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

PROJECT NAME : Westfield Turnpike Industrial Park  
PROJECT MUNICIPALITY : Westfield  
PROJECT WATERSHED : Westfield River  
EEA NUMBER : 15845  
PROJECT PROPONENT : City of Westfield  
DATE NOTICED IN MONITOR : April 11, 2018

Pursuant to the Massachusetts Environmental Policy Act (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 **requires** a Mandatory Environmental Impact Report (EIR). The City should submit a Draft EIR in accordance with the Scope included in this Certificate.

Project Description

The Environmental Notification Form (ENF) provided a conceptual plan for a multi-use development totaling 988,000 gross square feet (sf), including 105,000 sf of office space, 550,000 sf of warehouse and distribution space, 211,000 sf of light industrial/manufacturing space and 122,000 sf of light industrial/research and development (R&D) space ("Flex Tech"). The project includes the construction of 1,885 parking spaces, a stormwater management system, infrastructure for water, wastewater and other utilities, and driveways to provide access from Cabot Road and Turnpike Industrial Road. According to the ENF, the mix of uses is flexible and

build-out of the project will be responsive to market demand. An existing rail spur serving businesses southeast of the site may be extended to the site if a future tenant desires rail access.

### Project Site

The project site is comprised of seven parcels with a combined area of 74.88 acre. Four parcels (66 acres) are owned by the City; three privately-owned parcels will be conveyed to the City prior to commencement of construction. An approximately 1,275 sf house is located on the site along Cabot Road. The site is almost entirely wooded except for an approximately 10.5-acre cleared field in its northwest corner that is in agricultural use. The site is bordered by the Massachusetts Turnpike (MassPike)/Interstate-90 (I-90) to the south, an industrial park to the southeast, Sabrina Brook Lane to the east, Cabot Road to the north and cleared fields to the west. Apart from the industrial park, the area surrounding the site is generally comprised of low-density residential neighborhoods, farmland and undeveloped land.

A proposal by the City to construct a solid waste management facility at the site was reviewed by MEPA in the early 1990s (EEA# 8518). Water and sewer service was extended to the south side of the site in connection with the proposal. The facility was not constructed because a moratorium was placed on the creation of new landfills in 2001. Since then, the City has rezoned the site for industrial and other uses.

Powdermill Brook is located west of the site and flows south under the MassPike to the Powdermill Brook Dam, a component of the City's flood control system. According to the ENF, the site does not contain wetlands and is not located within a floodplain. According to the 14<sup>th</sup> Edition of the Massachusetts Natural Heritage Atlas prepared by the Natural Heritage and Endangered Species Program (NHESP), the project site does not contain mapped rare species habitat. The site does not contain historic structures listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth; an archaeological survey conducted in 1992 determined that the site lacks historic or archaeological significance.

Many commenters emphasized the site's environmental attributes, including wildlife habitat, location above an aquifer and proximity to important flood control features. As specified in the Scope below, the City should review information submitted by commenters in preparing an assessment of existing environmental conditions for the DEIR.

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the development of the 74.88-acre parcel, the roadway and associated infrastructure improvements include alteration of 74.65 acres of land and creation of 48.15 acres of impervious area. The project will generate 3,530 average daily vehicle trips (adt) and add 1,885 parking spaces. It will use 17,170 gallons per day (gpd) of water and generate 15,875 gpd of wastewater. Greenhouse Gasses (GHG) are associated with on-site energy use and transportation.

Because of the conceptual nature of the project design, the ENF identified general measures to avoid, minimize and mitigate impacts. The Scope requires that the DEIR include

significantly more detail regarding the nature and extent of environmental impacts and mitigation measures.

### Jurisdiction and Permitting

The project is subject to the preparation of a Mandatory EIR pursuant to the MEPA regulations because it requires State Agency Actions and will directly alter 50 or more acres of land (301 CMR 11.03(1)(a)(1)); create ten or more acres of impervious area (301 CMR 11.03(1)(a)(2)); generate 3,000 or more new trips on roadways providing access to a single location (301 CMR 11.03(6)(a)(6)); and construct 1,000 or more new parking spaces at a single location (301 CMR 11.06(a)(7)). The project requires a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT). It is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol ("GHG Policy").

The project will require a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the United States Environmental Protection Agency (EPA).

The project has received Financial Assistance from the Commonwealth through the Site Readiness Program administered by the Massachusetts Development Finance Agency (MassDevelopment) and may seek additional funding. Therefore, MEPA jurisdiction is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations.

### Public Comments

I received over 200 comment letters, most of which expressed concern regarding the extent of land alteration, potential impacts to an underlying aquifer and to wildlife habitat, changes to hydrology that could affect the City's flood control infrastructure and increased truck traffic. These issues were raised at the MEPA consultation session on April 23, 2018, where representatives of the City committed to analyze project impacts in greater detail and to address concerns raised by residents. As discussed in the Scope below, the City will be required to provide additional information and analysis regarding these issues in the DEIR and to respond to each comment received on the ENF.

## SCOPE

### General

The City will file a DEIR and a Final EIR (FEIR) which will provide additional information and analysis about the project. Both the DEIR and FEIR will be subject to public review and comment. The ENF described the project components, impacts and mitigation measures at a conceptual level. The DEIR should provide detailed plans, descriptions and data that sufficiently describe the proposed project, its impacts, and baseline environmental conditions for the purpose of State Agency and public review. The DEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. The DEIR

should clearly demonstrate that the City has sought to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible.

