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July 24, 2009

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

PROJECT NAME : Honda Automobile Dealership
PROJECT MUNICIPALITY : Littleton Road (Route 110) – Westford
PROJECT WATERSHED : Nashua River
EOEA NUMBER : 14437
PROJECT PROPONENT : Boch Westford, LLC
DATE NOTICED IN MONITOR : June 24, 2009

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 determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

Project Description

According to the Environmental Notification Form (ENF), the proposed project consists of the construction of an approximately 51,982 square foot (sf) automobile dealership/showroom with sales, service, and vehicle storage on 15.31 acres. The remainder of the site will be utilized for parking, access and vehicle storage. The site also currently contains an approximately 11,500 sf paint store and a single family residential home, which will be demolished to make way for the automobile dealership. The owner of this site also owns an adjacent 6.35 acres that includes the 11,430 sf Westford Post Office (built in 1980), a 4,500 sf stand-alone retail building (Westford Home Lighting)(built in1991), and a building pad for a proposed 30,000 sf office building that has been locally approved but has yet to be constructed.

Jurisdiction

The project is subject to review pursuant to Sections 11.03(1)(b)(2), 11.03(6)(b)(14), and

11.03(6)(b)(15) of the MEPA regulations because the project requires state permits and creates five or more acres of impervious area, generates 1,000 or more new average daily trips on roadways permitting access to a single location and includes the construction of 150 or more new parking spaces, and includes the construction of 300 or more parking spaces. The project will require an Access Permit from the Massachusetts Highway Department (MassHighway). It should comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges from a construction site. The project will require an Order of Conditions from the Westford Conservation Commission for impacts to wetland resource areas and buffer zones and, on appeal only, a Superseding Order of Conditions from the Massachusetts Department of Environmental Protection (MassDEP).

Because the proponent is not seeking financial assistance for the proposed project, MEPA jurisdiction is limited to those aspects of the project that are within the subject matter of any required or potentially required state permits and that may cause Damage to the Environment, as defined in the MEPA regulations (in this case: wetlands, stormwater, and traffic).

Review of the ENF

Traffic and Transit

The project will have one entrance and exiting driveway onto the north side of Littleton Road (Route 110) at its intersection with Concord Road (Route 225), which is located on the south side. The remainder of the project site would continue to access Route 110 via the existing relocated site driveway that is further west of the proposed dealership driveway. MassHighway has proposed improvements along Route 110 in the vicinity of the project site, including the widening of the corridor and the installation of a traffic signal at the intersection of Route 225. The proposed site driveway for the automobile dealership would serve as the fourth leg of the new signalized intersection. Based on the Institute of Traffic Engineers Land Use Code (LUC) 841 – New Car Sales, the proposed project is estimated to generate approximately 1,734 new vehicle trips per weekday. The existing uses on the project site are generating approximately 600 trips using LUCs 210 – Single Family Home and 816 – Hardware/Paint Store. The adjacent 6.35 acre site containing the existing Post Office (LUC – 732 – Post Office) and the Lighting Store (LUC – 814 – Specialty Retail) are estimated to generate approximately 1.436 daily vehicle trips. The proponent will construct approximately 473 parking spaces for the proposed auto dealership.

For mitigation of its traffic impact on Route 110, the proponent is proposing to adjust the traffic signal timing at the new MassHighway signal at its driveway at the intersection of Route 110/Route 225 and to relocate MassHighway's proposed traffic signal arm at the driveway. Comments from MassHighway indicate that the traffic associated with the project can be accommodated by the roadway infrastructure.

As described in the ENF, the proponent will construct new five-foot wide sidewalks along the perimeter of the automobile dealership property on Littleton Road. It should address MassHighway's concern regarding the provision of a Transportation Demand Management (TDM) program with transit promotion and ridesharing for employees prior to the issuance of an Access Permit. The nearby Westford Office Park has committed to establish a Transportation Management Association (TMA). The proponent should consider joining this nearby TMA. I urge the proponent to work closely with MassHighway, the Northern Middlesex Council of Governments (NMCOG), the local transit provider, and the Town of Westford to develop a traffic mitigation plan that will facilitate the safe and effective use of public transportation and pedestrian access to the project site. The Lowell Regional Transit Authority operates a bus route, Route 15, along Route 110 in the vicinity of the project site.

