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August 1, 2022

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

PROJECT NAME : Alden Mills Fire Station
PROJECT MUNICIPALITY : Revere
PROJECT WATERSHED : North Coastal
EEA NUMBER : 16536
PROJECT PROPONENT : City of Revere
DATE NOTICED IN MONITOR : June 24, 2022

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Environmental Impact Report (Single EIR) and hereby determine that it **adequately and properly** complies with MEPA and its implementing regulations.

The Certificate on the Expanded Environmental Notification Form (EENF)/Proposed EIR provided a limited Scope for a Single EIR, focused primarily on climate resiliency concerns due to the project's location in a coastal floodplain and the criticality of the asset in providing fire protection for the surrounding communities. While the Single EIR described improvements made to the project to address these concerns, including elevating the building above current floodplain levels, project design may need to undergo further refinement to address off-site flood impacts. In addition, this project proposes construction on a Coastal Dune regulated under the Massachusetts Wetlands Protection Act (M.G.L. c. 130 s. 40; WPA) and the Wetlands Regulations at 310 CMR 10.00. Comments from Agencies, including the Massachusetts Department of Environmental Protection (MassDEP), the Office of Coastal Zone Management

(CZM) and Department of Conservation and Recreation (DCR), indicate that the project as designed does not appear to comply with the wetlands performance standards and Massachusetts Building Code requirements for construction on a Coastal Dune. As detailed below, MassDEP has appealed the Order of Conditions issued for the project and will issue a Superseding Order of Conditions (SOC) that will make a finding with respect to the project's conformance with the relevant performance standards for Coastal Dune. As MassDEP has full authority to determine the project's compliance with regulatory standards, and because adequate disclosure of impacts and mitigation was made in the Single EIR, I am allowing the project to proceed to subsequent permitting.

Project Description

As described in the Single EIR, the project consists of the construction of a two-story fire station with a footprint of approximately 8,190 square feet (sf), a parking lot with 10 spaces and two driveways. The fire station will include two service bays for fire trucks, a smaller bay for fireboats, a community room and living space for firefighters. The project also includes construction of a new stormwater management system, landscaping and new sidewalks and five on-street parking spaces.

Project Site

The 0.6-acre (25,671-sf) project site is located in the Point of Pines section of Revere. The site is bordered by Lynnway to the east, ramps connecting Lynnway to Route 1A (North Shore Road) to the south, North Shore Road to the west and to the north by open space owned by the Department of Conservation and Recreation (DCR) and a bus loop with a landscaped island. A bus stop associated with bus service provided by the Massachusetts Bay Transportation Authority (MBTA) is located on the landscaped island.

The City of Revere (City) owns an approximately 0.35-acre portion of the project site, which was the site of a fire station that was used until 2000 and demolished in 2021. Portions of the site owned by DCR include a 0.11-acre (4,592 sf) parcel and 0.14 acres (6,000 sf) of land adjacent to Lynnway. The areas owned by DCR are parkland protected under Article 97 of the Amendments to the Constitution of the Commonwealth (Article 97). The project includes landscaping and construction of a new sidewalk and on-street parking in the area along Lynnway, which will continue to be owned by DCR. The proposed parking lot will be located on the 0.11-acre parcel, which will be conveyed from DCR to the City pursuant to Article 97 legislation which has not yet been enacted.

As shown on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) (number 25025C0029J, effective date March 16, 2016), a portion of the site is located within the 100-year floodplain (Zone AE) with a Base Flood Elevation (BFE) of 10 ft North American Vertical Datum of 1988 (NAVD 88) designated as Land Subject to Coastal Storm Flowage (LSCSF). The site is located on a Barrier Beach identified as Rv-1 in the Massachusetts Barrier Beach Inventory prepared by the Massachusetts Office of Coastal Zone Management (CZM).

The site is located within an Environmental Justice (EJ) population designated as Income, within one mile of EJ populations designated as Minority and Minority and Income and within 5 miles of EJ populations designated as Minority; Income; Minority and Income; Minority and English Isolation; Income and English Isolation; and Minority, Income and English Isolation.

Environmental Impacts and Mitigation

Potential environmental impacts of the project include the addition of 0.28 acres of impervious area; alteration of 28,023 sf (0.64 acres) of Barrier Beach and Coastal Dune and 1,705 sf of Land Subject to Coastal Storm Flowage (LSCSF); generation of 20 average daily trips (adt); construction of 10 parking spaces; and permanent conversion of 0.11 acres of public parkland owned by DCR to a parking lot for use by the fire station employees.

The project will minimize and mitigate environmental impacts by providing DCR with approximately 13 acres of land; constructing a new stormwater management system with Best Management Practices (BMPs) to improve water quality, reduce flow rates and infiltrate stormwater; constructing a new sidewalk along Lynnway; and providing community meeting space in the fire station. The project design will incorporate climate resiliency measures as described below, though outstanding issues remain.

Jurisdiction and Permitting

The project is undergoing MEPA review because it requires Agency Action and meets/exceeds the review thresholds at 301 CMR 11.03(1)(b)(3) (conversion of land held for natural resources purposes in accordance with the Amendments to the Constitution of the Commonwealth Article 97 to any purpose not in accordance with Article 97) and 301 CMR 11.03(3)(3)(b)(1)(a) (alteration of a coastal dune). The project is required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a Designated Geographic Area (or DGA) (as defined in 301 CMR 11.02) around an EJ population. The project (DEP File #061-0783) received an Order of Conditions (OOC) from the Revere Conservation Commission (RCC) on July 11, 2022; MassDEP has appealed the OOC and will issue an SOC. The project requires a Construction Access Permit from DCR. The project was granted a Vehicular Access Permit by the Massachusetts Department of Transportation (MassDOT) on March 28, 2022,¹ and an 8(m) Permit from the Massachusetts Water Resources Authority (MWRA) on October 19, 2021. The project is subject to the EEA Article 97 Land Disposition Policy (Article 97 Policy).

The project may require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA).

The project involves a Land Transfer from DCR. Therefore, MEPA jurisdiction is broad and extends to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

¹ According to the City, the applications for the MassDOT and MWRA permits were submitted in 2021 before it was known that the project required MEPA review. The City should consult with MassDOT and MWRA to determine if amendments to the permit are necessary to reflect the project as described in the Single EIR and prior MEPA filings.

