

For Office Use Only
 Executive Office of Environmental Affairs
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NPC

Notice of Project Change

The information requested on this form must be completed to begin MEPA Review of a NPC in accordance with the provisions of the Massachusetts Environmental Policy Act and its implementing regulations (see 301 CMR 11.10(1)).

Project Name: Lawrence Gateway Project – Quadrant Area Re-Use Plan		EOEA #: 10544
Street: 70 General Street – bound between General, Canal, Marston, and Union Streets		
Municipality: Lawrence	Watershed: Merrimack River	
Universal Tranverse Mercator Coordinates:	Latitude: 42°42'27.32" Longitude: 071°09'00.20"	
Status of project construction:	20 %complete	
Proponent: GenCorp Inc. – In Partnership with Merrimack Valley Regional Transit Authority and the City of Lawrence (See attached MOA)		
Street: 70 General Street		
Municipality: Lawrence	State: MA	Zip Code: 01840
Name of Contact Person From Whom Copies of this NPC May Be Obtained: Chet Gwardyak, P.E.		
Firm/Agency: CDM Inc.	Street: 50 Hampshire Street	
Municipality: Cambridge	State: MA	Zip Code: 02139
Phone: 617-452-6271	Fax: 617-452-6271	E-mail: GwardyakCT@cdm.com

In 25 words or less, what is the project change?

The project change involves additional parking spaces and park layout alteration for the redevelopment (final phase) of the Lawrence Gateway Project – Quadrant Area Re-Use Plan project. See full project change description beginning on page 3.

Date of ENF filing or publication in the Environmental Monitor: November 11, 1995

Was an EIR required? Yes No; if yes,
 was a Draft EIR filed? Yes (Date:) No
 was a Final EIR filed? Yes (Date:) No
 was a Single EIR filed? Yes (Date:) No

Have other NPCs been filed? Yes (Date(s): 4/27/98) No
 3/3/05 Notification Letter

If this is a NPC solely for lapse of time (see 301 CMR 11.10(2)) proceed directly to "ATTACHMENTS & SIGNATURES" on page 7.

PERMITS / FINANCIAL ASSISTANCE / LAND TRANSFER

List or describe all new or modified state permits, financial assistance, or land transfers not previously reviewed: Please see Attachment B.

Are you requesting a finding that this project change is insignificant? (see 301 CMR 11.10(6))

Yes No; if yes, attach justification.

See narrative included with this form.

Are you requesting that a Scope in a previously issued Certificate be rescinded?

Yes No; if yes, attach the Certificate

Are you requesting a change to a Scope in a previously issued Certificate? Yes No; if yes, attach Certificate and describe the change you are requesting:

Summary of Project Size & Environmental Impacts	Previously reviewed (1995 ENF)	Net Change	Currently Proposed
LAND			
Total site acreage	8.6 acres (GenCorp site) 13.66 acres (Total site)	0 acres	8.6 acres (GenCorp site) 13.66 acres (Total site)
Acres of land altered	13.66	0	13.66
Acres of impervious area	7.1 acres	+1 acre	8.1 acres
Square feet of bordering vegetated wetlands alteration	0	0	0
Square feet of other wetland alteration	326,700 sq. ft. of BLSF**	-152,276 sq. ft. BLSF**; +24,660 sq. ft. of Riverfront Area*	174,424 sq. ft. BLSF**; 24,660 sq. ft. of Riverfront Area*
Acres of non-water dependent use of tidelands or waterways	0	0	0
STRUCTURES			
Gross square footage	0	+400	400
Number of housing units	0	0	0
Maximum height (in feet)	0	0	0
TRANSPORTATION***			
Vehicle trips per day	2,271	727	2,998
Parking spaces	735±	+228±	963±

WATER/WASTEWATER			
Gallons/day (GPD) of water use*****	0	0	0
GPD water withdrawal	0	43,200****	43,200
GPD wastewater generation/ treatment	0	43,200****	43,200
Length of water/sewer mains (in miles)	0	0	0

* Riverfront Area was not a resource area until 1996, when the Rivers Protection Act was enacted. Therefore, it was not noted in the 1995 ENF.

** BLSF area, excluding buildings, which were determined by DEP to be outside the 100-year floodplain in 1995 letter. The 1995 ENF included building footprints in the BLSF total.

*** A Traffic Impact Study has been performed with recommendations for signalization and turning lanes (see Attachment E).

**** Plan now includes a groundwater treatment plant, which will discharge to the Spicket River after treatment.

***** Park will include a sprinkler system but no drinking water or restroom facilities.

Does the project change involve any new or modified:

1. conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97? Yes No

2. release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction? Yes No

3. impacts on Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities? Yes No

4. impact on any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

Yes No; if yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources? Yes No

5. impact upon an Area of Critical Environmental Concern? Yes No

If you answered 'Yes' to any of these 5 questions, explain below: N/A

PROJECT CHANGE DESCRIPTION (attach additional pages as necessary). The project change description should include:

(a) a brief description of the project as most recently reviewed

(b) a description of material changes to the project as previously reviewed,

(c) the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and

(d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any previously issued Section 61 Finding, include a proposed modification of the Section 61 Finding (or it will be required in a Supplemental EIR).

