTA purchased the five test buses, and will continue to improve between now and 2024, when the Quincy bus garage will be operational.
- There are options to mitigate some of the range loss that the MBTA experienced during this pilot: buses that are stored indoors overnight, charge en-route, or use auxiliary heating (electric heat pumps or, yes, small fossil-fuel based heating systems) do not experience as much range loss in the cold.
- We're not asking for 100% of the bus fleet to be electric on opening day in 2024! That would be unreasonable. We are urging the MBTA to make sure there are some electric buses in the fleet from the beginning and a plan for steadily increasing numbers after that.

Electric buses can cut it, and they'll protect our climate and health, too. We can't afford to delay them.

Thank you for your consideration,

Lisa Treat

76 Bourne St

Boston, MA 02130

active voter

From: Patrick Joyce
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Saturday, September 26, 2020 8:21:29 AM

Hi, I'm writing to submit public comments regarding EEA# 16267 Quincy Bus Maintenance Facility.

The climate and public health are two of the most important issues facing Massachusetts and the world today. We all have to do our part. I urge you to please build the Quincy bus garage for all-electric buses. Make as much as possible of the bus fleet electric at the outset, and then plan to increase the number of electric buses in the fleet going forward.

Thank you,

Patrick Joyce
Cambridge, MA

From: David Reich
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Sunday, September 27, 2020 1:02:32 PM
Attachments: Statement to T 21 Sept 2020.docx

I'm attaching comments from Quincy Climate Action Network, a community group of Quincy Residents working to reduce greenhouse gas emissions.

Public Comments of David Reich, board chair, Quincy Climate Action Network

Since plans for the new bus barn were announced, Quincy Climate Action Network has been urging the T to seize the opportunity and switch to battery electric buses on all routes originating in Quincy. In addition to their benefits to the environment and the city as a whole, the quieter, zero emission buses promise to make the new bus barn far more tolerable for its closest neighbors, who have never had to live with a bus barn before.

I came away from this summer's community meeting with the T with the hope that the T management was taking this option seriously. New reporting by the *Boston Globe*'s Adam Vaccaro and by Bruce Mohl in *Commonwealth* magazine, as well as language in the ENF itself, leads me to worry that I was wrong. To judge from these sources, the T seems mired in defeatism and old ways of thinking. I seems to going through the motions, having already decided to stick with diesel-powered buses, albeit more efficient diesel buses.

The T's main objection to adopting the battery electric buses centers on winter performance. Granted, that's a genuine obstacle, yet somehow many cities with climates as cold or colder than ours have found a way around it. I hope before you make a final decision, you consult with your colleagues in Montreal, Amsterdam, Oslo, even Worcester and find out how they're making electric buses work for them. QCAN and others have called the T's attention to workarounds including in-route charging, in-motion charging, propane bus heaters, electric heat pumps. We hope the T will not only consider those options but try them out and see what happens.

We also hope the T will entertain the possibility that buses that are currently on the market have a range that far exceeds that of the BEBs in the T's pilot project, on which the T has been basing its assumptions. For example, the 15 meter BYD buses that are being adopted in cold-weather Helsinki (average January temperature 7 degrees below that of Boston) would suffice for the vast majority of Quincy bus routes even if their actual mileage were half the claimed range of 250 miles. Can't the experts at the T devote a little time to exploring this and similar technologies before committing themselves—and us--to yet another generation of diesel buses?

From what the T representatives have said so far and the way in which they've said it, I believe that the T wants to do the right thing. I also believe the T understands that by making the transition to a new bus barn more attractive for Quincy, they will make it easier for themselves. Quiet, zero-emission electric buses could be very attractive. Yet another generation of polluting, climate-threatening diesel buses would be pretty unattractive and would not be well received by the people of Quincy or, I have reason to believe, the city government.

From:	Emily Lee
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Sunday, September 27, 2020 8:40:54 AM

Hi MBTA,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Regards,
Emily Lee

From: Bill Sloane
To: MEPA (EEA)
Subject: Comment about Quincy Bus Maintenance Facility
Date: Sunday, September 27, 2020 2:49:50 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: My view is that we need to build for the future; in this case, invest in all-electric buses that contribute to the movement away from fossil-fuel use and add to the momentum towards the reduction in green house gases in the atmosphere; a large percentage of which come from the transportation sector. Climate change is real, and we need to address it! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

From: Karen Thomas-Alyea
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Sunday, September 27, 2020 4:54:32 PM

Dear MEPA,

To avert the disaster of climate change and to reduce the health impacts of air pollution from internal combustion engines, we need to move into the clean energy economy of the future. We need Massachusetts to be a leader and plan projects that are forward thinking. Please design the Quincy Bus Maintenance Facility (EEA#16267) to use the vehicles of the future - all-electric buses.

Sincerely,
Karen E. Thomas-Alyea
Arlington, MA

From: Maureen Quinn-Dupont
To: MEPA (EEA)
Subject: "EEA# 16267 Quincy Bus Maintenance Facility"
Date: Sunday, September 27, 2020 10:46:03 PM

Hello,

I am writing to you regarding the Quincy Bus Maintenance Facility (EEA# 16267). We need more buses and bus garages if we are ever going to solve climate change and congestion. However I think the proposed garage should be for electric not diesel hybrid buses. We can't have any more diesel or gas; it would just be shortsighted given the climate crisis. We must have electric buses, with the electricity sourced from wind or solar. Thank you for your attention to this matter.

Sincerely,

Maureen Quinn-Dupont

From:	Seeta Badrinath
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Sunday, September 27, 2020 2:34:59 PM

To whom it may concern:

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

I am a Boston resident, a user of the T, a pediatrician, and a parent. It is ridiculous at this point in time to NOT plan for an eventual all electric fleet of buses. We should not continue to invest in polluting diesel buses, even if they are hybrids. The state has made a commitment to tackle climate change; transportation and especially the T, is an incredibly important part of that. Other nations are already doing this -- in colder climates than New England. Massachusetts can be a leader on this issue. Please do not miss this opportunity.