Changes Since the Filing of the Expanded ENF/Proposed EIR

The design of the building, except for the apparatus bay where fire trucks and the fire boat will be stored, has been modified to meet Massachusetts Building Code requirements for construction in a floodplain and to increase its resiliency. The first-floor elevation has increased from 11.5 ft NAVD 88 as proposed in the EENF/Proposed EIR to 13.25 ft NAVD 88. According to the Single EIR, this elevation is above the existing 500-year flood elevation and will provide two feet of freeboard above the existing 100-year flood elevation. In addition, the transformer pad outside the building has been raised to elevation 13.25 ft NAVD 88, electrical outlets have been raised to elevation 16.5 ft NAVD 88, occupied portions of the apparatus bay, including bathrooms and gear rooms, have been raised to 14.0 ft NAVD 88 and building mechanical systems will be mounted on the roof. Areas below elevation 16.5 ft NAVD 88 will be wet floodproofed.

Review of the Single EIR

The Single EIR was generally responsive to the Scope included in the Certificate on the EENF/Proposed EIR. It described existing site conditions and provided a description and plans of the updated design of the building and post-development site conditions. It provided a supplemental analyses of baseline health conditions within the DGA and potential project impacts and mitigation measures relative to EJ populations.

Environmental Justice

As noted above and previously documented in the EENF/Proposed EIR, the project site is located within an EJ population designated as Minority and within one mile of EJ populations designated as Minority and Minority and Income. Within the census tracts containing the above EJ populations, the following languages are identified as those spoken by 5% or more of residents who also identify as not speaking English very well: Spanish, Khmer and Portuguese. In accordance with the MEPA regulations at 301 CMR 11.02, the DGA for the project is identified as one mile.

In response to the Scope included in the EENF/Proposed EIR Certificate, the Single EIR reviewed public outreach efforts that will continue to be implemented by the City to inform the public about the project and opportunities to provide input into the project during future planning, permitting and construction phases of the project. The City's outreach plan includes the following components:

- Notification via email to Community Based Organizations and the City's website of construction commencement, construction completion and opportunities to provide input into the project;
- Translation of project summaries into Khmer, Portuguese and Spanish;
- Offering language interpreters at public meetings; and,
- Holding community informational meetings upon request.

As previously documented in the EENF/Proposed EIR, EJ populations within the DGA are contained within census tracts or municipalities that exhibit the following vulnerable health EJ criteria as identified in the Department of Public Health's (DPH) EJ Tool: heart attack hospitalizations, childhood asthma and childhood lead exposure. In response to the Scope and as required by the MEPA Interim Protocol for Analysis of EJ Impacts, the Single EIR provided a review of potential sources of pollution in the DGA based on data provided by the DPH EJ Tool. The DPH EJ Tool indicates that there are significant numbers of potential pollution sources in the DGA, including:

- MassDEP major air and waste facilities: two sites (one in Saugus and one in Lynn) with air operating permits, 10 large quantity waste generators (7 in Lynn, two in Saugus and one in Revere), and two large quantity toxics users (one in Lynn and one in Saugus).
- M.G.L. c. 21E site: two sites (one in Lynn and one in Saugus) regulated under c. 21E and the Massachusetts Contingency Plan (MCP).
- "Tier II" toxics use reporting facilities: Seven facilities that store hazardous chemicals above reporting thresholds (six in Lynn and one in Saugus).
- MassDEP sites with Activity and Use Limitations (AULs): Seven sites with hazardous materials remaining on-site after final site cleanup (four in Lynn, two in Saugus and one in Revere).
- Wastewater treatment plants: Two private wastewater treatment plants, one in Lynn which treats sanitary sewage from a residential development and one in Saugus that treats industrial wastewater.
- Underground storage tanks (USTs): Two sites in Lynn and one site in Revere.
- EPA facilities listed in the Toxics Release Inventory: One site in Lynn.
- Road infrastructure: Route 1A, which passes through the DGA in a north-south direction.
- MBTA bus and rapid transit: Ten MBTA bus stops (eight in Lynn, two in Saugus and five in Revere), 15 MBTA bus routes through the area and two commuter rail stations/stops (both in Lynn).
- Other transportation infrastructure: One cargo rail line.
- Energy generation and supplies: Three power generators, including an incinerator in Saugus, a private gas power plant in Lynn and a wind turbine at the Lynn wastewater treatment facility.

The Single EIR included an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"), which was previously provided in the EENF/Proposed EIR, which identified that the project site is at high risk from sea level rise/storm surge and urban flooding due to extreme precipitation. EJ populations within the DGA are also located in within a coastal floodplain and are also likely to be at risk from sea level rise/storm surge and extreme precipitation. Resiliency issues are also pronounced as the project is intended to provide critical fire protection services to the surrounding communities, including EJ populations. As discussed in detail below, MassDEP and CZM believe that the project as designed may have adverse impacts on adjacent properties by redirecting floodwaters; the City may be required to make changes to the design of the project to minimize impacts to adjacent properties, including

properties located within the nearby EJ population. While the building itself has been elevated, the floor of the apparatus bay must be at elevation 11.5 ft NAVD 88 so that trucks can enter and exit the facility without damaging the trucks; if the apparatus bay were to be elevated, the driveway would have a steep angle and trucks would bottom-out when transitioning between the driveway and the roadway, which is at a lower elevation. The City should continue to study alternatives to improve the climate resiliency of the project while minimizing off-site impacts, including the use of an open-pile foundation.

Based on the above, the filing indicates that there is some indication of an existing “unfair or inequitable” burden, including heart attack hospitalizations, childhood asthma, childhood lead exposure, potential sources of pollution and climate risks. In the EENF/Proposed EIR and the Single EIR, the City has asserted that the project will not result in disproportionate adverse effects, or increase the risks of climate change, on the EJ populations by materially exacerbating such existing burdens. In particular, the filings indicated the project is not expected to have a negative impact on EJ populations because the building and project site are small, the building will replace a fire station that was previously located at the site, the fire station will only generate 20 vehicle trips per day and the project will be designed with a new stormwater management system to minimize runoff and flooding. The project will provide a needed public safety service to the neighborhood, and thereby help alleviate public health burdens of the neighborhood. As noted above, the project should continue to study alternatives to improve resiliency and minimize off-site impacts, particularly in light of the potential for disproportionate adverse impacts on EJ populations.

Article 97

The project is subject to the EEA Article 97 Policy and must obtain Article 97 legislation for the approximately 0.11-acre parcel to be transferred from DCR to the City. The EENF/Proposed EIR included an analysis of the proposed land transfer with respect to the six criteria listed in the Article 97 Policy used to determine if exceptional circumstances are present justifying the land transfer. In addition to the 0.11-acre parcel, the City is also seeking an easement on a 3.7-acre parcel from DCR to be used for a separate public safety facility constructed on Revere Beach Parkway. The City has proposed to transfer approximately 13 acres of wetlands in the Rumney Marshes Area of Critical Environmental Concern (ACEC) to DCR in exchange for the 0.11-acre parcel and 3.7-acre easement. According to DCR, a revised bill (H.4979) has recently been filed with the Legislature that was prepared with DCR’s input and is consistent with the Article 97 Policy. In addition to the 13 acres of wetlands, the City will provide a payment to DCR if an appraisal determines that the DCR parcels have a higher value than the City parcels. Neither the EENF/Proposed EIR nor Single EIR included an Article 97 analysis for the 3.7-acre easement; according to the Single EIR, the City will file a separate ENF or NPC for the easement.