### Project Description and Permitting

The DEIR should include a detailed description of the proposed project, including building designs and planned uses, and identify potential phasing of the project. The DEIR should include surveyed plans of the project site clearly documenting ownership, rights-of-way (ROW), easements and other restrictions, site topography, soil conditions, infrastructure and adjacent land uses. The DEIR should identify wetland resource areas, water supply protection zones, aquifers, and prime farmland at or in proximity to the site. Any proposed on-site refueling facilities or uses that generate hazardous waste or waste oil should be identified. The DEIR should identify mitigation to offset construction period and long-term environmental impacts and propose mitigation measures, including a description and plans of any proposed roadway and intersection modifications. The DEIR should include plans that depict access roads, stormwater management systems, and utility connections associated with the project. It should describe changes to the project since the filing of the ENF.

The DEIR should provide a description and analysis of applicable statutory and regulatory standards and requirements, and a discussion of how the project will meet those standards. The DEIR should include an updated list of required State Permits, Financial Assistance, or other State approvals. It should review the consistency of the project with local and regional land use and economic development plans, including the Pioneer Valley Plan for Progress and Valley Vision documents prepared by the Pioneer Valley Planning Commission (PVPC).

### Alternatives Analysis

The objective of the MEPA review process is to avoid or minimize and mitigate damage to the environment to the greatest extent feasible. Consistent with that goal, an alternatives analysis is required to consider what effect changing the parameters and/or siting of a project, or components thereof, will have on the environment. A "No-Build" alternative must be evaluated for the purpose of establishing a future baseline in relation to which the project and its alternatives can be described and analyzed, and its potential environmental impacts and mitigation measures can be assessed.

The ENF identified and evaluated the following alternatives to the project: No-Build, Regional Distribution Center, and Preliminary Concept Plan. During the review period, the City provided additional information quantifying the impacts of each alternative. The No-Build alternative would leave the 66-acre parcel owned by the City in its undeveloped state and the City would not purchase any of the adjoining lots. This alternative would avoid the land alteration and traffic impacts associated with the Preferred Alternative, but it would not meet the City's objectives for job creation and increased tax revenue.

The Preliminary Concept Plan alternative would be limited to the 66-acre site owned by the City. An approximately 795,000-sf mixed-use development would be constructed, including

100,000 sf of office space, 450,000 sf of warehouse and distribution space, 172,000 sf of light industrial/manufacturing space, 73,500 sf of research and Flex Tech space and 1,541 parking spaces. This alternative would create 34.1 acres of impervious area, generate 2,915 adt, use 14,630 gpd of water and generate 13,300 gpd of wastewater. According to the ENF, this alternative is not preferred because it makes less efficient use of the land configuration and infrastructure and would provide a smaller buffer between the site and residential uses along Cabot Road and Sabrina Brook Lane. The Regional Distribution Center alternative would include the construction of a single 1,000,000-sf warehouse and distribution building and 1,387 parking spaces on the 74.88-acre site. It would create 42.95 acres of impervious area, generate 1,390 adt, use 4,400 gpd of water and generate 4,000 gpd of wastewater. According to the ENF, this alternative may be economically viable but it does not include a mix of uses that the City has determined is necessary to attract a greater variety of business and types of job opportunities.

According to the ENF, the Preferred Alternative would generally have greater impacts than any of the other alternatives with respect to land alteration, creation of impervious area, traffic generation and water and sewer use. The preliminary layout of the Preferred Alternative would minimize impacts to adjacent residences by locating loading and service areas to the west, away from residential areas. It would include vehicular access from both Cabot Street and Turnpike Industrial Road to distribute trips to and from the site. The Preferred Alternative includes a mix of uses that will meet the City's development goals, create a variety of job opportunities and generate tax revenue.

The DEIR should fully describe the Preferred Alternative and analyze feasible alternatives in accordance with the MEPA regulations at 301 CMR 11.07(6)(f). It should analyze all feasible alternatives that are consistent with the objectives of the City. In addition, the DEIR should review at least one alternative that minimize land alteration, impervious area and traffic impacts. I encourage the City to consider an alternative site layout based on the extension of the rail spur onto the site and identify potential reductions in impervious area, land disturbance and truck traffic. In light of public concerns about the clearing of the site, I encourage the City to consider an alternative that maintains and maximizes a forested buffer area between the site and abutting residences. For each alternative, the analysis should provide conceptual site plans, a quantitative summary of potential environmental impacts in a tabular format, and a supporting narrative describing the alternative and associated environmental impacts. The DEIR should describe the impacts to land alteration, impervious area, traffic, water supply, and wastewater generation and treatment of each alternative and provide a quantitative comparison to the Preferred Alternative. It should note the potential benefits of each alternative for on-site renewable energy generation, particularly rooftop solar photovoltaic (PV) systems.

#### Land Alteration

The DEIR should quantify the total amount of alteration associated with the proposed project. It should show the locations where fill has been placed for regrading purposes and the depth of fill. The DEIR should show areas of land alteration for buildings, roadways, parking, wastewater, water and stormwater infrastructure, lawns and landscaping, and other project components. The DEIR should include site plans that clearly locate and delineate areas proposed for development and areas to be left undisturbed. The DEIR should identify how the project is

designed to avoid and minimize land alteration. If the project will occur in more than one phase, the DEIR should clearly identify the activities proposed for each phase and the area to be developed. Regardless of any phasing of construction, the DEIR should describe how proposed land alteration, such as clearing, regrading or paving, will be limited to the minimum area necessary at any time.