Sincerely,

Seeta Badrinath, MD, MPH

From: Carrie Rosenblum
To: MEPA (EEA)
Subject: Quincy bus proposal
Date: Monday, September 28, 2020 8:29:39 AM

Good morning,

I recently learned about the Quincy Bus Maintenance Facility plans for diesel hybrid buses. I'm writing to express my concern that planning for a fleet of diesel hybrids is not doing enough to tackle climate change and reduce our reliance on fossil fields. The MBTA writes in its proposal "the proposed project would allow for future conversion to a zero-emission battery electric bus fleet." We should be sowing the seeds and investing strategically in zero-emission buses now, rather than at some nebulous time in the future. The facility should be built in a way that accommodates all-electric buses, and the MBTA should make some of the fleet electric from the get-go. I'm not suggesting that the fleet should be 100% electric immediately-- that would be unreasonable. But for the health and climate resilience of our communities, we owe it to our citizens to put in a good-faith effort to begin this transition to electric NOW. This would mean outfitting some new electric buses in the fleet, and have a concrete plan for steadily increasing numbers after that.

Thank you,
Carrie Rosenblum
Cambridge, MA

From:	Elizabeth Spencer
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility”
Date:	Monday, September 28, 2020 10:33:02 AM

Dear MBTA,

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Please our lives and our climate is at stake.

Sincerely,

Elizabeth Spencer

From:	jeff.dvorin
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Monday, September 28, 2020 10:07:50 AM

To whom it may concern:

I am a resident of Boston, a frequent user of the T, and a strong advocate for electric vehicles. Boston has always been an example of forward-thinking and should strive to remain one.

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Sincerely,
Jeff Dvorin

Jeff Dvorin
jeff.dvorin@gmail.com

From:	Kris Gusmini
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility
Date:	Monday, September 28, 2020 6:23:03 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. The time to begin the conversion to an electric fleet is now!

Thank you for your hard work.

Kris Gusmini

Natick, MA

From: peat duggins
To: MEPA (EEA)
Subject: concerning future plans for EEA# 16267 Quincy Bus Maintenance Facility
Date: Monday, September 28, 2020 11:14:59 AM

To whom it may concern, I recently read of the plans to build the new Quincy Maintenance Bus facility (EEA# 16267) as a diesel-hybrid facility. I have taken some time to educate myself on the factors at play in this project and I am hoping you will take a minute to consider my thoughts as a citizen, voter and tax-payer. I am very concerned with climate change and have been extremely frustrated by the lack of initiative in (and even active-opposition to) taking action to mitigate climate change on the national stage.

I am appealing to you, the decision makers on this building-facility to take a longer-sighted view of how Massachusetts runs its crucial transportation infrastructure. I'll trust your intelligence and do-diligence as to how/why combating climate change is critical, but I want to stress how important it is we (YOU) do what we can, where we can, right here, on this project

I don't have the hard numbers at my disposal for the proposed bus facility, but having now owned an electric vehicle for several years and having installed a solar array that supplies 100% of the electricity for both my home and car, I understand that the upfront costs of switching your infrastructure can be daunting. It was for me. However, I am a hard-core spend thrift and I understand that it's not all about the short-game. In the case of switching my house and car, I know the fabulous truth, that switching away from a fossil-fuel economy is not only better for EVERYONE (and everyone's children), it is actually saving me money; the period at which the new system pays for itself was less than a decade on a system that will last several times as long. With the economies-of-scale at your disposal I am certain that you will find it even more advantageous.

I am writing to voice my support of a counter-proposal to build the Quincy bus garage for all-electric buses, and additionally to make some of the fleet electric ASAP, as well as planning on increasing the proportion of electric buses once the garage is built. I am 100% certain that the cost of doing so now, at the start of construction, is cheaper than it will ever be otherwise. I encourage you to run the numbers on the long-term economics of switching the entire (or majority of the) MBTA fleet to electric. You will find there is a break-even point after which it is actually cheaper to switch. I am very certain that you will discover that point will come well-before the expected life-span of the system itself, in which case, it is just better business/politics to go all-electric, say nothing of the moral responsibility of fighting climate change. Please take the long-view, I plan to live-out the rest of my days in Massachusetts and we all need to do our part to ensure it will be worth living in.

Thank you for your time,

-Patrick Duggins
24 Beethoven St,
Roxbury, MA 02119
--
Peat Duggins
pd@peatduggins.com
www.peatduggins.com

From:	Sofia Rose Wolman
To:	MEPA (EEA)
Subject:	Regarding EEA# 16267 Quincy Bus Maintenance Facility
Date:	Monday, September 28, 2020 1:50:12 PM

Greetings!
I'm writing regarding EEA# 16267 Quincy Bus Maintenance Facility:
I care about climate and public health! Please, build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.
I hope MA can be a LEADER given all the intellectual and financial resources, not to mention a constituency that by and large recognizes the imminent disaster of climate change and need for ACTION that is as EXTENSIVE as possible.
As those responsible for this area of infrastructure, this is of utmost importance. Another world is possible! Thank you for playing a courageous and visionary role, rather than a hesitant one. Be safe, and peace,
Sofia

--
Sofia Rose Wolman (she/her/hers)
To reach me more directly, please text 774-249-9382

From: Bill Dube
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Tuesday, September 29, 2020 1:27:15 PM

I am submitting a comment on the Quincy bus garage project planned to open in 2024. Yes, diesel-hybrid is better for the environment than diesel-only. But I urge you to build the Quincy bus garage to accomodate all-electric buses, and to include some all-electric buses in the fleet when it opens in 2024. The technology gets better every year, so I ask you to plan for a transition to all-electric at some point after 2024.
Thank you,
Bill Dube
Natick, MA

From:	Elisabeth Dambolena
To:	MEPA (EEA)
Subject:	Electric buses for the MBTA
Date:	Tuesday, September 29, 2020 11:07:56 AM

Hi,
I am a member of the Green Energy Consumers Alliance. I support their proposal of gradually introducing electric buses in the fleet of MBTA buses.

Please refer to the reason they put forward, why this would be a good thing to do.

For health reason I cannot write a longer message, but I fully support their proposal.

Elisabeth Dambolena

From: Jackie Boni
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Tuesday, September 29, 2020 3:18:16 PM

Hi -

I understand that you are currently taking comments regarding the proposal for the Quincy bus facility upgrade. That garage is a particular favorite of mine since 2 of my uncles drove busses based out of there for their entire careers.

I am writing to support upgrading to a fully electric fleet vs. a diesel fleet. If that isn't possible, can it be mix of buses, so that the facility is set to house electric buses and then as new buses come on-line they can be electric?

