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October 16, 2020

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

PROJECT NAME	: Resiliency Improvements at Watershops Pond Dam
PROJECT MUNICIPALITY	: Springfield
PROJECT WATERSHED	: Connecticut River
EEA NUMBER	: 16234
PROJECT PROPONENT	: City of Springfield
DATE NOTICED IN MONITOR	: September 9, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Single Environmental Impact Report (Single EIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Project Description

As described in the Single EIR, the project includes improvements to the City of Springfield's (City) Watershops Pond Dam to address structural deficiencies and maintain the operability of its mechanical and electrical systems. The project will enhance the resilience of the dam to minimize the potential for failure under existing and future conditions and to maintain its impoundment for recreational use; it will not increase the dam's impoundment capacity or change its hydraulic functions, such as flood attenuation. The project includes the following components:

- Replacement of the two low-level outlet sluice gates and the movable crest gate and associated mechanisms;
- Permanent closure of two penstock openings at the right abutment of the dam;

- Reconstruction of an approximately 180-foot (ft) long section of the upstream left training wall within the impoundment approximately 10 ft north of its current location and placement of backfill to provide an accessway for maintenance vehicles;
- Repair or replacement of the operator platform and walkway, railings and signage,
- Repairs to the masonry of the downstream and upstream training walls;
- Replacement of electrical service to the site;
- Removal of trees and other vegetation on the dam structure; and
- Installation of tie-down anchors in the downstream dam face to improve stability.

According to the Single EIR, the improvements to the dam have been designed in accordance with the Department of Conservation and Recreation's (DCR) Office of Dam Safety (ODS) regulations (302 CMR 10.00), including the requirement that the dam withstand one-half of the Probable Maximum Flood (PMF), which is calculated based on a Probable Maximum Precipitation (PMP) volume of 36.4 inches in a 72-hour period. The tie-down anchors will be installed at the downstream base of the dam to minimize the potential for dam failure due to sliding or overturning of the structure.

The 3.5-ft high crest gate spans the width of the dam spillway and in its raised position creates additional flood storage in the impoundment. Flood protection provided by the dam is enhanced by raising the crest gate and opening the low-level sluice gates to release flood waters in a controlled manner. The sluice gates are at least 60 years old and will be replaced to ensure that they can be reliably opened and closed. A small building housing mechanical equipment that operates the crest gate is located at the southern end of the dam and is accessible only by a narrow path along the downstream left embankment. The path will be widened to 10 ft to allow vehicular access to the building to facilitate installation of new crest gate equipment and its operation and maintenance. The penstocks were historically used to divert water from the impoundment to generate power for the historic buildings north of the dam known as the Watershops, but the turbine generators were removed over 50 years ago. The penstocks are no longer used and will be permanently closed as part of the project.

To facilitate access to parts of the dam to be repaired, the impoundment will be drawn down by opening the low-level outlet sluice gates. Because the low-level outlets are located approximately 11.5 ft above the bottom of the dam, rather than at the bottom as is typically the case, a residual pool with a maximum depth of approximately four feet will remain during the drawdown. The impoundment will be drawn down for approximately 18 months; as described in more detail below, the proposed duration of the drawdown is longer than necessary to complete construction in order to minimize water level changes during the hibernation periods of resident turtles and amphibians and to take advantage of springtime precipitation to facilitate refilling of the impoundment. However, the City will determine, in consultation with MassWildlife, whether refilling of the dam by December 1st of the prior year is feasible in order minimize the period of drawdown while avoiding the hibernation periods of resident animals.

Project Site

The dam is located on the Mill River in southwestern Springfield. According to the Single EIR, it was constructed in 1857 to provide hydropower to the Springfield Armory, including the Watershops. The dam impounds an area of approximately 193 acres, known as

Watershops Pond or Lake Massasoit, that extends to the northeast. After the Springfield Armory closed in 1968, the dam was sold by the federal government to the City subject to the requirement that it be used to maintain the surrounding impoundment area and associated parkland for recreational purposes. Watershops Pond has a maximum depth of approximately 20 ft and is used for recreational fishing, canoeing and kayaking. Much of the shoreline is privately owned, but public access is available at three City-owned parks.

