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May 25, 2007

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
NOTICE OF PROJECT CHANGE

PROJECT NAME : Massachusetts Army National Guard - Methuen  
Readiness Center  
PROJECT MUNICIPALITY : Methuen  
PROJECT WATERSHED : Merrimack  
EOEA NUMBER : 13307  
PROJECT PROPONENT : Massachusetts Army National Guard  
DATE NOTICED IN MONITOR : April 25, 2007

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

Project History

As originally proposed in the Environmental Notification Form (ENF) submitted to the MEPA Office in July 2004, the project involved the demolition of an existing 30,000 sf Motor Vehicle Storage Building (MVSF), renovation of the existing 7,000 sf Armory Building, construction of a new 2-story 63,000 sf Military Readiness Center, and alterations to the associated paved and unpaved parking areas and internal driveways within the 5.5 acre Massachusetts Army National Guard facility located off Lowell Street (Route 110) in Methuen. The project included the construction of 257 parking spaces (71 pervious spaces – military vehicles, 191 impervious surface spaces – soldier-owned vehicles, 5 impervious surface spaces – visitors), force protection features, and supporting stormwater management infrastructure. The project's estimated potable water supply needs (12,500 gallons per day (gpd)) and wastewater flows (12,500 gpd) will be served by the Town of Methuen's Water and Sewer Department, respectively.

According to the comments received from the Department of Conservation and Recreation (DCR) and CZM, a portion of the proposed Readiness Center building appeared to be located within the 100-year floodplain (A10 zone) and therefore needed to meet applicable state building codes (Section 3107.0) and comply with applicable federal flood plain management policies (Executive Order 11988, Flood Plain Management) for the construction of buildings within the 100-year floodplain, and applicable state Wetlands Protection Act regulations. As described in the ENF, the project site is also located within rare species habitat for the Bald Eagle (*Haliaeetus leucocephalus*) and the Shortnose Sturgeon (*Acipenser brevirostrum*).

The project is subject to environmental review pursuant to 301 CMR 11.03 (10)(b)(2) of the MEPA regulations since the project involves demolition of historic structures listed in the Inventory of Historic and Archaeological Assets of the Commonwealth and is being conducted, in part, by a state agency (Department of Capitol Asset Management (DCAM)). The project is also subject to environmental review pursuant to 301 CMR 11.03(3)(b)(1)(f) of the MEPA regulations because it would result in the alteration of ½ or more acres of land subject to flooding. The project required a 401 Water Quality Certification from MassDEP and an Order of Conditions from the Methuen Conservation Commission (and hence Superseding Order(s) from MassDEP if any local Orders were appealed). The project also required a revised access permit from the Massachusetts Highway Department (MHD). The project must comply with the National Pollution Discharge Elimination System (NPDES) General Permit for stormwater discharges from a construction site of over one acre from the U.S. Environmental Protection Agency. The proponent is required to file for a Building Permit from the State Department of Public Safety, Division of Inspection. The proponent should also consult with MassDEP regarding the recycling of demolition debris (such as asphalt, brick, and concrete), and the proper management of asbestos, which may be encountered during the renovation of the buildings. Because the proponent is seeking financial assistance (approximately 25%) from the Commonwealth for the project, MEPA jurisdiction extends to all aspects of the project that may cause significant Damage to the Environment, including land alteration, drainage, historical resources, and traffic.

#### Notice of Project Change

According to the information provided in this Notice of Project Change (NPC), the proponent has redesigned the project site to include the demolition of an existing 30,000 sf Motor Vehicle Storage Building (MVSb), renovation of the existing 7,000 sf Armory Building, construction of a separate new 2-story 69,000 sf Military Readiness Center, and alterations to the associated paved and unpaved parking areas and internal driveways within the 5.5 acre Massachusetts Army National Guard facility located off Lowell Street (Route 110) in Methuen. The revised project also includes the construction of 166 surface parking spaces, force protection features, and supporting stormwater management infrastructure. The project's estimated potable water supply needs (12,500 gallons per day (gpd)) and wastewater flows (12,500 gpd) will be served by the Town of Methuen's Water and Sewer Department, respectively.

### Historical Resources

As noted in the comments previously received from the Massachusetts Historical Commission (MHC) on the ENF submittal, Methuen Armory meets the criteria of eligibility for listing in the National Register of Historic Places pursuant to 36 CFR 60. MHC had determined that the proposed demolition of the Motor Vehicle Storage Building (MVSB) would have an "adverse effect" on a historic structure (36 CFR 800.5(a)(2)(i)), and had requested a consultation meeting to explore ways to avoid, minimize or mitigate the project impacts. According to the information provided by the proponent, on December 20, 2006 MHC informed the proponent that the proposed project change and the proponent's proposed utilization of matching and complimentary materials, height, mass-to-avoid ratio, and building proportions, will result in new construction that is compatible with the existing historic Armory building.

### Wetlands and Drainage

The proposed project will result in the alteration of approximately 23,400 sf of previously altered buffer to wetlands located immediately adjacent to the project site's western property line. A significant portion of the project site is located within the 100-year flood plain. According to the proponent, the project will impact approximately 100,490 sf of bordering land subject to flooding. I note that compensatory flood storage will need to be provided for any flood storage area to be eliminated by the proposed project. The flood storage volume should be incrementally equal to the flood volume displaced. The proponent is proposing pre-treatment of stormwater runoff and below-grade detention of stormwater. The underground system(s) should be installed in areas that are outside the 100-year floodplain. MassDEP recommends that consideration be given to utilizing pervious pavement more extensively for parking, particularly in areas of the site that will be used infrequently. The use of pervious paving material will reduce the volume of stormwater runoff that would need to be captured, treated, and detained in underground cisterns or holding tanks. The proponent should also consult with the Department of Conservation and Recreation (DCR) to consider incorporating low impact development (LID) design measures into the project design to improve the management of stormwater runoff from the proposed project site. I strongly encourage the proponent to consider incorporating the use of such LID measures as permeable surface parking materials and landscaped bioretention areas to significantly reduce the total amount of impervious area and stormwater runoff from the proposed project.

### Sustainable Design

This project continues to present an opportunity for incorporating sustainable design elements and sustainable construction into the design. Sustainable design elements, over the course of the project design life, can both prevent Damage to the Environment and reduce operating costs to the proponent. To the extent feasible, the proponent should incorporate sustainable design elements into the project design.

The basic elements of a sustainable design program may include, but not be limited to, the following measures:

- Optimization of natural day lighting, passive solar gain, and natural cooling,
- Use of energy efficient HVAC and lighting systems, appliances and other equipment, and use of solar preheating of makeup air,
- Favoring building supplies and materials that are non-toxic, made from recycled materials, and made with low embodied energy,
- Provision of easily accessible and user-friendly recycling system infrastructure into building design,
- Development of a solid waste reduction plan,
- Development of an annual audit program for energy consumption, waste streams, and use of renewable resources,
- LEED certification, and
- Water conservation and reuse of wastewater and stormwater

Based on the information provided by the proponent and consultation with relevant public agencies, I conclude that no further MEPA review is required. The review of the NPC, and additional information provided by the proponent to the MEPA Office, has served to adequately disclose potential impacts and mitigation, and to demonstrate that project impacts do not warrant the preparation of an Environmental Impact Report. The proponent can resolve any remaining issues in the permitting process.

May 25, 2007  
Date



Ian A. Bowles, Secretary

Comments received:

05/16/07 URS Corporation  
05/15/07 Massachusetts Highway Department (MHD)

IAB/NCZ/ncz  
NPC #13307