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Executive Office of Energy and Environmental Affairs
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March 26, 2021

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : DeBerry-Homer Elementary School
PROJECT MUNICIPALITY : Springfield
PROJECT WATERSHED : Connecticut River
EEA NUMBER : 16334
PROJECT PROPONENT : Mayor Domenic J. Sarno, City of Springfield
DATE NOTICED IN MONITOR : February 24, 2021

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project proposes the construction of a new elementary school, referred to in the ENF as the DeBerry-Homer Elementary School, at 680 Union Street in the City of Springfield (the City). The new elementary school will serve up to 800 kindergarten through fifth (K-5) grade students and 120 pre-kindergarten (pre-K) students. The new school will replace the existing DeBerry School (70 years old) located at 670 Union Street and the Homer Elementary School (120 years old) located at 43 Homer Street. The DeBerry school will be demolished; the Homer School will be turned over to the Springfield Department of Community Development for redevelopment. The proposed project consists of a new, three-story 155,990 gross square foot (sf) elementary school, multiple playgrounds, two basketball courts, bus drop-off lanes, access driveways, 164 parking spaces, pedestrian walkways, landscaped areas, low impact design (LID) stormwater management systems, and underground utilities including municipal water and sewer, natural gas, electricity, and communication services. The project will be phased such that the DeBerry

School will remain fully operational during the construction of the new school, and demolished once the new school is complete. The new parking lot and bus drop-off lane will be constructed in the area occupied by the existing building. Monroe Street will be converted from a two-way street to a one-way street with vehicular drop-off along the existing right of way.

Project Site

As described in the ENF, the 5.53-acre project site is owned by the City and contains the existing William N. DeBerry Elementary School (DeBerry School) in the western half of the site. The DeBerry School is a large single building that has a one-story addition, parking lot, playground, basketball court, and baseball diamond. DeBerry Park is located on the eastern half of the site; several residential buildings and other structures were demolished to create the park. The site is bounded by Monroe Street to the north, Eastern Avenue to the east, Union Street to the south, and residential properties to the west. DeBerry Park is protected Article 97 Land held by Springfield Park Commission. The project site does not contain *Estimated and Priority Habitat of Rare Species* as delineated by the Natural Heritage and Endangered Species Program (NHESP) in the 14th Edition of the Massachusetts Natural Heritage Atlas, nor is it located in an Area of Critical Environmental Concern (ACEC). The site does not contain any wetland resources nor does it contain any structures listed in the State Register of Historic Places or the Massachusetts Historical Commission's (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth (the Inventory).

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include the alteration of 5.53 acres of land, the creation of an additional 2.33 acres of impervious area within the project site (4.40 acres total), the creation of 119 parking spaces (164 parking spaces total), and the generation of 1,181 new average daily vehicle trips (adt) (1,776 adt total). The project will require the release of 2.846 acres of land held for Article 97 purposes. The project will result in an increase of 8,600 gallons per day (gpd) of water demand (10,600 gpd total) and the generation of 10,600 gpd wastewater.¹

Measures to avoid, minimize, and mitigate, environmental impacts include: the transfer of 3.43 acres of land to the City's Park Commission to mitigate the loss of Article 97 land, the construction of a stormwater management system to capture and treat runoff, use of sediment and erosion controls during construction, and use of a planned construction vehicle route to minimize traffic impacts during construction.

Jurisdiction and Permitting

This project is subject to MEPA review and preparation of an ENF pursuant to 301 CMR 11.03(1)(b)(3) because it requires a State Agency Action and involves the conversion of land held for natural resources purposes in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth to any purposes not in accordance with Article 97. The project will receive Financial Assistance from the Massachusetts School Building Authority (MSBA).

¹ Volume of wastewater provided in an email from Janet Bernardo (Horsley Witten Group) to Eva Murray (MEPA Office) sent March 25, 2021.