Thanks for considering and I wish you the best!

Jackie Boni
13 Nichols Rd, Needham, MA 02492
617-899-8063

From: Eric Holihan
To: MEPA (EEA)
Subject: EEA# 16267 Quincy Bus Maintenance Facility
Date: Wednesday, October 7, 2020 10:30:09 AM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

We need to make smart decisions taking into acount long term health and climate implications. Thanks.

-Eric

From: Fay Strigler
To: MEPA (EEA)
Subject: EEA #16267 Quincy Bus Maintenance Facility
Date: Tuesday, October 13, 2020 6:59:44 PM

To Whom It May Concern:

I am a Quincy senior who no longer has a car and therefore, depends on public transportation to get around. I would like to add to the chorus of voices from Quincy Climate Action Network to the unanimous vote of the Quincy City Council to prepare to buy only battery electric buses to be charged and maintained at the new bus barn slated for the old Lowe's parking lot on Burgin Parkway.
Electric buses are already used in climates much colder than Quincy, like Oslo. In three years, the technology for battery electrics will be even more advanced than it is now. The upfront cost may be more than the cost for diesel hybrid buses, but over the long term, electric buses cost $200,000 less per bus. I have heard of arrangements where the costs of electric schoolbuses are fronted and paid back by the schools with their fuel savings. Is this a possibility with our buses? Lastly, after having seen the beautiful new park across the street from the Lincoln Hancock School, I look forward to buses that will complement this green space and this community by belching no toxic fumes and making minimal noise. When people ask why Quincy is so much cleaner and quieter than it used to be, we can point to the MBTA having listened to longstanding commuters in Quincy at 3 train stops, 14 buses and 1 commuter rail stop. Please go electric!

Thanks for your attention,
Fay Strigler
Quincy Climate Action Network

From:	Czepiga, Page (EEA) on behalf of MEPA (EEA)
To:	Patel, Purvi (EEA)
Subject:	Fw: MBTA bus depot in Quincy Burgin Pkw.
Date:	Tuesday, September 15, 2020 11:46:42 AM

From: Helvi Johnson <helvianneli14@gmail.com>
Sent: Tuesday, September 15, 2020 10:10 AM
To: MEPA (EEA) <mepa@mass.gov>; Helvi Johnson <helvianneli14@gmail.com>
Subject: MBTA bus depot in Quincy Burgin Pkw.

Dear MEPA,
As a resident of close proximity to the new Bus Depot in Quincy, I am concerned about the air pollution in the area, as the busses idle while they are not in service. While MBTA is waiting for the new electric busses coming on line in the future the pollution is a huge issue for the area . The pollution is already high, as the cross the street there is one of the states largest parking carriage , and already pollutes the ambient air, as folks are leaving the commuter parking garage
What are your rules for the MBTA regarding controlling air pollution and the busses contributing to the residential neighborhood next to the facility?

Please add these comments to the public comments section,
Sincerely,
Anneli Johnson
Accredited Environmental Consultant, NGCF, Inc.
36 Garfield Street , Quincy, MA 02169

617-479-1601

From: Polly Lev
To: Patel, Purvi (EEA); abrennan@mbta.com
Subject: Re: EEA#16267 Quincy Bus Maintenance Facility
Date: Friday, September 18, 2020 4:26:43 PM

On Fri, Sep 18, 2020, 4:13 PM Polly Lev <pollylev63@gmail.com> wrote:

> This is very close to housing on two sides. Why not put it across the highway near Home Depot and away from housing. The "zero emissions" buses they speak of are years away ! they will be maintaing these deisal buses for years to come, squeasing every last dime out of them at the expense of our health.
>
> Deisal fumes contain over fifty toxic substances that cause cancer, heart failure, and lung disease. Just because they hide it indoors, like a slaughterhouse, may make it a little quieter but no less toxic to the air !

From: Czepiga, Page (EEA) on behalf of MEPA (EEA)
To: Patel, Purvi (EEA)
Subject: FW: EEA #16267, Quincy Bus Maintenance Facility
Date: Monday, September 21, 2020 9:03:58 PM

-----Original Message-----
From: Willa <willa@keyfitz.org>
Sent: Monday, September 21, 2020 7:48 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: EEA #16267, Quincy Bus Maintenance Facility

Dear MEPA,

I just heard that you are considering a facility for electric buses! I am delighted. Electric buses would be so much cleaner, quieter, and lower-maintenance than diesel or even hybrid buses. I don't have any specific comment on any of the other aspects of the planned facility, I just wanted to encourage you to take bold strides towards electrifying the entire MBTA bus fleet as soon as possible if not sooner!

Willa Bandler
Walpole

From:	Czepiga, Page (EEA) on behalf of MEPA (EEA)
To:	Patel, Purvi (EEA)
Subject:	Fw: Quincy Bus Maintenance Facility
Date:	Tuesday, September 22, 2020 8:12:40 AM

From: post island <postisland@gmail.com>
Sent: Monday, September 21, 2020 9:33 PM
To: MEPA (EEA) <mepa@mass.gov>
Subject: Quincy Bus Maintenance Facility

To Those Who Should Be Concerned:
As lifelong Quincy residents , "T" patrons and concerned environmentalists we are very concerned regarding the building of this facility and much more so that it be dedicated to the use of electric buses.
FYI -below is the letter to Governor Baker from QCAN in support of electric buses.

Dear Governor Baker,

I urge you on behalf of the Quincy Climate Action Network to convert the MBTA buses that
operate in and around our city to battery electric buses. As climate activists QCAN members are working first of all to reduce the greenhouse gas pollution that threatens the property and lives of Quincy residents, and converting the fleet to electric buses is an attractive option for radically reducing GHG pollution. Electric buses have one quarter the carbon footprint of diesel hybrid buses, a footprint that will grow increasingly small and eventually disappear altogether as the electricity supply comes more and more from renewable sources. Today one Quincy bus route alone, the 215, daily emits 2,000 pounds of CO2 equivalent. Multiply that by the number of bus routes in our city and convert all the routes to electric buses, and you've made a real dent in GHG pollution. What's more you'll have done it at a substantial cost savings because lifetime costs of buying, maintaining, and operating battery electric buses are significantly lower than those for hybrid diesel buses.

