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June 1, 2021

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

PROJECT NAME	: Lakeville Hospital Redevelopment
PROJECT MUNICIPALITY	: Lakeville
PROJECT WATERSHED	: Taunton River
EEA NUMBER	: 16298
PROJECT PROPONENT	: Rhino Capital Advisors LLC
DATE NOTICED IN MONITOR	: April 23, 2021

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 consists of the redevelopment of the Lakeville State Hospital site which will include demolition of remnant hospital facilities and construction of a 402,500 sf warehouse facility including ancillary office space and 130 loading docks. In addition, the project includes remediation of a solid waste disposal area (SWDA). As described by the Proponent, the specific use of the warehouse is not known as a tenant has not been identified. The project includes construction of new access roadways with improved curb cuts from Route 105. The Proponent intends to

initially construct 298 parking spaces and landbank¹ up to 206 parking spaces (total of 504 vehicle parking spaces) for construction as needed depending on the eventual tenant.

Changes Since the EENF

The Single EIR identifies several small project refinements since the Certificate on the EENF was issued including a reduction in parking, additional screening and noise mitigation, and changes to the stormwater management system resulting from additional wetland delineation. Proposed parking for the project has been reduced from 403 spaces built day 1 to 298 spaces built day 1. The total number of parking spaces to be landbanked has been increased to 206 parking spaces. In total, the project has removed 60 parking spaces from the design. The Proponent will be required to seek additional review by the Town of Lakeville Planning Board prior to constructing any additional parking above the day 1 program of 298 spaces. However, the stormwater management system has been designed assuming full buildout of the entire parking program and the impacts of full buildout have been included in this Single EIR so that the project may be reviewed based on its potential maximum build scenario.

The project has been revised to include additional screening around its perimeter. A vegetated berm has been added to the front of the project site to screen the parking lot from vehicular traffic on Route 105 and another vegetated berm has been added at the rear to screen the site from a residential development that is currently under construction. The vegetated berm previously proposed along the south-westerly limits of the project site has been increased in height and a fence equipped with AcoustiFence material has been added atop the berm providing additional noise mitigation.

Since filing the EENF, the limits of the on-site Certified Vernal Pool (CVP) have been further delineated. As a result, two surface infiltration basins have been relocated outside of the wetlands 100-ft buffer zone associated with the CVP.

Project Site and Procedural History

The approximately 49.4-acre project site is located at 43 Main Street in Lakeville. The project site is bounded by Route 79 (Rhode Island Road) and residential land to the north, commercial land to the south, Route 105 (Main Street) to the east, and residential land to the west. Under existing conditions, the site is developed with seven buildings, totaling 407,653 sf, of varying heights ranging from 1 to 8 stories, SWDA, parking areas, and site driveways, which together constitute the former Lakeville State Hospital. The former Lakeville State Hospital was closed in 1992 and has subsequently remained vacant and generally abandoned over the last three decades. Access to the existing project site is currently provided via two driveways along Route 105 and one driveway via Route 79.

Three state-listed disposal sites are located on-site and an additional offsite disposal site was identified within 500 ft of the project site. The Release Tracking Numbers (RTNs) for the on-site areas are: 4-0011931, 4-11935 & 4-6008. The RTN for the offsite area is 4-1835. None of the on-site disposal sites have achieved regulatory closure through the implementation of an

¹ The parking will remain undeveloped until warranted by future warehouse use and/or tenant.

Activity and Use Limitation. An additional nearby disposal site was identified on the southeastern abutting property; however, based on the regional groundwater flow and lack of groundwater impacts at the disposal site, it is considered unlikely to impact environmental conditions on-site. The documented releases associated with RTNs 4-6008 and 4-11935 have achieved regulatory closure and do not require additional assessment or remediation. The solid SWDA associated with RTN 4-11931 is under the jurisdiction of the MassDEP Bureau of Solid Waste and will be remediated as part of the project.

The project site is partially located within two local zoning districts: (1) the Business District; and (2) the Residential District. However, the project site is located within three local overlay districts: (1) the Mixed-Use Development District; (2) the Development Opportunities District; and (3) the Water Resource Protection District. The Proponent has petitioned for a Special Permit with the Town of Lakeville Planning Board to permit the project within the Development Opportunities District. Warehouses and wholesale distribution centers are uses permitted by Special Permit within the Development Opportunities District. The Planning Board may adopt regulations relative to densities of land use, the bulk and height of structures, yard sizes, lot areas, setbacks, open spaces, parking, use of signs and other dimensional criteria for development within the Development Opportunities District. The project site was designated a Priority Development Site under the Chapter 43D Expedited Local Permitting program.

The project site was previously the subject of a prior project that underwent MEPA review (EEA# 13063, Lakeville State Hospital Redevelopment). A Certificate on the Final Environmental Impact Report (FEIR) was issued on December 16, 2005 for an approximately 317,000 sf mixed-used development including the demolition of the hospital and clean-up of the site, as well as construction of retail and restaurant uses, age restricted residential uses and office uses. However, construction did not move forward. The project was proposed on an approximately 73-acre site which was subsequently subdivided into several mixed use lots including the 49.4-acre project site for this project. As described by the Proponent, this project has no current or former connection to any of the remaining 23.6 acres of land, which were previously subdivided and are now under different ownership.

Jurisdiction and Permitting

The project is subject to MEPA review and the preparation of a mandatory EIR pursuant to 301 CMR 11.03(1)(a)(2) because it requires a State Agency Action and will create greater than 10 acres of new impervious area. The project also exceeds the following ENF thresholds: 301 CMR 11.03(1)(b)(1) direct alteration of 25 or more acres of land; and 11.03(6)(b)(15) construction of 300 or more new parking spaces at a single location. The project requires a Vehicular Access Permit from MassDOT and a 401 Water Quality Certificate from the Massachusetts Department of Environmental Protection (MassDEP). The Proponent has indicated that they are exploring State Financial Assistance opportunities; however, no specific opportunities have been identified. The project is subject to MEPA's Greenhouse Gas (GHG) Policy and Protocol (GHG Policy).