Watershops Pond Dam is classified as High Hazard Potential dam, which indicates that there is a high likelihood that if the dam were to fail, there would be loss of life and serious damage to downstream structures. The dam has an overall Dam Safety Rating of "Good" and it is expected to perform safely under all flood loading conditions. The dam discharges flow to the west, where it passes through an approximately 200-ft long tunnel under a building and Allen Street before daylighting on the west side of the street. From the dam, the Mill River flows southwest through a densely-developed section of the City. South of Mill Street, the river flows over the Bay State Thread Dam; MEPA review of the planned removal of the Bay State Thread Dam (EEA# 15828) was completed in 2018 but the dam has not yet been removed. Downstream of the dam, the river is conveyed under the eastern part of the City in a pressure conduit, then flows through a channel before joining the Connecticut River. The pressure conduit was constructed by the U.S. Army Corps of Engineers (ACOE) as a component of its Connecticut River Flood Control System.

Watershops Pond is identified in the Massachusetts Department of Environmental Protection's (MassDEP) 2016 Integrated List of Waters as requiring the establishment of a Total Maximum Daily Load (TMDL) due it its impairment by nutrients and eutrophication. According to the EENF, surveys of fish species within the pond by the Massachusetts Division of Fish and Wildlife (MassWildlife) found that it contains common warm water fish species, such as Bluegill (*Lepomis macrochirus*), Pumpkinseed (*Lepomis gibbosus*), Largemouth Bass (*Micropterus salmoides*), White Perch (*Morone americana*) and Common Carp (*Cyprinus carpio*). As shown on the Federal Emergency Management Agency's (FEMA) National Flood Insurance Rate Map (FIRM) numbers 25013C0402E, 25013C0406E and 25013C0407E (effective July 16, 2013), the dam and impoundment are generally located within the 100-year floodplain (Zone AE) with no defined Base Flood Elevation (BFE); the north branch of the Mill River upstream of the impoundment has a BFE of approximately 161 ft NAVD 88 and is within a defined floodway.

According to the Massachusetts Historical Commission (MHC), the dam is listed in the National Register of Historic Places as a contributing element of the Watershops Armory. The EENF included a letter to the City from MHC dated July 19, 2019 with a determination that the project will have no adverse effect on the dam or the Watershops Armory.

Environmental Impacts and Mitigation

Potential environmental impacts of the project include alteration of approximately nine miles (47,215 linear feet (lf)) of Bank, 9.8 acres (429,000 sf) of Bordering Vegetated Wetlands (BVW), 170 acres (7,373,850 sf) of Land Under Water (LUW), 0.2 acres (8,940 sf) of Bordering Land Subject to Flooding (BLSF) and 0.05 acres (2,210 sf) of Riverfront Area. These impacts are largely due to the drawdown of the impoundment and are anticipated to be temporary. Potential permanent impacts to wetland resource areas associated with reconstruction of the

downstream left training wall and removal of vegetation near the gate control house include impacts to 285 lf of Bank, 1,560 sf of LUW and 250 sf of Riverfront Area.

The project will increase the resiliency of the dam by repairing and reinforcing structural deficiencies and replacing components critical to its operation. As noted below, the City will be required to provide additional information on monitoring temporary impacts to BVW and potential measures to mitigate permanent impacts to BVW and LUW.

Jurisdiction and Permitting

The project is subject to the preparation of a Mandatory EIR pursuant to the MEPA regulations because it requires State Agency Actions and will alter one or more acres of BVW (301 CMR 11.03(3)(a)(1)(a)) and ten or more acres of any other wetlands (301 CMR 11.03(3)(a)(1)(b)). The project will require a Section 401 Water Quality Certificate (WQC) from the Massachusetts Department of Environmental Protection (MassDEP) and a Chapter 253 Permit from ODS. It is subject to the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol (GHG Policy).