Wetlands/Coastal Resiliency

As noted above, the design of the building has been revised to incorporate measures to improve coastal resiliency, including establishing a first floor elevation of 13.25 ft NAVD 88,

which exceeds the existing 500-year flood elevation and provides two feet of freeboard above the existing 100-year flood elevation; the transformer pad has been raised to elevation 13.25 ft NAVD 88; electrical outlets have been raised to elevation 16.5 ft NAVD 88; occupied portions of the apparatus bay, including bathrooms and gear rooms, have been raised to 14.0 ft NAVD 88; and building mechanical systems will be mounted on the roof. In addition, landscaping with native species will be provided to improve flood damage protection and storm damage prevention on site. According to the Single EIR, stairs, ramps, walls that support ramps and granite block benches will be used as natural elements to dissipate wave energy in coastal flood events; however, as discussed below, these structures may exacerbate flooding impacts by reflecting wave energy where it might otherwise be dissipated.

The Single EIR included an updated delineation of wetland resource areas on the project site, reviewed the applicability of the Wetlands Regulations performance standards to the project and provided a revised analysis of the project's impacts to wetlands and proposed mitigation measures. As detailed below, MassDEP and CZM do not believe that the design of the Preferred Alternative meets the performance standards for Coastal Dunes in the Wetlands Regulations at 310 CMR 10.28.

As recommended by MassDEP in its comments on the EENF, the City filed an NOI which confirmed that the site is located on a Barrier Beach, Coastal Dune and within LSCSF. In the Single EIR, the City asserted that the performance standards for Barrier Beach and Coastal Dune are not applicable to the project because the site has been highly altered and no longer has the topography and other physical characteristics or performs the functions associated with these resource areas. However, comments from MassDEP and CZM indicate that the soils data included in the Single EIR demonstrate that the site consists of marine deposits made up of sand, gravel and peat, which are typical of dune sediments on developed barrier beaches. Furthermore, Coastal Dunes on previously-developed sites maintain the ability to dissipate storm energy and provide storm damage and flood control functions that are protected by the performance standards.

As proposed in the Single EIR, construction of the fire station would include removal of the existing dune sediments to a depth of up to 10 ft and their replacement with structural fill, a solid foundation for the building and other solid structures such as stairs and ramps. According to CZM and MassDEP, the project design does not appear to be consistent with the Coastal Dune performance standards because the proposed structures and impervious area will negatively impact the ability of the dune to dissipate wave energy and provide flood control, and may exacerbate flooding by redirecting floodwaters to adjacent properties. Construction of a building on a Coastal Dune typically requires an open pile foundation in order to meet the performance standards; in addition, a pile foundation is explicitly required by the Massachusetts Building Code for buildings on a Coastal Dune. According to MassDEP, it has filed an appeal of the OOC issued by the Revere Conservation Commission to ensure that the project is designed in a manner that will protect the interests of the Wetlands Protection Act. As indicated, I am allowing the project to proceed to subsequent permitting because MassDEP has full authority to determine the project's compliance with regulatory standards, and adequate disclosure of impacts and mitigation was made in the Single EIR.

Mitigation and Draft Section 61 Findings

The Single EIR included a chapter that summarized proposed mitigation measures and provided individual draft Section 61 Findings for each State Agency that will issue permits or transfer land for the Project. The draft Section 61 Findings should be revised and finalized during permitting.

Article 97

- The City will provide DCR with approximately 13 acres of wetlands located within the Rumney Marshes ACEC in exchange for the 0.11-acre parcel at the project site and an unrelated easement on a 3.7-acre parcel; and,
- If the appraisal conducted by the Division of Capital Asset Management and Maintenance (DCAMM) identifies a higher value of the DCR-owned parcels than the City-owned parcels, the City will pay the difference to DCR.

Wetlands and Stormwater

- Minimize exposed soil by sequencing construction activities so as to not disturb land until necessary and by using temporary stabilization measures;
- Implement sedimentation and erosion controls around catch basins and the perimeter of disturbed areas;
- Establish a permanent vegetative cover as soon as possible or use other soil stabilization methods;
- Comply with all conditions imposed on the project in the SOC that may be issued by MassDEP;
- Construct a new stormwater management system that complies with the requirements of the Massachusetts Stormwater Management Standards (SMS), including the use of deep sump catch basins, water quality separators and an infiltration system constructed under the proposed parking lot, and has sufficient capacity to attenuate peak flows and remove Total Suspended Solids (TSS) from the (current) 100-year storm event based on NOAA Atlas 14 precipitation estimates.

Resiliency and Adaptation

- Establish a first floor elevation of 13.25 ft NAVD 88, which exceeds the existing 500-year flood elevation and provides two feet of freeboard above the existing 100-year flood elevation;
- Construct the transformer pad at an elevation 13.25 ft NAVD 88;
- Install electrical outlets at an elevation 16.5 ft NAVD 88;
- Construct occupied portions of the apparatus bay, including bathrooms and gear rooms, at elevation 14.0 ft NAVD 88;
- Mount building mechanical systems on the roof; and,
- Provide landscaping with native species.

Environmental Justice

- Implement measures during the construction period to minimize noise, air quality, traffic and water quality impacts on EJ populations;
- Provide a community room for use by residents;
- Decrease emergency response times to nearby EJ populations by constructing a new, modern fire station facility.

Greenhouse Gas Emissions

- Incorporate the following energy-efficient measures in the project design:
 - Energy recovery ventilation;
 - A solar reflective roof;
 - LED lighting;
 - Enhanced insulation;
 - Low-E glass for windows;
 - Vertical bifold doors for heat loss reduction;
 - Use of sustainable refrigerants; and,
 - Bike racks to mobile-source emissions by encouraging commuting by bike.

Construction

- Minimize noise impacts by minimizing idling by equipment and trucks, limiting construction to daylight hours, and using mufflers on equipment;
- Comply with MassDEP's Air Pollution Control regulations at 310 CMR 7.00, including anti-idling provisions, require that contractors use Ultra-Low Sulfur Diesel Fuel and require that diesel equipment be fitted with after-engine emissions controls, such as diesel oxidation catalysts and/or particulate filters;
- Use of dust control measures to reduce fugitive dust emissions; and,
- Maximizing recycling of construction materials and disposing of wastes in compliance with MassDEP's Solid Waste regulations.