The project will require submission of Pre-Construction Notification (PCN) to the U.S. Army Corp of Engineers (ACOE) under Section 404 of the Federal Clean Water Act (CWA) for

discharge of dredged or fill material associated with the removal of the SWDA and subsequent wetland restoration. The project received an Order of Conditions from the Lakeville Conservation Commission (Dep File No. SE192-853) that was not appealed. It will require a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the United States Environmental Protection Agency (EPA).

Because the Proponent may receive State Financial Assistance, MEPA jurisdiction is broad and extends to all aspects of the project that may cause Damage to the Environment as defined in the MEPA regulations.

Environmental Impacts and Mitigation

Potential environmental impacts include alteration of 39.5 acres of land (37.8 acres previously disturbed), creation of approximately 14.4 acres of new impervious area (23.2 acres total on site); temporary alteration of 516 sf of Bordering Vegetated Wetland (BVW); generation of 682 average daily trips (adt); construction of 504 parking spaces; approximately 6,045 gallons per day (gpd) of water use; generation of approximately 6,045 gpd of wastewater; and greenhouse gas (GHG) emissions associated with on-site energy use and transportation.

Measures to avoid, minimize and mitigate these impacts include implementation of a Transportation Demand Management (TDM) plan to reduce single-occupancy vehicles (SOV) trips, installation of electric vehicle (EV) charging stations and installation of a stormwater management system consistent with the stormwater management standards (SMS) of the Wetlands Regulations (310 CMR 10.00). The project will incorporate mitigation measures to reduce the project's GHG emissions and improve the resiliency of the project in light of the anticipated effects of climate change.

Review of the Single EIR

The Single EIR described existing site conditions, provided a project description and plans, and an updated Transportation Impact Assessment (TIA), and compared environmental impacts of the Preferred Alternative to alternative designs. It identified the project's impacts on land, transportation, water demand and wastewater generation, wetlands, water quality, and historic resources. The Single EIR provided an updated GHG analysis and described mitigation measures. As described in the Single EIR, the Proponent continues to seek financial assistance opportunities for the project. However, to date, none have been identified and there is no update to provide on this item compared to the information provided in the EENF. Additionally, a tenant has not yet been identified by the Proponent. To the extent future design changes are made to the project prior to the taking of Agency Actions, including a selection of land use or tenant that differs materially from the disclosures made in the Single EIR or that results in an increase in estimated trip generation numbers, further review may be required in the form of a Notice of Project Change.

Alternatives Analysis

The Single EIR included an expanded alternatives analysis which identified a No-Build Alternative, Mixed-Use Alternative, Original Project Alternative (as described in the EENF) and a Reduced Build Alternative (Preferred Alternative). The No-Build Alternative would maintain the existing conditions at the project site, leaving in place the abandoned Lakeville State Hospital on an overgrown vacant lot. The No-Build Alternative is the only alternative that would eliminate the direct wetland impacts, as the direct wetland impacts are required to remove the SWDA from the Project Site. Although this alternative would not result in any new environmental impacts, it was dismissed because it would not meet the project goals of the Preferred Alternative, including the clean-up of the SWDA and the abatement of the airborne asbestos in the buildings, increased tax revenue and creation of new jobs.

The Mixed-Use Alternative (49 acres) represents a reduced version of the development that was proposed and permitted by a previous proponent in 2005. The project proposed in 2005, as described above, was a development alternative previously approved for the project site. Since 2005, the parcel has been subdivided down to 49 acres from approximately 70 acres. The Mixed-Use Alternative (49 acres) consists of a reduced version of the 2005 proposal scaled to fit within the current 49-acre property size. This alternative would consist of an approximately 251,050 sf mixed-use redevelopment, including 126,842 sf of retail space, 66 units of age-qualified housing and 50,750 sf of office space. This alternative would require the removal of the SWDA and therefore would require direct wetland impacts. This alternative would result in 2.6 acres of new land alteration, 13.3 acres of new impervious area, 516 sf of wetland impacts, generation of 7,962 new adt and construction of 1,056 new parking spaces. This alternative would result in similar land and wetland alteration but would result in a significant increase in new adt compared to the Preferred Alternative. While a larger version of this alternative was permitted, it never moved on to construction. For these reasons, this alternative was dismissed.

The Original Project Alternative as presented in the EENF (the “EENF Alternative”) involved the construction of a 402,500 SF warehouse building, up to 564 surface parking spaces, loading dock and trailer storage areas. The EENF Alternative proposed to land bank 161 parking spaces and build a minimum of 403 parking spaces (total of 564 spaces at full build). The EENF Alternative would require the removal of the SWDA and therefore would require direct wetland impacts. The direct wetland impacts are only associated with removing the SWDA from the wetland and are not triggered by the development program. While it would be possible to construct the EENF Alternative without removing the SWDA, the Town has specifically requested that as part of any development of the project site, the SWDA be removed. This alternative would result in the new alteration of 1.7 acres of land and creation of 14.8 acres of new impervious area², 516 sf of wetland impacts, and generation of 682 new adt. This alternative meets the project goals but results in a slight increase in impervious area (0.4 acres) compared to the Preferred Alternative.

The Reduced Build Alternative (which is the Preferred Alternative) is similar to the project presented in the EENF as it proposes to maintain the building size as originally proposed (402,500 sf). However, the Preferred Alternative proposes to reduce the number of parking

² The EENF indicated that this alternative would result in 14.4 acres of new impervious area; however, the Single EIR indicates that was an error.

spaces from 564 spaces to 504 spaces, with approximately 206 spaces banked for a total of 298 parking spaces on day 1. The EENF Alternative provides the benefits inherent in the proposed development, particularly with respect to the clean-up of the SWDA and the abatement of asbestos in the existing buildings, increased tax revenue and creation of new jobs. The revision of the parking program reduces impervious area from 14.8 acres to 14.4 acres. The project will continue to generate 682 new adt. The project will continue to impact 516 sf of wetlands associated with the removal of the SWDA. Because this alternative meets the project goals and results in a slight reduction of impervious area, it was chosen as the Preferred Alternative.