QCAN members live and breathe in Quincy, so our city's air quality also affects us every day of
our lives. Breathing the air in our part of the world can threaten human health. Take our asthma
rates, for instance. According to the state's own numbers, one in nine Massachusetts residents
suffers from asthma—including more than 10 percent of adults and almost 13 percent of
children. The Asthma and Allergy Foundation of America has named the Boston metropolitan

area number eight on its list of the top 20 asthma capitals for 2019, based on estimated asthma prevalence, emergency department visits due to asthma, and asthma-related fatalities. By comparison, New York City and Los Angeles, typically thought of as places with unhealthy air, don't even make the top 20 list.

Quincy in particular has suffered a decline in air quality owing to huge increases in vehicle traffic, including the all-day rush hour conditions on I-93 and routine tie-ups on local streets that have resulted from a development boom that has added some 2,000 residential units in the city since 2013. Emissions from the diesel engines of buses, some of them not in good working condition, exacerbate the problem.
The coming years will likely bring further declines in air quality, given the pace of real estate development in Quincy, with 2,000 more units in the planning or construction stages, along with the emissions we can expect from a new compressor station being built just over the Fore River Bridge.

With zero tailpipe emissions, battery electric buses can help bring our city's air quality back to its status of ten years ago—not pristine, perhaps, but better than now. According to reporting in the Boston Globe, the old bus barn on Hancock Street is slated for replacement anyway. We respectfully suggest that you seize the day and replace the old barn with a facility that accommodates electric buses, and further that you move expeditiously towards a total conversion of the MBTA's Quincy-based bus fleet to battery electric. Not only would it help preserve the planet for future generations, but it would give us Quincy residents something to cheer about today."

Sincerely,
Mike Cotter, RN
Cyndy Roche Cotter, Family Nurse Practitioner d
5 Post Island Rd.
Quincy, MA 02169
postisland@gmail.com

September 25, 2020

Massachusetts Executive Office of Energy and Environmental Affairs
MEPA Office

Re: Quincy Bus Garage MEPA Review Comments

Dear Purvi Patel,

I live in East Braintree in the Fore River Basin. The Basin has the two EJ communities of Quincy Point where my grandmother lives and Germantown across Town River. Quincy has more EJ neighborhoods including in South Quincy. We are served by dirty MBTA diesel buses. They spurt out black smoke and soot.

Photo of black smoke coming out of the MBTA Bus in Quincy Center (Robert Kearns)

As Scott Hamwey from the MBTA has said, we have the most polluting buses in the entire MBTA fleet serviced out of the Quincy Bus Garage.

East Braintree has levels of benzene higher than state levels. This is a concern for local and state officials. In the basin we are also in excess of toluene, formaldehyde. 1,3 butadiene and Volatile Organic Compounds.

We are concerned about cumulative emissions from all of the fuel tank farms, compressor station, three power plants, MWRA regional sewage pumping station, NEFCO/MWRA pelletizer plant, fatty acid refinery and other industrial facilities. There are a total of 10 facilities.

Sprague tank farms in Quincy Point were operating for years without permits and were recently settled for a $350,000 fine from MassDEP and Attorney General Maura Healey.
We are concerned about cumulative emissions and the impacts on respiratory illness and disease like cancer.

Black soot and smoke coming out of the buses at Quincy Center (Robert Kearns)

Zero Emissions Electric buses would be a huge improvement.

We must have faster procurement of Zero Emissions Electric buses. Also the fact that the bus garage building will be zero emissions electric buses ready but not have the actual chargers is disappointing.

We should have some electric buses in the garage on day 1.

I hope that the MBTA can make clear commitments for electrifying the Quincy fleet.

The MBTA should install in-route charging stations for electric buses at Quincy Center Station and Braintree MBTA Station. Both Quincy Center and Braintree Stations are used as layover areas for buses. PVTA has this at charging capabilities at the bus station in Downtown Holyoke.

PVTA Electric Bus Charger at Downtown Holyoke Bus Station (Robert Kearns)

Braintree has a municipal light department called Braintree Electric Light Department (BELD). They will likely be interested in working with MBTA to get these bus chargers for the Braintree Station and get the transmission for chargers at the Braintree MBTA station. The Braintree MBTA station serves the 226, 230, and 23 routes. BELD has a program promoting electric vehicles in town and has chargers at their offices. They also have helped the town install chargers at the Town Hall, Braintree High School, 85 Quincy Ave town offices, MBTA Garage, East Middle School, and with three different charging vendors at the South Shore Plaza.

Electric Vehicle Chargers at Braintree's East Middle School

5 level 1 and 2 level 2 electric vehicle chargers for employees and the MBTA fleet in the parking lot seems small for the size of the parking lot. I urge the MBTA to be more aggressive as they must be a leader to reach the Commonwealth's goal of 300,000 Electric Vehicles on the road by 2025. Governor Baker reaffirmed this commitment in 2017.

Members of the media have rightfully said that this is going to be a challenge.

If this facility is to open in mid 2024 at the earliest, it should be capable of having a much more aggressive electric charging infrastructure for employees and the MBTA fleet. MBTA should at least follow the City of Boston's policy requiring 25% of parking spaces in new off-street parking shall be equipped with electric vehicle charging stations and 75% remaining shall be EV Ready for expansion.

In conclusion, I have a vision of cleaner air in my community and a livable climate through zero emissions.

Best,

Robert Kearns
200 Pilgrim Road
Braintree, MA 02184

FRRACS
NO COMPRESSOR
South Shore, MA

Dear Purvi Patel,

Re: Quincy Bus Garage MEPA Review Comments

Fore River Residents Against the Compressor Station (FRRACS) has not only been fighting against the Weymouth Compressor Station, but for a cleaner future for the Fore River Basin.

We have members from around Massachusetts and specifically hundreds from the Fore River Basin Communities of Braintree, Quincy and Weymouth. The Fore River Basin has two Environmental Justice Neighborhoods of Quincy Point and Germantown.

We are served by dirty diesel buses that expel dark black smoke and soot through our communities. These are the oldest, highest polluting buses in the entire MBTA fleet.

The Fore River Basin is already overburdened with air pollution from a myriad of industrial facilities in the small geographic area. We have been called a sacrifice zone, and the “fertile crescent of hazardous waste”. We have the Clean Harbors Facility that ships in and out hazardous waste on trucks for the region, three power plants, three tank farms, a regional sewer pumping station, a fertilizer plant, a fat and plant oil refinery, a new compressor station, and many other industries around the designated port area. A total of 10 such facilities.

