



The Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Deval L. Patrick
GOVERNOR

Timothy P. Murray
LIEUTENANT GOVERNOR

Ian A. Bowles
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1181
<http://www.mass.gov/envir>

August 17, 2007

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
SINGLE ENVIRONMENTAL IMPACT REPORT

PROJECT NAME: Proposed Retail Development
PROJECT MUNICIPALITY: Greenfield
PROJECT WATERSHED: Deerfield and Connecticut
EEA NUMBER: 13929
PROJECT PROPONENT: Greenfield Investors Property Development, LLC
DATE NOTICED IN MONITOR: July 11, 2007

As Secretary of Energy and Environmental Affairs, I hereby determine that the Single Environmental Impact Report (Single EIR) submitted for this project **adequately and properly complies** with the Massachusetts Environmental Policy Act (MEPA) (G. L. c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00).

Project Description

As described in the Single EIR, the project proposes the development of an approximately 160,000 square foot (sf) retail store with garden center in Greenfield, MA. The development parcel is part of a larger 29-acre site consisting of two lots divided by the recently abandoned Gill Road west of the intersection of Routes 2 and 2A. The 19-acre development parcel to the south of Gill Road (the "South Parcel") is largely disturbed due to past gravel operations and currently a construction/fuel supply operation. The project will also involve construction of new utility service connections, construction of a stormwater management system, installation of landscaping, construction of site improvements and parking facilities, and improved site access off Route 2A. The approximately 10-acre parcel to the north (the "North

Parcel”) is undeveloped and consists largely of wetland resource areas. The Proponent intends to donate this parcel to the Friends of Wissatinnewaug, Inc. (FOW) due to its archaeological sensitivity.

Jurisdiction and Permitting

The project is undergoing MEPA review and requires the preparation of an EIR pursuant to Section 11.03(6)(a)(6) of the MEPA regulations because it will result in the generation of more than 3,000 new average daily vehicle trips (adt). The project also exceeds the following ENF review thresholds: Section 11.03(1)(b)(2) because the project will result in the creation of more than 5 acres of new impervious surface and Section 11.03(6)(b)(15) because the project requires the construction of more than 300 new parking spaces at a single location.

The project requires the following permits and/or review: a National Pollutant Discharge and Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA); a Programmatic General Permit from the U.S. Army Corps of Engineers (ACOE); an Access Permit from the Massachusetts Highway Department (MHD); a Sewer Connection/Extension Permit and possibly a 401 Water Quality Certificate from the Department of Environmental Protection (MassDEP); review from the Massachusetts Historical Commission (MHC); two Orders of Conditions from the Greenfield Conservation Commission; Major Development Review from the Greenfield Zoning Board of Appeals; and a Curb Cut Permit from the Greenfield Department of Public Works.

Because the Proponent is not seeking financial assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that may cause significant Damage to the Environment and that are within the subject matter of required or potentially required state permits. In this case, MEPA jurisdiction extends to land alteration, stormwater, transportation, wetlands, wastewater and historic resources.

MEPA History

In accordance with Section 11.05(7) of the MEPA regulations, the Proponent submitted an Expanded ENF (EENF) for the project with a request that I allow the Proponent to fulfill its EIR obligations under MEPA with a Single EIR, rather than the usual process of a Draft and Final EIR. The EENF received an extended comment period pursuant to Section 11.06(8) of the MEPA regulations. In a Certificate issued on February 15, 2007, I found that the EENF met the regulatory requirements and I allowed the Proponent to file a Single EIR in fulfillment of Section 11.03 of the MEPA regulations. The Certificate on the EENF laid out the issues to be addressed in the Single EIR.

Review of the Single EIR

The purpose of MEPA review is to ensure that a project Proponent studies feasible alternatives to a proposed project; fully discloses environmental impacts of a proposed project; and incorporates all feasible means to avoid, minimize, or mitigate Damage to the Environment as defined by the MEPA statute. I have fully examined the record before me, including but not limited to the Scope issued on February 15, 2007; the Single EIR filed in response; and the comments entered into the record. I find that the Single EIR is sufficiently responsive to the requirements of the MEPA regulations and the Scope to meet the regulatory standard for adequacy. The Proponent has provided a sufficient level of information about the project and its potential impacts and proposed mitigation. Remaining issues outlined in this Certificate may be addressed during permitting.