The Springfield Conservation Commission issued an Order of Conditions (OOC) on September 16, 2020 that was not appealed. The project requires the filing of a Project Commencement Notification (PCN) to the ACOE pursuant to the General Permits for Massachusetts and a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the Environmental Protection Agency (EPA).

The City is not seeking Financial Assistance for the proposed project. Therefore, MEPA jurisdiction is limited to those aspects of the project within the subject matter of any required or potentially required State Permits that have the potential to cause Damage to the Environment, as defined in the MEPA regulations.

Review of the Single EIR

The Single EIR was generally responsive to the limited Scope included in the Certificate on the Expanded Environmental Notification Form (EENF). It included a draft Aquatic and Wetland Resource Monitoring and Mitigation Plan that describes how the City will monitor the effects of the drawdown and mitigate any permanent impacts to wetland resource areas. The Single EIR provided responses to comments received on the EENF and presented updated draft Section 61 Findings. As noted by MassDEP, the City will be required to review alternative designs for the reconstruction of the left embankment and demonstrate that the Preferred Alternative will minimize placement of fill in the pond.

Wetlands, Water Quality and Aquatic Habitat

The 18-month drawdown of the impoundment will expose 170 acres of LUW and eliminate the hydrological connection between the pond's surface water and BVW along the shoreline. Under full drawdown conditions, a residual pool of approximately 20 acres with a water depth of up to 4.8 ft will remain. The drawdown will commence in late 2020 and construction activities will occur in the spring, summer and fall of 2021. Based on consultation

with MassWildlife prior to filing the EENF, the City proposed to postpone refilling the impoundment until April 2022 to avoid disturbance to turtles and frogs that may begin hibernation during the fall/winter months. As required by the Scope, the Single EIR evaluated the potential for minimizing the duration of the drawdown if construction is completed sooner than expected (thereby allowing refilling to occur in 2021 before turtles and frogs enter the fall/winter hibernation months). According to the Single EIR, MassWildlife believes that impacts to animals entering winter hibernation could be avoided if a stable water level over much of the pond is established by December 1st. The Single EIR indicated that meeting the December 1st target date would require that refilling of the pond begin several months prior to that date due to low flows in the summer and fall. The Single EIR contained a commitment that, if construction activities are completed before the early fall of 2021, the City will determine at that time whether refilling of the pond can be completed by December 1st based on precipitation forecasts and consultation with MassWildlife, and will proceed with refilling if conditions warrant.

The Single EIR included a draft Aquatic and Wetland Resource Monitoring and Mitigation Plan describing how the impacts of the drawdown will be monitored and mitigated. The plan includes monitoring dissolved oxygen (DO), temperature and aquatic vegetation in the water column, the condition of BVW vegetation and groundwater hydrology before, during and after the drawdown. Water quality and surveys of aquatic vegetation will occur at four locations in the pond; during the drawdown, samples in the residual pool will be collected monthly from March to October and once every two months during the winter. If DO concentrations between 4 and 5 parts per million (ppm) are observed in the residual pool, testing will be conducted on a weekly basis; if the average DO level falls below 4 ppm, the residual pool will be aerated to increase DO levels. Monitoring of vegetation and groundwater will take place at two to three locations within each of the primary stands of BVW prior to the drawdown and twice during the drawdown (once in the early growing season and once late in the growing season); additional monitoring after the drawdown will occur if significant impacts to BVW are observed. The monitoring program will include surveys of plant species, photo-documentation of each monitoring location, groundwater level observations in monitoring wells, observations of wildlife and observations of invasive species. Impacts to the pond will be mitigated after the pond is refilled and will include restocking of fish, re-planting BVW if necessary and removal of invasive species.