### Traffic and Transportation

The ENF included a trip generation estimate and identified the number of parking spaces to be provided. It included a Transportation Scoping Letter submitted to MassDOT that outlined a proposed traffic analysis to be prepared for the project, including the roadways and intersections that will be studied, the data to be collected and analyses that will be undertaken to determine the project's transportation impacts.

The DEIR should include a traffic study prepared consistent with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014, MassDOT's comment letter, and this Scope. The TIA should provide a comprehensive evaluation of the project's use of area roadways, public and private transit, pedestrian and bicycle facilities, and other transportation modes. It should describe existing conditions, include a plan of the transportation study area, and identify the proposed site access and egress. It should provide counts of existing traffic in the traffic study area and include projections for future traffic conditions under No Build, Build, and Build with Mitigation scenarios. A seven-year planning horizon should be used for the analysis. Future traffic conditions should incorporate background growth due to nearby planned development projects and an overall annual growth in traffic volumes. As requested by MassDOT and PVPC, it should document existing and proposed trips by trucks and other heavy vehicle traffic associated with the project and existing uses on Turnpike Industrial Road.

### *Trip Generation*

Using trip generation rates published by the Institute of Transportation Engineers (ITE) for Land Use Codes (LUC) 154 (High-Cube Transload and Short-term Storage Warehouse), 110 (Light Industry), and 710 (Office Park), the ENF indicated that the project will generate 3,520 new adt. I note that the Transportation Scoping Letter in Attachment C of the ENF calculated a higher number of adt for, presumably, an earlier version of the Preferred Alternative. The DEIR should fully document its trip generation estimate based on the ITE *Trip Generation Manual* (10<sup>th</sup> edition) or other sources approved by MassDOT. It should identify the LUCs for each proposed use. For the total project and for each land use, the TIA should provide estimates of weekday daily and morning and evening peak period trips and differentiate between vehicle types for the anticipated trips. The DEIR should describe and document any adjustment of these estimates.

### *Traffic Operations*

The TIA should describe the project's anticipated transportation impacts and identify appropriate mitigation measures. The Proponent should indicate a clear commitment to

implement proposed mitigation measures and describe the timing of their implementation, including whether measures are implemented based on phases of the project or occupancy levels.

Unless otherwise indicated by MassDOT, the study area for the TIA should, at a minimum, include the following intersections and roadways:

- Cabot Road at Lockhouse Road/Root Road;
- Turnpike Industrial Road at Lockhouse Road;
- Arch Road at Southampton Road (Route 10/Route 202);
- Southampton Road (Route 10/Route 202) at Friendly's Way;
- Russellville Road at Cabot Road; and,
- Southampton Road (Route 10/Route 202) at Servistar Industrial Way.

The TIA should describe the anticipated trip distribution. For each intersection, the DEIR should provide capacity analyses for the weekday peak periods for existing and future conditions and any intersections where mitigation is proposed. For all analysis scenarios, the TIA should provide illustrations depicting the peak hour 50<sup>th</sup> (average) and 95<sup>th</sup> percentile queue lengths for each lane group/turning movement and a tabular summary of the results of the intersection operations analysis, including volume-to-capacity ratios (V/C) and average delays. The level-of-service (LOS) for each lane group/turning movement should be clearly indicated for each condition.

The DEIR should calculate crash rates for each study area intersection using local and MassDOT data covering the most recent five-year period. Mitigation should be proposed for any intersection that exceeds the State and/or District 2 average crash rates. The intersection of Arch Road at Southampton Road (Route 10/Route 202) has been identified as a Highway Safety Improvement Program (HISP) crash cluster from 2012-2014; the City will prepare a Roadway Safety Audit (RSA) for the intersection and include its findings and any necessary mitigation in the DEIR. Any proposed roadway improvements, including bicycle/pedestrian facilities, that are recommended to mitigate traffic impacts should be consistent with Complete Streets design guidelines contained in the *MassDOT Project Development and Design Guide*.

### *Parking*

The project will include 1,885 parking spaces. The DEIR should document how the parking supply was developed and compare the number of parking spaces to the amount required based on the most recent edition of ITE's *Parking Generation* document and local zoning requirements. The DEIR should reevaluate the number of parking spaces required for the project based on the comparison above, identify the number of parking spaces that can be reduced through implementation of Transportation Demand Management (TDM) measures, evaluate opportunities for shared parking, and consider banking some land that would only be constructed for parking if warranted by demand.

### *Transportation Demand Management*

The ENF did not include a TDM plan. The DEIR should include a comprehensive TDM plan. It should describe and map all existing, planned, and proposed services, facilities, or routes for accessing the site by modes of travel other than single-occupancy vehicles (SOV), including public transportation, private shuttles, bicycling, and walking. The City should consult with the Pioneer Valley Transit Authority (PVTA) and other local transit providers, transportation management associations (TMA) and MassRIDES, the Commonwealth's Travel Options provider, regarding the potential to provide service to the site. In particular, the DEIR should analyze transit service to the site operated by PVTA or a private shuttle service.

The DEIR should include a thorough evaluation of feasible TDM measures to reduce the SOV trips to the site by both employees and visitors and evaluate the expected trip reduction of each. The DEIR should include commitments by the Proponent to adopt all feasible measures.