While I am finding the Single EIR to be adequate, I note concerns about the scale of the project and concerns that the Single EIR is unresponsive to the Scope for alternatives outlined in the Certificate on the EENF. The Single EIR did evaluate a reduced build alternative as required in the February 15, 2007 Certificate. The Single EIR also contained sufficient information on project alternatives, impacts, and mitigation, and provided the state permitting agencies with sufficient information to understand the environmental consequences of their permit decisions. Proposed mitigation is sufficient for unavoidable environmental impacts and the project includes many improvements to a currently degraded and impacted site. The Proponent should carefully review and consider the detailed comments that have been submitted on the Single EIR and continue to work with the City of Greenfield, local watershed groups, and interested citizens to minimize the environmental impacts of the project during the local and state permitting process.

Permitting and Consistency

In response to the Certificate on the EENF, the Single EIR provided a discussion of the project's consistency with local zoning. The site lies within a "General Commercial" (GC) zoning district, which allows as-of-right retail and garden center uses. The project site is also located within the Corridor Overlay (CO) district as part of the French King Highway/High Street Corridor. According to the Single EIR, the project is consistent with the goals of the CO District because it will enhance the existing blighted site visible from the French King Highway for both light and noise. Existing and additional vegetation at the site will also provide extensive screening and buffering. In response to comments submitted on the EENF, the Proponent provided visual perspectives of the proposed building from a number of locations. The Proponent should respond to comments from the Greenfield Historical Commission regarding visual impacts of the project from the French King Highway overlook during the local review process.

The northern edge of the site is adjacent to Route 2, commonly known as the Mohawk Trail. Portions of the Mohawk Trail are designated as a state scenic byway. The Franklin Regional Council of Governments (FRCOG) is currently working on a Mohawk Trail Corridor Management Plan for the section of the Mohawk Trail from the Greenfield Rotary east to Athol. According to the Single EIR, the project is compatible with the goals of the scenic byway

Management Plan to protect and promote historic, scenic, natural and recreational features along the Mohawk Trail. In response to comments from the Greenfield Historical Commission, all feasible measures should be taken to promote compatibility with the Canada Hill neighborhood, the Riverside National Register Archaeological district and the Cherry Rum Brook corridor as a natural resource and historic Native American trail landscape.

Alternatives

The Single EIR presented an updated analysis of alternative development concepts that were considered by the Proponent during the preliminary design process for the project. In addition to the No-Build Alternative and the Preferred Alternative, the Proponent assessed three other alternatives in the Single EIR featuring a mix of retail and restaurant space. Preliminary Alternative 1 would include approximately 180,000 sf of new retail and restaurant space with almost 700 new parking spaces. Preliminary Alternative 2 would consist of approximately 124,000 sf of retail and restaurant space and 670 new parking spaces. The Reduced Build Alternative includes approximately 135,000 sf of retail with a garden center and 540 parking spaces. No alternative land uses other than retail and/or restaurant uses were considered for the project site due to the development objectives set forth by the City and the Proponent.

The Proponent's Preferred Alternative involves the development of a 160,000 sf retail store with a garden center. According to the Single EIR, the Proponent's Preferred Alternative locates new development within previously developed and/or previously altered areas where infrastructure exists, and contains the development outside the limits of the most environmentally and archaeologically sensitive areas. The Proponent has made additional changes to the Preferred Alternative since the submittal of the EENF to scale back the development footprint out of wetland resource buffer zones.

In addition, the parking field has been reduced by 24 spaces to a 580-space surface parking lot in an effort to reduce the creation of new impervious surface. City of Greenfield parking requirements for retail uses require a minimum of one parking space per 300 square feet for the first 50,000 sf, plus one parking space per 600 sf for the area over 50,000 sf. This results in a minimum parking requirement of 351 spaces for the project. The Proponent asserts however in the Single EIR that the average parking ratio required to support the project during peak shopping periods is in the range of 4 to 5 parking spaces per 1,000 sf of building. The Proponent cites studies conducted by the Institute of Traffic Engineers (ITE) and the Urban Land Institute (ULI) that recommend a parking ratio of 4 to 5 spaces per 1,000 sf. If the Proponent were to provide 4 parking spaces per 1,000 sf, the parking need would be approximately 640 spaces. The Proponent proposes 580 parking spaces, for a ratio of 3.63 spaces per 1,000 sf. The Proponent asserts that the entire proposed parking field is expected to be utilized during the peak shopping season. The Proponent also proposes to use areas of the parking field for snow storage during off-peak shopping seasons which will allow snow melt to discharge through the stormwater system for treatment. The Proponent should continue to examine opportunities to reduce the size of the proposed parking field.

