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October 17, 2008

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

PROJECT NAME: Westinghouse Redevelopment
PROJECT MUNICIPALITY: Springfield
PROJECT WATERSHED: Connecticut River
EEA NUMBER: 14205
PROJECT PROPONENT: Packard Development
DATE NOTICED IN MONITOR: **September 10, 2008**

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

Project Description

As described in the Single EIR, the project involves the redevelopment of the Westinghouse site in Springfield, MA. The project site is approximately 40 acres of mostly developed land bounded by Page Boulevard (Route 20A) to the north and Interstate 291 (I-291) to the south. The site currently contains approximately 916,000 square feet (sf) of development in the form of multiple warehouses, manufacturing buildings and surface parking. The project includes the complete redevelopment of the project site with approximately 470,000 sf of retail and restaurant uses and 2,012 parking spaces (1,022 net new spaces). The project is expected to generate approximately 16,700 new vehicle trips on a typical weekday and 22,900 new vehicle trips on a typical Saturday. The project also includes the development of enhanced stormwater management facilities, traffic and pedestrian access improvements, remediation of contaminated

land, connections and upgrades to water and sanitary sewer facilities, and new landscaped areas within the project site.

Jurisdiction

The project is undergoing environmental review and requires the preparation of an EIR pursuant to the following sections of the MEPA regulations: 301 CMR 11.03(6)(a)(6), because it will generate more than 3,000 new average daily trips (adt) on roadways providing access to a single location; and 301 CMR 11.03(6)(a)(7), because it involves the construction of more than 1,000 new parking spaces at a single location. The project requires a National Pollutant Discharge Elimination System (NPDES) General Construction Permit from the U.S. Environmental Protection Agency (EPA); an Indirect Highway Access Permit from the Massachusetts Highway Department (MassHighway); and approval from the Department of Environmental Protection (MassDEP) under the Massachusetts Contingency Plan (MCP). The project is subject to the EEA Greenhouse Gas (GHG) Emissions Policy and Protocol.

Because the Proponent is not seeking financial assistance from the Commonwealth for the project, MEPA jurisdiction is limited to those aspects of the project that may cause Damage to the Environment as defined in the MEPA regulations and that are within the subject matter of required or potentially required state permits. In this case, jurisdiction extends to transportation and hazardous waste.

Changes Since the Filing of the Expanded ENF

The project has changed slightly since the filing of the Expanded Environmental Notification Form (EENF) in response to comments received on that document. Changes include:

- Relocation of the unsignalized driveway off Page Boulevard such that the entrance is approximately 140 feet to the east of Edendale Street;
- Construction of sidewalk improvements on Stevens Street, pedestrian connections to crossings on Page Boulevard, enhanced internal paths and connections, and benches, landscaping and lighting;
- Reduction of total number of parking spaces from 2,059 to 2,012;
- Additional groundwater recharge in the rear of the project parcel; and
- Commitments to additional GHG reduction measures.

Review of the Single EIR

The Single EIR included a description of the project, a summary of changes since the filing of the EENF and a listing of permits and approvals and project phasing. The Single EIR included a summary of project alternatives that were investigated as part of the EENF and addressed site layout modifications to facilitate improved pedestrian flow and connections to the

adjacent neighborhood. Existing structures on-site will not be reused; however the Proponent has indicated a willingness to investigate incorporation of the on-site radio towers into the future design layout. The Single EIR contained a summary of how the number of on-site parking numbers were derived and presented a plan that reduces the number of parking spaces by 47 spaces. Parking areas will be available to provide additional parking for neighborhood uses.

Traffic

The Single EIR included a supplemental traffic assessment in response to comments received on the EENF. This supplemental information was prepared in accordance with the EOEEA/EOTPW Guidelines for Traffic Impact Analysis. The traffic assessment evaluated an additional intersection (Roosevelt Avenue at Bay Street) at the recommendation of MassHighway, presented additional improvements to address existing deficiencies, outlined additional traffic mitigation measures, and included updated Transportation Demand Management (TDM) measures. EOTPW has indicated that the Single EIR adequately analyzed the project's traffic impacts and proposed mitigation measures that will address the impact on the State highway system.