Conclusion

Based on review of the Single EIR and in consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. State Agencies and the Proponent should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12. If any changes are made to the project, including as a result of conditions included in the SOC, the Proponent should consult with the MEPA Office to determine whether a Notice of Project Change may be required.



August 1, 2022
Date

Bethany A. Card

Comments received:

07/20/2022	City of Revere
07/25/2022	Massachusetts Office of Coastal Zone Management (CZM)
07/25/2022	Massachusetts Water Resources Authority (MWRA)
07/25/2022	Massachusetts Department of Environmental Protection (MassDEP)/Northeast Regional Office (NERO)
07/26/2022	Department of Conservation and Recreation (DCR)

BAC/AJS/ajs



July 26, 2022

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

Re: EOEEA #16536 Alden Fire Station Single EIR

Dear Secretary Card:

The Department of Conservation and Recreation (“DCR” or “Department”) is pleased to submit the following comments in response to the Single Environmental Impact Report (“SEIR”) submitted by the City of Revere (the “Proponent”) for the Alden Fire Station project (the “Project”).

The Project is located within 1 mile of an Environmental Justice (“EJ”) Population requiring submittal of an EIR. The Proponent is submitting this SEIR in accordance with 301 CMR 11.06(8). As described in the SEIR, the Project will construct a new fire station at 140 Lynnway in Revere’s Point of Pines neighborhood. The City is requesting transfer of an adjacent 4,592 sf parcel from the DCR to allow for a larger building footprint and increased parking area on the site.

Article 97

Transfers of interests in state conservation property must meet the requirements set forth in the Executive Office of Energy and Environmental Affairs (“EEA”) Article 97 Land Disposition Policy (the “Policy”). The Policy has the stated goal of ensuring no net loss of lands protected under Article 97 in the ownership and control of the Commonwealth and its political subdivisions, and states as a general premise that EEA and its agencies shall not sell, transfer or otherwise dispose of any right or interest in Article 97 lands. Transfer of ownership or interests therein only may occur under exceptional circumstances, as defined in the Policy, including the determination that no feasible alternative is available, and a minimum amount of land or an interest therein is being disposed for the proposed use. Such a transfer also requires legislative authorization by the General Court through a two-thirds supermajority roll-call vote.

In January 2022, DCR provided to the Proponent a re-draft of H.4221, originally filed at the request of the Proponent, that would meet the Policy. That re-draft was recently filed as H.4979. The bill addresses 3 distinct dispositions involving two separate DCR parcels that are requested for transfer by the City, including the DCR parcel located at the proposed fire station Project site, and one unrelated easement requested by the City. The bill calls for an appraisal to be performed by DCAMM to determine fair market value of the DCR’s parcels and the City’s parcels. If the appraisal identifies a difference in values of DCR land over the City land, the City will be required to pay the difference to DCR, and DCR would use those funds for purposes of meeting the requirements of the EEA Article 97 Land Disposition Policy. Following

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Bethany A. Card, Secretary
Executive Office of Energy & Environmental Affairs
Douglas J. Rice, Commissioner
Department of Conservation & Recreation

completion of MEPA review and passage of the Article 97 legislation, DCR may issue a 5-year License Agreement for the City to occupy the site to bridge the time while the DCAMM Article 97 appraisal process is progressing.

Construction and Access Permit

The Project will require a DCR Construction and Access Permit (“CAP”) for a new curb cut and for work activities within the boundaries of the adjacent DCR managed roadways. DCR has developed ‘Design Standards and Guidelines for Revere Beach Boulevard and Ocean Avenue’. Conditions in the DCR CAP will be informed by the Design Standards and Guidelines.

Flood Hazard Management

As proposed, this Project involves activities within a 1%-chance floodplain (100-year floodplain) as delineated on the current effective Flood Insurance Rate Map (“FIRM”) for Suffolk County, dated March 16, 2016. Specifically, the site includes a zone AE, with a base flood elevation of 10 feet above North American Vertical Datum (“NAVD”). Additionally, an Order of Conditions dated July 11, 2022 identifies the site as a coastal dune. 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 Revere 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. Revere 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 administer any of these requirements and therefore does not provide official determinations as to compliance with them; rather, our comments are provided as an overview of the requirements and the documentation that the FHMP believes may be necessary to demonstrate compliance with these requirements.

The State Building Code, Appendix G (as amended) requires buildings in coastal dunes to be constructed on open pile foundations with the bottom of the lowest horizontal structural member supporting the lowest floor at an elevation determined by the Conservation Commission, typically at least two feet above grade. The proposal, while apparently compliant with standards for construction in A zones, does not meet the Building Code standards for construction in a coastal dune.

Thank you for the opportunity to comment on the SEIR. Questions related to the Article 97 process can be directed to Jennifer Howard, Director of Land Acquisition and Protection at jennifer.howard@mass.gov. Questions related to Flood Hazard Management can be directed to Eric Carlson at eric.carlson@mass.gov. Please contact Sean Casey at sean.casey@mass.gov, DCR's Director Construction and Access Permits, to request a CAP.

Sincerely,

Douglas Rice

Douglas J. Rice
Commissioner

cc: Patrice Kish, Priscilla Geigis, Tom LaRosa, Jennifer Howard, Sean Casey, Eric Carlson



MASSACHUSETTS WATER RESOURCES AUTHORITY

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July 25, 2022

Bethany A. Card, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Alex Strysky
Boston, MA 02114

Subject: EOEEA #16536 – Environmental Impact Report
Alden Fire Station, Revere, MA

Dear Secretary Card,

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Environmental Impact Report (EIR) submitted by City of Revere (the “Proponent”) for Alden Fire Station (the “Project”) located at 140 Lynnway in Revere. The Project site formerly contained a fire station, which was demolished and the site was cleared in 2021. The Project involves construction of a new 2-story fire station which will service the Point of Pines neighborhood of Revere.

MWRA previously commented on the Project Environmental Notification Form (ENF) on April 22, 2022. MWRA’s comments on this EIR continue to address Toxic Reduction and Control (TRAC) discharge permitting and MWRA Enabling Statue Section 8(m) permitting.

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 separate sewer and storm drain systems. Therefore, the discharge of groundwater or stormwater to the sanitary sewer system associated with this Project is prohibited.

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 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 Michael J. Quercio, Source Coordinator, in the TRAC Department at (617) 305-5645 or Michael.Quercio@mwra.com.

Section 8(m) Permitting

Section 8(m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, allows the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. Due to the proximity of MWRA infrastructure to the Project site, an 8(m) permit will be required. The Proponent should coordinate with Ralph Francesconi in the Operations Permitting Group at (617) 305-5827 or Ralph.Francesconi@mwra.com for assistance. The EIR acknowledges this requirement.