### *Transportation Monitoring Program*

The DEIR should include a draft traffic monitoring program to evaluate the assumptions made in the traffic study and the adequacy of the transportation mitigation measures, including the TDM program. The program should include annual traffic monitoring for a period of five years. The monitoring program should include:

- Automatic traffic recorder (ATR) counts at the site driveway for a continuous 24-hour period on a typical weekday;
- Travel survey of employees and patrons of the site; and
- Weekday AM and PM peak hour turning movement counts (TMC) and operations analysis at mitigated intersections.

### *Rail Access*

A freight rail line runs in a north-south direction in the vicinity of the site. A spur line provides freight service to industrial uses at the intersection of Turnpike Industrial Road and Lockhouse Road. According to the ENF, the project has been designed to accommodate an extension of the rail spur onto the project site but the spur is not included in the project at this time. The DEIR should provide additional information, including plans, describing the existing rail line, its service area and potential routes for an extension of the spur to the site. It should review the feasibility of the extension with respect to environmental impacts, cost and permitting. It should summarize potential benefits, such as reduced truck traffic, and any changes to the site design that would be necessary to support the spur.

### Climate Change

Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth (EO 569) was issued on September 16, 2016. EO 569 recognizes the serious threat presented by climate change and directs state 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 greenhouse gas 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. As noted in the Scope, the DEIR should address the potential effects of climate change on the project site.

The GHG Policy and requirements to analyze the effects of climate change through EIR review is an important part of this statewide strategy. These analyses advance proponents' understanding of a project's contribution and vulnerability to climate change. The City should consider cross cutting measures, such as incorporation of renewables and inclusion of low impact development (LID) in site design, which can improve the project's resiliency, reduce GHG emissions and conserve and sustainably employ the natural resources of the Commonwealth.

I also encourage the City to participate in the Municipal Vulnerability Preparedness (MVP) grant program. The MVP program is a community-driven process to define natural and climate-related hazards, identify existing and future vulnerabilities and strengths of infrastructure, environmental resources and vulnerable populations, and develop, prioritize and implement specific actions the City can take to reduce risk and build resilience.

#### *Greenhouse Gas Emissions*

This project is subject to review under the GHG Policy. The DEIR should include an analysis of GHG emissions and mitigation measures in accordance with the standard requirements of the Policy, which requires projects to quantify carbon dioxide (CO<sub>2</sub>) emissions and identify measures to avoid, minimize or mitigate these emissions. The analysis should quantify the CO<sub>2</sub> emissions associated with building energy use (stationary sources), transportation-related emissions (mobile sources) and lost carbon and sequestration associated with the extensive land alteration. The DEIR should identify and commit to mitigation measures to reduce GHG emissions.

As noted by the Department of Energy Resources (DOER), the project could potentially offset stationary-source GHG emissions by using energy-efficient building envelopes, lighting, and heating, ventilation and air conditioning (HVAC) systems and generating on-site renewable energy. In addition to mitigating GHG emissions, the measures recommended by DOER may reduce costs by eliminating the need for gas service to the site, reducing costs and building area associated with large HVAC systems, and lower utility costs for tenants. The project could be eligible for financial incentives from the MassSave program and through Alternative Energy Credits (AEC) for renewable thermal production, including heat pumps. The Commonwealth's SMART program provides the opportunity for the City or developer of the project to benefit directly by selling energy generated from rooftop solar PV to the utility.

#### *Stationary sources*

The DEIR should include an analysis that calculates and compares GHG emissions associated with: 1) a Base Case that conforms to the 9<sup>th</sup> Edition of the Massachusetts Building Code, which references the American Society of Heating, Refrigerating and Air-Conditioning

Engineers (ASHRAE) 90.1-2013 and the International Energy Conservation Code (IECC) 2015 and 2) a Mitigation Alternative that achieves greater reductions in GHG emissions. The City of Westfield has adopted the Massachusetts Stretch Energy Code (SC). Therefore, the project will be required to meet the applicable version of the SC in effect at the time of construction. The SC increases the energy efficiency code requirements for new construction (both residential and commercial) and for major residential renovations or additions in municipalities that adopt it. The current SC requires a reduction in energy use of 10 percent compared to that achieved by complying with the baseline energy provisions of the State Building Code.

The GHG analysis should clearly demonstrate consistency with the objectives of MEPA review, one of which is to document the means by which Damage to the Environment can be avoided, minimized and mitigated to the maximum extent feasible. The DEIR should identify the model used to analyze GHG emissions, clearly state modeling assumptions, explicitly note which GHG reduction measures have been modeled, and identify whether certain building design or operational GHG reduction measures will be mandated by the Proponent to future occupants or merely encouraged for adoption and implementation. The DEIR should include the modeling printouts for each alternative and emission tables that compare base case emissions in tons per year (tpy) with the Preferred Alternative showing the anticipated reduction in tpy and percentage by emissions source (direct, indirect and transportation). Other tables and graphs, such as the table of mitigation measures recommended by DOER, may also be included to convey the GHG emissions and potential reductions associated with various mitigation measures as necessary. The DEIR should provide data and analysis in the format requested in DOER's letter.