Land Alteration / Impervious Area and Stormwater

The EENF indicates that the project will alter approximately 39.5 acres of land, the vast majority of which constitutes previously disturbed land with the exception of 2.6 acres of new land alteration. The project will create 14.4 acres of new impervious area for a total of 23.2 acres on-site. After construction of the project, the 49.4-acre project site will consist of 14 acres of paved surfaces (including access drives, parking, loading areas and trailer storage areas), 9.2 acres of building footprint, 7.2 acres of wetlands, 2.7 acres of undisturbed vegetated area, 4.5 acres of previously disturbed wooded area, and 11.8 acre of additional pervious area consisting of open space, landscaping, stormwater infrastructure and grass. To reduce land alteration, the project has eliminated 60 surface parking spaces which has resulted in roughly 0.4-acre reduction in proposed impervious surface at full build conditions. Furthermore, the project has also reduced the amount of parking spaces being built day one by 105 spaces which could reduce impervious area by an additional 0.7 acres. The Single EIR notes that the project will require additional review by the Town of Lakeville Planning Board prior to constructing any of the banked parking spaces. The Proponent should continue to explore ways to reduce on-site impervious surface.

The project results in a substantial increase in impervious area. To mitigate these impacts, the project includes installation of a new stormwater management system that will fully comply with MassDEP's Stormwater Management Standards for a new development although the site includes previously developed area. Stormwater runoff from the impervious portions of the site will be collected within the proposed closed pipe drainage system via deep-sump hooded catch basins and routed through one of the four proposed stormwater management BMPs prior to discharge to one of nine existing discharge points. The four stormwater BMPs proposed for the project include two vegetated surface infiltration basins, one vegetated surface gravel wetland, and one proprietary hydrodynamic separator. Because the project is located within an area of rapid infiltration, discharges to an Outstanding Resource Water (ORW), and is considered a land use with higher potential pollutant loads (LUHPPL), the proposed stormwater management system has been designed to treat a one-inch water quality volume and provide 44 percent Total Suspended Solids (TSS) pretreatment prior to infiltration. Stormwater runoff from pervious areas at the perimeter of the site may discharge directly to the discharge points and not route through the above-described stormwater management system. The Single EIR also identifies the elimination of the subsurface infiltration basin since the EENF for cost reasons. The subsurface infiltration basin was originally proposed near the northerly curb cut to detain, treat, and recharge stormwater runoff. This stormwater runoff is now being routed to the nearest surface infiltration basin.

Wetlands

As noted above, impacts to BVW are associated with the cleanup of the SWDA which is located within a wetland system. The Lakeville Conservation Commission reviewed the project for its consistency with the Wetlands Regulations (310 CMR 14.00) and issued an Order of Conditions on March 5, 2021 (DEP File No. SE192-853). There is a certified vernal pool (CVP) associated with this wetland system which will be impacted by the SWDA remediation. CVPs are designated Class B Outstanding Resource Waters (ORWs). Therefore, all wetlands bordering Class B ORWs are designated as ORWs. Any dredging or filling of an ORW requires a 401 Water Quality Certification from MassDEP pursuant to 314 CMR 4.00. MassDEP will review the project for its consistency with the Water Quality Regulations (314 MR 9.00).

As described in the Single EIR, additional wetland field delineations were performed since the Certificate on the EENF was issued. As a result, the two surface stormwater infiltration basins proposed for the project have been re-designed so that they are located outside the 100-foot limits of the established CVP in compliance with the MassDEP's Stormwater Management Standards. Based on these additional field efforts and subsequent design changes, buffer-zone impacts for the project have been reduced from 103,700 SF to 90,790 SF.

Transportation

The project requires a Vehicular Access Permit from MassDOT because it abuts and would be accessed from Route 105, a state highway. The Single EIR includes an updated TIA prepared in general conformance with the current MassDOT/EOEEA *TIA Guidelines*. The TIA is generally responsive to the MassDOT comment letter on the EENF and includes a comprehensive mitigation program. Access to the site is proposed via two unsignalized full access driveways from Route 105, one at Lori Lane, and another approximately 1,200 feet further east. The TIA includes trip generation estimates calculated using the Institute of Transportation Engineers (ITE)'s *Trip Generation Manual* (10th Edition). The trip generation was calculated based on ITE trip rates for Land Use Code 150 – Warehousing. Accordingly, the site is expected to generate 682 daily weekday vehicle trips, with 74 vehicle trips during the weekday morning peak hour, and 77 vehicle trips during the weekday evening peak hour. The TIA details the share of trips projected to be truck trips. Truck trips make up 242 trips (35 percent) of the daily trip generation, 8 trips (11 percent) of the weekday morning peak hour trip generation, and 12 trips (16 percent) of the weekday evening peak hour trip generation.

As requested in the Scope, the Single EIR includes more detailed information about the appropriateness of the selected LUC. To address concerns associated with the appropriateness of the ITE LUC 150, the Proponent prepared a comparison table summarizing the trip generation associated with all of the ITE warehousing categories including LUC 151 (mini-warehousing), LUC 154 (High-Cube Transload and Short-term Warehouse), LUC 155 (High-Cube Fulfillment Center Warehouse), LUC 156 (High-Cube Parcel Hub Warehouse) and LUC 157 (High-Cube Cold Storage Warehouse). These calculations are presented in Table 4-1 of the Single EIR. LUC 151 (Mini-Warehousing), 154 (High-Cube Transload and Short-Term Warehouse), 155 (High-

Cube Fulfillment Center Warehouse), and 157 (High-Cube Cold Storage Warehouse) generate less morning and evening peak hour trips than LUC 150 (Warehousing). Additionally, the Proponent asserts that there are no plans to install refrigeration units on-site, making LUC 157 (High-Cube Cold Storage Warehouse) not applicable. While land uses attributed to LUC 156 result in additional trip generation than LUC 150, this land use typically serves as regional and local freight-forwarder facilities for time sensitive shipments via airfreight and ground carriers. These sites also often include truck maintenance, wash, or fueling facilities which the Proponent asserts is not anticipated as part of the proposed project. As indicated in its comment letter, MassDOT is satisfied with the supporting documentation and concurs with the use of LUC 150 to estimate the trip generation for the project.

Traffic Operations

The TIA included an updated operational analysis for the 2027 No Build and 2027 Build analyses which was revised to reflect an annual growth rate of one percent instead of the 0.55 percent growth rate based on the Central Transportation Planning Staff (CTPS) travel demand model. The revised analyses do not indicate any significant changes in the intersection delays and levels of service. In the TIA included in the EENF, the 2027 analysis includes a proposed traffic signal at the intersection of Route 105 at Bridge Street, with no associated changes to the lane geometry because the future configuration is not yet finalized. According to the Single EIR, this intersection is scheduled for reconstruction by MassDOT in the future. The Single EIR includes capacity analyses for the intersection in both the unsignalized and signalized conditions to demonstrate that the Project is not expected to have a significant impact to operating conditions at this intersection.