Brief Description of Project as Most Recently Reviewed

As stated in the November 1995 Environmental Notification Form (EOEA #10544), "The proposed project is an ongoing phased remediation which involves the demolition and off-site disposal of structures; excavation and off-site disposal of soils; subsurface/groundwater/raceway investigation and remediation; and land re-use development (currently conceived as being parking/open space in support of economic revitalization of surrounding area)". Concurrently with submission of the ENF, GenCorp requested a waiver from the mandatory requirement to prepare an EIR for demolition of historical properties on the project site. MEPA issued a Final Record of Decision (FROD) authorizing the project to proceed without preparation of an EIR. The FROD also served as the Certificate on the ENF (see Attachment C).

On April 27, 1998 a Notice of Project Change was filed before the beginning of Phase III of GenCorp's Remediation and Redevelopment Project for drainage and utility work, and its Massachusetts Contingency Plan Phase II Comprehensive Site Assessment. On March 3, 2005, GenCorp filed a Notification Letter as required by MEPA to proceed with its soil and subsurface remedial activities.

Under a Memorandum Of Agreement, the Merrimack Valley Regional Transit Authority (MVRTA), in partnership with the City of Lawrence and GenCorp, is ready to implement the last phase of its project, the land re-use development. The last phase of the project involves redevelopment and roadway improvements to create 963± parking spaces (landscaped surface parking facility) and an open-space/passive park, concurrent with approved remedial activities. The property site is comprised of two contiguous properties owned by GenCorp Inc. (GenCorp) and the City of Lawrence (City) and portions of two abutting properties owned by 181 Canal Street Realty and Riverside Realty Trust. The project site is within an industrial mill complex located at the eastern entrance point to the city's downtown corridor. The site previously contained state-listed historic resources, the demolition of which was conditionally approved by the Massachusetts Historical Commission and reviewed by MEPA in 1995. Specific project activities include installation of a new drainage system; abandonment and filling of a raceway system; area filling and re-grading; paving and landscaping; and roadway and intersection widening. The roadway improvements were identified through a Massachusetts Highway Department (MassHighway)-funded Intermodal Surface Transportation Efficiency Act (ISTEA) study as complimentary transportation enhancements that connect to and build upon substantial highway interchange and bridge replacement projects being accomplished by MassHighway.

Concurrent with the redevelopment and roadway activities are final remedial activities respectively being performed by GenCorp and the City under the coordinated review of the U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (DEP). GenCorp's remedial activities are defined in a DEP/EPA-approved Remedial Action Plan (RAP) and will be performed under Remedy Implementation Plans to be approved by EPA, DEP and other appropriate regulatory authorities. The City remedial activities are being performed under a Release Abatement Measure to be approved by EPA, DEP, and other appropriate regulatory authorities.

Description of Material Changes to Project

One proposed change to the project is the addition of approximately 228 parking spaces to the GenCorp site and contiguous properties. Also included are necessary alterations to the original proposed open space/passive park on the abutting site, as requested by the City of Lawrence. A one-story, 400-square foot treatment building will be constructed on the site to house the groundwater treatment system. Compensatory flood storage for filling within the 100-year floodplain (BLSF) is also proposed, as described below.

This changes will result in an increase in impervious area of one acre (over the 7.1 acres presented in the 1995 ENF). The changes in parking lot layout as requested by the City of Lawrence are the reason for this change. The amount of impervious area currently proposed does not exceed the EIR threshold. Please note, the site has historically been nearly 100% impervious, and the project as currently proposed will still result in a net decrease in impervious surface of approximately 22,215 square feet.

The proposed site development will provide for approximately 2.6 acres of landscaped and passive park area, which will reduce peak stormwater flows and improve the quality of stormwater reaching the Spicket River.

Finally, closing the raceways and treating contaminated groundwater on the site will remove a potential source of contaminants in the Spicket River.

Other Wetland Impacts

This project will result in alterations to Bordering Land Subject to Flooding (BLSF). The 1995 ENF defined BLSF as the entire footprint of land below elevation NGVD 34 feet. DEP, however, has issued a determination that BLSF does not include the footprint of buildings on the site, since those areas do not store flood waters. Thus, the area of BLSF affected by the project has not fundamentally changed; the changes on the NPC form compared to the 1995 ENF reflect a modified BLSF estimate per DEP guidance.

Because MEPA thresholds for "other wetlands" (which include BLSF) are in square feet, project changes are noted on the NPC form in terms of square feet of BLSF affected by the project. However, because the primary function of BLSF is to provide flood storage, a discussion of BLSF storage volume is more meaningful. Development of a landscaped park on the site will result in a net increase in flood storage of 39,140 cubic feet (259,130 cubic feet to be filled for the parking lot; 298,270 cubic feet of compensatory storage to be provided as part of the proposed re-use project).