The project received Site Plan Approval from the Springfield Planning Board on December 23, 2020. The project will require review from the Springfield Engineering Department and Springfield Sewer and Water Commission. The project requires a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the United States Environmental Protection Agency (EPA).²

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

Review of the ENF

The ENF provided a description of existing and proposed conditions, preliminary project plans, geotechnical report, traffic impact analysis, Springfield City Council Order (ID# 5427), correspondence with MHC, modified stormwater design memorandum, and a site feasibility study. The ENF also identified measures to avoid, minimize and mitigate environmental impacts. Additional information regarding wastewater generation, permitting, reuse of the Homer School, and proposed tree and shrub plantings was provided to the MEPA Office to assist in review.³ For the purposes of this Certificate, this supplemental information in combination with the original filing materials is referred to as the ENF.

Comments from MassDEP do not identify any impacts that were not reviewed in the ENF, nor do they note deficiencies in the alternatives analysis or recommend additional alternatives for further review. Comments from the Pioneer Valley Planning Commission (PVPC) express concern with the proposed stormwater management system, discussed further below. Comments from PVPC also note concerns regarding potential historic impacts from the project related to the two buildings that are each over 70 years old.

Alternatives Analysis

As described in the ENF, the purpose of the project is to address the structural and programmatic deficiencies of the existing elementary schools; specifically, the project is proposed to provide adequate facilities and programming to accommodate 920 students. A feasibility study was performed that evaluated three (3) different sites and twelve different alternatives based on their ability to satisfy project requirements while minimizing impacts. Based on the results of the feasibility study, four alternatives (Alternative 1, Alternative 2, Alternative 3, and Alternative 4 (Preferred Alternative)) at the DeBerry School site were selected for further evaluation in addition to a No-Build Alternative.

The No-Build Alternative would avoid impacts to Article 97 Land but would not address the project purpose of providing adequate educational facilities and programming for students in the City of Springfield and was therefore dismissed. Alternative 1 would involve repairs to the existing DeBerry School to bring it into code compliance but would not include any expansion of the existing facilities. While this alternative avoids impacts to Article 97 Land and any creation of additional impervious

² The necessity of a NPDES CDP was not identified in the ENF but was confirmed in an email from Janet Bernardo (Horsley Witten Group) to Eva Murray (MEPA Office) on March 25, 2021.

³ Supplemental information provided in an email from Janet Bernardo (Horsley Witten Group) to Eva Murray (MEPA Office) on March 25, 2021.

surface, the school's capacity would remain limited to 280 students. As this Alternative does not satisfy the necessary programming or capacity for students, it was dismissed. Alternative 2 would involve building a new 400-student, three-story school adjacent to the existing school, allowing the existing school to be occupied during construction. Alternative 2 would require the transfer of Article 97 Land and would increase the impervious surface within the project, but to a lesser extent than the Preferred Alternative. According to the ENF, this Alternative was dismissed as it would not provide the desired amount of programming or facilities for students, which has been identified as a critical need in the City.

Alternative 3 includes renovations and upgrades to the existing building and a large addition, providing adequate facilities 800 students K-5 and 120 Pre-K students. Alternative 3 maintains the original 1951 DeBerry School classroom building and adds a large three-story addition. This Alternative would result in impacts to Article 97 Land as well as similar impacts from impervious surface, wastewater generation, and stormwater generation as the Preferred Alternative, but would result in limited remaining space for recreational areas. According to the ENF, this Alternative was dismissed as, due to the nature of the renovation and addition, the students currently attending the DeBerry School would need to be relocated to rented space or modular units during construction, which would result in additional environmental impacts and costs.

The Preferred Alternative (described herein) involves the construction of a new, three-story elementary school and demolition of the existing DeBerry School. The new construction allows for an efficient layout of the building and in turn a smaller footprint than Alternative 3, maximizing the quantity of open space dedicated to outdoor activities while meeting the programmatic needs of the City. The students currently attending the DeBerry School will not need to be relocated during construction. According to the ENF, the Preferred Alternative was selected as it achieves the project purpose while minimizing environmental impacts.