The DEIR should present an evaluation of mitigation measures identified in the GHG Policy Appendix and in DOER's comment letter. In particular, the feasibility of each of the mitigation measures outlined below should be assessed for each of the major project elements, and if feasible, GHG emissions reduction potential associated with major mitigation elements should be evaluated to assess the relative benefits of each measure. The DEIR should explain, in reasonable detail, why certain measures that could provide significant GHG reductions were not selected – either because it is not applicable to the project or is deemed technically or financially infeasible. At a minimum, the DEIR should consider the following GHG mitigation measures:

- Incorporating above-Code continuous roof and wall insulation and avoid glass curtain wall assemblies to minimize heat loss and uncontrolled infiltration through the building envelope;
- Use of high-albedo roofing materials;
- Installing high-efficiency HVAC systems with adequate numbers of thermal zones to support temperature controls and responsive controls such as economizers and demand controlled ventilation;
- Use of heat recovery systems;
- Installation of rooftop solar PV systems;
- Minimizing energy use through building orientation and assessment of solar gain, day-lighting and viability of PV systems;
- Incorporating lighting motion sensors, climate control and building energy management systems;
- Installing LED lighting, both exterior and interior;

- Use of cold climate heat pumps; and
- Develop a tenant manual to encourage energy and water conservation, recycling, use of Energy Star rated appliances to reduce plug loads, and other energy-efficiency measures that could be implemented as part of the “fit-out” of the tenant space.

The DEIR should note whether the project will seek certification by the Green Building Council’s Leadership in Energy and Environmental Design (LEED) rating system, and if so, to what level. If applicable, the DEIR should identify specific measures that will be incorporated into the project design to achieve the LEED certification.

The DEIR should thoroughly analyze the feasibility and benefits of incorporating on-site energy generation and renewable energy sources. At a minimum, the DEIR should analyze the feasibility of employing solar PV systems and document the expected energy savings and reduction in GHG emissions. I encourage the Proponent to consult with DOER regarding this analysis to ensure that compliance with the building code and site and source energy accurately reflect the benefits of CHP. The DEIR should include an analysis of utility company incentives, AEC and other incentives for implementing on-site renewable energy generation and evaluate the applicability of the incentive programs to the project.

The DEIR should describe the potential output of one or multiple rooftop solar PV systems, an economic analysis associated with a first-party or third-party installation, and an analysis of how mechanical systems could be arranged to maximize the area that could be dedicated to PV systems. This analysis should include assumptions about available rooftop areas, potential system outputs, and installation costs (\$/watt). The Proponent should refer to DOER’s comment letter and additional information on DOER’s web site (<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/solar/>). Roofs should be constructed in such a way that they are “solar ready” in order to facilitate future installation of PV systems. If PV is not financially feasible, the Proponent should commit in the DEIR to revisit the PV financial analysis on a regular basis and to implement PV when the financial outcomes meet specified objectives.

#### *Mobile sources*

The GHG analysis should include an evaluation of potential GHG emissions associated with mobile emissions sources. The DEIR should follow the guidance provided in the Policy for *Indirect Emissions from Transportation* to determine mobile emissions for Existing Conditions, Build Conditions, and Build Conditions with Mitigation. The Proponent should thoroughly explore means to reduce overall single occupancy vehicle trips. The DEIR should also review measures to promote the use of low-emissions vehicles, including installing electric vehicle charging stations and providing designated parking spaces for these vehicles. More information on electric vehicle infrastructure can be found at the following websites: <http://www.afdc.energy.gov/afdc/fuels/electricity.html> and <http://www.oregon.gov/ODOT/HWY/OIPP/docs/EVDeployGuidelines3-1.pdf>. The Build with Mitigation model should incorporate TDM measures and any roadway improvements implemented by the project, and document the reductions in GHG emissions associated with the mitigation.



### *Land Alteration*

This project will alter approximately 75 acres of land. In accordance with the GHG Policy, projects that alter over 50 acres of land are required to analyze the carbon associated with removal of trees and soil disturbance during the construction period and loss of carbon sequestration. The purpose of this analysis is to develop an *estimate*, not an exact accounting of GHG emissions associated with land. The DEIR should describe the methodology and data used to develop the analysis, identify associated impacts on GHG emissions, and identify measures to avoid, minimize and mitigate impacts.

I encourage the City to consult with EEA and MEPA on the development of this analysis. The City may develop its own analysis or may consider a draft protocol developed by EEA land policy staff and the MEPA Office. The draft protocol includes: assumptions regarding current and proposed land uses, forest types, and soil types; assumptions regarding carbon sequestration of soils and trees; and the ability to consider a one-time loss of sequestration (e.g. tree clearing) as well as loss of potential sequestration over a certain time period. The draft protocol was used most recently to estimate GHG emissions associated with land alteration for the Norton Business Park (EEA # 15750) and Campanelli Business Park (EEA# 15830) projects.

### *Adaptation and Resiliency*

Pursuant to the GWSA, MEPA review of projects subject to an EIR must consider the reasonably foreseeable climate change impacts and GHG emissions of projects subject to MEPA review (and effects such as predicted sea level rise); and (2) ensure that projects subject to MEPA take all feasible measures to avoid, minimize, or mitigate “Damage to the Environment” (as defined in the MEPA statute), including GHG emissions.

The region’s climate is expected to experience higher temperatures and more frequent and intense storms. The Northeast Climate Science Center at the University of Massachusetts at Amherst has developed projections of changes in temperature, precipitation and sea level rise for each river basin in Massachusetts. This data is available through the Climate Change Clearinghouse for the Commonwealth at [www.resilientMA.gov](http://www.resilientMA.gov). By the end of the century, average temperature in the Westfield River Basin is expected to rise by 4.2 to 11.2 degrees Fahrenheit (F), including an increase in the number of days with temperatures over 90 F from 9 to 60 days. During the same time span, the average annual precipitation in the Westfield River Basin is expected to increase by 2.1 to 9.1 inches, most of which is expected to occur in the winter with increasing dry days in the summer.