The Single EIR included a detailed TDM program with the goal of reducing vehicle trips by employees of the project. These measures are detailed in the mitigation section below. The Proponent has committed to conduct an annual traffic monitoring program for a period of five years, beginning six months after occupancy of the full-build project. The details of the traffic monitoring plan area detailed in the mitigation section below.

Historic and Cultural Resources

The project is located within the Lakeville State Hospital which is included in the Inventory of Historic Assets of the Commonwealth. Correspondence from MHC indicates that no further MHC review is required for the project as proposed.

Climate Change

GHG Analysis

The Single EIR included a revised GHG analysis in response to recommendations outlined in DOER's comment letter on the EENF. The proposed project is subject to the Massachusetts Stretch Code (energy performance improvement of 10% over ASHRAE 90.1-2013-Appendix G) plus certain Massachusetts amendments including C405.3 and C405.4 (lighting), C405.10 (EV

charging), and C406 (three additional efficiency measures). The Preferred Alternative is proposing the following C406 measures:

- C406.2 – improved HVAC
- C406.3 – reduced lighting power density
- C406.8 – improved envelope performance

Since the EENF was submitted, the project has incorporated several energy efficiency improvements including improved vertical envelope performance (vertical UA: 0.0617 Btu/F-hr); use of efficient electrification of space heating/cooling for the office portion of the facility use of air source heat pumps (ASHP) for water heating throughout the warehouse; 95% rooftop solar readiness; and construction of 20 electric vehicle (EV) charging stations. I commend the Proponent for taking proactive measures to reduce GHG emissions from new building construction. Such measures are needed to meet recommendations made through the *Massachusetts 2050 Decarbonization Roadmap*³ as well as the 2050 Net Zero emissions goal now mandated by Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy*.

As described in the DOER's comment letter, no space cooling is planned for the non-warehouse (office) portion of the project and heating of the warehouse will be done with a gas fired heating units. Swapping to ASHP, which can be used for both heating and cooling, would provide the ability for space cooling. The Single EIR included a feasibility analysis for the use of ASHP for space heating in the warehouse; while technically feasible, the analysis concluded that the use of ASHPs is cost prohibitive at this time. The Proponent should continue to study the feasibility of using ASHP in the warehouse portion of the building.

Adaptation and Resiliency

As described in the Single EIR, the project will incorporate several measures to increase resiliency to extreme temperatures and increased precipitation including reducing impervious cover by 0.4 acres, installing landscaping, and constructing light-colored surfaces. Additionally, the project includes:

- Although the estimated design life of the building is 50 years, the project includes installing a stormwater management system designed to handle the 2090 100-yr storm event;
- Land-banking roughly 41% of the proposed parking at the front of the site to reduce impervious coverage;
- Constructing landscaped islands in the parking lot fronting Main Street to provide shade and reduce heat island effect;
- Installing a significant amount of landscaping with native species around the edges of the development to provide shade and stormwater management;
- Constructing 60-foot-wide concrete pads, rather than dark-colored asphalt, along the entire long edges at the loading docks to reduce the area of heat-absorbing surfaces; and

³ <https://www.mass.gov/info-details/ma-decarbonization-roadmap>

- Installing a white roof to reduce heat absorption and the need for active interior cooling and related energy use.

Construction Period

The Single EIR identified construction period BMPs for erosion and sedimentation controls, construction staging areas, traffic management, and air/noise pollution. The Single EIR identified a general construction schedule, working hours, safety measures, and trucking routes. The Single EIR indicated that all contractors and subcontractors will be required to use equipment (over 50 horsepower) that is either Tier 4 equipment or that has been retrofitted with appropriate diesel emissions control devices. The project will require its construction contractors to use Ultra Low Sulfur Diesel (ULSD) fuel in off-road equipment.

The Single EIR indicates that the project will comply with all applicable solid waste and air quality regulatory requirements and the project's generation, handling, recycling, and disposal of construction and demolition debris pursuant to M.G.L. c. 40, §54 and 310 CMR 7.00. The project will retain a Licensed Site Professional ("LSP") to manage the environmental aspects of the project, including proper management and/or disposal of contaminated soil and groundwater encountered during construction.

Mitigation and Section 61 Findings

The FEIR 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 Proponent will submit a self-certification to the MEPA Office identifying the GHG reduction measures incorporated into the pediatric medical facility. This self-certification will be signed by an appropriate professional (e.g. civil engineer, traffic engineer, architect, general contractor) indicating that all of the GHG mitigation measures, or equivalent measures that are designed to collectively achieve the identified reductions in stationary source GHG emissions and transportation-related measures committed to in the Single EIR have been incorporated into the project. To the extent the project will take equivalent measures to achieve the identified reductions, I encourage the Proponent to commit to achieving the same level of GHG emissions identified in the mitigated (design) case expressed in volumetric terms (e.g., tpy). The GHG self-certification should provide a narrative description of any changes made to building design or TDM measures since the Single EIR. Details of the Proponent's implementation of operational measures will also be included.

Land Alteration and Stormwater

- Construction of a stormwater management system that fully complies with MassDEP's Stormwater Management Standards; and,
- Reduce impervious area by 0.4 acres.
- Landbanking 206 parking spaces until need is warranted.

Wetlands

- Removal of the SWDA from the wetland will serve as the 1:1 mitigation for wetland alteration with full restoration of the 516 square feet of BVW in order to meet the performance standards of the WPA. All proposed direct wetland impacts are due to the proposed removal of the existing unlined, uncapped SWDA that encroaches into the wetland.
- Comply with the performance standards of the Wetlands Regulations (310 CMR 10.00) and WQC Regulations (314 CMR 9.00) by complying with the Order of Conditions issued by the Lakeville Conservation Commission and WQC issued by MassDEP.