Water Supply/Wastewater

According to the ENF, the Town of Westford will supply the project with public water. The project will consume approximately 2,860 gallons per day (gpd) of water. It will generate approximately 2,600 gpd of wastewater that will flow to a Title 5 septic system. The proponent is not proposing to install a car wash. However, if a car wash is installed at some later date, the proponent would install a recirculating wash system.

Wetlands/Stormwater

The proponent has estimated that the project will impact approximately 1,514 sf of Bordering Vegetated Wetlands (BVW). The proponent has proposed an approximately 1,521 sf replication area. On July 8, 2009 the proponent supplied a replication plan showing the areas that will be impacted and replicated. However, as noted in the comments from MassDEP, the proponent will need to provide further information about how the project meets the performance standards under the Wetlands Protection Act.

The project will create approximately 5.13 additional acres of impervious area on the 15.31 acre auto dealership site. The quality of stormwater runoff generated by the project will be improved by the implementation of Best Management Practices. Existing site runoff is sheet flow. Under the stormwater management system proposed for the project, runoff from the proposed driveways and parking areas will flow to catch basins equipped with deep sumps and hoods. Stormwater would then flow to underground Storm Tech Isolator Rows and infiltration structures and a vegetated filter strip. Roof runoff will be flow to the stormwater system. The overall rate of water discharging from the site is expected to be less than existing peak runoff rates. No drainage will discharge to the MassHighway drainage system. The proponent has committed to perform an annual inspection and maintenance program for the stormwater collection system and a twice a year sweeping program of the proposed driveways and parking areas. It has developed a spill prevention plan that includes a catch basin closure plate which will

be located in the service area. However, the proponent should review the comments provided by MassDEP indicating that additional information will need to be provided to ensure that the stormwater management design meets applicable performance standards.

I strongly encourage the Proponent to continue to evaluate opportunities for incorporating sustainable design alternatives including LID techniques in the project's 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. 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/>.

Sustainable Design

According to the ENF, the proposed auto dealership building will include: the following sustainable design elements: using high-albedo roofing materials; maximizing interior daylighting; incorporating window glazing to balance and optimize daylighting, heat loss and solar heat; incorporating additional insulation to minimize heat loss; incorporating motion sensors and lighting and climate control; tracking the energy performance of the building and developing strategies to maintain efficiency; using low volatile organic compounds (VOC) paint, adhesives, sealants and carpets; using locally manufactured materials; using metal halide and fluorescent lighting in lieu of incandescent lighting; constructing the building to face south for the solar benefit; using low energy (e) glass; using water efficient plumbing fixtures; and developing a construction waste management plan during construction. I commend the proponent for including these energy efficiency and sustainable design measures, which have the potential to reduce greenhouse gas emissions associated with the project.

Although the project is not subject to the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol because I have found that it does not require the preparation of an EIR, I strongly encourage the proponent to voluntarily undertake additional measures to reduce GHG emissions associated with the project. In particular, buildings such as the one proposed for this project are often suitable for the installation of roof-top solar photovoltaic (PV) systems, which can serve to offset the project's energy usage by generating clean renewable power on site. In light of the likely continued rise in electricity prices, the continued reduction in the cost of PV, opportunities for third party PV arrays with power purchase agreements, and the numerous other

tax and financial incentives available for solar projects, I urge the proponent to evaluate the feasibility of installing solar PV for this project.

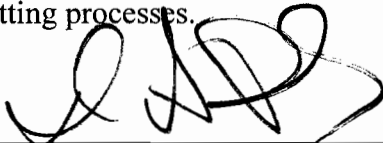
Construction Period Impacts

The proponent should commit to using ultra low sulfur diesel fuel for off-road engines in construction vehicles to reduce fine particulate matter as recommended by MassDEP. Because the project involves some demolition, the proponent should also commit to recycling construction and demolition wastes as recommended by MassDEP.

Conclusion

Based on a review of the information provided by the proponent, a review of the comment letters, 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. Any remaining issues can be addressed during the state permitting processes.

July 24, 2009
Date



Ian A. Bowles

Comments received:

- Vanasse & Associates, 6/30/09
- Vanasse & Associates, 7/8/09
- MassHighway, 7/9/09
- Vanasse & Associates, 7/10/09
- Northern Middlesex Council of Governments, 7/13/09
- Massachusetts Department of Environmental Protection/Northeast Regional Office, 7/15/09
- Massachusetts Executive Office of Transportation, 7/17/09
- Vanasse & Associates, 7/21/09

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