On behalf of the MWRA, thank you for the opportunity to provide comments on this Project. Please do not hesitate to contact Katie Ronan of my staff at (857) 289-1742 with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Weidman', with a long horizontal flourish extending to the right.

Rebecca Weidman

Director

Environmental and Regulatory Affairs

cc: John Viola, MassDEP



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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July 25, 2022

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

RE: Revere
Alden Fire Station
EEA # 16536

Attn: MEPA Unit

Dear Secretary Theoharides:

The Massachusetts Department of Environmental Protection Northeast Regional Office (MassDEP-NERO) has reviewed the Environmental Impact Report (EIR) for the proposed Lower Alden Fire Station in Revere. MassDEP provides the following comments.

Wetlands

This project proposes the construction of an 8,190 sf fire station with associated parking, utilities, and landscaping at 140 Lynnway in Revere, in the Point of Pines neighborhood. Construction requires obtaining 4,592 sf of DCR land on the abutting property, as well as obtaining a construction access permit which will allow access to the fire station from a bus loop that is on the aforementioned DCR property. This land swap is part of a larger 14-acre land transfer between the DCR and City of Revere.

MassDEP's comments on the EENF pointed out that the parcel on which the project is proposed is mapped as a Barrier Beach as defined in and regulated by 310 CMR 10.29. By definition, a barrier beach is made up of "coastal beaches and coastal dunes extending roughly

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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parallel to the trend of the coast.” In this case there is no coastal beach on the site, so the Barrier Beach is classified as coastal dune. This Barrier Beach is significant to storm damage prevention and flood control, so the project must comply with the performance standards for work on dunes specified at 310 CMR 10.28(3) through (5). The project must also comply with the standards in the building code for work in dunes, which includes elevating structures on open pilings. In addition, MassDEP’s comments emphasized that a portion of the project is located in Land Subject to Coastal Storm Flowage (LSCSF), which is elevation 10.0 NGVD 88, not Bordering Land Subject to Flooding (BLSF).

The SEIR acknowledges that the correct Resource Areas are Barrier Beach, Dune and LSCSF but project implementation does not appear to fully comply with the performance standards for work in these areas. The SEIR asserts that the site itself is not a dune because it contains no natural hill, mound or ridge of sediment serving the purpose of storm damage prevention and flood control. The SEIR further asserts that the site is not landward of a coastal beach, and the sediments on the site are not fine to medium well sorted sands deposited by wind action or storm overwash [SEE: Definition of Dune at 310 CMR 10.28 (2)]. Previous development at the site has changed the natural slope of the coastal dunes as they existed prior to construction of the fire station and development of the site. The applicant’s borings and soils report indicate that the sediments at the site consist of marine deposits made up of sand and gravel, peat, and the structural fill used during the construction of the previous fire station. Such a soil profile is typical of dune sediments on developed barrier beaches. Dunes on previously developed sites sometimes lose their ability to exchange sand and sediment by wind and wave action but maintain their function to dissipate storm energy and provide storm damage prevention and flood control. The proposed development of this site should be designed to protect the functions of storm damage prevention and flood control on the site to the maximum extent possible. Because the SEIR refutes the presence of any dune at the site, no attempt has been made to comply with the performance standards for work on a Dune.

In response to comments from CZM and MassDEP suggesting the project incorporate a design for improved resiliency to coastal storm events, the proposed first floor elevation of the building has been raised from 11.5 NAVD88 to 13.25 NAVD88, providing 2 feet of freeboard above the 100-year flood plain elevation to meet Massachusetts State Building Code requirements for critical structures. Bathrooms and gear rooms in the apparatus bay have been raised to a first-floor elevation of 14 feet NAVD88. All the areas in the building below elevation 16.5 NAVD88 are proposed to be wet floodproofed and the electrical outlets in the building will be above elevation 16.5. The site will be landscaped with native coastal vegetation. The apparatus bay floor cannot be raised beyond the initially designed elevation of 11.5 without creating access/egress issues for the fire apparatus, specifically bottoming out. Therefore, the elevation of this portion of the building is not proposed to change. MassDEP concurs with CZM that the proponent should explore approaches that reduce the velocity of flood waters and reduce erosion. This usually means elevating structures wherever possible to allow floodwaters to pass under them, reducing impervious areas and increasing areas of native vegetation.

MassDEP also concurs with CZM that the coastal dune at the site is comprised of unconsolidated sediments that will move in response to flood related energy in a manner likely to destabilize solid foundations. To address the problem of unconsolidated dune sediments, the project is proposing to excavate soil materials at the site to a depth of up to ten feet and replace them with

structural fill. This removal and replacement of dune sediments will change critical characteristics of the dune as described under 310 CMR 10.28, including its form, shape, volume and ability to move landward or laterally. The replacement of dune sediments and installation of the proposed solid fill foundation and impervious areas including parking will diminish the dune's ability to reduce storm damage and provide flood control in contravention of the performance standards at 310 CMR 10.28 (3). These changes may result in storm or wave energy being reflected onto adjacent sites and structures. The depth of flooding in this area is likely to be exacerbated by climate change impacts, which should be appropriately considered in the design of the building and the site.

MassDEP is concerned that the project has not sufficiently examined how the floodplain currently functions and how it will function for the design life of the project, including how floodwaters will flow across the site in the 100-year storm event. The SEIR does not present an analysis of possible changes in the extent of coastal floodwater or changes in velocity, direction, or depth of floodwaters resulting from any proposed solid fill or grade changes on or adjacent to the site. As stated in the comments for the EENF, the analysis should include consideration of conditions during storm events where there is a combination of rain and coastal flooding.

MassDEP is in receipt of a Notice of Intent (NOI) for the project (MassDEP File #61-0783), and an electronic copy of the Order of Conditions (OOC), dated July 11, 2022, approving the project as proposed in the NOI. While the NOI acknowledges the presence of Barrier Beach and LSCSF at the site, it refutes the presence of Dune on the site. The OOC states there are 28,000 square feet of Coastal Dunes at the site. However, the OOC does not include conditions to ensure that the project meets the performance standards for work on Coastal Dune. Because the OOC identifies the site as a coastal dune, the building is required to be constructed on open pilings under the State Building Code. Due to concerns about the ability of OOC to protect the interests of the Act, MassDEP filed an appeal of the Order on July 22, 2022 and will review the project in preparation for a Superseding Order of Conditions.