I have received several comments pertaining to proposed traffic mitigation measures, including those on local roadways. I strongly encourage the Proponent to continue to work with the City of Springfield, local business owners and residents to ensure that traffic impacts associated with the project are appropriately mitigated. Comments on the traffic analysis include concerns related to the impact of the AM peak hour on signal coordination efforts and street pattern changes along Page Boulevard. Additional comments were received concerning available queue lengths and storage capacities in the project area. I strongly encourage the Proponent to expand its traffic monitoring plan to incorporate the comments submitted on behalf of the City of Springfield by their traffic consultant and to continue to evaluate additional mitigation measures related to queue length and pedestrian accommodations during the ongoing City of Springfield permitting process.

Greenhouse Gas Emissions

The Single EIR included an expanded GHG analysis in response to the Certificate on the EENF and in accordance with the EEA Greenhouse Gas Emissions Policy and Protocol (the Policy). Additionally, during the Single EIR comment period, the Proponent submitted additional information clarifying the content presented in the Single EIR. The Single EIR has presented an estimated GHG reduction of 33 percent for stationary sources and 10 percent for mobile sources in comparison to the code compliant base case as outlined in the Policy. Reductions in GHG emissions have been achieved through commitments to implement transportation demand management (TDM) measures, intersection improvements, and building design and operations improvements. These measures include the use of high efficiency HVAC systems, installation of white colored thermoplastic olefin (TPO) membrane roofing, efficient lighting and windows, and the purchase of 35 percent green power to meet energy demand from one of the anchor retail stores. The specific measures are detailed in the section on Mitigation and Section 61 Findings below.

The Single EIR notes that the project will be designed to be compliant with the Massachusetts State Building Code and as design progresses and tenants are identified, the Proponent will work to evaluate and encourage the incorporation of energy efficient systems. The Proponent is reminded that the recently passed Green Communities Act, Chapter 169 of the Acts of 2008, requires that the International Energy Conservation Building Code be adopted and fully integrated into the State building code. The Massachusetts requirements will therefore be changing, and the new standards may apply to buildings constructed as part of this project.

I acknowledge the difficulty in confirming the amount of GHG reductions possible in buildings whose tenants and uses are unknown at the time of MEPA review. The Single EIR does provide a discussion of GHG mitigation commitments associated with the two anchor stores, as these tenants are presently known. The two anchor stores represent approximately 50 percent of the project's total carbon emissions. However, I share MassDEP's concern that the Proponent's efforts to encourage future tenants to adopt additional GHG mitigation measures may or may not result in tangible GHG reductions. MassDEP has suggested two means to reconcile the inability of the Proponent to make project-wide GHG reduction commitments while demonstrating reasonable compliance with the GHG Policy. These include:

1. a commitment by the Proponent to increase its investment in mitigation measures for the project components it controls, with an allowance to reduce that commitment if the anticipated GHG reduction from future tenants materialize; or
2. a commitment by the Proponent to retain on its development team or otherwise make available, without charge, to prospective tenants a person with sufficient expertise to provide an energy assessment of alternative building designs and operating systems under consideration.

I strongly encourage the Proponent to make these additional commitments to further ensure that all feasible GHG reduction measures are incorporated into the project.

In addition, the Single EIR stated that solar photovoltaic (PV) systems are not being included amongst the project's mitigation commitments. The Single EIR analyzed the installation of a 50kW solar PV system as a supplemental source of energy, capable of generating approximately 61,320 kWh in its first year, or 5,110 kWh per month. The Single EIR estimated the payback period of the installation for each anchor retail building at approximately seven years. The Single EIR also cited uncertainty in government tax credits as an additional challenge in implementing solar PV on-site. In light of the recent extension of federal tax credits for solar PV systems, the likely continued rise in the electricity prices, the continued reduction in the cost of PV, opportunities for third party PV arrays with power purchase agreements, and new opportunities for utility ownership of solar installations, I strongly encourage the Proponent to revisit its analysis of the projected payback period with a more realistic projection of the revenue stream as suggested in MassDEP's comment letter. In addition, the recently passed Climate Protection and Green Economy Act, M.G.L.c. 21N, mandates economy-wide reduction targets for greenhouse gas emissions in Massachusetts of between 10 and 25 percent by 2020. I second the recommendation of MassDEP that the Proponent consider the potential advantages of early GHG reduction under the new law. I also encourage the Proponent to construct the facility with

consideration for the added weight of future PV systems so that they may be installed in the future based upon tenant needs.