Land Alteration/Drainage

The project will result in the creation of 9.4 acres of new impervious surface. Currently no stormwater management facilities exist on the site. Under existing conditions, untreated stormwater runoff infiltrates through the ground or runs off to the wetland systems in the northern and northwestern portions of the site. The project site straddles the divide between two watersheds: the east branch of Cherry Rum Brook, which drains to the Green River and eventually the Deerfield River; and the Fall Brook which flows north and east into the Fall River, and then to the Connecticut River. The Single EIR contained an analysis of existing drainage conditions in which the site was divided into two drainage areas that contribute to two design points where peak discharge rates were evaluated. The Proponent should note comments regarding existing conditions for Drainage Area #1.

Under proposed conditions, runoff generated from impervious surfaces on site will be collected and managed in accordance with MassDEP Stormwater Management Policy (SMP) guidelines. The proposed development has been designed to direct stormwater runoff from a portion of the building rooftop to a bio-retention basin located adjacent to a detention pond in the northwestern portion of the site. Additional stormwater runoff from areas adjacent to the north, west and south sides of the building will be collected in a closed drainage system via catch basins with 4-foot sumps and hooded outlets, and will be directed through a water quality unit and conveyed to the detention pond located in the northwestern portion of the site. A portion of the roof runoff will discharge directly into the detention pond.

Runoff from a large portion of the parking area on the east side of the building will be collected in catch basins with 4-foot deep sumps and hooded outlets and will be directed through a water quality unit and conveyed to an above ground detention pond located in the southeastern portion of the site. The remaining stormwater from the parking area located east of the building will be collected in catch basins and routed through a water quality unit that will convey stormwater into an underground infiltration system in the northern portion of the parking area and will discharge into the wetlands to the north. Half of the roof runoff will also be conveyed to this underground infiltration system. Discharge from the underground infiltration system and above ground detention system will flow through level spreaders and vegetated buffer strips.

The proposed garden center is located at the northeast of the building. The garden center will be fenced-in and approximately 40 percent of the garden center will be covered by a roof. Runoff generated from the garden center will be routed through a specialized water quality unit which disperses stormwater through a series of treatment cartridges that contain media that bind soluble contaminants such as nutrients and pesticides. I strongly urge the Proponent to consider covering the entire Garden Center area with a roof or a canopy.

According to the Single EIR, the Proponent has incorporated Low Impact Development (LID) techniques into the site design. The stormwater management system includes several provisions to provide recharge to the aquifer that underlies the site. Runoff from the eastern half of the building roof, the canopy over the garden center and a portion of the parking lot will be directed to a subsurface infiltration system after being routed through various treatment

structures. Runoff from the western half of the building roof will be directed to a bioretention area, which will promote additional infiltration.

In the Single EIR, the Proponent responded to concerns regarding the impact of project-related stormwater runoff on fishery resources in Cherry Rum Brook and Fall Brook, and on Fall River and the Green River, both of which are designated as Cold Water Fisheries under 314 CMR 4.00. To protect these resources, the stormwater management system includes BMPs such as the subsurface infiltration system and the bioretention swales that will help lower the temperature of stormwater discharges. The Proponent should address remaining concerns regarding adverse thermal impacts to cold water fisheries during the wetlands permitting process.

According to the Single EIR, a comprehensive source control program will be implemented at the site, which includes pavement sweeping at least 4 times annually, catch basin cleaning, and enclosure and maintenance of all dumpsters, compactors and loading areas. Snow plowed from paved surfaces at the site will be stockpiled in portions of the proposed parking lots outside of the 100-foot buffer zone that drain to structural BMPs within the stormwater management system. A copy of the Operations & Maintenance (O&M) Plan for the stormwater management system was submitted with the Single EIR. The Proponent will also implement and extensive erosion and sedimentation control plan to prevent indirect impacts to wetlands during construction.