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 wetlands 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,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

John D. Viola
Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Eric Worrall, Rachel Freed, Jill Provencal, Phil DiPietro, MassDEP-NERO



THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
OFFICE OF COASTAL ZONE MANAGEMENT
251 Causeway Street, Suite 800, Boston, MA 02114-2136
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MEMORANDUM

TO: Bethany A. Card, Secretary, EEA
ATTN: Alex Strycky, MEPA Office
FROM: Lisa Berry Engler, Director, CZM
DATE: July 25, 2022
RE: EEA-16536, Alden Fire Station; Revere

The Massachusetts Office of Coastal Zone Management (CZM) has completed its review of the above-referenced Single Environmental Impact Report (SEIR), noticed in the *Environmental Monitor* dated June 24, 2022, and offers the following comments.

Project Description

The previously filed EENF proposed construction of a new 2-story 8,190 square-foot fire station to serve the Point of Pines neighborhood on a 0.35-acre vacant site that was the location of a previously demolished fire house. The project as proposed in the EENF required 4,592 square feet (SF) of land owned by the Department of Conservation and Recreation (DCR) on an adjacent parcel to be transferred to the city for access to the existing bus loop, construction of four of the proposed parking spaces, the subsurface infiltration system, and a dumpster. This proposed Article 97 land transfer is a portion of a larger land swap between the city and DCR. The project is located within and adjacent to land subject to coastal storm flowage (LSCSF), FEMA zone AE elevation 10 NAVD88, on a barrier beach within a coastal dune. Since the filing of the proposed EENF/EIR, changes have been made to the project to mitigate the potential impacts of coastal flooding and building on the barrier beach/dune. According to the SEIR, the proposed first floor elevation of the building has been raised from 11.5 NAVD88 to 13.25 NAVD88 to improve resilience to coastal storm events, providing 2 feet of freeboard above the 100-year flood plain elevation to meet Massachusetts State Building Code requirements for critical structures. Electrical outlets within the building have been raised to elevation 16.5 and floor outlets have been eliminated. All occupied portions of the apparatus bay such as bathrooms and gear rooms have been raised to a first-floor elevation of 14 feet NAVD88, and areas below elevation of 16.5 NAVD88 are proposed to be wet floodproofed. The transformer pad has been raised to elevation 13.25 NAVD88 and building mechanical systems are roof mounted. According to the SEIR, stairs, ramps, walls that support ramps, and granite block benches will be used as natural elements to dissipate wave energy in coastal flood events. The SEIR proposes to improve the proposed design by landscaping the site with native coastal vegetation to enhance site resiliency. The SEIR states that the floor of the apparatus bay cannot be raised beyond the originally proposed 11.5 NAVD88 elevation shown in the initial design without creating serious access/egress issues for the fire apparatus itself, so the elevation of this portion of the building is not proposed to change.

Project Comments

The SEIR maintains that the site is located within a barrier beach and dune, but the site itself is not a dune because it is fairly level and therefore not a natural hill, mound or ridge of sediment serving the purpose of storm damage prevention and flood control, it is not landward of a coastal beach, and the sediments on the site are not fine to medium well sorted sands typical of material deposited by wind action or storm overwash. The natural slope on coastal dunes that have been developed is often modified by previous construction activities, and the sediments identified in the



borings and soils report, specifically marine deposits consisting of gravel and sand, peat, and structural fill used during the construction of the previous fire station, are very typical of dune sediments on developed barrier beaches. Despite these alterations, dunes in areas of previous development can and do function to dissipate storm energy and provide storm damage prevention and flood control. It is important that the project protect these functions on the site to the maximum extent.

The SEIR incorporates several important improvements to the project to improve coastal resiliency, including additional first-floor elevation, elevation of electrical utilities, and placement of mechanical systems on the roof. Additional landscaping with native species will also improve flood damage protection and storm damage prevention on site. The SEIR also states that stairs, ramps, walls that support ramps, and granite block benches will be used as natural elements to dissipate wave energy in coastal flood events, but these structures may exacerbate flooding impacts by reflecting wave energy where it might otherwise be dissipated. The proponent should explore approaches that work with the resource area to reduce the velocity of flood waters and reduce erosion. Typically, reducing impervious areas, elevating structures wherever possible to allow floodwaters to pass under, and increasing native vegetation are effective methods of reducing flooding impacts.

As stated in CZM comments on the EENF, the sediments in the coastal dune will respond to moving floodwaters in a particular way. Specifically, the unconsolidated sediments on the coastal dune will move in response to flood related energy in a way that is likely to destabilize solid foundations. To address this and provide a more stable base, the project proposes to remove the existing dune sediments to a depth of up to ten feet and replace them with structural fill. These changes, along with the proposed solid foundation and impervious areas will reduce the dune's ability to dissipate storm damage and provide flood control and may reflect energy onto adjacent sites and structures. Because the site is located within and adjacent to LSCSF that is likely to be exacerbated by climate change impacts, these issues should be appropriately considered in the design of the building and the site. Examining how the project will affect floodplain function currently and for the design life of the project, including how floodwaters will flow across the site in a 100-year storm event and how that may change with the proposed fill and development, will help to ensure that the project design adequately protects these functions. The analysis should include and address any possible changes in velocity, direction, depth, and extent of coastal floodwater because of any proposed fill, grade changes, and solid project components within and adjacent to the site. This should be assessed for conditions during rain events and coastal storm events where there is a combination of rain and coastal flooding. Permitting documents should demonstrate that these considerations have been applied in the design of the building elevations and site approaches.

Federal Consistency Review

The proposed project may be subject to CZM federal consistency review and if so must be found to be consistent with CZM's enforceable program policies. For further information on this process, please contact Robert Boeri, Project Review Coordinator, at robert.boeri@mass.gov, or visit the CZM web site at <https://www.mass.gov/federal-consistency-review-program>.

LE/kg/rh

cc: Kathryn Glenn, Rebecca Haney, CZM
Rachel Freed, Jill Provencal, DEP NERO
Joy Duperault, Eric Carlson, DCR
John Shue, Revere Conservation Commission



The City of REVERE, MASSACHUSETTS

Director of Economic Development

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BRIAN M. ARRIGO
Mayor

July 20, 2022

Alexander Strysky, Environmental Analyst
MEPA Office of the Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Boston, MA 02114

RE: City of Revere Support for MEPA Approval of the 06.15.22 SEIR
For the New Alden A. Mills Fire Station @ 140 Lynnway 00 EEA # 16536

Dear Mr. Strysky,

In my capacity as Revere Director of Economic Development, and on behalf of Revere Mayor Brian M. Arrigo, we hereby recommend and respectfully request MEPA approval of the Single Environmental Impact Report (SEIR) filed on 06.15.22 by Brennan Consulting on behalf of the City of Revere for the otherwise fully permitted proposal to construct a suitable replacement for the original Alden Mills Fire Station at 140 The Lynnway.