Article 97

The project will result in the disposition of 2.846 acres of Article 97 Land. Any disposition affecting land held for Article 97 purposes must be carefully considered to protect these lands from development pressures and to preserve the Commonwealth's legacy of open space conservation and protection. Land protected by Article 97 may not be disposed of without authorization from the legislature. The ENF included a copy of the Article 97 Legislation: Chapter 89 of the Acts of 2020: "An Act Authorizing the City of Springfield to Convert the Use of Park Land at DeBerry Park for a New Elementary School and to Replace it with Additional Park Land in the City of Springfield" which authorized the City to use the DeBerry Park land for the construction of the new school. As stated in the Article 97 Legislation, the City will transfer the care, custody, management and control of three parcels of land totaling 3.43 acres to the Springfield Park Commission to be used solely for public park purposes in order to comply with the Article 97 Policy. According to the ENF, this land, bound by King Street and Wilbraham Avenue, is located approximately 0.5 miles east of the existing DeBerry Park.

The new park will provide a net gain of 0.584 acres of Article 97 public park land within the DeBerry and Homer School neighborhoods. On November 14, 2019, the Springfield Park Commission voted to support and approve the conversion of the DeBerry Park parcel from park land to school land and to accept and dedicate the replacement park land located at the intersection of King Street and Wilbraham Avenue. The ENF states construction of the new park land began in the Fall of 2020 and is

anticipated to be completed in the Spring of 2021. The site will include athletic fields and parking areas comparable to what currently exists at the DeBerry Park.

Stormwater

The project will involve the creation 2.33 acres of impervious area for a total of 4.40 acres within the project site. According to the ENF there is currently no stormwater management in place on-site to treat or retain runoff from the existing 2.1 acres of impervious surface. Stormwater runoff from the site is currently directed into a combined sewer/stormwater system within Union Street and Monroe Street. To mitigate stormwater runoff generated from the project, an on-site stormwater management system is proposed that will convey runoff from the rooftops, parking areas, and walkways through a series of area drains, catch basins, and manholes that will capture and direct surface runoff into one of three underground infiltration systems. According to the ENF, the proposed drainage system has the capacity to capture, store, and recharge stormwater generated from a 100-year, 24-hour storm event. Post-development peak discharge rates for the 2-year, 10-year, 25-year, 50-year, and 100-year storms are below existing peak discharge rates and volumes. As described in the ENF, the proposed stormwater management system will hydraulically disconnect over 5 acres of stormwater runoff from the combined sewer system. Comments from PVPC request information about any additional analysis completed regarding aboveground stormwater facilities that make use of trees and plants in order to mitigate the increase urban heat island effect experienced by the City of Springfield. Additional information provided to the MEPA Office on March 25, 2021 included a tree and shrub planting plan that proposes planting deciduous, flowering, and evergreen trees; deciduous and evergreen shrubs; and additional grasses and groundcover at the new elementary school. I encourage the Proponent to consider additional green infrastructure stormwater management as the project design is finalized.

Water and Wastewater

The project will result the generation of 10,600 gpd of wastewater and water demand. Potable water and wastewater services will be supplied by the Springfield Water and Sewer Commission (SWSC). The water and wastewater service will be connected to the municipal water main and combined sewer main (respectively) in Union Street. According to the ENF, the SWSC has confirmed that the municipal systems will have adequate capacity to service the new school.

Hazardous Waste

The ENF identified release tracking number (RTN) 1-0021166 within the project site that is regulated by MassDEP under the Massachusetts Contingency Plan (MCP); specifically, the release of lead was identified in shallow soil in the southwest portion of the site. Comments from MassDEP note additional RTNs within a 0.5-mile radius of the project site. According to the ENF, response actions within the site will likely include the excavation and off-site disposal of lead impacted soil. The ENF indicated that a permanent solution will likely be achieved under the following remediation work.

Traffic

The project will result in the creation of an additional 119 parking spaces within the project site (164 parking spaces total), and the generation of 1,181 new adt (1,776 adt total). Monroe Street is

proposed to be converted to a one-way eastbound roadway to allow for parent drop-off along the south side of the roadway. To facilitate this, an exit-only driveway is proposed on the western portion of the site, connecting to Monroe Street. A one-way bus loop will be located on the eastern portion of the site, connecting to Union Street. In total, four curb cuts are proposed along Union Street. A traffic control plan will be implemented during construction to provide adequate travel in and out of the construction site. Construction fences will be installed at the start of construction to allow walking students and busses to access the existing school. Comments from WalkBoston are supportive of the project, including the conversion of Monroe Street to a one-way, but note additional measures that should be evaluated to reduce impacts to traffic, increase pedestrian safety, and improve accommodations for bicyclists. I refer the Proponent to WalkBoston's comments for more information on these multimodal initiatives.