The project will also occur within Riverfront Area (which is 25 feet from the mean high water of the Spicket River).

Significance of Proposed Changes with Specific Reference to 301 CMR 11.10(6) Factors

The proposed project changes are insignificant in that the proposed plan and uses – parking and open space/passive park - remain the same, with an increase in parking and decrease in the landscaping and park from the original Conceptual Site Reuse Plan submission.

The project is significant because it is a keystone to the Lawrence Gateway Project - the City's main economic redevelopment plan - linking its eastern gateway to its downtown, which is planned to undergo major revitalization. The City and its project partners view this as the best alternative for the project site. Alternatives would include no site work and vacant lots, denying hundreds of employees and visitors parking for access to adjacent mill buildings, Lawrence General Hospital, an MVRTA shuttle bus to downtown Lawrence, and a new park at the confluence of the Spicket and Merrimack Rivers. Significant federal and state funding has been committed to the project as outlined in Attachment B. The change will continue to include access to the historical bridge, the National Park Service Natural Heritage Industrial Trail, and MA-DCR tow path along the canals in the North Canal Historic District leading to Heritage State Park and downtown Lawrence.

Lawrence's U. S. congressional delegation, its state delegation, the mayor and city councilors are all in support of the Plan. In fact, as recently as May 2007, U. S. Senators, Edward M. Kennedy and John F. Kerry announced that the U.S. Senate approved legislation directing the U.S. Army Corps of Engineers (USACE) to assist in the restoration of the Lawrence Gateway, including filling the abandoned raceways that have delayed redevelopment and have been a source of potential contamination to the Spicket and Merrimack Rivers (see Attachment D). The passage of the Water Resources Development Act could provide up to an additional \$5 million to the project, which already has commitments of approximately \$20 million in public and private funds to implement this Plan.

Regarding the factors listed under 301 CMR 11.10(6):

- (a) There is no expansion of the project.
 - In its original filing, GenCorp included a Conceptual Site Re-Use Plan that included parking and an open space/passive park.
 - The combined site acreage remains the same.
 - Some areas of proposed landscaping will be replaced by parking, though significant landscaping remains.
 - The same remedial activities will be performed by GenCorp and the City under coordinated review of the EPA and DEP.

Please note: The exposed raceway must now be filled in to further protect from any release of pollutants or contaminants.

- (b) The increase in parking spaces is approximately 31%, but the new total of approximately 963 spaces does not exceed any review threshold. See traffic study included as Attachment E. The filling of the raceway should further protect from any release of pollutants or contaminants.
- (c) The commencement of this phase of the project is anticipated for Spring 2008. At the time of filing the original ENF no date was given for this phase of the project.
- (d) There is no change in project site.
- (e) Existing permits are currently in effect and are being amended or extended as appropriate. Additional filings will be required with some previously involved agencies. It is anticipated that changes will not result in any agency involvement that wasn't previously required.

GenCorp, the City, and MVRTA are currently in discussions with the Lawrence Conservation Commission, DEP, and USACE regarding any new permits. Please see Attachment B for more detailed information. Financial assistance has been given to the City and MVRTA for re-use purposes as originally planned. GenCorp will coordinate with the City regarding any land transfer, also as originally planned.

- (f) There are no changes that will prevent or materially delay realization of benefits to environmental quality and resources or public health. Also, please see note in section (a) above.
- (g) This project does not involve a lapse of time, or changes in the ambient environment or information concerning the same.

Measures Proponent is Taking to Avoid Damages to the Environment or to Minimize and Mitigate Unavoidable Environmental Impacts

Measures that the project is taking to avoid damages to the environment or to minimize and mitigate unavoidable environmental impacts include the site raceway closure and new drainage system.

CDM has prepared a detailed analysis of raceway closure alternatives, as well as relevant wetlands issues and resultant impacts. The primary reason for closing the raceways, other than no longer meeting their functional purpose, is for environmental protection. GenCorp has taken responsibility for cleaning the raceways of PCBs, and MVRTA will oversee raceway filling and the implementation of a new drainage system which will no longer discharge to the raceways. Cleaning and filling the raceways will prevent migration of contaminants to the Spicket and Merrimack Rivers. Groundwater treatment will be put in place by GenCorp. New drainage and stormwater management will meet current environmental standards, as dictated by an NPDES discharge permit to be issued by the U.S. EPA.

DEP's Bureau of Waste Site Cleanup has already concurred with the RAP that has been approved by the USEPA. The project staff has evaluated alternatives associated with the raceways. There is no viable technical alternative that can provide confidence that ongoing discharge of contaminants from the raceway to the Spicket River can be controlled unless the raceways are closed and hydraulically isolated from the Spicket River.

Safety benefits of filling the raceways include providing long-term structural stability of the old, ungrouted stone tunnels from the 1800s that make up the old raceways, and closing down old penstocks, some of which have collapsed. The area above the old tunnels will be used for parking, which will be open to the public. Filling the raceways will help ensure their safety.