Mitigation and Draft Section 61 Findings

The Single EIR provided draft Section 61 Findings for use by State Agencies. The Section 61 Findings should be provided to State Agencies to assist in the permitting process and issuance of final Section 61 Findings. The Single EIR identified permitting requirements and measures that will be employed to avoid, minimize and mitigate environmental impacts. These include:

- Obtaining a Section 401 WQC from MassDEP in compliance with applicable Water Quality Regulations (314 CMR 9.00) and Surface Water Quality Standards (314 CMR 4.00);
- Installing small temporary cofferdams around work areas to minimize water quality impacts from suspended sediment;

- If dewatering is necessary, using frac tanks or other measures to remove sediment before the water is discharged downstream;
- Requiring contractors to minimize idling of vehicles and use Ultra Low Sulfur Diesel (ULSF) fuel;
- Minimizing odor during the drawdown by removing or burying dead fish and applying odor-reducing foam;
- Minimizing the potential release of oil and/or hazardous materials by using biodegradable hydraulic fluid in construction equipment where possible and implementing a spills contingency plan;
- Adhering to the Board of Underwater Archaeology (BUAR) Policy Guidance for the Discovery of Unanticipated Archaeological Resources if submerged cultural resources are encountered during the course of the work;
- Refilling the pond if construction is completed in time to permit the pond to be filled prior to December 1st; and,
- Implementing the Aquatic Wetland Resource Monitoring and Mitigation Plan to minimize temporary and permanent impacts to wetlands and water quality associated with the drawdown and to mitigate any impacts that are identified through monitoring.

Conclusion

Based on a review of the Single EIR, comments letters, and consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. Outstanding issues can be addressed during State and local permitting and review. No further MEPA review is required. The Proponent and State Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

K. Theoharides

October 16, 2020
Date

Kathleen A. Theoharides

Comments received:

10/02/2020 Pioneer Valley Planning Commission (PVPC)
10/09/2020 Massachusetts Department of Environmental Protection (MassDEP)/Western Regional Office (WERO)

KAT/AJS/ajs

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Martin Suuberg
Commissioner

October 9, 2020

Kathleen A. Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Alex Strysky, EEA No. 16234
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: Watershops Pond Dam Resiliency Improvements
Springfield SEIR

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Single Environmental Impact Report SEIR) submitted for the proposed Resiliency Improvements at Watershops Pond Dam in Springfield, Massachusetts. The dam is listed as an "high hazard potential" concrete and masonry gravity dam. The Project is being funded by a grant from the U.S. Department of Housing and Urban Development's National Disaster Resilience Competition. The City of Springfield was awarded $17 million in funding and all work associated with the Project must be completed within the performance period which closes in September 2022. Portions of the project are eligible for review under limited project provisions and regulated at the discretion the local conservation commission. The Single Environmental Impact Report consists mainly of preparation of an aquatic and wetland monitoring and mitigation plan to address possible impacts to wetland resource areas. The applicable MassDEP regulatory and permitting considerations regarding wetlands, water quality certification, air pollution, solid waste, hazardous waste and waste site cleanup are discussed.

I. Project Description

The dam which impounds the Mill River forming Watershops Pond (also known as Lake Massasoit) was constructed in 1857 and substantially modified in 1958. Upgrades will include replacement of the existing moveable crest gate, general masonry repairs to the upstream and downstream training walls, replacement of the upstream left training wall and widening of the access route, vegetation and tree removal, repair or replacement of the operator platform and walkway and existing railings, and the installation of new security fencing and hazard warning signage. Two penstock openings will be permanently closed and two existing sluice gates will be replaced. As needed, angled tie-down anchors in the downstream dam face will be added to meet regulatory requirements for dam safety.

The project will not change traffic or infrastructure demands and will improve safety and functionality of the City-owned infrastructure and improve public safety. There will be a temporary drawdown of the pond. The drawdown will provide the Springfield Water and Sewer Commission the opportunity to inspect, maintain and repair infrastructure and the Springfield Department of Public Works will be able to make repairs to stormwater outfalls not normally accessible, and allow removal of trash and discarded items in the pond. There is also tornado debris that can be removed during the drawdown.

Greenhouse Gas Emission Policy and Protocol will be followed. Emissions will be limited to the operation of construction equipment on-site and the SEIR states that it would qualify for a de minimis exemption. A Waiver of a Mandatory Environmental Impact Report was requested by the Proponent, but denied as per the Secretary's Certificate issued for the EENF on July 31, 2020. The Secretary granted the request for the Proponent to file an SEIR. The project is scheduled to begin in October 2020.