Upon completion of construction, the Proponent should provide a certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, general contractor) indicating that the all of the mitigation measures referenced in the Section on Mitigation and Section 61 Findings below, or equivalent measures that collectively will reduce stationary source GHG Emissions by 33 percent and mobile GHG emissions by 10 percent, have been incorporated into the project. The certification should be supported by as-built plans. For those measures that are operational in nature (i.e. TDM, recycling) the Proponent should provide an updated plan identifying the measures, the schedule for implementation and how progress towards achieving the measures will be obtained. MassHighway should incorporate this self-certification requirement into its Section 61 finding for this project.

Hazardous Materials

The Single EIR included a brief update on ongoing hazardous waste remediation activities in accordance with M.G.L. 21E or the Massachusetts Contingency Plan (MCP) on-site. Historically there have been as many as three release conditions at the project site listed with MassDEP. One of these Release Tracking Numbers (RTN) remains active (1-15982), the other two RTN's (1-16658 and 1-16661) have achieved closure through the submittal of a Response Action Outcome (RAO) statement. The Single EIR notes that the active RTN 1-15982 is currently in Phase II of the MCP investigations. Additional investigation and reports are currently being prepared to address the associated release conditions and to specify that the project will result in the resolution of the RTN. MassDEP has noted that the Phase IV – Remedy Implementation Plan, as described in 310 CMR 40.0874, should be submitted to MassDEP, unless an RAO statement is submitted prior to December 9, 2008. If these requirements cannot be met, the Proponent will need to file an application for a Tier II Extension with MassDEP.

Construction Management

The Single EIR described various construction management techniques to be utilized during the construction period to limit environmental impact. The Single EIR discussed erosion and sedimentation controls, site preparation, construction staging and general construction requirements, how the project will comply with NPDES permitting requirements, and efforts to mitigate noise, dust and air quality impacts during construction activity. The Single EIR confirmed that all construction debris will be handled, managed, and disposed of in accordance with applicable regulations, including the “waste bans” as applicable at local solid waste facilities in the project areas. Also, the Proponent has noted that solid waste/debris will be managed and disposed of in accordance with MassDEP’s Waste and Recycling Regulations and Standards (310 CMR 16.00 and 310 CMR 19.000). The Single EIR stated that, if feasible, existing steel/metal, asphalt, brick, and concrete will be recycled and/or reused on-site. Asbestos-containing waste will be managed in accordance with MassDEP’s Solid Waste Management regulations (310 CMR 19.061) for “special waste.”

Stormwater and Utilities Infrastructure

The Single EIR responded to questions raised in comments on the EENF related to stormwater, water and wastewater. The Single EIR included a discussion and supporting data to confirm compliance with MassDEP's Stormwater Management Standards dated January 2, 2008, including additional information on additional stormwater recharge efforts incorporated into the site design. The City of Springfield Planning and Economic Development Department comment letter notes several additional design measures that may need to be adjusted during the design and construction process to ensure that the stormwater management system works effectively. The Single EIR noted that the site is adequately served by existing water and sewer infrastructure, and sufficient capacity exists to serve the project.

Permitting

MassDEP has indicated in their comment letter on the Single EIR that the project may be subject to 314 CMR 5.00 *Ground Water Discharge Permitting Program Regulations* as currently proposed for revision. The revised regulations will require a General Permit for stormwater discharge into the ground from parking lots with high intensity use. The Proponent should remain apprised of the potential approval of these regulations and obtain the required permit if applicable. Additionally, MassDEP has noted that the project will require Underground Injection Control Program Registration or a Groundwater Discharge Permit for underground, stormwater infiltration structures. The Proponent should work with MassDEP regarding the appropriate regulatory application. MassDEP has stated that mitigation measures can adequately be addressed through the registration or permitting process, if applicable. However, should material changes to the project be required as a result of the permitting or registration requirements, a Notice of Project Change pursuant to 301 CMR 11.10 may be required.