The DEIR should discuss potential effects of climate change to the project site. Consistent with the requirements of the GWSA, the DEIR should review features of the project design that will increase the resiliency of the site to likely climate change impacts, including measures to address potential impacts associated with storms and flooding. I encourage the City to consult the data available on the [resilientMA.gov](http://resilientMA.gov) website to develop climate change scenarios for the site and identify potential adaptation measures. EEA’s *Climate Change Adaptation*



*Report*<sup>1</sup> (September 2011) and PVPC's *Pioneer Valley Climate Action and Clean Energy Plan*<sup>2</sup> (February 2014) provide additional resources to assist in this analysis.

The DEIR should identify site elements that will be designed to minimize impacts associated with more frequent and intense storms and with extreme heat waves including, but not limited to:

- Ecosystem-based adaptation measures to reduce heat island effect and mitigate stormwater runoff, such as integration of tree canopy cover, rain gardens, and low impact development (LID) stormwater management techniques;
- Use of on-site renewable energy systems may provide added resiliency during periods of power loss during storms;
- Protection of emergency generator fuel supplies from effects of extreme weather and flood proofing; and
- Expansion of the size of emergency generators (beyond the 8-10 hour run time) to allow for select common areas and other emergency and life safety systems to remain operational for a period of time beyond code requirements, specifically in residential buildings.

Many commenters questioned whether the proposed land alteration and addition of impervious area would alter hydrological conditions that could affect the Powdermill Brook Dam. I encourage the City to assess potential of the project to exacerbate downstream flooding and describe elements of the project that will minimize this risk, including under future climate conditions.

### Water Resources

Many commenters stated that the project site is located over an important aquifer and expressed concern that the project could impact its water quality. The DEIR should review available data from MassDEP, the Massachusetts Bureau of Geographic Information (MassGIS) and information submitted by commenters with respect to the location of the aquifer. It should provide maps of public and private groundwater and surface water supplies and any associated Wellhead Protection Areas and Surface Water Supply Protection Zones. The DEIR should describe measures to avoid and minimize impacts to water supplies and identify any potential project permitting requirements.

According to the ENF, the project will add approximately 75 acres of impervious area. The ENF did not include a detailed analysis of existing and proposed stormwater conditions. The City has committed to constructing a drainage system that will comply with the Stormwater Management Standards (SMS) of the Wetlands Regulations (310 CMR 10.00) to ensure that the system removes pollutants from runoff and maintains pre-construction peak discharge rates and

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<sup>1</sup> Available online at <http://www.mass.gov/eea/docs/eea/energy/cca/eea-climate-adaptation-report.pdf>

<sup>2</sup> Available online at <http://www.pvpc.org/sites/default/files/PVPC%20Climate%20Action%20Clean%20Energy%20Plan%20FINAL%2002-18-14.pdf>

flow volumes. According to the ENF, the project is a land use with a higher potential pollutant load (LUHPPL) and the stormwater management system will be required to comply with additional treatment requirements. Best Management Practices (BMP) such as infiltration basins, water quality units, grass swales and sediment forebays will be used and the project will employ Low Impact Design (LID) to maximize infiltration and on-site reuse of stormwater runoff.

The DEIR should include a description of the proposed stormwater management system and provide documentation, including plans and calculations, in support of the proposed design. It should include a detailed review of LID techniques for stormwater management and incorporate these measures into the project design to the greatest extent possible. The DEIR should include a review of the use of pervious pavement, raingardens/bioretention areas, bioswales, tree box filters, and green roofs, and analyze the potential onsite reuse of roof runoff for irrigation purposes. I encourage the City to continue to evaluate options for minimizing impervious area.

### Infrastructure

The project will use 17,170 gpd and generate 15,875 gpd of wastewater. The site will be connected to the municipal water and sewer systems located in Cabot Road and Turnpike Industrial Road. According to the ENF, adequate infrastructure exists to serve the site, including sufficient capacity at the Neck Street Wastewater Treatment Facility.

The DEIR should review the project's drinking water sources and confirm that adequate capacity exists to serve the site, including fire protection needs. It should document all impacts associated with the installation of infrastructure at the site, including water, sewer, natural gas and other utilities, and describe any off-site impacts associated with providing service to the site. The DEIR should provide plans of infrastructure serving the site.

The DEIR should identify water conservation measures that will be incorporated into the project design, such as reusing grey water and rainwater for toilet flushing and irrigation, low-flow plumbing fixtures, limits on outdoor water use, and drought-resistant plants for landscaping. If any proposed uses would generate industrial or medical wastewater, the City should consult with MassDEP regarding permitting and the DEIR should describe waste handling and disposal.

### Air Quality

The DEIR should identify whether any proposed uses will require air quality permits from MassDEP. As noted by MassDEP, industrial, commercial, and institutional uses may use heating equipment and emergency generators that require permitting. The DEIR should describe air quality impacts due to proposed uses and construction and identify permitting and mitigation requirements.

### Construction Period

The DEIR should describe construction activities to be undertaken at the site, including tree removal, site grading, installation of infrastructure, and building construction. It should



estimate the duration of the construction period, identify construction-period impacts and propose mitigation for noise, air quality, water quality, and traffic impacts.