Due to the prior use of the site as a gravel operation, the site will need to be raised approximately nine feet in order to accommodate the proposed layout and drainage system. The Proponent included a detailed cut and fill earthwork analysis to review the replacement of materials on-site and the need for import materials to achieve proposed site grades. Approximately 81,000 cubic yards of on-site material, primarily sand, will be relocated on-site and compacted. The proposed approximately 65,000 cubic yards of site import fill materials include bituminous pavement, concrete, pavement and slab base sections, building structural fill, rip rap and detention basin berm materials. In addition approximately 10,000 cubic yards of topsoil and ordinary fill will be used at the site. The Proponent should ensure that fill material does not contain invasive species.

Wetlands

The project site contains a number of federal, state and locally regulated wetland resource areas including bordering vegetated wetlands (BVW), Bank, Land Under Water Bodies and Waterways, and Riverfront Area. The boundaries of wetlands regulated under the local Greenfield Wetlands Bylaw and the MA Wetlands Protection Act (WPA) were confirmed by the Greenfield Conservation Commission in a February 2007 Determination of Applicability (DOA). The Single EIR provided a description of each of the six wetland systems on the site and a discussion of their significance with respect to the interests of the WPA.

The South Parcel includes a small wetland (Wetland 4) that consists of a marsh and linear swales located in the floor of the former gravel pit. The Greenfield Conservation Commission's

DOA stated that Wetland 4 is regulated as Bank and BVW. Four small isolated wetlands that are not regulated under the WPA or local bylaw also exist on the South Parcel. The Proponent has submitted a Request for Determination from the U.S. Army Corps of Engineers (USACE) to confirm federal Clean Water Act (CWA) jurisdiction over these isolated wetlands. If the USACE asserts jurisdiction, the isolated wetlands will be regulated under Section 401 of the CWA.

The project will result in the following wetland impacts:

Wetland 2: 2,200 sf of temporary impacts to previously-developed Riverfront Area related to the construction of a paved turn-around at the end of the public portion of Gill Road. The project will also result in impacts to 600 sf of new development in the Riverfront Area at this location

- Wetland 4 is located within the footprint of the proposed retail store building. The project will therefore result in the permanent alternation of 2,350 sf of BVW and 230 linear feet of Bank associated with this wetland system.
- Extension of sanitary sewer service to the proposed development will entail temporary alteration of 70 sf of BVW and 12 linear feet of Bank in Wetland 6. This work has been configured to occur within the footprint of an existing trail through Wetland 6 and adjacent uplands.

Construction of the parking field will result in the permanent alteration of approximately 2,435 of isolated wetlands in the South Parcel.

- Approximately 5.6 acres of work is proposed within the 100-foot buffer zone of state and locally regulated wetland resources.

The project requires an Order of Conditions from the Greenfield Conservation Commission. A Notice of Intent (NOI) was filed with the Commission in March of 2007 (DEP #168-0251) but was recently withdrawn by the Proponent. The Proponent intends to refile the NOI shortly. The Proponent should note comments from MassDEP submitted on the original NOI and to MEPA. A second NOI for off-site work related to the extension of the sewer line will also be filed. Based on the jurisdictional determination on the isolated wetlands, the project may also require a 401 Water Quality Certificate (WQC) from MassDEP for impacts to over 5,000 sf of BVW and IVW combined. The Proponent should consult with the MEPA office if the USACE issues a positive determination on the IVW to determine if further MEPA review is required to evaluate compliance with the 401 WQC regulations and to allow for public review of a Section 61 Finding for MassDEP.

According to the Single EIR, no Certified Vernal Pools exist on or near the property. Mapping maintained by MassGIS indicates the presence of a potential vernal pool in Wetland 3, which is located immediately west of the South Parcel. In response to the Certificate on the EENF, the Proponent inspected Wetlands 1 through 4 for the presence of indicators of vernal pool habitat. Inspections were conducted in April, May and June of 2007 in compliance with Natural Heritage and Endangered Species (NHESP) methodology. According to the Single EIR, the inspections did not reveal the presence of the necessary indicators to comply with the criteria for certification developed by the NHESP.

The most recent Flood Insurance Rate Map (FIRM) for the project site indicates that most of the North Parcel lies within Zone A. Zone A is an area subject to flooding during a 100-year frequency storm. A Flood Study was performed on the North Parcel and it was determined that the limit of 100-year flooding is contained within the North Parcel. The Greenfield Conservation Commission did not confirm the presence of any "Land Subject to Flooding" resources in its DOA decision. The Proponent should resolve the issue of potential impacts to floodplain during the NOI process.