Construction

Construction is anticipated to begin June 2021 and last approximately 28 months. All construction and demolition activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The Proponent must perform asbestos surveys of these buildings prior to disturbance of the buildings. If asbestos is found, MassDEP must be notified prior to its handling or removal in accordance with the Asbestos regulations (310 CMR 7.15). The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle construction and demolition (C&D) debris to the maximum extent.

Conclusion

The ENF has adequately described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on review of the ENF and comments received on it, and in consultation with MassDOT, I have determined that an EIR is not required.

March 26, 2021

Date



Kathleen A. Theoharides

Comments received:

03/11/2021 Pioneer Valley Planning Commission (PVPC)
03/15/2021 Massachusetts Department of Environmental Protection (MassDEP), Western Regional
Office (WERO)
03/16/2021 WalkBoston

KAT/ELM/elm

March 11, 2021

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 Environmental Notification Form (ENF) for the DeBerry-Homer Elementary School in Springfield, Massachusetts, EEA # 16334.

Dear Secretary Theoharides:

The Pioneer Valley Planning Commission (PVPC) has the following review comments on the ENF for the above-cited project. As proposed, the project consists of the construction of a new school building and demolition of the existing school building. PVPC is fully supportive of the project, and particularly commends the elimination of storm flows to the combined sewer system, which translates to fewer sewer overflows into the Connecticut River. At the same time, we would like to identify two areas of concern based upon our review of the ENF.

Land Use and Environmental Comments

The ENF proposes to use underground infiltrators for stormwater management for the proposed new school. We would like to request information about any additional analysis completed regarding aboveground stormwater facilities that make use of trees and plants for the project. This is of critical importance due to the increase in the number of days with recorded temperatures over 90° F and increased “urban heat island” impacts, especially in the Environmental Justice neighborhoods where this school is located. As part of this project, we would recommend greater consideration to green infrastructure stormwater management or planting trees, which provide important shade and cooling benefits during our hottest months.

Historic Preservation Comments

The DeBerry School Massachusetts Historic Commission (MHC) Inventory Form that was submitted (pages 459-460) is incomplete and does not meet current MHC standards. We encourage the project proponent to properly inventory the soon to be demolished mid-20th century DeBerry School as it relates to a significant

African American (Rev. Dr. William N. DeBerry) in Springfield history. Similarly, we also recommend an inventory of the late 19th century Homer School building as it will soon be vacated and is also not documented. Both buildings are more than 50 years old, have the potential of local historical and architectural significance, and would benefit from a proactive approach to their preservation through documentation.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kimberly H. Robinson", with a stylized flourish at the end.

Kimberly H. Robinson, MUP
Executive Director

cc: S. Hanson, PVPC Alternate – Springfield
R. Rice, DiNisco Design, Inc.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

March 15, 2021

Kathleen A. Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Eva Murray, EEA No. 16334
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: DeBerry-Homer Elementary School
Springfield

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted for the proposed DeBerry-Homer Elementary School at 680 Union Street in Springfield, MA (EEA #16334).

The applicable MassDEP regulatory and permitting considerations regarding air pollution, solid waste, hazardous waste and waste site cleanup are discussed. MassDEP attended a site visit on March 9, 2021.

I. Project Description

The project proponent, the City of Springfield, will construct a new DeBerry-Homer Elementary School at 680 Union Street, to replace the existing DeBerry School (70 years old) currently located at 670 Union Street and the Homer Elementary School (120 years old) that is currently located at 43 Homer Street in Springfield. The new school will be a single building located on 5.53 acres of City-owned property and will serve up to 800 K-5 students and 120 Pre-K students. A new community

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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building is also part of this project. Part of the project involves excavation of DeBerry Park which is located at the proposed site of the new school. The current DeBerry school will remain open during construction of the new DeBerry-Homer Elementary School and will be demolished when the new school is complete. Construction will begin in June 2021 and continue for approximately 28 months.

