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July 7, 2006

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

PROJECT NAME : Massachusetts Firefighting Academy
PROJECT MUNICIPALITY : Stow
PROJECT WATERSHED : Sudbury, Assabet, Concord
EOEA NUMBER : 13817
PROJECT PROPONENT : Massachusetts Division of Capitol Asset
Management
DATE NOTICED IN MONITOR : June 7, 2006

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report.

As described in the Environmental Notification Form (ENF), the proponent proposes the renovation and expansion of the existing Department of Fire Services/Massachusetts Firefighting Academy (MFA) facility located on a 50.12-acre site on Sudbury Road in Stow. The proposed project includes the construction of a new 2-story (42,880 square feet (sf)) Administrative Building for MFA, a new 20,150 sf Fire Station training building, a new 15,525 sf warehouse, and renovations to the existing 36,740 sf MFA building, a new potable water line (5,500 linear feet (lf)) from the Town of Sudbury, an on-site Title 5 wastewater disposal system, and approximately 294 additional surface parking spaces (387 surface parking spaces total).

The project is undergoing review pursuant to Section 11.03 (1)(b)(2) of the MEPA regulations, because the project involves creation of 5 or more (approximately 5.05 acres total) acres of impervious surface. The project is also undergoing review pursuant to 11.03 (1)(b)(3) of the MEPA regulations, because the project proposes the conversion of land held for natural resources purposes, in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth, to a purpose not in accordance with Article 97.

The project will require an Order of Conditions from the Stow Conservation Commission (and hence Superseding Order(s) from DEP if any local Orders were appealed), and possibly a Groundwater Discharge Permit from DEP. The project must comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges from a construction site of over one acre. If blasting will be required during project construction, the proponent will need to prepare a blast design plan pursuant to the Board of Fire Protection Regulations (577 CMR 13.09) for the proposed construction of roads, houses and utilities within the project site. Blasting mixtures that include perchlorate have been identified as the source of contamination in many Massachusetts public water supplies and thus should be prohibited from use in the project watershed.

Because the proponent is seeking financial assistance from the Commonwealth for the project, MEPA jurisdiction extends to all aspects of the project that may cause significant Damage to the Environment.

Wetlands:

As illustrated in the project site plan, the project will not result in the alteration of bordering vegetated wetlands (BVW). The proponent anticipates a small amount of disturbance to the 100-foot wetland buffer zone related to the proposed water main construction discussed below.

Water:

As described in the ENF, the existing MFS facility obtains potable water (4,705 gpd) from the Town of Maynard's municipal water supply system, and water for firefighting training from a combination of recycled stormwater and fire training water, and White Pond (2,720 gpd) under an agreement with the Town of Maynard. The proponent proposes to obtain the total potable water supply needs for the expanded MFA facility (up to 10,000 gpd) from the Sudbury Water District's (SWD) water supply system. The proponent has proposed to construct a new water main (approximately 4,000 lf) from the project site to an existing 10" water main located in at the Hudson Road/Spruce Lane intersection at the Sudbury/Stow town boundary. According to DEP, the SWD has sufficient capacity to serve the expanded MFS facility. The proposed water main extension will require a DEP Permit (BRP WS32).

Non-potable water for firefighting training activities will continue to be obtained from a combination of recycled and treated rainwater, stormwater runoff and firefighting training water. According to the information provided in the ENF, the MFA facility will continue to withdrawal fire training water (up to 80,000 gpd) water from White Pond under an agreement with the Town of Maynard..

Water Conservation

I encourage the proponent to incorporate water conservation and water use efficiency in the project design to comply with the March 1989 state plumbing code. Specifically, the proponent should commit to employing efficient water conservation technologies for the project including water saving devices, low flow toilets, and low flow appliances (dishwashers, washing machines). The proponent should also consider implementing an Irrigation Management Plan (IMP) to further reduce the project's irrigation water demand. An IMP could involve the use of amended soils and compost, the planting of native and drought-tolerant species of trees, shrubs, and turf grasses, an automated water efficient irrigation system, and a water management protocol for drought conditions. I ask that the proponent consult with DEP, and refer to the Massachusetts Water Resources Commission's *Lawn and Landscape Water Conservation, An Addendum to the Water Conservation Standards for the Commonwealth of Massachusetts, October 2002*, during the final design of the proponent's IMP.

Wastewater:

The total wastewater flow to be generated by the expanded Fire Fighting Academy facility (8,330 gpd) will be treated via an on-site wastewater treatment system with a design flow capacity of 9,500 gpd in accordance with Massachusetts Title 5 regulations. According to the comments received from DEP, the proposed on-site Title 5 wastewater treatment system will require that the proponent install a pressure distribution system as part of the this project's proposed wastewater treatment system design. I anticipate that DEP's permitting process will include a rigorous review of the proponent's proposed wastewater management system.