Permanent impacts to wetland resources will be mitigated through the construction of a 6,800 sf replacement wetland that has been designed in accordance with MassDEP and USACE design guidelines. The replacement wetland will be monitored in accordance with conditions dictated in the Greenfield Conservation Commission Order of Conditions, and with MassDEP and USACE requirements.

Wastewater

The project is anticipated to generate approximately 7,370 gallons per day (gpd) of wastewater. The Proponent proposes to directionally drill a new sewer main under Route 2 to connect to the City-operated and maintained sewer system on the northern side of Route 2. The Proponent submitted a letter from the City of Greenfield with the Single EIR stating that there is adequate capacity in the municipal system to treat the projected flows. According to the Single EIR, the City of Greenfield is intending to be a co-applicant for the off-site Notice of Intent to be submitted to the Greenfield Conservation Commission for the sewer extension. The construction of new sewer main through the site will provide the City of Greenfield with the opportunity to connect the Canada Hill neighborhood and several businesses on the French King highway to the municipal sewer system. The Proponent intends to convey ownership of the proposed sewer main to the City of Greenfield after construction.

Transportation

The EENF included a Traffic Impact and Access Study (TIAS) that was prepared in accordance with the Executive Office of Environmental Affairs (EOEA)/Executive Office of Transportation (EOT) guidelines. The traffic impact analysis and proposed mitigation were developed in coordination with the Massachusetts Highway Department (MHD) and local officials. The project is anticipated to generate approximately 9,220 new vehicle trips on a typical weekday and approximately 12,420 vehicle trips on a typical Saturday. EOT/MHD stated in their comments on the EENF that the TIAS adequately analyzed the project's traffic and proposed adequate mitigation measures to address the impacts. The Certificate on the EENF required that the Proponent address additional comments submitted on the EENF regarding the project's impacts on state and local roadways.

To provide for improved site access, Gill Road will be closed at its eastern intersection with Route 2A and will become the primary access/egress to the Site during construction. When the project is complete the general public will use a new full access signalized intersection on

Route 2A. This intersection is proposed to be located southeast of the development approximately 300 feet west of the existing intersection of the abandoned Gill Road and Route 2A.

The Single EIR updated the TIAS to include the following intersections: High Street/Beacon Street, High Street/Sanderson Street and High Street/Maple Street. The High Street intersections are projected to operate at LOS F during the Saturday midday peak under 2001 Build conditions. The Proponent performed warrant analyses for each of these intersections however none of the intersections have enough volume to warrant a signal. High Street/Route 2A is a City of Greenfield roadway west of the project site. Traffic data was also collected along Adams Road and Lampblack Road.

In the Single EIR, the Proponent presented the following intersection and roadway improvement measures that will result in increased roadway capacity to mitigate the project's impacts on traffic:

- Turners Falls Road at 5th Street/Canal Avenue: Installation of a three-way stop control intersection and pavement markings at this location to enhance the safety of pedestrians and cyclists. A bicycle path has been constructed along the canal which crosses Turners Fall Road and runs parallel to Canal Street. The Proponent will also install one-way signage and one-way pavement markings on 5th Street to enforce the one-way traffic flow away from this intersection. The Proponent has indicated in supplemental comments submitted to the MEPA office that it will continue to work with the Town of Montague and the City of Greenfield to ensure adequate and coordinated mitigation at this intersection.
- Wildwood Avenue at Route 5/10 (Federal Street): The Proponent has identified the need to mitigate existing deficiencies along Wildwood Avenue and is committed to working with the City of Greenfield and MassHighway to develop a strategy to reduce existing cut-through traffic to/from Federal Street/Bernardston Road and French King Highway. The Proponent is aware that the City of Greenfield and MassHighway are currently improving the traffic signals on either end of Silver Street, and that the improvements at Wildwood Avenue and Federal Street/Bernardston Road will need to complement these improvements.
- Route 2A at Site Driveway: The Proponent will install a fully-actuated traffic control signal at this location. In addition, the Proponent will construct a northbound exclusive left-turn lane and a southbound exclusive right-turn lane at the intersection. Traffic exiting the site will travel on separate left and right turn lanes.

The Proponent concludes in the Single EIR that the surrounding roadway network can adequately accommodate the anticipated traffic increases from the proposed development with proposed roadway improvements. EOT/MHD indicates in their comments on the Single EIR that it is satisfied with the Proponent's analysis of traffic impacts and proposed mitigation.