*Transportation**TDM Program*

- The project includes the implementation of TDM measures including:
 - Assist Site employees with ride matching to promote carpooling;
 - Offer sponsored vanpools and subsidized expenses;
 - Disseminate information on alternate modes of transportation;
 - Consider providing subsidized transit passes to promote transit use;
 - Allow employees to use pre-tax dollars for the purchase of MBTA passes, as the pre-tax purchase is free from both federal and state income and payroll taxes;
 - Provide bicycle racks on-site;
 - Offer incentives for bicycle and pedestrian commutes, such as covered bicycle storage, changing rooms, and shower facilities;
 - Provide preferred parking for low-emitting fuel-efficient vehicles and/or electric vehicle charging stations;
 - Develop transportation related marketing and education materials;
 - Distribute transit maps and passes; and
 - Host an annual mobility management educational meeting for employees.
 - Provision of a central commuter information center, including transit maps, schedules, and route information for people walking and bicycling;
 - Provision of preferred parking for carpool and vanpool in locations convenient to users; and
 - Provision of direct deposit

Transportation Monitoring

- The Proponent has committed to conduct an annual traffic monitoring program for a period of five years, beginning six months after occupancy of the full-build project. The goals of the monitoring program would be to evaluate the assumptions made in the TIA and the adequacy of the mitigation measures, as well as to determine the effectiveness of the TDM program. If capacity analysis reveals traffic issues, particularly issues not identified in the TIA, the Proponent shall work with the Town of Lakeville and appropriate MassDOT units to identify suitable mitigation measures. It would include:
 - Simultaneous automatic traffic recorder (ATR) counts at site driveways for a continuous 24-hour period on a typical weekday;

- Weekday AM and PM turning movement counts (TMCs) and capacity analyses at selected intersections; and
- Travel survey of employees and visitors at the site.
- As noted above, project design changes that may occur due to future identification of a specific tenant and use for the building may require an NPC and further traffic analysis and mitigation.

GHG

Stationary-source GHG emissions will be reduced from 541 tpy under the Base Case to 442 tpy (18.4 percent) in the Preferred Alternative incorporating the following building design features:

- Building envelope with the following vertical UA: 0.0617 Btu/F-hr.
- Use of ASHP for service water for the entire building.
- Efficient electrification (i.e. ASHP) for 100% of space heating of the office portion of the building.
- Improved efficiency of HVAC, lighting and other details documented in the Single EIR table entitled “Current Proposed Design”, Appendix D, Single EIR submission, dated April 15, 2021.
- 95% rooftop solar readiness.
- Electric vehicle charging for 20 parking spaces.

Adaption and Resiliency

- The stormwater management system has been designed to treat the 2090 100-yr storm event.
- Incorporate landscaping and light colored materials into project design.
- Minimize the need for irrigation by using native plantings in landscaping;

Construction Period

- Compliance with MassDEP’s Air Pollution Control regulations pursuant to M.G.L. c.40, §54 and the Massachusetts Air Pollution Control regulations at 310 CMR 7.01, 7.05, 7.09 and 7.11, including anti-idling provisions; and use of vehicles meeting EPA’s Tier 4 Emissions Standards;
- Implementation of measures to minimize dust and odors, including dust monitoring if necessary;
- Designate truck routes for construction vehicles;
- Compliance with MassDEP’s noise regulations;
- Compliance with MassDEP’s Solid Waste regulations and implementation of measures to reuse and recycle a target of 75 percent of construction and demolition (C&D) debris and appropriately handle and dispose of asbestos;
- Conduct all earthwork and construction in accordance with the Massachusetts Contingency Plan (MCP); and,

- Use of sedimentation and erosion controls in compliance with the requirements of the SMS and the NPDES General Permit for Construction Activities, including development and implementation of a Stormwater Pollution Prevention Plan (SWPP).

Conclusion

Based on a review of the Single EIR and consultation with State Agencies, I find that the Single EIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. 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

June 1, 2021

Date

Kathleen A. Theoharides

Comments received:

05/25/2021	Massachusetts Department of Environmental Protection (MassDEP) Southeast Regional Office (SERO)
05/26/2021	Massachusetts Department of Transportation (MassDOT)
06/01/2021	Massachusetts Department of Energy Resources (DOER)

KAT/EFF/eff



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Secretary

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Commissioner

May 24, 2021

Kathleen A. Theoharides
Secretary of Environment and Energy
Executive Office of Energy and
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100 Cambridge Street, Suite 900
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Boston, MA 02114

RE: SEIR Review. EOEEA 16298
LAKEVILLE, Lakeville Hospital
Redevelopment at 379 Walnut Street at
43 Main Street

Dear Secretary Theoharides,

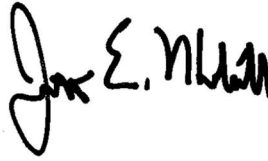
The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Single Environmental Impact Report (SEIR) for the Lakeville Hospital Redevelopment at 43 Main Street, Lakeville, Massachusetts (EOEEA #16298). The Project Proponent provides the following information for the Project:

The Project proposes a 402,500-square foot (sf) warehouse building that will include 128 loading docks and a small amount of ancillary office space. While the building will be devoted to a warehouse use, the exact nature of the facility is not yet determined, as a tenant has not yet been secured. The Project will also require new access roadways with improved curb cuts from Route 105, approximately 403 vehicle parking spaces (with a potential expansion of up to an additional 161 spaces as land banked spaces), and storage for up to 130 tractor trailers.

Comments/Guidance

The MassDEP Southeast Regional Office has determined that the Proponent's SEIR has addressed the Department's ENF comments and appreciates the opportunity to comment. If you have any questions regarding these comments, please contact George Zoto at (508) 946- 2820.