Environmental impacts associated with this project include:

- 307 total site acreage – existing
- 820 cubic yards (approximate) of dredge material
- Up to 429,000 SF of new bordering vegetated wetlands alteration-temporary
- 47,215 LF Bank – temporary
- 169.2 acres of Land Under Water Bodies and Waterways - temporary
- 8,940 SF bordering Land Subject to Flooding - temporary
- 1,960 SF Riverfront Area – temporary
- 285 LF of bank – permanent
- 1,560 SF of Land Under Water Bodies and Waterways – permanent
- 250 SF of Riverfront Area - permanent
- 305 SF gross square footage structures (existing)

II. Required Mass DEP Permits and/or Applicable Regulations

Wetlands
310 CMR 10.00
Waterways
310 CMR 9.00
Water Quality Certificate
314 CMR 9.00
Air Pollution
310 CMR 7.00
Solid Waste
310 CMR 16.00
Hazardous Waste
310 CMR 30.00
Bureau of Waste Site Cleanup
310 CMR 40.000

III. Permit Discussion

Bureau of Water Resources

Wetlands & Waterways

MassDEP has no additional comments. See prior comment letter dated July 22, 2020.

Resource Area Delineation

MassDEP has no additional comments. See prior comment letter dated July 22, 2020.

401 Water Quality Certificate

MassDEP has met with the Proponent's consultant to review the project; the Proponent has provided adequate preliminary information for permitting to proceed. As proposed and acknowledged in the previous comments, this project will require a 401-water quality certification (WQC) for dredging. The Proponent is required to provide sufficient information to adequately describe cumulative impacts to "Waters of the United States within the Commonwealth" (Bordering and Isolated Vegetated Wetlands and Land Under Water) and include an alternatives analysis. The Proponent should submit a copy of the application for Dredge Project Certification to the Boston Office of MassDEP for review with a copy sent to the Western Regional Office. A single permit for the dredge project will be issued from Boston and under these regulations, MassDEP has the authority to ensure impacts are to be avoided, minimized and mitigated.

Bureau of Air and Waste

MassDEP has no additional comments. See prior comment letter dated July 22, 2020.

Bureau of Waste Site Cleanup

MassDEP has no additional comments. See prior comment letter dated July 22, 2020.

IV. Section 61 Findings

The proponent has presented proposed Section 61 Findings in the SEIR for this project. MassDEP has reviewed these findings and finds them to be satisfactory.

V. Other Comments/Guidance

MassDEP has adequate regulatory authority through the 401 WQC permitting process to determine the potential environmental impacts from the project and to ensure that all feasible measures are taken to avoid, minimize and mitigate any negative impacts as necessary. With respect to Greenhouse Gas (GHG) Emissions, MassDEP concurs that the long term GHG impacts from the construction stage of this project are De Minimis.

The MassDEP permitting process will ensure environmental impacts are avoided where possible and minimized where necessary. MassDEP staff is available for discussions as the project progresses. If you have any questions regarding this comment letter, please do not hesitate to contact Kathleen Fournier at (413) 755-2267.

Sincerely,

Michael Gorski
Regional Director

cc: MEPA File

Catalyst for Regional Progress
PVPC
Kimberly H. Robinson, MUP
Executive Director

October 2, 2020

Ms. Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Attention: MEPA Unit

Reference: Review Comments on the Single Environmental Impact Report (SEIR) for the Resiliency Improvements at Watershops Pond Dam in Springfield, Massachusetts, EEA # 16234.

Dear Secretary Theoharides:

The Pioneer Valley Planning Commission (PVPC) has the following review comments on the SEIR for the above-cited project. As proposed, the project consists of a program of resiliency improvements to the existing dam in order to provide for the continued function of the dam in Springfield, Massachusetts. Overall, PVPC is very supportive of the improvements at the Watershops Pond Dam for resiliency as this waterway and related infrastructure are in the heart of the City of Springfield and have important implications as our climate trends toward increasing extremes. We appreciate your consideration of these comments as you develop the certificate for the SEIR.