Transportation Demand Management

The Single EIR outlined proposed Transportation Demand Management (TDM)

strategies that the Proponent will implement to reduce vehicular traffic to and from the site. Measures outlined in the Single EIR include the promotion of ridesharing and the designation of preferential parking spaces for employees that carpool. The Proponent states that it will encourage the selected tenant for the project to implement the following additional measures: an on-site vehicle trip reduction coordinator; a guaranteed ride home program; installation of showers and clothing lockers for cyclists; discounts to customers for alternative travel use; and delivery restrictions of truck deliveries to off-peak hours. In the Letter of Commitment for MHD, the Proponent should provide a clear commitment to implement and continuously fund proposed TDM measures.

Public transportation in the study area includes a number of bus routes that are operated by one public transportation agency operating in the Greenfield area. Recently the Franklin Regional Transportation Authority (FRTA) and the Greenfield Montague Transportation Area (GMTA) combined into one agency where none of the bus routes have been modified with the merger. There are four fixed FRTA and three fixed GMTA in the vicinity of the study area.

The project will accommodate public transportation via a local bus route that will be allowed to enter the project site. The bus will enter at the main intersection, proceed along the main access drive and turn around at the spin circle, and drop off/pick up pedestrians adjacent to the garden center without creating a bus route/pedestrian conflict at the main entrance to the building. The Proponent is committed to working with the regional public transit agency to identify appropriate locations for bus stops on existing routes adjacent to the site.

Sidewalks will be provided from the building entrance to the site access drive/French King Highway (Route 2A) intersection. In response to comments submitted on the EENF, the Proponent added a sidewalk from the parking field at the truck turn around to the remaining portion of Gill Road so that the remainder of Gill Road could be used as a pedestrian corridor or bicycle path for pedestrian access to the site. To facilitate both employee and customer bicycle access to the site, secure bicycle storage racks will be provided near the front doors of the retail store.

Historic Resources

According to MHC, the North Parcel may have archaeological significance in relation to a North American burying ground. The North Parcel is also directly adjacent to multiple archaeological sites, including the Riverside Archaeological District which is listed in the State and National Registers of Historic Places. The Proponent has committed to donating this 10-acre parcel to the Friends of the Wissatinnewag (FOW) where an agreement is currently being worked out between the Proponent and the FOW and the Narragansett Indian Tribe.

MHC issued a State Archaeologists Permit in December of 2006 to the Public Archaeology Laboratory, Inc (PAL) to conduct a reconnaissance archaeological survey of the 17-acre South Parcel and any additional easements required for stormwater management or sewer easement purposes. The Proponent conducted walkover and subsurface investigations at the site in 2007. The findings of the investigations and a record of consultation between the

Proponent, PAL and MHC were submitted with the Single EIR. A single archaeological artifact was found in situ at the site and several other artifacts were recovered from disturbed zones. PAL concluded that no additional cultural resource investigations are warranted at the site. The Proponent will submit the final survey report to MHC for review. The Proponent should continue to consult with MHC on measures that can be implemented to avoid, minimize or mitigate any impacts to significant historic or archaeological resources at the site.

Sustainable Development

The Proponent states in the Single EIR that it aims to incorporate sustainable design measures for the project through coordination with the building architect and tenant once selected. The Single EIR provided a discussion of potential sustainable design measures that will be evaluated including strategies related to site design, site lighting, sustainable landscaping, construction waste management, building performance, energy efficiency, water efficiency, sustainable building materials, indoor environmental quality, waste reduction, transportation demand management, air quality and the development of an Environmental Management Program. The Proponent will also evaluate potential sustainable design measures using the LEED Green Building Rating System as a general guideline. Given the State's recent efforts to address the greenhouse gas emissions impacts of large development projects, the Proponent should make a concerted commitment to implement site and building design strategies to reduce energy consumption and environmental impacts.

Construction Period Impacts

The Single EIR included a discussion proposed measures to avoid or eliminate construction-period impacts related to noise, air quality, wetlands, water quality and traffic. The Proponent outlined a proposed construction phasing schedule. As noted in the Certificate on the EENF, I encourage the Proponent to consider participating in MassDEP's Clean Construction Equipment Initiative consisting of an engine retrofit program and/or use of low sulfur fuel to reduce exposure to diesel exhaust fumes and particulate emissions during construction.