The project includes several age specific playgrounds and two basketball courts, separate bus drop-off lanes, pedestrian walkways and landscaped areas. Underground utilities include electricity and communication services, natural gas and city water and sewer. The designer of the low impact design stormwater management system has worked with the Springfield Water and Sewer Commission as well as the Springfield Department of Public Works. Stormwater from the site's 4.4 impervious acres will be captured by three subsurface infiltration chambers and the mitigation measures will allow the stormwater from up to a 100-year storm to be retained on-site. A long-term Operation and Maintenance Plan has been approved.

Environmental Impacts associated with this project include:

- total site acreage - 5.53 acres
- acres of impervious area existing 2.12, change + 2.33 Total - 4.40 acres
- gross sq ft - 56,964 existing, change + 99,086, Total 155,990 gross sq ft
- vehicle trips per day - increase of 1,181, total daily 1,776 vehicle trips per day
- parking spaces increase of 119 spaces, total of 164 parking spaces
- wastewater increase of 8,600 gpd for a total of 10,600 gpd

II. Required Mass DEP Permits and/or Applicable Regulations

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 Air and Waste

Air Quality

Construction and Demolition Activities

The earth moving, excavation and construction activity must conform to current Air Pollution Control Regulations. The proponent should implement measures to alleviate dust, noise, and odor nuisance conditions that may occur during the excavation and construction activities for the new DeBerry-Homer School. Such measures must comply with the MassDEP's Bureau of Air and Waste (BAW) Regulations 310 CMR 7.01, 7.09, and 7.10.

Construction Equipment

MassDEP believes it is necessary to mitigate the construction-period impacts of diesel emissions to the maximum extent feasible and recommends that the project proponent require the contractors and subcontractors to use diesel equipment/machinery that are fitted with pollution control devices as well as to minimize excessive idling. All non-road engines shall be operated using only ultra-low sulfur diesel (ULSD) with a sulfur content of no greater than 15 ppm pursuant to 40 CFR 80.510.

Solid Waste

The proponent shall properly manage and dispose of all solid waste generated by or discovered during this proposed project pursuant to 310 CMR 16.00 and 310 CMR 19.000, including the regulations at 310 CMR 19.017 (waste ban). In addition, the proponent shall manage regulated asbestos and asbestos-containing waste material as special wastes in accordance with 310 CMR 19.061.

Asbestos

The project submittal states that several residential buildings and other structures were demolished to create the DeBerry Park site.

Demolition activities of that era sometimes left the building material and asbestos in the cellar hole or basement of the building and covered it with some amount of soil or pavement. Please reference the excavation operations for the Springfield Welcome Center and new Basketball Hall of Fame sites on Columbus Avenue in Springfield as examples of this activity. If this type of demolition material is found during excavation at the DeBerry Park please contact MassDEP.

The project submittal also states that the current DeBerry School will be demolished after completion of construction of the DeBerry-Homer Elementary School. Prior to any demolition/renovation in any building at the site, the applicant shall perform a thorough survey of the building for asbestos containing materials. This survey shall comply with MassDEP regulation 310CMR7.15(4), and the US EPA Asbestos NESHAP regulation 40 CFR Part 61. All building materials known or suspected to be asbestos containing material shall be removed prior to demolition in compliance with all parts of 310 CMR 7.15.

Solid and Hazardous Waste Management

If MassDEP determines that either because of the nature of the proposed activity, the amount of the material, and/or the characteristics of the material that the material requires management as a hazardous or solid waste, then the disposition of the sediments must comply with any applicable requirements pursuant to 310 CMR 30.0000, 310 CMR 16.00 or 310 CMR 19.000. In addition, reuse or disposal of the dewatered sediments at a Massachusetts landfill shall comply with MassDEP COMM-97-001 *"Reuse and Disposal of Contaminated Soil at Massachusetts Landfills"* and the *"Revised Guidelines for Determining Closure Activities at Inactive Unlined Landfill Sites"*.

Hazardous Waste

If any hazardous waste, including waste oil and soil and debris is generated or discovered anywhere at the site, the proponent must ensure that such generation and disposal is properly registered with the Department and managed in accordance with 310 CMR 30.0000.