Land Use and Environmental Comments

We are glad to see that the hydrology and hydraulics analysis has used NOAA's Atlas 14 precipitation dataset from 2015, but ask for some consideration as to whether this is adequate over the expected lifespan of a dam (typically 50 years to 2070 in this case). As part of a recent state-wide stormwater advisory conversation, MassDEP proposed the use of the upper confidence level of Atlas 14, minus 10% in an updated Stormwater Handbook. It has been recommended by many professional staff that this approach does not seem to be adequately protective and that it would be better to use the upper confidence level with no reduction by 10%. While this state-wide conversation is not resolved, it may be worth comparing rainfall data scenarios for this Watershops Pond Dam project to more fully understand the resiliency offered by this project. Based on the discussion provided in Section 6.16 of the SEIR, it does not appear that this analysis has been done and that the project is only responsive to current conditions.

Relative to continued monitoring of impacts to wetland resources pre-, post-, and during drawdown and construction, this project has identified that a full drawdown was the preferred option and related construction thereafter would result in temporary impacts to the wetland resources. The Conservation Commission has provided an Order of Conditions and will ensure compliance through the drawdown and construction process. Practices to ensure correct installation, meeting of grades and structure elevations, among other elements, are critical to proper post-construction functioning of such a stormwater system. Utilization of a third-party review, as required by the Conservation Commission in an Order of Conditions would assist the city with assurance that proper monitoring of site and possible erosion and sediment control is utilized pre-, post-, and during drawdown and related construction to improve the dam.

The project will create a temporary loss of passive recreation opportunity for an already recreation-challenged neighborhood. A consideration for ensuring that abutters and those who currently use the facility for passive recreation opportunities are informed of the impending drawdown and related construction is encouraged, especially in other languages appropriate to the neighborhood. It may also be beneficial for signage at the site to direct users to other nearby recreational opportunities around the city.

Historic Preservation Comments

The *Watershops Armory National Register District* (SPR.BP), at 1 Allen Street, contains at least 13 contributing resources which relate to this site, as well as to the National Historic Landmark *Springfield Armory National Historic Site* (SPAR) at 1 Armory Street. One of these resources, the *Watershops Armory Dam* (SPR.926), is the focus of the proposed *Resiliency Improvements at the Watershops Pond Dam Project*. The dam was constructed from 1857 to 1902 and hydroelectric power was added in the 1920s. Further improvements were made in 1958. Past drawdowns have occurred ca. 1941, 1955-57, 1973-1974, and in 1996-1997.

It does not appear that the proposed project will have an adverse impact on the district's known contributing historic resources. To whatever extent is possible, and within the constraints of compliance and durability, visible historic masonry should be repaired in kind with like materials and should strive to match the original appearance.

The project site is connected to an area formerly used for the production of gun parts for the Springfield Armory and relates to nearly two hundred years of American manufacturing history. The proposed temporary drawdown and dredging activities could uncover and/or adversely impact archaeological materials related to the site's period of significance when the area was operational as the Springfield Armory Watershops. It is recommended that Kelly Fellner, Springfield Armory National Historic Site Superintendent, be consulted as the SPAR is the repository for archival material related to the Watershops. The recently completed side scan sonar may further assist in determining areas of possible archaeological interest. Additionally, if the drawdown, dredging, or ground disturbance uncovers artifacts, they should be left where they were found and the Massachusetts Department of Conservation and Recreation Archaeologist (617) 626-1377 and/or the Massachusetts Board of Underwater Archaeological Resources (as noted on page 83 of the SEIR) should be contacted as soon as possible.

Thank you for the opportunity to offer our comments on this proposed project.

Sincerely,

Kimberly H. Robinson, MUP
Executive Director

cc: S. Hanson, PVPC Alternate – Springfield
T. Jenkins, GZA GeoEnvironmental, Inc.