The DEIR should describe truck routes and other mitigation measures that will be implemented to minimize impacts to residential areas by trucks travelling to the site during the construction period. The City and its contractors should participate in MassDEP's Diesel Retrofit Program, including the use of after-engine emissions controls, such as oxidation catalysts or diesel particulate filters. Construction equipment should use engines meeting Tier 4 federal emissions standards. More information regarding construction-period diesel emission mitigation may be found on MassDEP's website at <https://www.mass.gov/guides/reducing-air-emissions-from-diesel-construction-engines>.

The DEIR should provide detailed information regarding the project's generation, handling, recycling, and disposal of construction and demolition debris (C&D) and identify measures to reduce solid waste generated by the project. I encourage the City to set an aggressive target for the recycling of construction and demolition debris. Demolition activities must comply with MassDEP Solid Waste and Air Pollution Control regulations, including those related to management of demolition procedures and debris, including asbestos-containing materials.

#### Mitigation and Section 61 Findings

The DEIR should include a separate chapter that summarizes measures to avoid, minimize and mitigate environmental impacts and to provide public benefits. The DEIR should include draft Section 61 Findings for all State Permits required. The proposed Section 61 Findings should specify in detail all feasible measures that the Proponent will take to avoid, minimize and mitigate potential environmental impacts to the maximum extent practicable. The draft Section 61 Findings should clearly identify parties responsible for funding and implementation, and the anticipated implementation schedule that will ensure mitigation is implemented when appropriate in relation to environmental impacts.

To ensure that all GHG emissions reduction measures adopted by the Proponent in the Preferred Alternative are actually constructed or performed, the Proponent must provide a self-certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the required mitigation measures, or their equivalent, have been completed as a condition of a Certificate approving a DEIR. The commitment to provide this self-certification should be incorporated into the draft Section 61 Findings included in the DEIR.

#### Responses to Comments

The DEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the DEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the DEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the DEIR to those parties who commented on the ENF, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. A copy of the DEIR should be made available for public review at the Westfield Public Library.




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 May 11, 2018

Date

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 Matthew A. Beaton

## Comments received:

04/24/2018	Janis Kordana
04/24/2018	Mindy Bailargeon
04/26/2018	Thomas S. Woodson
04/26/2018	Kate Phelon
04/26/2018	Ali Salehi
04/27/2018	Daniel Howard
04/27/2018	David Amanti
04/28/2018	Jean Carpenter
04/29/2018	Kate Pighetti
04/29/2018	Peter Soule
04/29/2018	Dan Bienvenue
04/29/2018	Bob Phillips
04/29/2018	Kristen Mello
04/29/2018	Bill Westerlind
04/29/2018	William Rodrigues
04/29/2018	Lisa Chagnon
04/29/2018	Amy Thomas
04/29/2018	Karen Pighetti
04/29/2018	Hannah Roberts
04/29/2018	Lynn Rog
04/29/2018	Keith Kennedy
04/29/2018	Dawn Sienkiewicz
04/29/2018	Kirsten Chagnon
04/29/2018	Mary Cohutt
04/29/2018	Tanya Smith
04/29/2018	Julie Schermerhorn
04/29/2018	Jeff Deterlizzi
04/29/2018	Robert Fanion, Sr.
04/29/2018	Raymond Thibault



04/29/2018 Constance Adams  
04/29/2018 John Keilch  
04/29/2018 Nicoll Vincent  
04/29/2018 Heidi Leonard  
04/29/2018 Jessica B.  
04/29/2018 Patrick Leonard  
04/29/2018 Cory Liptak  
04/29/2018 Demetrios Kanavaros  
04/29/2018 Heather Liptak  
04/29/2018 Katherine Callahan  
04/29/2018 Alexandra Sutter  
04/29/2018 Elyse Wheeler  
04/29/2018 Genevieve Broderick  
04/29/2018 Sara Mielke  
04/29/2018 Aurius Mahue  
04/29/2018 Brenda Morse  
04/29/2018 Rich Mahue  
04/29/2018 Joshua Redfern  
04/29/2018 Carolyn Healey  
04/29/2018 Gail McArdle  
04/29/2018 Lindsay Panis  
04/29/2018 Steven Theodorakis  
04/29/2018 Bryan McEwan  
04/29/2018 Tara McEwan  
04/29/2018 Neal Burke  
04/29/2018 Mary Burke  
04/29/2018 Salam Zebian  
04/29/2018 Pamela Krzyzek  
04/29/2018 Debra Laquerre  
04/29/2018 Nancy Bonci  
04/29/2018 Madelyn Jemiolo  
04/29/2018 Heather Pighetti  
04/29/2018 Lisa Chagnon  
04/29/2018 Stephanie Harris  
04/29/2018 Andrew Harris  
04/29/2018 Jessica Rabort  
04/29/2018 Kaitlyn Rabort  
04/29/2018 Karen Walker  
04/29/2018 Judi Lamothe  
04/30/2018 Rachel Bilodeau  
04/30/2018 Cassy Smithies  
04/30/2018 Pamela Small-Willman  
04/30/2018 Annie Bartlett  
04/30/2018 Helen Ware  
04/30/2018 Gail Garcia  
04/30/2018 Erin Burke