Bureau of Waste Site Cleanup

Massachusetts Contingency Plan (MCP)

The proponent identified release tracking number (RTN) 1-0021166 with in a 0.5-mile radius of the project area. In addition, there are other RTNs with in the 0.5-mile radius of the project location. If soil/or groundwater contamination is encountered during reconstruction activities, the proponent should retain a Licensed Site Professional (LSP); the MCP details procedures to follow for the parties conducting work. MassDEP staff are available for guidance.

In addition, a spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction activities should be presented to workers at the site and enforced. The plan should include but not be limited to, refueling of machinery, storage of fuels, and potential releases.

IV. Other Comments/Guidance

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,

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Michael Gorski
Regional Director

cc: MEPA File



March 16, 2021

Secretary of Energy and Environmental Affairs Kathleen Theoharides
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office, Eva Murray
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Theoharides:

WalkBoston continues to work in the City of Springfield where we have conducted 14 walk audits to date, nine of them around Springfield elementary schools. Before the COVID 19 pandemic began, WalkBoston was working with the Homer Street School to evaluate the safety and quality of the new walking routes students will take to reach the combined DeBerry-Homer Elementary School between Monroe and Union Streets. It is with this expertise that we submit the following comments on the DeBerry-Homer Elementary School Environmental Notification Form (ENF).

The Pare Corporation Traffic Impact Analysis discusses the proposed vehicular and pedestrian traffic patterns to be implemented with the construction of the new combined elementary school. Our comments are in response to the findings of that analysis.

1. We applaud the idea of converting Monroe Street into a one-way street with vehicular drop off within (or along) the existing right of way. Too many new elementary schools devote much of their site to absorb traffic congestion with long drop off driveways and circles, which increases the total amount of impervious surface and removes the possibility of using the land for playgrounds, passive green space or other pedagogical functions. That said, a wider Monroe Street will invite drivers to speed during times when school is not in session, or when student drop off and pick up are not occurring. The parking queue shown on the proposed vehicular circulation plan is at least 1000' long which effectively widens the street section from an 11-foot travel lane to a 20-foot wide speed zone. Additional traffic calming measures should be considered – such as textured paving or flex posts delineating the pick-up lane, speed tables, and/or additional signage.
2. Given the proposed one-way traffic flow through the site – entrance on Union Street to the parking lot and exit onto Monroe Street – safeguards (such as a staff member at the driveway entrance) may need to be put in place to discourage drivers traveling westbound on Union Street from cutting through the parking lot to drop off their students either in the parking lot or cut into the queue on Monroe Street. Drivers accustomed to two-way traffic on Monroe may see this as the fastest way to drive their student to the front door.
3. The increase in vehicular traffic causes many of the traffic signals around the school site to fail Level of Service (LOS) standards. The proposed mitigation at the State St/Catharine St/Eastern Ave/Wilbraham Road intersection is to adjust the signal phasing to include a longer green phase. While this may improve vehicular circulation, this will most likely extend the pedestrian wait time. Every effort should be made to reduce wait times to

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improve compliance with the WALK signal. Research has shown that pedestrian compliance rates drop significantly if wait times exceed 60 seconds.

4. Additional midblock crossings are needed on Union Street. The pedestrian circulation diagram shows no midblock crossings between Eastern Avenue and Hancock Street (approximately 1,400 feet or ¼ mile). Students walking from the neighborhood to the south or from west of the school site along Union Street will not walk to the Union Street/Eastern Avenue intersection only to double back to reach the school building entrance. Midblock crossing locations with appropriate pedestrian hybrid beacons, signage and crosswalk markings should be identified based on student travel patterns and desire lines.
5. The pedestrian circulation diagram indicates that bicyclists are expected to ride on the sidewalks to reach the school. While no sidewalk dimensions are provided, mixing cyclists and walkers on sidewalks is not a preferred option. Given the generous width of the existing travel lanes on Monroe Street and Union Street, the option of including bike lanes on these streets is preferable. The City of Springfield is in the process of updating its Complete Streets Prioritization Plan. Every effort should be made to coordinate with the bicycle network planning work already completed and in process when reallocating space on Monroe and Union Streets.

Thank you for the opportunity to submit these comments. Please reach out to us with any questions that may arise from our response.

Sincerely,

A handwritten signature in black ink that reads "Stacey Beuttell". The signature is written in a cursive, flowing style.

Stacey Beuttell
Executive Director