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October 10, 2008

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

PROJECT NAME : Berkshire Medical Center Parking Garage and Medical Office Building
PROJECT MUNICIPALITY : Pittsfield
PROJECT WATERSHED : Housatonic
EOEA NUMBER : 14313
PROJECT PROPONENT : Berkshire Medical Center, Inc.
DATE NOTICED IN MONITOR : September 10, 2008

Pursuant to the Massachusetts Environmental Policy Act (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 **does not require** the preparation of an Environmental Impact Report (EIR).

As detailed in the Environmental Notification Form (ENF), the proposed project consists of construction of a five-level parking garage and a new medical office building, as well as renovation of an existing medical building, on an approximately 4-acre site adjacent to the main hospital (Berkshire Medical Center). The adjacent hospital development was the subject of a prior MEPA review (EEA# 8143). A Certificate on the Final Environmental Impact Report (FEIR) for the hospital development was issued on October 1, 1990 with a determination the FEIR adequately and properly complied with MEPA.

Project Description

The parking garage and medical building proposed in the ENF will be constructed on a site that is currently paved and used as a hospital surface parking area. The total area of new structures proposed is 263,000 square feet. A total of 755 parking spaces will be provided, including 618 spaces at the new garage and 137 surface spaces (resulting in 349 net new spaces). Site parking and circulation will be reconfigured as part of the project. The ambulatory surgery

facilities in the existing Crane Center outpatient building will be relocated to the new medical building and the Crane Center building will be used for other hospital functions. The proposed project may include construction of a new pedestrian bridge across Wahconah Street. The project site is currently served by municipal water and sewer services.

According to the ENF, the proposed project will result in 1,430 new vehicle trips on an average weekday, for a total of 3,100 trips per day. Impervious area will be reduced by approximately 0.5 acres. The ENF proposes improvements to the existing stormwater management system and implementation of green building technologies. The proponent is pursuing Leadership in Energy and Environmental Design (LEED) certification for the project and considering solar panels for the roof of the garage.

MEPA Jurisdiction and Permitting

The project is undergoing environmental review because it may receive funding from the Massachusetts Health and Educational Facilities Authority (HEFA) and it exceeds ENF review thresholds for transportation. The project may require a permit for stormwater discharge from the Massachusetts Department of Environmental Protection (MassDEP). The project is under review pursuant to Section 11.03(6)(b)(14) and (15) of the MEPA regulations because it will result in generation of 1,000 or more new vehicle trips per day and construction of 300 or more new parking spaces at a single location. When a project involves financial assistance from the Commonwealth, 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.

REVIEW OF THE ENF

The ENF includes a description of existing and proposed conditions, a discussion of alternatives, a storm drainage analysis, and a traffic impact study.

Transportation

The ENF includes a Traffic Impact Study with an analysis of trip generation and related impacts. The study includes information on background traffic conditions and proposed conditions including a level of service summary and queue analysis for several intersections in the project area. The study concludes that the additional traffic from the proposed new medical building and the redistribution of traffic associated with trips to and from existing parking areas, can be accommodated without a significant impact to the level of service in the area. The ENF recommends traffic channelization devices such as separator curbs, traffic control signs and pavement markings, and pedestrian accommodations. The traffic analysis in the ENF indicates that the Wahconah Street/North Street intersection currently experiences a level of service F for left turns in all three analysis periods (i.e. existing, build and no-build) for the weekday afternoon. The ENF proposes right-turns only at the Wahconah Street exit of the proposed garage to avoid additional impacts associated with left turns through traffic queues.

The ENF indicates that the North Street/Wahconah Street/Burbank Street and the North Street/Tyler Street intersections significantly exceed the statewide average crash rate. Both have been recommended for improvements in the 2006 Downtown Pittsfield Circulation Plan. According to the ENF, the City of Pittsfield is planning to install a traffic signal at the intersection of North Street and Wahconah Street, which is expected to provide a better level of service at this intersection. However, during the MEPA site visit and consultation, the Berkshire Regional Planning Commission (BRPC) raised concerns regarding the timing of the proposed project and potential traffic impacts if it is completed prior to the City's signalization of the North Street/Wahconah Street intersection. The BRPC also requested additional information on the analysis of the Charles Street/North Street intersection. The proponent has since provided supplemental information to BRPC and the MEPA Office that addresses traffic mitigation commitments and other issues raised during the MEPA consultation.

The supplemental information provided by the proponent included a letter from the City of Pittsfield to BRPC indicating that the City is planning to construct the Wahconah/North/Burbank Street intersection project during the summer of 2009, using a combination of City funds and Chapter 90 funds. Based on the proponent's timetable for project construction, it is expected that the City's intersection work will be completed before the new medical office building is complete and generating new traffic. The proponent has committed to work cooperatively with the City to expedite the right-of-way acquisition that is expected at the intersection. However, the parking garage may be completed prior to the intersection improvements. In this case, the proponent has committed to monitor traffic exiting the garage onto Wahconah Street and, if the City determines that the garage exit is causing an adverse impact on the unsignalized intersection, the proponent will temporarily close the Wahconah Street exit until the City's signal improvements are complete. The proponent should continue coordination with the City to expedite the traffic signal installation at the North/Wahconah/Burbank Street intersection and to discuss potential coordination of this signal with the existing signal at the First Street/Tyler Street intersection as recommended by BRPC.