Very truly yours,



Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Millie Garcia-Serrano, Regional Director
David Johnston, Deputy Regional Director, BWR
Gerard Martin, Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Jeff Gould, Chief, Wastewater Management, BWR
Daniel Gilmore, Chief, Wetlands and Waterways, BWR
Andrew Poyant, Wetlands and Waterways, BWR
Carlos Fragata, Wetlands and Waterways, BWR
Mark Dakers, Chief, Solid Waste, BAW
Alison Cochrane, Solid Waste, BAW
Elza Bystrom, Solid Waste, BAW
Cynthia Baran, Chief, Asbestos, BAW
Joseph Cerutti, Underground Injection Control Program, BRW/Boston
Allen Hemberger, Site Management, BWSC



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Acting Secretary & CEO



May 26, 2021

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Lakeville: Lakeville Hospital Redevelopment – SEIR
(EEA #16298)

ATTN: MEPA Unit
Erin Flaherty

Dear Secretary Theoharides:

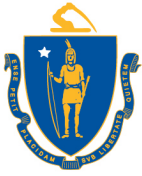
On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Single Environmental Impact Report for the Lakeville Hospital Redevelopment project in Lakeville as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Moller
Executive Director
Office of Transportation Planning

DJM/jll

cc: Jonathan Gulliver, Administrator, Highway Division
Patricia Leavenworth, P.E., Chief Engineer, Highway Division
Marie Joe Perry, District 5 Highway Director
Neil Boudreau, Assistant Administrator of Traffic and Highway Safety
Southeastern Regional Planning and Development District
Planning Board, Town of Lakeville



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Acting Secretary & CEO



MEMORANDUM

TO: David Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: May 26, 2021

RE: Lakeville Hospital Redevelopment – SEIR
(EEA #16298)

The Public/Private Development Unit (PPDU) has reviewed the Single Environmental Impact Report (SEIR) for the proposed Lakeville Hospital Redevelopment in Lakeville. The project site consists of approximately 49.4 acres located along and northwest of Route 105 (Main Street) between its intersection with Bridge Street and Lori Lane. The site has been vacant since the Lakeville State Hospital closed in 1992 but contains seven buildings totaling 407,653 square feet, a solid waste disposal area, parking, and driveways. While other developments have been proposed for the site, none have advanced to construction.

The proposed project consists of a 402,500 square foot warehouse building, although the exact nature of the use is not known as a tenant has not been identified. Access is proposed via two unsignalized full access driveways from Route 105, one at Lori Lane, and another approximately 1,200 feet further east. Both driveways will be at existing driveways, one of which has been abandoned and at which there is currently no curb cut.

The project is expected to generate 682 vehicle trips per day and will include provisions for 504 passenger vehicle parking spaces, and up to 130 spaces for tractor trailer storage. The Proponent intends to initially construct 298 parking spaces and landbank up to 206 of the 504 vehicle parking spaces, for construction as needed depending on the eventual tenant. The project impervious cover exceeds the MEPA Environmental Impact Report (EIR) land threshold. The project requires a Vehicular Access Permit from MassDOT because it abuts and would be accessed from Route 105, a state highway.

The SEIR includes an updated TIA prepared in general conformance with the current MassDOT/EOEEA *TIA Guidelines*. The TIA is generally responsive to the MassDOT comment letter on the Expanded Environmental Notification Form (EENF) and includes a comprehensive mitigation program.

Trip Generation

The TIA includes trip generation estimates calculated using the Institute of Transportation Engineers (ITE)'s *Trip Generation Manual* (10th Edition). The trip generation was calculated based on ITE trip rates for Land Use Code 150 – Warehousing. Accordingly, the site is expected to generate 682 daily weekday vehicle trips, with 74 vehicle trips during the weekday morning peak hour, and 77 vehicle trips during the weekday evening peak hour. The TIA details the share of trips projected to be truck trips. Truck trips make up 242 trips (35 percent) of the daily trip generation, 8 trips (11 percent) of the weekday morning peak hour trip generation, and 12 trips (16 percent) of the weekday evening peak hour trip generation.

As requested by MassDOT, the SEIR includes more detailed information about the appropriateness of the selected LUC. We are satisfied with the supporting documentation and concur with the use of LUC 150 to estimate the trip generation for the project.

Traffic Operations

In the SEIR, the 2027 No Build and Build analyses are revised to reflect an annual growth rate of one percent instead of the 0.55 percent growth rate based on the Central Transportation Planning Staff (CTPS) travel demand model. The revised analyses do not indicate any significant changes in the intersection delays and levels of service.

In the TIA included in the EENF, the 2027 analysis includes a proposed traffic signal at the intersection of Route 105 at Bridge Street, with no associated changes to the lane geometry because the future configuration is not yet finalized. According to the SEIR, this intersection is scheduled for reconstruction by MassDOT in the future. The SEIR includes capacity analyses for the intersection in both the unsignalized and signalized conditions to demonstrate that the Project is not expected to have a significant impact to operating conditions at this intersection.

Parking

Following consultation with MassDOT and the Town of Lakeville, the SEIR has revised the allocation of the proposed parking supply for the project. The Proponent now plans to construct at opening 298 parking spaces and up to 130 spaces for tractor trailer storage. In addition, to reduce impervious surfaces and remain flexible to the needs of potential tenants, the Proponent plans to landbank, for construction only as needed depending on the eventual tenant, up to 206 vehicle parking spaces. The Proponent is seeking approval for the total potential parking at the site, 504 vehicle parking spaces.

The SEIR also includes a detailed justification of the parking provision for the project. The justification includes a comparison between the number of proposed spaces and several sites from neighboring warehouse facilities as well as the estimated parking demand based on

ITE's *Parking Generation Manual* (5th Edition). We are satisfied with the justification provided regarding the parking supply for the project.

Multimodal Access and Facilities

Access is proposed via two driveways from Route 105, one at Lori Lane, and another further east. The Project Background and Existing Site Conditions section notes that there is an existing driveway onto Route 79. According to the SEIR, the Proponent is not proposing any access onto Route 79.

Transportation Demand Management (TDM) Program

In the EENF, the Proponent provided a detailed TDM program with the goal of reducing vehicle trips by employees of the project. The Proponent has added in the SEIR the following TDM measures suggested by MassDOT:

- Provision of a central commuter information center, including transit maps, schedules, and route information for people walking and bicycling;
- Provision of preferred parking for carpool and vanpool in locations convenient to users; and
- Provision of direct deposit for site employees.

Transportation Monitoring Program

The Proponent has committed to conduct an annual traffic monitoring program for a period of five years, beginning six months after occupancy of the full-build project. It would include:

- Simultaneous automatic traffic recorder (ATR) counts at site driveways for a continuous 24-hour period on a typical weekday;
- Weekday AM and PM turning movement counts (TMCs) and capacity analyses at selected intersections; and
- Travel survey of employees and visitors at the site.