The Proponent should update project Section 61 findings to specify that, upon occupancy of the site, should the traffic monitoring protocol indicate unsafe conditions at the intersection of I-291 on- an off-ramps with Page Boulevard, revised pavement markings for acceleration and deceleration lanes should be provided as originally requested by MassHighway. Additionally, the Proponent should coordinate with MassHighway on physical or timing modifications to traffic signals at Roosevelt Avenue/Page Boulevard, Roosevelt Avenue/Bay Road, and Page Boulevard/I-291 off-ramp. MassHighway has noted that the traffic monitoring plan should also include counts for the AM peak period to help optimize the morning coordination plan for these traffic signals.

Mitigation and Draft Section 61 Findings

As required, the Single EIR included updated draft Section 61 findings. The Proponent has committed to the following mitigation measures as summarized below:

Traffic

- The project will have two new signalized access points along Page Boulevard, one across from East Street and the other will utilize Stevens Street. There will also be a right-in/right-out only driveway proposed along Page Boulevard, located between the two signalized access points. Truck deliveries will utilize Stevens Street to access the back of the larger retail buildings on the south side of the site. These driveways will replace the approximately five existing unsignalized curb cuts that serve the site today.

Widen Page Boulevard to provide four lanes of travel (two lanes in each direction) between Roosevelt Avenue and Stevens Street. Provide striping of on-street parking spaces along both sides of Page Boulevard (between Stevens Street and Jenness Street on the north side and Stevens Street and right-in/right-out project drive on the south side). Provide sidewalks, pedestrian accommodations and landscaped buffers along Page Boulevard.

- Widen Stevens Street to provide three lanes of travel (two northbound lanes and one southbound lane) between Page Boulevard and the project driveway. Modify Stevens Street to provide two lanes of travel and an 8-foot on-street parking lane (on the west side) between the north project driveway and Eureka Street. Reconstruct the sidewalk on the east side of Stevens Street from Page Boulevard to approximately 400-feet south of the north project drive. Install two “No Truck” signs on Eureka Street, facing Stevens Street.
- The Proponent will make intersection improvements at Page Boulevard at Roosevelt Avenue including:
 - Curb cut and lane modifications;
 - Optimization of the intersection’s cycle length and associated signal timing changes at the intersection of I-291?Interchange 5 westbound off-ramp; and
 - Coordination with signals located on Page Boulevard at East Street and Stevens Street.
- The Proponent will make intersection improvements at the Page Boulevard at East Street/Prentice Street/Proposed East Site Driveway including:
 - Widening and restriping of the intersection to provide turning and through lanes;
 - Sidewalk improvements and enhanced pedestrian crosswalks;
 - Installation of a three-phase actuated-coordinated traffic control signal;
 - Closure of the entrance to Prentiss Street;
 - Coordination of the traffic signal with signals located on Page Boulevard at the I-291/Interchange 5 westbound off-ramp, Roosevelt Avenue and Stevens Street.
- The Proponent will make intersection improvements at the Page Boulevard at Stevens Street intersection including:
 - Widening and restriping of the intersection to provide turning and through lanes;
 - Sidewalk improvements and enhanced pedestrian crosswalks;

- Coordination of the traffic signal with signals located on Page Boulevard at the I-291/Interchange 5 westbound off-ramp, Roosevelt Avenue and East Street.
- Investigation of the need for installing signage and pavement markings to discourage vehicle queues from blocking the Page Boulevard/Osborne Terrace intersection.

Alteration of the East Street at Roosevelt Avenue/Price Street intersection to provide safer and more efficient operations. Improvements include the construction of a raised island to direct northbound East Street traffic to the right allowing traffic to intersect Roosevelt Avenue at a right angle.