Sprague tank farms in Quincy Point recently settled for a $350,000 fine from MassDEP and Attorney General Maura Healey for operating without air permits.

The cumulative air pollution impacts are of grave concern for us, the residents of the Basin.

Cumulative emissions mean impacts like respiratory illness and diseases like cancer.

East Braintree has levels of benzene higher than state levels. This is a concern for local and state officials. In the Basin we are also in excess of toluene, formaldehyde. 1,3 butadiene and Volatile Organic Compounds.

Zero Emissions Electric buses would be an improvement for our communities. Any mitigation of emissions and air pollutants is welcome to help protect our public health.

We must have aggressive procurement of Zero Emissions Electric buses. It is disappointing that the bus garage building will be zero emissions electric buses ready but not have the actual chargers in place inside on day one.

We should have electric buses in the garage when it opens in 2024.

The Quincy bus fleet must have a clear timeline and electrification plan.

In-route charging stations for electric buses should be installed at Quincy Center and Braintree MBTA Stations. Both Quincy Center and Braintree Stations are used as layover areas for buses. PVTA has this at charging capabilities at the bus station in Downtown Holyoke.

Five level 1 and two level 2 electric vehicle chargers for employees and the MBTA fleet in the parking lot seems small for the size of the parking lot. The MBTA must be more aggressive in their plans. The MBTA must be a leader and set the example for other government entities and the private sector to reach the Commonwealth's goal of 300,000 Electric Vehicles on the road by 2025. Governor Baker reaffirmed this commitment in 2017.

Without a lack of aggressive action today reaching this electric vehicle goal will be a challenge.

If this facility is to open in mid 2024 at the earliest, it should be capable of having a much more aggressive electric charging infrastructure for employees and the MBTA fleet. MBTA should at least follow the City of Boston's policy requiring 25% of parking spaces in new off-street parking shall be equipped with electric vehicle charging stations and 75% remaining shall be EV Ready for expansion.

In conclusion, the Global Warming Solutions Act has strong targets for emissions reductions, we must be very aggressive to make and exceed the emissions reductions set out in the law.

Thank you for reviewing our comments. We look forward to improved service and cleaner air.

Best,

Robert Kearns
Fore River Residents Against the Compressor Station Board Member

From: Anna Desousa
To: Patel, Purvi (EEA)
Subject: Public ENF Comment: Quincy Bus Garage
Date: Sunday, October 4, 2020 12:29:26 PM

Good afternoon M. Patel,

I am reaching out as a concerned resident of Cambridge, MA at 57 Cedar Street regarding the new Quincy Bus Garage. The MBTA promises to make the new garage able to house an electric, zero-emissions bus fleet; however, it fails to specify when this new fleet will arrive and does not appear to be prioritizing the replacement of diesel busses in the immediate future. Anyone who takes the Quincy bus route, or leaves near it, deserves to breathe clean air. I ask that clean electric busses be prioritized in the creation of this new garage and that a clear, public timeline is released showing when they will arrive.

Thank you,
Anna --
Anna Desousa
adesousa824@gmail.com
(508)-309-9091

From:	SARAH FREEMAN
To:	Patel, Purvi (EEA)
Subject:	EEA#16267 - Quincy Bus Maintenance Facility
Date:	Sunday, October 11, 2020 12:06:48 AM

Dear Ms. Patel,

Re: EEA#16267 - Quincy Bus Maintenance Facility

I hope that the MBTA can make clear commitments for:

1. electrifying the Quincy fleet;
2. installing in-route charging stations for electric buses at Quincy Center Station and Braintree MBTA Station, both of which are used as layover areas for buses. This has apparently been done by PVTA at the bus station in Downtown Holyoke.

A recently-released report from Harvard, BU & UNC was presented by WBUR Earthwhile. It addresses the connection between transportation & public health. Three excerpts & a link to the report follow:

- About 40% of greenhouse gas emissions in Massachusetts come from transportation, more than any other sector. Vehicles also produce pollutants like carbon monoxide and particulate matter that can that can directly harm people. Research has shown that this type of air pollution disproportionately affects lower-income communities and communities of color.

- "a preliminary analysis of the health impacts of the regional Transportation & Climate Initiative (TCI) found that the plan that would reduce greenhouse gases the most would also yield the biggest health benefits, helping to avoid about 1,100 deaths and nearly 5,000 asthma cases, and saving $11.1 billion in heath costs in the decade after the initiative kicks in."

"The analysis — known as the Transportation, Equity, Climate and Health Study (TRECH) and conducted by researchers at Harvard's Center for Climate, Health, and the Global Environment, Boston University's School of Public Health and the University of North Carolina".

https://www.wbur.org/earthwhile/2020/10/06/transportation-climate-initiative-health-benefits

Thank you for the opportunity to comment.

Sarah Freeman
22 Arborway, Jamaica Plain, MA 02130

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purvi.patel@mass.gov

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Comment Details

EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Aaron	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Geschiere	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	troddentrails913@gmail.com	02130	

Comments

Topic: Electric Buses Now

Across the country, cities are rapidly shifting their bussing fleets from diesel to electric. They are cost effective in the long run, even at today's prices, and they will be a major improvement for public health and climate. Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Attachments

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purvi.patel@mass.gov

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EEA #/MEPA ID*	**First Name**	**Address Line 1**	**Organization**
16267	Catia	131 South Central Avenue	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Confortini	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	catiacc@yahoo.com	02170	

Comments

Topic: All electric fleet now

Dear EEA: As a resident of Quincy I urge you to transition to an all electric fleet immediately without transitioning to hybrid vehicles. The long term benefits and savings of EV buses must be taken into consideration, included externalities like health cost savings, climate benefits, noise pollution benefits. It is technically feasible to switch to EV buses now, as other cities in the world have already done. You have four years to get this right and to correct what lead to poor performance in your pilot project for the Silver Line. The technology Technology has already improved since the MBTA purchased the five test buses, and will continue to improve between now and 2024. Moreoever, there are options to mitigate some of the range loss that the MBTA experienced during this pilot. At the very least, you could have some of the bus fleet to be electric on opening day in 2024, even if not 100% of it, and have a plan for steadily increasing numbers after that. Thank you for your attention. Sincerely, Catia Confortini

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EEA #/MEPA ID*	**First Name**	**Address Line 1**	**Organization**
16267	Gregory	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Robben	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	+16105058086	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	gregoryrobben@gmail.com	--	

Comments

Topic: Electrify from the Start

While the current plan mentions future electrification, I think this new station and associated fleet should have some or all electric buses from the start. We have seen in other modern countries, even Scandinavian countries with colder climates, that the modern electric bus technology is more viable that ever and by the time the station is complete in 4 years there will be further improvements. Electric buses improve the quality of life for those who drive, maintain, ride, and live near the bus routes by reducing local emissions (even if powered by a fossil fuel plant, the power plant is far more efficient), reducing noise, and reducing the amount of maintenance/consumables that go into servicing the vehicle. I would hope to see at least half of the new buses for this station be electric or plug-in hybrid with the goal of full electrification by the end of the decade.