The proponent has committed to additional mitigation including a Transportation Demand Management (TDM) Program, and pedestrian crosswalk improvements on Wahconah Street and Park Street, and from the bus stop across North Street to Burbank Street. The proponent is currently an active partner in the Mass Rides program, assigns reserved parking for car pool drivers, and provides other incentives to encourage employee use of alternative transportation. The ENF proposes designation of a transportation coordinator and other efforts to further promote alternative transportation modes that will reduce single-occupant vehicle use, thereby reducing greenhouse gas emissions and other traffic-related impacts.

Stormwater

The ENF includes a summary of the storm drainage analysis conducted by the proponent with a comparison of pre-development and post-development run-off rates for the 2-year, 10-year, 25-year, and 100-year storm event. The ENF proposes improvements to the existing storm drainage system, which consists of drain pipes connected to the City's municipal storm drainage system. The proposed system will include deep catch basins with oil hoods, oil/water separator, stormwater filtration at the snow storage area, and underground infiltration and retention

galleries. The proposed medical office building will also include a rain garden and infiltration dry wells to recharge groundwater with roof drainage.

The underground injection of stormwater through a structure is currently subject to the jurisdiction of MassDEP through the Underground Injection Control (UIC) Program. However, MassDEP has proposed revisions to 314 CMR 5.00 *Ground Water Discharge Permitting Program Regulations* requiring a General Permit for storm water discharge into the ground from parking lots with high intensity use. The proposed project will be subject to that regulation based on the number of vehicle trips per day (more than 1,000 trips per day). I refer the proponent to the MassDEP comment letter for additional guidance on registration and the draft permit regulations. As noted in its comment letter, MassDEP staff will be available to assist the proponent at the time of permitting and construction.

Water and Wastewater

The additional water demand and wastewater generation from the proposed medical office building is estimated in the ENF at 5,000 gallons per day. The project as proposed in the ENF does not require any water supply or wastewater permits from MassDEP. The ENF indicates that the project will be served by the City of Pittsfield municipal water and sewer system. MassDEP, in its comment letter, strongly advises the proponent to receive written confirmation from the public water supplier and wastewater treatment facility that adequate capacity, infrastructure and pressures are available to accommodate the project. MassDEP also strongly advises the proponent to coordinate with the Pittsfield Water Department regarding compliance with cross connection control program requirements.

Construction

The proponent should implement measures to avoid and minimize dust, noise, and odor nuisance conditions that may occur during demolition and construction activities, and provide advance notification of construction and demolition work, including asbestos removal or abatement, to MassDEP as required by 310 CMR 7.00. The proponent should refer to the regulations referenced by MassDEP in its comment letter to determine if any approval or permit threshold is exceeded for any proposed boiler, incinerator or other internal combustion process being proposed and consult with MassDEP regarding permit or certification requirements. I encourage the proponent to participate in the MassDEP diesel retrofit program to mitigate construction period emissions, and to use ultra low sulfur diesel (ULSD) in off-road engines to reduce emissions of fine particulates. I refer the proponent to MassDEP's comment letter for additional information and guidance on compliance with air pollution control, solid waste, and hazardous waste regulations.

As further detailed in the MassDEP comment letter, the project site is currently undergoing a Release Abatement Measure (RAM) Plan to assess the reported soil and groundwater contamination of metals and petroleum-related contaminants. The proponent should have a Licensed Site Professional (LSP) on retainer as recommended by MassDEP and implement a "spills contingency plan" for potential releases of oil and or hazardous materials from pre and post-construction activities.

Conclusion

The proponent has committed to measures to reduce greenhouse gas (GHG) emissions associated with the project. In addition to its commitment to a comprehensive transportation demand management (TDM) program, the proponent is pursuing LEED certification for the new office building and/or the garage, and considering installation of solar panels on the garage. I commend the proponent for its efforts, and encourage the proponent to follow through with implementation of the proposed sustainable design and GHG mitigation measures.

I have determined that the ENF has sufficiently defined the nature and general elements of the project, and proposed measures to avoid and minimize or mitigate environmental impacts. Based on the City of Pittsfield's commitment to intersection improvements in the project area, I am satisfied that the local roadway infrastructure will be able to accommodate the additional traffic generated by the project. I am confident that any outstanding issues can be adequately addressed during the state and local permitting and funding processes. No further MEPA review is required for the proposed project.

October 10, 2008

DATE



Ian A. Bowles, Secretary

Comments Received:

9/30/08 Department of Environmental Protection, Western Regional Office
10/1/08 Berkshire Regional Planning Commission

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