- Implementation of a Travel Demand Management (TDM) program. The program proposes to:
 - Facilitate bicycle and pedestrian travel by providing bicycle racks, sidewalks, and signalized pedestrian crossings;
 - Provide improved access from the Project to transit with on-site PVRTA bus service;
 - Encourage tenants to offer direct deposit to their employees;
 - Encourage tenants to provide a guaranteed ride home program;
 - Provide preferential carpool and vanpool parking within the parking lots to promote ridesharing;
 - Encourage tenants to provide subsidies who purchase monthly or multiple trip transit passes;
 - Encourage tenants to hold promotional events for employees and/or customers that choose alternative transportation modes; and,
 - Provide on-site services such as ATMs, restaurants, etc. to reduce the need for employees to leave the retail center.
- Conducting a Traffic Monitoring Plan that will count traffic trips and turning movements entering and exiting all of the project driveways and at selected project intersections six (6) months following the opening of the project and again upon 85 percent occupancy (or, in any event, within three years of opening). The Proponent will prepare a memorandum of the results to the City of Springfield and MassHighway and if additional mitigation measures are necessary will coordinate with the City of Springfield.

GHG

- Mobile Source GHG emissions will be mitigated through the implementation of the traffic-related mitigation measures outlined above.
- In buildings the Proponent will construct, lease and maintain, the following mitigation measures will be implemented to offset stationary source GHG emissions:
 - High-efficiency Energy Star-compliant packaged HVAC systems (EER=10);
 - 80 percent heat efficiency;
 - Installation of motion sensors in non-display areas;

- White colored thermoplastic olefin (TPO) membrane roofing;
 - Installation of double low-e windows; and
 - Finish building ceilings.
- In Anchor Retail Store A (constructed and maintained by tenants) the following mitigation measures will be implemented to offset stationary source GHG emissions:
 - High-efficiency Energy Star-compliant packaged HVAC systems (EER=11.4);
 - 80 percent heat efficiency;
 - Installation of motion sensors in non-display areas;
 - Installation of efficient lighting in display and interior areas;
 - Installation of double low-e windows; and
 - Finish building ceilings.
 - In Anchor Retail Store B (constructed and maintained by tenants) the following mitigation measures will be implemented to offset stationary source GHG emissions:
 - High-efficiency Energy Star-compliant packaged HVAC systems (EER=10);
 - 80 percent heat efficiency;
 - **Installation of motion sensors** in non-display areas;
 - White colored thermoplastic olefin (TPO) membrane roofing;
 - Installation of efficient lighting; and
 - Finish building ceilings.
 - The Proponent will install Energy-Star equipment will in buildings it operates.
 - One of the Anchor Retail stores will purchase 35 percent of its energy from a Green Power source that utilizes renewable resources. The preliminary estimate of the stationary source GHG emission reductions due to the use of Green Power is approximately 158.1 tons per year (tpy).

The Single EIR presented draft Section 61 findings that addressed traffic-related mitigation measures. These Section 61 findings must be expanded to include GHG mitigation measures in accordance with the GHG Policy. The final Section 61 findings will be included with all state permits issued for this project, and will be considered binding upon the proponent as mitigation commitments. In accordance with Section 11.12 (5) (e) of the MEPA regulations, final Section 61 findings must be forwarded by each permitting agency to the MEPA Office, which will publish a Notice of Availability in the Environmental Monitor.


As noted elsewhere in this Certificate, the Proponent should provide a certification to the MEPA Office signed by an appropriate consultant (e.g., engineer, architect, general contractor) indicating that the all of the above referenced mitigation measures have been incorporated into the project. The certification should be supported by as-built plans. For those measures that are operational in nature (i.e. TDM, recycling) the Proponent should provide an updated plan identifying the measures, the schedule for implementation and how progress towards achieving measures will be obtained. This self-certification will be a requirement of the MassHighway Section 61 finding for this project.

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 adequate information on project 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.

October 17, 2008

Date


Ian A. Bowles

Comments received:

10/09/2008	East Springfield Neighborhood Council
10/09/2008	Pioneer Valley Planning Commission
10/09/2008	Springfield Preservation Trust
10/09/2008	Joseph Freedman Co., Inc.
10/10/2008	Massachusetts Department of Environmental Protection – WERO
10/10/2008	City of Springfield – Planning and Economic Development
10/10/2008	Sheet Metal Workers International Association
10/10/2008	Executive Office of Transportation and Public Works
10/10/2008	Massachusetts Department of Environmental Protection and Department of Energy Resources (joint letter)

IAB/HSJ/hsj