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Judi	49 Cranch Street	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Gaine	--	--
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	jagaine@gmail.com	02169	

Comments

Topic: Health, Asthma sufferers beg for clean air.

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. I am a lifelong MBTA rider. I have severe Asthma and the fumes take my breath away, since I was a child. The Asthma data suggest this is a strong pollutant, and causes acute reactions.

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Kathryn	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Hill Schrumpf	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	--	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	hellokaty37@gmail.com	--	

Comments

Topic: Plan for A Green Energy-Driven Fleet Today, Not Tomorrow

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Paul	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Campese	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	+15085772399	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	p.campese@gmail.com	--	

Comments

Topic: Please make the buses/facility all electric

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. This is the better long-term strategy. Thank you.

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EEA #/MEPA ID*
16267

Comments Submit Date
9/25/2020

Review Due By
11/16/2020

Reviewer
Purvi Patel purvi.patel@mass.gov

First Name
Shawn

Last Name
Szturma

Phone
--

Email
shawn.szturma@gmail.com

Address Line 1
81 Walnut Street

Address Line 2
--

State
MASSACHUSETTS

Zip Code
02476

Organization
N/A

Affiliation Description
Individual

Status
Opened

Comments

Topic: EEA# 16267 Quincy Bus Maintenance Facility

Dear Sir, I'm excited about investment in public transportation. I understand this maintenance facility is long overdue. However, I object to a commitment in writing that "the proposed bus fleet would be diesel hybrid" for this facility. While “the proposed project would allow for future conversion to a zero-emission battery electric bus fleet" that's short-sighted. Instead I would recommend that the MBTA actively plan for an all-electric, zero-emission bus fleet rather than “diesel-hybrids.” That's the right decision to combat climate change and improve public health. A better approach would be to any, or all of the following: - Build the Quincy bus garage for all-electric buses - Make some of the fleet electric from the beginning. You have a number of years to make this a reality - Devise a plan to increase the number of electric buses in the fleet once the garage is built Thank you for your consideration of these recommendations. I'm thankful for your services.

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Stephen	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Frail	--	--
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	--	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	sfrail2001@yahoo.com	--	

Comments

Topic: No more diesel buses

We are in a climate crisis, and we need to start acting like it. Already electric buses are affordable, feasible, and far less polluting than diesel buses. They also require FAR less maintenance over their life span. Please change this proposal to prioritize electric a bus fleet, and expedite the retirement of diesel buses.

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Susan	23 Norris St	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/25/2020	Hall	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	suehall@alum.mit.edu	02140	

Comments

Topic: EEA# 16267 Quincy Bus Maintenance Facility

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. It is crucial that we work toward electrifying everything as quickly as possible!

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16267	C.	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/26/2020	Reid	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	+16175555555	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	cyn.r17@gmail.com	02140	

Comments

Topic: Go for all electric instead of diesel hybid

For the health of people living on bus routes and the health of the planet - it only makes sense to not include diesel in any planning for future transportation.

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Jennifer	61 Tremont Street #2	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/26/2020	Marusiak	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	jmarusiak@gmail.com	02139	

Comments

Topic: EEA# 16267 Quincy Bus Maintenance Facility

Our climate doesn't have time for half-measures and hybrid solutions. The Quincy Bus station should be built to phase in all-electric buses right from the start after its 2024 completion. Massachusetts knows it needs to electrify everything as quickly as possible to stand a chance of meeting its emissions goals, and this is a prime example of setting ourselves up for a missed opportunity towards compliance with our climate laws. 2024 is already halfway through the short, science-based timeframe we were given by IPCC to drastically reduce emissions and avoid the worst of climate change. Come on, Massachusetts--we can do better!

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purvi.patel@mass.gov

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Jeremy	351 Marlborough Street Apt 5	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/26/2020	Cushman	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	jscushman@gmail.com	02115	

Comments

Topic: Electric buses

I care about the climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

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purvi.patel@mass.gov

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Charles	9 Lowell Street	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/28/2020	Chester	--	--
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	chester@gep-guide.net	02138	

Comments

Topic: Go electric

The Quincy bus garage should be built for all-electric buses, NOT polluting diesel busses.

Attachments

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purvi.patel@mass.gov

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	--	--	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9/28/2020	--	--	--
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	--	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	mollycrahman@gmail.com	--	

Comments

Topic: EEA# 16267 Quincy Bus Maintenance Facility

Regarding the Quincy Bus Maintenance Facility: we need to build our infrastructure for the future now! We must plan for sustainable, operational transit by seizing this pivotal moment to start our electric infrastructure now. Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built. Let's see this as a strategic opportunity and a moral imperative!

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purvi.patel@mass.gov

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EEA #/MEPA ID*	First Name	Address Line 1	Organization
16267	Ania	28 Temple Street	--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
10/5/2020	Camargo	--	Individual
Review Due By	**Phone**	**State**	**Status**
11/16/2020	--	--	Opened
Reviewer	**Email**	**Zip Code**	
Purvi Patel purvi.patel@mass.gov	ania.camargo@gmail.com	02114	

Comments

Topic: We need electric buses, no more pollution for Quincy

I am the mother of 2 teenagers and I am worried about the polluted future they are inheriting. Please lead the way on transforming our polluting transportation system and the health problems it is causing for the people of Quincy and Massachusetts. Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the beginning and make a plan to increase the number of electric buses in the fleet once the garage is built.