The goals of the monitoring program would be to evaluate the assumptions made in the TIA and the adequacy of the mitigation measures, as well as to determine the effectiveness of the TDM program. If capacity analysis reveals traffic issues, particularly issues not identified in the TIA, the Proponent shall work with the Town of Lakeville and appropriate MassDOT units to identify suitable mitigation measures.

Section 61 Finding

The SEIR includes a Draft Section 61 Finding, outlining the mitigation measures the Proponent has committed to implementing in conjunction with this project. The Draft Section 61 Findings will be the basis for MassDOT to issue final Section 61 Findings for the project.

MassDOT recommends that no further environmental review be required based on transportation-related issues. The Proponent should continue consultation with the town of Lakeville and appropriate MassDOT units, including PPDU and the District 5 Office, to finalize the permitting process for the project. If you have any questions regarding these comments, please contact me at *Lionel.Lucien@dot.state.ma.us*.



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF
ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENERGY RESOURCES
100 CAMBRIDGE ST., SUITE 1020
BOSTON, MA 02114
Telephone: 617-626-7300
Facsimile: 617-727-0030

Charles D. Baker
Governor

Karyn E. Polito
Lt. Governor

Kathleen A. Theoharides
Secretary

Patrick C. Woodcock
Commissioner

2 June 2021

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: Lakeville Hospital Redevelopment, Lakeville, Massachusetts, EEA #16298

Cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resources
Patrick Woodcock, Commissioner, Department of Energy Resources

Dear Secretary Theoharides:

We've reviewed the Single Environmental Impact Report (SEIR) for the above project. The proposed project includes a 402,000-sf warehouse building, including a 20,000-sf office.

Executive Summary

The project is committing to the following emissions reduction measures, including:

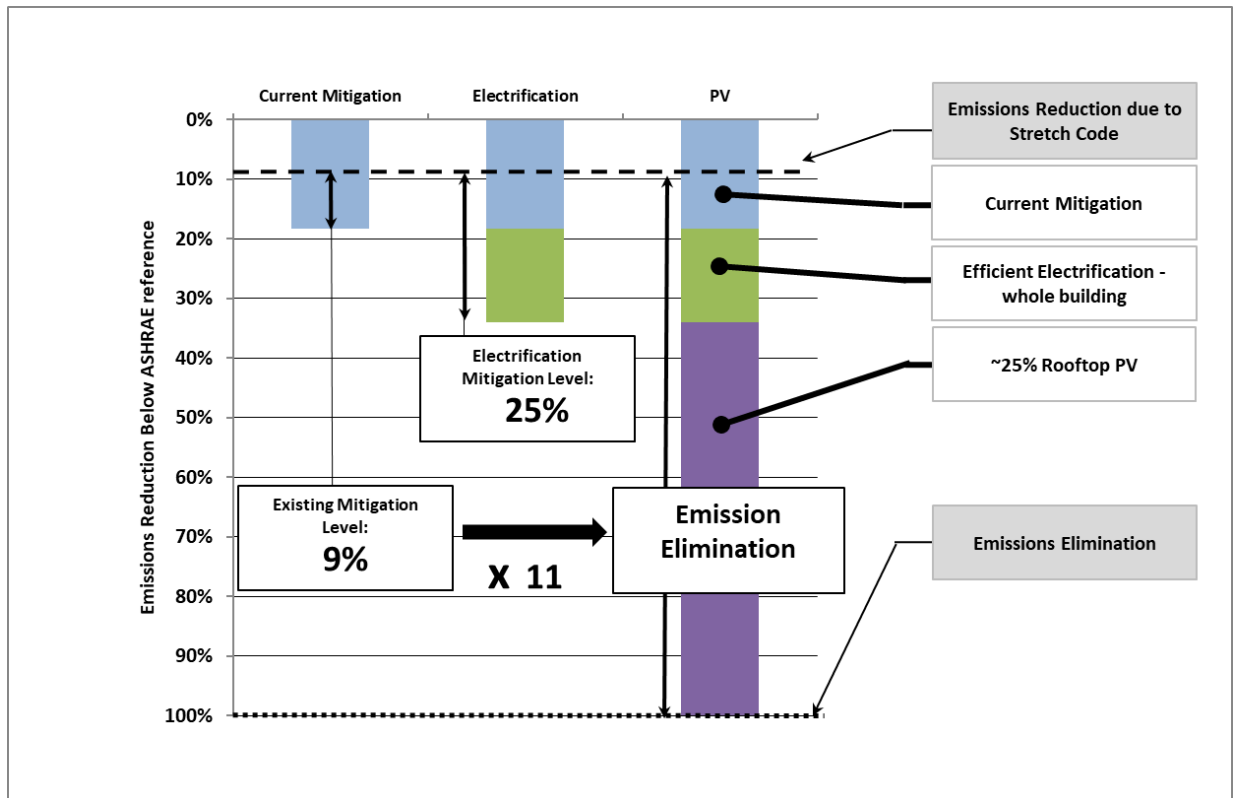
- Improved vertical envelope performance;
- Efficient electrification of space heating for office portion of the facility;
- Air source heat pump water heating;
- 95% rooftop solar readiness;
- 20 EV charging stations.

The project could also benefit from extending air source heat pump heating to the entire building.

Mitigation Level

Current Mitigation Level¹ is 9%. This can be improved as follows:

- Efficient electrification of space heating of the warehouse portion of the building would improve Mitigation Level (ML) to 25%, a more than 2.5x improvement.
- Addition of PV on about 25% of the roof would improve ML by a factor of x9 and would result in emissions elimination.



Code and C406 Measures

Code for the proposed building is Massachusetts Stretch Code (energy performance improvement of 10% over ASHRAE 90.1-2013-Appendix G) plus certain Massachusetts amendments including C405.3 and C405.4 (lighting), C405.10 (EV charging), and C406 (three additional efficiency measures).

The building is proposing the following C406 measures:

- C406.2 – improved HVAC
- C406.3 – reduced lighting power density

¹ Mitigation Level is the percent GHG reduction beyond the reduction that would occur as a result of following state and local building codes. A Mitigation Level of 0% means that no mitigation is proposed.