Hazardous Waste

Due to the historical use of the site as a fuel distribution facility, vehicle maintenance facility and sand and gravel mining site, the property has been impacted by numerous releases of oil and/or hazardous materials in the past. A release of fuel oil, kerosene and/or diesel fuel was detected in 2005 in soil and groundwater in 2005 in the vicinity of an existing fuel terminal at the site. A Release Notification Form (RNF) was submitted to MassDEP in August 2005. A Notice of Responsibility (NOR) was issued to the property owner and a Release Tracking Number (RTN) and Tier II classification was assigned to the site. The deadline for the submittal of Phase II Comprehensive Site Assessment (CSA) and Phase II remedial action plan documents is August 2008. A Release Abatement Measure (RAM) plan has been prepared to address the on-site conditions warranting further assessment and remedial actions. According to the Single EIR,

all remedial work may be completed by September 2007, with post remedial groundwater monitoring to be completed by March 2008, before the beginning of site development work. An Asbestos Containing Material (ACM) demolition survey of suspected building materials was conducted at the site.

In response to comments from MassDEP regarding the Underground Injection and Control (UIC) Program, the Proponent states in the Single EIR that closure of the floor drains in the service garage will be accomplished to bring the site into compliance with UIC regulations at 310 CMR 27.00. Concentrations of petroleum hydrocarbons and arsenic were detected in the floor drains of the service garage. Remedial actions involving soil excavation and chemical oxidation are planned once the garage is razed.

Mitigation

The Single EIR presented a separate chapter on mitigation measures that outlined proposed mitigation, identified responsible parties and provided an estimate of individual costs of mitigation. The following is a summary of mitigation measures outlined in the Single EIR:

Transportation

The Proponent will construct a traffic signal and roadway improvements at the entrance to the site.

- The Proponent will either construct traffic calming improvements on Wildwood Avenue or contribute to signal design/conduit installation at the intersection of Wildwood Avenue/Federal Street.
- The Proponent will install intersection improvements at Canal Street/5th Avenue. The Proponent will implement Transportation Demand Management (TDM) measures including the promotion of ride sharing and carpooling as well as providing staggered work hours.
The Proponent will construct bicycle and pedestrian amenities on site.
- The Proponent will work closely with the FRTA to provide a bus stop within the site for existing routes.

Wetlands/Stormwater

- The Proponent will create an approximately 6,800 sf wetland replication area to mitigate for wetland impacts.
- The Proponent will construct a Buffer Zone Restoration area of approximately 1 acre. The Proponent will implement a comprehensive Erosion & Sedimentation Control Plan and Stormwater Pollution Prevention Plan to minimize construction period impacts. The Proponent will install a stormwater management system that will employ Best Management Practices to provide groundwater recharge, attenuate peak flows, provide water quality treatment, and reduce thermal impacts to receiving waters. The Proponent will install several Low Impact Development measures such as a bioretention area and grassed swales.
- The Proponent will implement a comprehensive source control program which will include

regular pavement sweeping, catch basin cleaning, and maintenance of structural stormwater BMPs.

Wastewater

- The project is projected to generate approximately 8,000 gpd of wastewater and requires a Sewer Extension Permit from MassDEP. The Proponent will construct a sewer main that will service the project and that will provide a stub for future connection of residential and commercial buildings on French King Highway and in the Canada Hill neighborhood of Greenfield.

Conclusion

I find the Single EIR to be adequate and am allowing the project to proceed to the state agencies for permitting. The Single EIR contained sufficient information on project alternatives, impacts, and mitigation, and provided the state permitting agencies with sufficient information to understand the environmental consequences of their permit decisions. No further MEPA review is required.

August 17, 2007

Date

Ian A. Bowles

Comments received:

8/3/2007	Milan Dragicevich
8/4/2007	Al Norman
8/5/2007	Jessica van Steensburg
8/6/2007	Jessica van Steensburg
8/6/2007	Executive Office of Transportation
8/7/2007	Greenfield Historical Commission
8/8/2007	Sandra Thomas
8/9/2007	Trout Unlimited, Deerfield/Millers Chapter
8/9/2007	Charles V. Olchowski
8/9/2007	Haines Hydrogeologic Consulting
8/9/2007	Vanasse Hangen Brustlin, Inc., for the Proponent
8/10/2007	Stephen H. Kaiser
8/10/2007	Donovan Eastman
8/10/2007	Connecticut River Watershed Council
8/10/2007	Department of Environmental Protection, Western Regional Office

IAH/BA/ba