Attachments

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purvi.patel@mass.gov

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Comment Details

EEA #/MEPA ID*
16267

Comments Submit Date
10/12/2020

Review Due By
11/16/2020

Reviewer
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State
MASSACHUSETTS

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02169

Organization
Quincy Climate Action Network

Affiliation Description
Individual

Status
Opened

Comments

Topic: Electric battery buses

It is essential that all new buses purchased by the MBTA be all-electric plug-in/battery buses. Diesels are out, hybrid diesel/electric buses reduce cO2and other pollutants by only 30%, whereas all-electric buses have zero carbon and other operational emissions. (Yes. the electricity presently used to charge the batteries is not 100% clean, but electric vehicles still reduce overall pollution by 75% compared to gas or diesel, even when electricity source is considered.) Larry Chretian, Green Energy Consumers Alliance, has amply explained to the MBTA why it is economically and technically feasible AND ADVANTAGEOUS to buy all-electrics NOW rather than diesel/electric hybrids. Please buy all-electric buses as soon as it is physically feasible, and design the new Quincy facility accordingly. Please see the attached resolution unanimously passed by the Quincy City Council urging the forgoing.

Attachments

BEB resolution 29 June draft.docx(null)

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Whereas Gov. Baker has set a statewide goal of net zero greenhouse gas pollution (GHG) by 2050.

Whereas transportation is the state's biggest source of GHG;

Whereas the diesel buses on just one Quincy bus route, the MBTA's bus 215, emit 2,000 pounds of CO2 equivalent *daily;*

Whereas battery electric buses (BEBs) have one quarter the carbon footprint of diesel hybrid buses, a footprint that will shrink and then disappear as our electricity supply relies more and more on renewable sources;

Whereas, one in nine Massachusetts residents suffers from asthma—including more than 10 percent of adults and almost 13 percent of children.

Whereas the Asthma and Allergy Foundation of America has named the Boston metropolitan area number eight on its list of the top 20 asthma capitals for 2019, based on estimated asthma prevalence, emergency department visits due to asthma, and asthma-related fatalities;

Whereas studies have found that toxic exhaust from diesel buses can cause asthma in otherwise healthy people, and diesel exhaust is also a known carcinogen.

Whereas Quincy's air quality can be expected to decline, thanks to a new compressor station being built just over the Fore River Bridge;

Whereas the MBTA plans to build a new bus barn in Quincy or the vicinity that will accommodate both BEBs and hybrid diesel buses.

Whereas, compared to traditional diesel and hybrid diesel buses, BEBs will cause far less noise and air pollution in the new barn's immediate neighborhood, in that hybrid diesel buses lower tailpipe emissions by only 30 percent compared to old-style diesel buses, while BEBs have zero tailpipe emissions and don't rely on noisy engines.

Whereas, owing to savings on maintenance and fuel, BEBs cost $200,000 less over their lifetime than hybrid diesel buses.

Whereas BEB technology has been improving dramatically year by year, and orders for the new equipment don't need to be made until 2023, at which time BEBs will almost certainly have gotten even more efficient than they are at present.

And whereas even now, technologies such as quick mid-route charging, electric heat pumps, and winter heating packages mean that buses can function well year-round on all routes operating from the Quincy bus barn.

Therefore be it resolved that the Quincy City Council strongly urges the MBTA to replace its Quincy bus fleet with BEBs as soon as the new bus barn can be completed.

October 27, 2020

Purvi Patel
MEPA Analyst
Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Massachusetts Environmental Policy Act (MEPA) Office
100 Cambridge St., Suite 900
Boston, MA 02114

Email delivery of Adobe PDF document

Re: Quincy Bus Maintenance Facility, MBTA
EEA #16267
Comments

Dear MEPA Office:

We appreciate the opportunity to provide public comments on the Massachusetts Bay Transportation Authority's ("MBTA") proposed new bus maintenance facility as referenced above. In general, we support this proposal and praise the MBTA for taking this important first step to move forward with an ambitious program to replace and/or rehabilitate all such facilities and increase total capacity in order to support future fleet expansion needed to accommodate growing (post-pandemic) ridership demand. That said, we do offer some suggestions for consideration in the Secretary's Certificate with respect to appropriate and future (post opening) accommodation of battery electric buses (BEBs) in the design and construction of this new facility. As such, we offer the following comments and suggestions:

Comment #1: The MBTA has a pressing need to replace and upgrade aging bus maintenance facilities, and this specific proposed facility deserves support and praise in the Secretary's Certificate.

The MBTA has a pressing need to replace and upgrade aging bus maintenance facilities. Documented by the MBTA in its Integrated Fleet and Facility Plan (IFFP) published in December 2017, this conclusion is consistent with at least four (4) prior studies conducted by the Commonwealth and MBTA since 2003. A Better City recognized the need for a new and ambitious MBTA bus facility modernization program in its recent "New MBTA Bus Maintenance Facilities & Evolving Battery Electric Bus Technology, Case Study Report: Albany Street Garage", dated August 2019.

The MBTA's existing Quincy garage on Hancock Street with a rating of 2.4 (as of 2017) has long been identified as in poor condition and in need of complete replacement. The facility also suffers from both capability limitations and from being forced to operate at or over practical capacity. This facility needs to be replaced as soon as possible and we recommend that the Secretary's

Certificate consider the proposed new facility located directly on Burgin Parkway to be an exemplary project locus, conclude that the Environmental Notification Form ("ENF") as submitted to be extensive and thorough, and determine that no further environmental review be required.

Comment #2: The facility must be designed and constructed without undue delay and if that means the new facility must therefore be designed to commence operations with diesel buses, we support the MBTA's efforts to move forward under those circumstances.

We agree with the MBTA that if this facility moves promptly from concept to occupancy that it is highly likely it will need to commence operations by housing a fleet of ICE (internal combustion engine) buses powered with diesel fuels. As stated in Comment #1 above, it is of vital importance to the MBTA bus network that the existing Quincy garage close and be replaced with a modern and expanded facility without undue delay. If that means that the new facility must therefore be designed to commence operations with diesel buses, we support the MBTA's efforts to move forward under those circumstances in the context of realizing our suggestions listed in Comment #3 below.