- C406.8 – improved envelope performance

Summary of Envelope Commitments

Below is a summary of key envelope commitments:

Building	Vertical UA		Roof R value	
	Commitment (Btu/hr-F)	% Improvement over Code	Commitment	Code Requirement
Warehouse	0.0617	61%	R-30c.i.	R-30c.i.

Note the submission did not distinguish between warehouse and office vertical UA. Therefore, it is assumed that the warehouse and office, in aggregate, will have the vertical UA shown above.

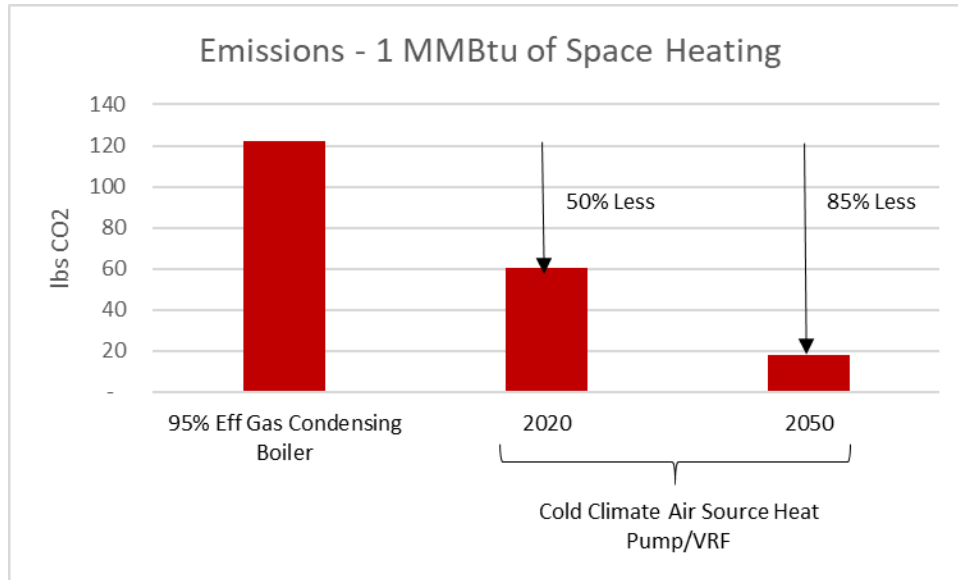
Electric Space and Service Water Heating

Efficient electrification and renewable thermal space and water heating entails the swapping of fossil fuels (natural gas, oil, and propane) or electric resistance systems with one or more of the following:

- Cold-climate air source heat pumps and variable refrigerant flow (VRF) for space heating;
- Air source heat pumps for water heating;
- Ground source heat pumps;
- Solar thermal.

Electrification of space and water heating is a key mitigation strategy with significant short- and long-term implications on GHG emissions. Massachusetts grid emissions rates continue to decline with the implementation of clean energy policies that increase renewable electricity sources. The implication is that efficient electric space and water heating with cold climate air source heat pump and VRF equipment have lower emissions than other fossil-fuel based heating options, including best-in-class (95% efficient) condensing natural gas equipment.

Currently, efficient electric heating has approximately **50% lower emissions** in Massachusetts than condensing natural gas heating. By 2050, efficient electric heating is expected to have approximately **85% lower emissions** in Massachusetts than condensing natural gas heating. See illustration below.



Electrifying Space Heating – Office Portion

The project is committing to efficient electrification of space heating for the office portion of the warehouse. We commend the project for this measure.

Electrifying Space Heating – Warehouse Portion

The proponent performed an analysis on the electrification of the non-office portions of the warehouse. The analysis shows that such a system would be technically feasible and would significantly reduce emissions, as illustrated on Page 2. Financially, the alternative would have a 10 year simple payback compared to baseline which the proponent deemed too long.

Note, however, with current, relatively low interest rates, the additional cost to finance efficient electrification could actually be smaller than the savings achieved meaning that the project would be achieving saving from “day 1”. For example, the operating cost savings associated with efficient electrification would exceed the financing and interest costs assuming a 30-year financing period at 3.4% interest rate.

Even at 5% interest rate, financing and interest costs would exceed operating savings by only a small amount (less than \$700 per month for a 400,000-sf building). This may be a worthwhile expense to improve the value of the warehouse asset. Currently, no space cooling is planned for the non-warehouse portion. Swapping to heat pumps, which can be used for both heating and cooling, would provide the ability for space cooling.

Service Water Heating

Service water heating can be accomplished in many ways including fossil fuel boilers, electric resistance, and air-source heat pumps. Air source water heating can be either centrally-located

Lakeville Hospital Redevelopment, EEA #16298
Lakeville, Massachusetts

systems that distribute hot water to the units, or localized, distributed, tank-based heat pump water heaters.

The project is committing to air to water heat pump water heating. We commend the project for making this commitment.

Solar PV

Rooftop solar can be a significant emissions reduction strategy. For example, PV on just 25% of the roof would eliminate project emissions.

For this reason, we recommend that as much roof as possible be made permanently solar-ready for PV systems to be installed during initial construction, or, at some time in the future. We commend the project for committing to 95% solar PV readiness.

EV

The project is committing to installing EV charging equipment for 20 spaces. We commend this commitment.

Key Project Commitment Summary

The project is committing to the items below.

- Emissions reduction of 14% lower than ASHRAE 90.1-2013 plus Massachusetts amendments, including C406 measures: C406.2 – improved HVAC, C406.3 – reduced lighting power density, C406.8 – improved envelope performance.
- Building EUI reduction of 20% lower than baseline ASHRAE 90.1-2013 plus Massachusetts amendments (Baseline EUI: 19 kBtu/sf-yr; Mitigated EUI: 15 kBtu/sf-yr).
- Envelope as follows: vertical UA: 0.0617 Btu/F-hr.
- Service water: air source heat pump.
- Air source heat pump (or air source VRF) space heating for 100% of space heating of the office portion of the building.
- HVAC, lighting and other details documented in table entitled “Current Proposed Design”, Appendix D, SEIR submission, dated 15 April 2021.
- 95% rooftop solar readiness.
- Electric vehicle charging for 20 parking spaces.

Sincerely,



Paul F. Ormond, P.E.
Energy Efficiency Engineer
Massachusetts Department of Energy Resources



Brendan Place
Clean Energy Engineer
Massachusetts Department of Energy Resources