Stormwater:

As described in the ENF, the stormwater management plan for the proposed project has been designed as an expansion to the project site's existing stormwater management and recycling system. According to the proponent, a significant portion of the expanded MFS facility project site's stormwater flows will be captured and recycled for firefighter training, irrigation or toilet flushing purposes. The proponent has proposed to incorporate an infiltration system, including one stormwater detention basin, to allow for direct recharge of any treated stormwater overflow. The proponent's stormwater management system will be designed to meet DEP's Stormwater Management Policy guidelines and includes the use of water quality swales, deep sump catch basins, 1 detention basin, and periodic road sweeping to service the project's stormwater flows for eventual discharge to Bordering Vegetated Wetlands (BVW) abutting the project site.

I encourage the proponent to evaluate sustainable design alternatives such as Low Impact Development (LID) techniques in site design and stormwater management plans.

LID techniques incorporate stormwater best management practices (BMPs) and can reduce impacts to land and water resources by conserving natural systems and hydrologic functions. The primary tools of LID are landscaping features and naturally vegetated areas, which encourage detention, infiltration and filtration of stormwater on-site. Other tools include water conservation and use of pervious surfaces. Clustering of buildings is an example of how LID can preserve open space and minimize land disturbance. LID can also protect natural resources by incorporating wetlands, stream buffers and mature forests as project design features. For more information on LID, visit <http://www.mass.gov/envir/lid/>. Other LID resources include the national LID manual (Low Impact Development Design Strategies: An Integrated Design Approach), which can be found on the EPA website at: <http://www.epa.gov/owow/nps/lid/>.

Conversion of Article 97 Lands:

As described in the ENF, the 50.12-acre project site, formerly part of the Sudbury State Forest, was the subject of an August 2002 transfer of Article 97 lands from the Department of Environmental Management (DEM), now the Department of Conservation and Recreation (DCR) to the Department of Fire Services. I note that the Legislature's approval of the transfer of the DCR Article 97 land (Chapter 245 of the Acts of 2002) described two separate parcels of property (Parcel 1 – 8.73 acres, Parcel 3 – 50 acres) a total of approximately 58.73 acres of Article 97 land to be converted from Article 97 protection.

The proponent's Article 97 Mitigation Plan includes a commitment to provide Article 97 open space mitigation including public parkland and passive recreational facilities on six separate parcels of property, listed below, and totaling 88.60 acres. According to the information provided in the ENF, all of the proposed Article 97 mitigation parcels are located adjacent to other protected publicly-owned open space land with existing publicly accessible trail systems and parking areas, and provide significant environmental and recreational resource values. In addition, the proponent has proposed to replace, operate and permanently maintain the existing publicly accessible hiking trail system and parking lot located on the eastern portion of the project site. The proponent needs to ensure that all the land areas included in the proponent's Article 97 mitigation proposal are permanently protected as public open space/parklands.

Proposed Article 97 Mitigation Parcels

<u>Parcel Name</u>	<u>Location</u>	<u>Size (acres)</u>
Arena Terrace	Concord	3.52
Fairhaven Road	Concord	.93
Pawtucket Boulevard	Lowell	23.28
Marrett Road	Lexington, Lincoln	12.76
Route 146, Southbound	Sutton	31.79
Route 2/Princeton Road	Fitchburg	16.32

Article 97 of the Massachusetts Constitution articulates the high value placed upon the preservation of existing open space lands, including lands subject to Conservation Restrictions. To further the Commonwealth's open space goals, EOEAs Article 97 Land Disposition Policy requires contains a requirement that unavoidable impacts are mitigated to achieve, at a minimum, "no net loss" of the Article 97 lands. Upon review of the information provided by the proponent and after consultation with the relevant public agencies, I find that the proponent has satisfied the requirements of EOEAs Article 97 Land Disposition Policy. However, as a condition of my approval of the proponent's Article 97 mitigation plan, I am requiring the proponent to work closely with the Town of Stow's Conservation Commission and Planning Board to address the comments received on the ENF regarding the impacts of the proponent's proposed Article 97 mitigation plan on the Town of Stow's protected open space resources and ongoing land protection activities.

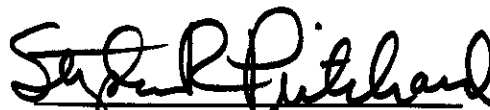
Construction Period:

The proponent should analyze construction-period impacts, including temporary impacts to wetlands, and the extent of any blasting and/or re-grading during construction. The proponent should consult with the Towns of Groton and Pepperell, and DEP to ensure that the proponent will meet any performance standards associated with a federal NPDES permit for all proposed project construction activities.

Based on a review of the information provided by the proponent and after consultation with the relevant public agencies, I find that the potential impacts of this project do not warrant the preparation of an EIR. The proponent can resolve the remaining issues during the process of final design and during the permitting process. The proponent should respond to the comments received pertaining to the project's potential impacts to site drives and traffic, Article 97 mitigation, lighting impacts and stormwater runoff in project permitting and final design.

July 7, 2006

Date



Stephen R. Pritchard, Secretary

Comments received:

6/28/06	Town of Stow, Conservation Commission
6/27/06	Massachusetts Department of Environmental Protection – CERO
6/27/06	Town of Stow, Planning Board

SRP/NCZ/ncz

ENF # 13817, MDFS – Stow Firefighting Academy, Stow