Comment #3: The facility must be designed and constructed to allow for prompt conversion to an all BEB fleet; The Secretary's Certificate should require that provisions for all equipment to support prompt accommodation of BEBs be built as part of the initial project and require that such equipment not be severable in case capital budget challenges create funding constraints for the proposed facility.

The ENF states: "The facility would be designed for diesel…buses and would allow for future conversion to a battery electric bus fleet." We do note, however, that while the ENF commits that the new facility as proposed will have "the ability to support battery electric buses" (see pp. 1), the ENF appears to omit sufficient detail as to what that means in terms of design, construction, and capital requirements. Although we agree with the MBTA's contention that OEM manufacturers are unlikely to be able to supply a practicable all BEB fleet to support Opening Day of this new facility, we do take a more optimistic view that the first successful procurements of all BEB fleets will likely take place within several years, not a decade or more thereafter. Regardless of whether initial MBTA BEB major purchases take place two or five years after occupancy of this proposed new facility, the facility must be designed and constructed with ALL equipment and space (including but not limited to power supply rooms, power inverter rooms, power conversation (AC to DC) rooms, space to house or locate fast Level 3 charging devices for each bus vehicle assigned to the new facility, and appropriate sized and located spare fixed conduits and connections between any such rooms and charging devices) necessary to support an expeditious and prompt switchover from diesel (fossil fueled) to electric (zero emission) propulsion.

We recommend that the Secretary's Certificate require:

(1) That the MBTA develop a detailed and complete listing of all equipment and spaces ("BEB Facility Elements") that need to be designed and constructed so as to provide the proposed new facility with the prompt and expeditious ability to switch from a diesel to BEB fleet; and

(2) That the MBTA undertake a supplementary process to disclose the details of such BEB Facility Elements, undertake an iterative and transparent public review process, and submit a final listing of such BEB Facility Elements back to MEPA as part of its official file record of approval. We further request that public review process include outreach to a variety of environmental and transportation advocates and stakeholders, including but not limited to the Conservation Law Foundation, Sierra Club, Massachusetts Chapter, and A Better City; and

(3) That the MBTA not be allowed to consider such BEB Facility Elements as accessory or optional objectives for the initial build or Phase 1 of the proposed facility. In other words, the MBTA appears to have committed to include the ability to support BEB in the proposed new facility and we recommend that MEPA go further and mandate that the MBTA not be allowed any severability in this regard. No matter the cost to include any such BEB Facility Elements in the initial project, we know with certainty that the cost to retrofit them at a later date will be at least an order of magnitude higher, which could result in an unacceptably higher financial bar precisely at the

moment in which the MBTA should be encouraged to swiftly switch from diesel to BEB fleets. The Secretary's Certificate should highlight the import of building this facility to fully support such a prompt switchover, mandate that the MBTA incorporate all BEB Facility Elements in the initial design and build of the proposed facility, and not be allowed any severability to delete, deviate from, or otherwise avoid and postpone the cost of these essential BEB elements in the event of any such funding constraints that the MBTA may or may not experience with this proposed facility. This facility needs to be designed and built right, and we urge MEPA to help make sure that happens right from the start by incorporating these BEB related requirements and requests in its Secretary's Certificate.

This project has to ability to not only help the MBTA take an important first step in its new and vital bus maintenance facility modernization program. By doing this initial step right–designed and built to accommodate a prompt and expeditious switch from a diesel to BEB bus fleet–this facility can help be an environmental beacon to help shape the kind of sustainable and climate responsible transportation system our region must embrace and produce to properly carry us forward thru this century. This project–provided it fully has all appropriate BEB accommodations–can be our shared legacy. Together, we have a wonderful opportunity to realize a truly transformational project that will advance accessibility, equity, and sustainability for the City of Boston, the region, and the Commonwealth. We look forward to continuing to serve as a partner with the MBTA and you in this significant effort.

Thank you in advance for your consideration of these comments and requests.

Sincerely,

[Signed by Glen A. Berkowitz]

Richard A. Dimino
President and CEO

cc:

Erik Stoothoff, Chief Engineer, MBTA
Chris Osgood, Chief of Streets, City of Boston
BPDA Director Brian Golden, City of Boston
Kathleen A. Theoharides, Secretary, Executive Office of Energy and Environmental Affairs
Staci Rubin, Conservation Law Foundation
Veena Dharmaraj, Sierra Club, Massachusetts Chapter

From:	Mark Holman
To:	MEPA (EEA)
Subject:	EEA# 16267 Quincy Bus Maintenance Facility" in the subject line
Date:	Monday, October 26, 2020 9:28:34 PM

It's hard to believe I need to say this, but our MBTA buses MUST be electric starting NOW for the MBTA to do its part meet legally established MA Climate goals and to help save the planet for our children.

As for EEA# 16267 Quincy Bus Maintenance Facility, I urge you to build the Quincy bus garage for all-electric buses. In addition, you should make at least some of the fleet electric from the start and develop and publish a plan to increase the number of electric buses in the fleet once the garage is built.

To do anything less would be a betrayal of your responsibility to taxpayers and riders and to public health if residents in the communities you serve.

Mark Holman
Taxpayer and MBTA rider
Roslindale
--
Mark A. Holman

Strategic FundRaising Solutions

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Integrated Marketing • Generous Gourmets™

Mark@SFRsolutions.net

From: Dave Chamberlain
To: MEPA (EEA)
Subject: MBTA Plans for Clean Buses
Date: Monday, October 26, 2020 8:07:57 PM

I read recently in a Green Energy Consumers newsletter that the MBTA is proposing a diesel hybrid bus fleet, which I assume is meant to address winter driving range concerns with all-electric buses. However, I am also aware that Norway is deploying electric buses in the Arctic Circle, and that Germany has buses that utilize CO2 heat pumps which gains 75% of heating energy needed from the ambient air.

Please consider developing plans for an all-electric bus fleet to limit GHG emissions and reduce urban pollution.

Best Regards,
Dave

David R Chamberlain, PE, CEM
Principal Energy Engineer

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From: Mike Zhe
To: MEPA (EEA)
Subject: EEA 16267
Date: Monday, October 26, 2020 7:56:36 PM

Regarding EEA# 16267 Quincy Bus Maintenance Facility: I care about climate and public health! Build the Quincy bus garage for all-electric buses, make some of the fleet electric from the get-go, and make a plan to increase the number of electric buses in the fleet once the garage is built.

Thanks,

Mike