This letter follows our 04.22.22 comment letter on the Extended Environmental Notification Form (EENF) for this new fire station, which is attached hereto and is incorporated herein by reference. That earlier correspondence provided background information on the need for a new fire station at the long-vacant location of the original Alden Mills Fire Station in the Point of Pines District; on the lengthy community-based municipal planning, design, funding and local permitting of that facility; and on the increasing urgency of this project given the existing neighborhoods previously served by this station as well as the several hundred new units of recently developed housing that it will prospectively serve. It also described the Article 97 requirements that resulted from the need for a relatively small portion of Department of Conservation Recreation (DCR) property that is required for construction of the new fire station, which will be provided as part of a larger Revere/DCR land swap that is the focus of pending state legislation. While all of those matters as still timely and relevant, that background information need not be repeated in detail here.

What is important to emphasize is that the fire station project described in the SEIR is a significant improvement over the project initially described in the EENF; and that those improvements were a direct result of the MEPA process to date. While many of them were outlined in our 04.22.22 EENF comment letter, they have now been further detailed and formally incorporated into the present SEIR document. Also worthy of note is our conviction that further project improvements are not likely to be possible and/or practical at this stage regardless of the results of further environmental analysis. What follows is intended to clarify and amplify our views in both respects.

What follows is intended to clarify and amplify our views in both respects:

Environmental Justice: As you know, in addition to being a Gateway City and a Transformative Development District, the City of Revere is also an Environmental Justice Community. As such, we have long been proactive in our municipal advocacy for environmental justice objectives, well before it became a specific focal point of MEPA analysis. That has included our renewed priority on affordable housing retention and growth as well as more equitable and accessible public transportation. The latter has included active support for a regional rail station in Revere - currently we have none in what is an all-burdens/no-benefits scenario - as well as continuing leadership on a coalition of surrounding EJ communities, like Lynn, Chelsea, Everett and others, for full electrification of the so-called MBTA Environmental Justice Regional Rail Corridor through our communities. That has now been funded by the MBTA, and electrification would/should eventually allow for transit frequency and transit fares. In sum, Revere understands and endorses environmental justice values and goals as a matter of municipal policy.

As is made clear in the SEIR document itself, there are a few higher or more immediate environmental justice objectives for Revere than restoration of adequate public safety coverage to the Point of Pines district. This northern tier of our city is periodically isolated and/or difficult to access as a result of both its physical topography and daily traffic congestion. Given the relatively low elevation of this generally waterfront district, the fact that it is also traversed by major state roadways - DOT's Route 1A and DCR's Revere Beach Boulevard - imposes significant additional environmental burdens on Revere without many offsetting local benefits. When these roadways are periodically flooded and/or commuter/visitor traffic congestion occurs -- public safety staff and equipment often cannot respond promptly unless they are already on-site. The principal purpose of the new fire station project is to restore reliable RFD availability and accessibility; and without that, we are effectively neglecting a continuing environmental injustice of which we have long been well aware. This project clearly involves quality-of-life issues - and opportunities; but even more compelling are the public safety issues and opportunities at stake, which puts this project into another level of environmental urgency, importance and responsibility for all concerned.

Parcel Resiliency: The project site is located in the middle of a larger oceanfront/riverfront district; and with a finished floor elevation of 11.86 feet, the original Alden Mills Fire Station long had the highest elevation within that district. Indeed, when it was fully operational, that facility was regularly used as a place of community refuge during storm-related events. The site is surrounded by state roadways, beyond which lie the Point of Pines, Riverside, Oak Island and RiverFront neighborhoods as well as by the primarily residential section of Revere Beach Boulevard from Revere Street to Carey Circle. Those surrounding communities somewhat protect the site from most of the direct impacts of most weather-related events.

In that context, and as a practical matter, the site of this replacement fire station does not now function as a barrier beach, if it ever did; and if it functioned as a coastal dune, that functionality was long ago preempted by the interim public and private development that now circumscribes it. This parcel has also not been a primary focus of storm damage prevention, flood control, marine fisheries or the protection of wildlife habitat.

Nonetheless, it became increasingly clear during the planning and design of the new fire station, which resulted in the initial EENF design, and even more so during the MEPA review of that proposal, that resiliency could and should be a more important and integral element of this new RFD facility than it had been for the original fire station on this site. As a result, from a resiliency perspective, the new facility and site design reflected in this SEIR is a major improvement not only compared to past and existing conditions also but compared to the EENF design. Worthy of particular note in this regard:

- *Elevating the community room, communication center, and the transformer pad to a finished floor elevation (FFE) of 13.25 feet. This is 21 inches above the initial EENF design, which was already 18 inches above the current parcel 10.00-foot floodplain elevation. The proposed new FFE for these facilities is well above the 11.20 foot projected 500-year elevation; and it also allows more than 24 inches of freeboard above the 100-year flood-plain elevation of 10.00 feet, both of which are required by the State Building Code.*
- *Relocating the utility and gear rooms as well as the bathrooms and other occupied areas from the apparatus bay into the higher areas of the building with an elevation of no less than 14.0 feet. (NB: The elevator machine room, other mechanical equipment, and the generator were already designed to be on the roof in the original EENF design.)*
- *Further flood-proofing the structure itself, including the use of concrete masonry and flood-resistant overhead doors in the apparatus bay and of paperless gypsum board up to the 16.5 feet of flood-plain elevation, in accordance with the ASCE Flood Resistant Design and Construction Manual.*
- *Raising all electrical outlets to an elevation of 16.5 feet; and eliminating all floor electrical outlets.*
- *Designing all exterior stairs, ramps and support walls to dissipate any wave energy that might reach the site under coastal flooding conditions for the estimated 50-year lifespan of the new fire station.*
- *Landscaping the grounds more naturalistically with native coastal vegetation to further enhance site resiliency.*

NB: As noted in the SEIR document, the apparatus bay cannot be raised beyond the 11.86-foot FFE of the original fire station. That FFE that was maintained in the EENF design and is still almost two feet above the current floodplain. The apparatus floor in the new facility cannot be raised further without creating access/egress problems for the apparatus itself, which would bottom-out given the existing grade of the surrounding state roadways. It should be emphasized, however, that fire apparatus itself is elevated on sizable truck tires or tracks and that both RFD staff and equipment routinely operate in flooded conditions given the nature of their work.

In sum, while the EENF site and facility design was a major improvement over past and present physical and operational conditions on this parcel, the SEIR design is a significant improvement over the EENF design, due in large part to input and feedback from DEP, CZM and DCR, among others. Having valued and responded to that input and feedback, we do not believe that additional major above-grade improvements could/would be made without undue cost and delay, which is not likely to be correspondingly beneficial.