04/30/2018 John Burke  
04/30/2018 Lisa Stephens  
04/30/2018 Jennifer Gagnon  
04/30/2018 Kerri Tabb  
04/30/2018 Ronald Tabb  
04/30/2018 Tanya Smith  
04/30/2018 Evan Pighetti  
04/30/2018 John Slattery  
04/30/2018 Daryl Seaha  
04/30/2018 Sean Reilly  
04/30/2018 Amanda Quinones  
04/30/2018 Jeanne Morganelli  
04/30/2018 Tania Nivar  
04/30/2018 Manny Nivar  
04/30/2018 Nicole Lussier  
04/30/2018 Maggie Deedy  
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04/30/2018 Stacey Nubile  
04/30/2018 Nicole Sampson  
04/30/2018 Justin Kelly  
04/30/2018 Pamela Weingart  
04/30/2018 Courtney Arment  
04/30/2018 Anna Sabonis  
04/30/2018 Kelly Champagne  
04/30/2018 Stephanie Morris  
04/30/2018 Norm Champagne  
04/30/2018 Brandy Latshaw  
04/30/2018 Patricia Bioniarz  
04/30/2018 Earl Metrock  
04/30/2018 Abigail McNutt  
04/30/2018 Erica Benjamin  
04/30/2018 MK Sherman  
04/30/2018 Julie Tobias  
04/30/2018 Michael McCarthy  
04/30/2018 Gary Gogol  
04/30/2018 Raeanne Fanion  
04/30/2018 Jennifer Dorgan  
04/30/2018 Rebecca Beardsley  
04/30/2018 Timothy Fanion  
04/30/2018 Lauren Gallerani  
04/30/2018 Kris Kuzniar  
04/30/2018 Jaclyn Wise  
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04/30/2018 Eileen Ringenbach  
04/30/2018 Maria Sopet  
04/30/2018 Tony Gendron

04/30/2018 Chantal Breault  
04/30/2018 Angela Burke  
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04/30/2018 Alexa Houle  
04/30/2018 Rick Kominsky  
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04/30/2018 Julie Olearcek  
04/30/2018 Judy Lieb  
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04/30/2018 Liam Rodrigues  
04/30/2018 Barbara Rokosz  
04/30/2018 Stacy Every  
04/30/2018 Rachel Morin  
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04/30/2018 Janet Garcia  
04/30/2018 Ryan Jaskulski  
04/30/2018 Jim Stucenski  
04/30/2018 Joanne Ramirez  
04/30/2018 Jeremy Burke  
04/30/2018 Carla Rastallis  
04/30/2018 Johnathan McHatton  
04/30/2018 Maxine Cloran  
04/30/2018 Alecia Standish  
04/30/2018 Jessica Riley  
04/30/2018 Patricia Sposato  
04/30/2018 Shannon Pighetti  
04/30/2018 Jolene Hamilton  
04/30/2018 Mark Chagnon  
04/30/2018 Kellye Shuman  
04/30/2018 Megan Harder  
04/30/2018 Karen Guido  
04/30/2018 Edward Barter  
04/30/2018 Jody Phillips  
04/30/2018 Eileen A. Florek  
04/30/2018 Sarah Gibson  
04/30/2018 Carole Tracy  
04/30/2018 Virginia Maldonado  
04/30/2018 Robert Labine  
04/30/2018 Crystal Barnes  
04/30/2018 Mark Czerniak, Jr.  
04/30/2018 Sarah Berard

04/30/2018 Charlotte Oleksak  
04/30/2018 Johnathan Kaczmarek  
04/30/2018 Kimberly Hatch  
04/30/2018 Melissa Plourde  
04/30/2018 Marina Levkha  
04/30/2018 Meredith Haley  
04/30/2018 Karen Bodendorf  
04/30/2018 Stephanie French  
04/30/2018 Sara Skribiski  
04/30/2018 Steven Bechard  
04/30/2018 Lori LaPlante  
04/30/2018 Heather Torrone  
04/30/2018 Kyrstin Glod  
04/30/2018 Chandra Jacques  
04/30/2018 Jessica York  
04/30/2018 Montana Cannizzaro  
04/30/2018 Taylor Laflamme  
04/30/2018 Erica Arooth  
04/30/2018 Dorothy Alger  
04/30/2018 Department of Energy Resources (DOER)  
04/30/2018 Jason Phillips  
04/30/2018 Seth Frappier  
04/30/2018 Paul Jedziniak  
04/30/2018 Bobby Gleason  
04/30/2018 Carly Carpenter  
04/30/2018 Daniel Osella  
04/30/2018 Gina Crosetti  
04/30/2018 Debra F.  
04/30/2018 Andy Oleksak  
04/30/2018 Ann J. Mello  
04/30/2018 Kandy Kocal  
04/30/2018 Mary O'Connell  
04/30/2018 Bob Westfield  
04/30/2018 Dan Rollend  
04/30/2018 Diane Pighetti  
04/30/2018 Brian Grady  
04/30/2018 Nick Belluzo  
04/30/2018 Andrea Perez  
04/30/2018 Rod Perez  
04/30/2018 Mark French  
04/30/2018 Alfred Gamache  
04/30/2018 Matthew Marchesi  
04/30/2018 Jacob Stephens  
04/30/2018 Taylor Kring  
04/30/2018 Michele Pine  
04/30/2018 Katherine Pighetti

04/30/2018 Angela Henrickson  
04/30/2018 Kristen Mello  
05/01/2018 Rolf Cachat-Schilling  
05/01/2018 Massachusetts Department of Environmental Protection (MassDEP) – Western  
Regional Office (WERO)  
05/01/2018 Massachusetts Department of Transportation (MassDOT)  
05/01/2018 Pioneer Valley Planning Commission (PVPC)  
05/01/2018 Elizabeth L. Adams  
05/08/2018 Rosalind Gwozdz

MAB/AJS/ajs