Foundation Construction Methodologies: As discussed in detail in the Geotechnical Investigation Report prepared for the project development team by John Turner Consulting, Inc., the use of geo-piers was determined to be a more appropriate and cost-effective foundation approach for this project than would be steel pilings. This decision was not surprising since geo-piers have been routinely and successfully utilized in most recent projects in/around our waterfront area, including along nearby Revere Beach Boulevard and on Ocean Avenue. Where steel pilings have been utilized rather than geo-piers - e.g., at Gibson Point in the nearby RiverFront and for the new Amazon facility on Squire Road - that selection was primarily based on constructability issues related to soil and subterranean conditions rather than for resiliency purposes.

From the City's perspective, the professionally recommended use of geo-piers for the foundation of the new fire station was most welcome for reasons of community safety, tranquility and quality-of-life, particularly for the many project neighbors. Based on previous experience, the use of steel pilings involves a lengthy and exceptionally disruptive construction process, both in terms of excessive noise and vibration on and around construction site as well its adverse traffic impacts. These are particularly relevant considerations for a small project site, in the middle of a residential district, and immediately adjacent to major multi-modal commuter and visitor routes, on which disruption would have both local and regional consequences. On that basis, the use of steel pilings rather than geo-piers in this case, where the latter are not required for constructability reasons, would have its own set of environmental justice implications, especially if its environmental burdens would exceed its environmental benefits, which we believe would be true in this instance.

Lack of Available Site Options: If this fire station project on this site does not receive MEPA approval at this stage, the practical problem is that there are no available options to the proposed development site. As has been noted, it is important that the new fire station be located within the Point of Pines district itself since it is often relatively inaccessible due to regional commuter/visitor traffic congestion on the state roadways that traverse the district and even more problematically because of its isolation by periodic flooding. That circumstance requires that RFD staff and equipment be available on-site if it to be responsive in emergency conditions. That requirement accounts for the Lynnway siting decision on the original Alden Mills Fire Station many decades ago; and this is now the only municipal property in the Point of Pines district outside of Gibson Park available for its replacement. If this new fire station project on this specific site is not approved by MEPA, the City of Revere will be left with no viable options to address what is now a longstanding and increasingly urgent public safety need.

Larger District Resiliency Issues/Opportunities: While we believe that the new fire station design, as now updated in the SEIR, has optimized the resiliency potential of the project, we are well aware that this relatively small project on a relatively small in-land parcel exists within a larger riverfront and oceanfront district. Much of that district is directly exposed to the water, where resiliency is clearly a continuing concern. Indeed, the vulnerability of the larger Point of Pines District has long been a municipal and community concern. With the invaluable technical and financial support of the Commonwealth of Massachusetts, the City of Revere has already begun to systematically address these issues - and opportunities - primarily through the Municipal Vulnerability Preparedness (MVP) Program.

In concert with the resiliency initiatives related to the RiverFront Master Plan, the MVP Program for Revere is preparing to implement a series of resiliency initiatives for the Point of Pines district as a whole, which should also be beneficial to the resiliency of this project site. Progress to date on these more comprehensive and extensive plans is described in the MVP report that was appended to the SEIR submission and is attached hereto for convenient reference. So also is the RiverFront Master Plan, which was unanimously adopted by the Revere Planning Board and is well on the way to realization with funding from the City of Revere, the Seaport Economic Council, MassWorks and the Gibson Point developers, among other sources of public and private support. The resiliency plans for the new fire station project are intended to leverage these more comprehensive and extensive undertakings; and they should be understood and evaluated in this larger and longer environmental context.

Requested NOI Filing: At the specific request of DEP and CZM, we filed on a Notice of Intent (NOI) for this project with the Revere Conservation Commission (RCC) on 05.23.22, despite initial indications from the Commission itself that an NOI would not be required in this case. Since then, the RCC has addressed this project in the required public hearing on 06.01.22; and after a site-visit, the project was approved with a related Order of Conditions at the regular 07.06.22 RCC meeting.

The Cost of Further Delay: Although MEPA review in this case was triggered by the project need for a relatively small portion DCR property, the City of Revere has sought to be responsive throughout the MEPA process to the input and feedback of responsible state environmental agencies, whose mission, jurisdiction and competence we respect and whose values we share. The site/facility designs that are described in the SEIR changes reflect their guidance; and to reiterate, we acknowledge and appreciate that the planned new Alden Mills Fire Station Project is a better project as a direct result of the MEPA process to date.

We also understand that there may be some further environmental analysis - e.g., additional wave velocity and other studies - that DEP and CZM have suggested that we have not undertaken, not simply because they are costly and time-consuming, but primarily and pragmatically because, whatever their outcomes, we believe that there is little that we can do to improve this project on this site. Others may disagree; and in reaching these conclusions, we mean no disrespect for the MEPA process or for the any of the involved EOEEA agencies - quite the contrary. But we are also faced with some competing and compelling considerations, including the fact that this already long overdue project is needed to serve the critical safety needs of existing neighborhoods, that residential development elsewhere in the immediate area is continuing apace, and that project costs are escalating with every passing day - a prospect that we be unable to fully and finally assess until the completion of a pending public bidding process, which itself awaits the outcome of MEPA review and approval. Depending on that outcome, we may have to make further provisions for full financing this facility.

As a practical matter, If we cannot move forward expeditiously on this project, it could/would likely be delayed by months, if not years; and that would become more than just a financial problem for our community, it would become a major public safety crisis, especially if something tragic were to occur in the meantime.

We fully understand that those are our problems, not yours, and that such considerations certainly are not the principal focus of MEPA review. That being said, we do hope that all concerned can appreciate the urgency of this project from our local perspective; and again, we hope that the conclusion of the MEPA process will not be unduly delayed by the need for additional environmental analysis that may not - arguably can not - further improve this critical project.

With appreciation for your unfailing consideration of our values and views throughout this process, the City of Revere again recommends and respectfully requests that MEPA act promptly and positively on the SEIR for the replacement Alden Mills Fire Station on 140 The Lynnway, which is now before you for review and, hopefully, for timely approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert B. O'Brien", with a large, stylized loop at the end.

Robert B. O'Brien
Revere Director of Economic Development

cc: Kim Tori and Page Czepiga of the MEPA Office
Eric Carlson and Andy Backman of the Department of Conservation & Recreation
Phillip DiPietro of the Department of Environmental Protection
Kathryn Glenn of Coastal Zone Management
Mayor Brian M. Arrigo and Chief of Staff Kim Hanton
City Council President Gerry Visconti and Ward 5 Councillor John Powers
RFD Fire Chief Christopher Bright and Deputy Chief Paul Cheever
City Solicitor Paul Capizzi and Revere CFO Richard Viscay
Infrastructure Chief Don Ciarramella and City Engineer Nick Rystrom
Site Plan Review Committee Chair Frank String and Building Commissioner Louis Cavignaro
The Alden Mills Fire Station Project Design/Development/Management Team