



*The Commonwealth of Massachusetts*  
*Executive Office of Energy and Environmental Affairs*  
*100 Cambridge Street, Suite 900*  
*Boston, MA 02114*

Charles D. Baker  
GOVERNOR

Karyn E. Polito  
LIEUTENANT GOVERNOR

Kathleen A. Theoharides  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1081  
<http://www.mass.gov/eea>

January 22, 2021

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
NOTICE OF PROJECT CHANGE

PROJECT NAME : Access Improvements to Western Avenue - East Phase  
PROJECT MUNICIPALITY : Westfield  
PROJECT WATERSHED : Westfield River  
EEA NUMBER : 15835  
PROJECT PROPONENT : City of Westfield  
DATE NOTICED IN MONITOR : December 23, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I have reviewed the Notice of Project Change (NPC) submitted for this project and hereby determine that it **does not require** an Environmental Impact Report (EIR).

Project Description

The previously reviewed project described the first phase (“Central Phase”) of a two-phase project designed to improve safety, traffic operations and access for pedestrians and bicyclists along Western Avenue by providing a multi-use path, reconstructing sidewalks, and widening intersections. The Central Phase involved the full-depth pavement reconstruction of an approximately 1.4-mile section of Western Avenue from Llewellyn Avenue to Lloyd Hill Road, in addition to reconstruction of the entire length of Lloyds Hill Road (1,400 ft). The project resulted in the following reconstructed roadway cross-sections:

- A 10-foot (ft) wide multi-use path along the north side of Western Avenue;
- An 8- to 9-ft wide multi-use path along the west side of Lloyds Hill Road;
- Relocated midblock crosswalks with textured surfaces, including three crossings with raised medians;
- 10-ft travel lanes and 5-ft wide shoulders on Western Avenue;

- 10-ft travel lanes and 1- to 2-ft wide shoulders on Lloyds Hill Road;
- Exclusive left-turn lanes at:
  - Western Avenue westbound at Laura Drive and the WSU commuter lot entrance
  - Western Avenue westbound at the westernmost entrance to Stanley Park
  - Western Avenue eastbound at the entrance to WSU's Woodward Center
  - Western Avenue eastbound at Lloyds Hill Road
- A new signal with a pedestrian phase at the intersection of Western Avenue at Westwood Drive and the Westfield State University (WSU) Driveway;
- An exclusive right-turn lane at Western Avenue westbound at the entrance to the WSU commuter lot;
- New pavement markings and signage; and,
- New crosswalks and upgraded ramps at signalized intersections.

The Central Phase also included construction of a new stormwater management system, reconstruction of the sanitary sewer main in Western Avenue from Gladwin Drive to Laura Drive and new water service and hydrants along Western Avenue between Loring Lane and Fairview Avenue.

During the review of the Environmental Notification Form (ENF) submitted for the Central Phase, the City of Westfield (City) disclosed that it was planning a second phase (East Phase) of the project. The City anticipated that the combined impacts of the Central and East Phases would not exceed a mandatory EIR review threshold. The Central Phase ENF Certificate required the City to file an NPC for the East Phase when the City was ready to seek funding for its construction.

### Project Change

The NPC described the East Phase of the project, which will extend the pedestrian, bicycle and roadway improvements eastward from the end of the Central Phase along an approximately 4,200-ft (0.8 miles) long section of Western Avenue to its terminus at Court Street and West Silver Street; an approximately 2,100-ft (0.4 miles) long section of Court Street; and an approximately 1,200-ft (0.23 miles) long section of West Silver Street. In addition to the full-depth pavement reconstruction of the roadways, the project includes the following components:

- A 10-ft wide multi-use path along the north sides of Western Avenue and Court Street from Lloyds Hill Road to High Street/Mill Street and on the south side of Court Street between High Street/Mill Street and Holcomb Street;
- A five-ft wide sidewalk along the south sides of Western Avenue and West Silver Street;
- 10-ft travel lanes and five-ft wide shoulders to provide bicycle accommodations in each direction on Western Avenue, Court Street and West Silver Street<sup>1</sup>;
- A 10-ft wide median/left-turn lane on the section of Western Avenue from approximately Granville Road to St. James Avenue;

---

<sup>1</sup> An approximately 200-ft long section of West Silver Street between Western Avenue and Holcomb Park is a one-way street and this section will be reconstructed to include one 10-ft travel lane, a five-ft shoulder and a five-ft wide sidewalk along the southern side of the road.

- A 10-ft wide median/left-turn lane on the section of Court Street from approximately Sterling Street to Mill Street;
- A pedestrian path through Holcomb Park with connections to Court Street and West Silver Street; and
- Crosswalks and ramps at intersections and driveways.

West Silver Street will be widened by up to nine feet within its existing right-of-way (ROW) to add bicycle accommodations. The NPC also noted that the reconstruction of Lloyds Hill Road described in the ENF would be shifted to the East Phase construction period.

### Project Site

The total project area encompasses approximately 30.22 acres, including 13.97 acres in the East Phase. The Central Phase section of Western Avenue passes along the south side of the Westfield State University and to the north of Stanley Park, which is listed in the Massachusetts Historical Commission's (MHC) *Inventory of Historic and Archaeological Assets of the Commonwealth*. Land uses in the East Phase are predominately residential with the exception of Pine Hill Cemetery, which is located north of the intersection of Western Avenue and Court Street. Western Avenue, Court Street and West Silver Street are classified by the Massachusetts Department of Transportation (MassDOT) as urban minor arterials.

The Western Avenue ROW ranges in width from approximately 83 ft to 100 ft and includes two 12-foot travel lanes, 3- to 4-ft wide shoulders and 5- to 6-ft wide sidewalks on both sides. The West Silver Street ROW within the project area is 50 ft wide and generally includes two 11-ft travel lanes and a five-ft wide sidewalk along the south side of the street; a short section of the street at the intersection of Western Avenue and Court Street is one-way only. The Court Street ROW in the project area varies in width between 66 ft to 90 ft and includes two 12-ft travel lanes and a five-ft wide sidewalk along the north side. Holcomb Park is an approximately 0.8-acre triangular-shaped park at the junction of Western Avenue, West Silver Street and Court Street.

### Environmental Impacts and Mitigation

Environmental impacts associated with the project change include increasing impervious area by approximately 0.15 acres and removing 51 public shade trees with a diameter at breast height (dbh) of 14 inches or more. The purpose of the project is to encourage non-vehicular modes of travel by enhancing pedestrian and bicycle accommodations in the project area and improve roadway safety for all users. Measures to avoid, minimize and mitigate damage to the environment include planting 75 trees within the project corridor and construction-period mitigation measures including sedimentation and erosion controls.

### Permitting and Jurisdiction

This project is subject to MEPA review and requires an ENF pursuant to 301 CMR 11.03(6)(b)(1)(b) and 11.03(6)(b)(2)(b) because it requires a State Agency Action and will

involve the widening of an existing roadway by four or more feet for one-half mile or more and will require the cutting of five or more living public shade trees of 14 or more inches dbh.

The Westfield Conservation Commission issued a Negative Determination of Applicability for the project on September 18, 2020 with a finding that no Order of Conditions was required. The project will require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA).

Because the City of Westfield is seeking State Financial Assistance from MassDOT, MEPA jurisdiction is broad and extends to those aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in the MEPA regulations.

### Review of the NPC

The NPC provided a description of existing and proposed conditions, preliminary project plans, and identified measures to avoid, minimize and mitigate project impacts. It identified alternative designs that would include five-ft wide sidewalks on the south side of Court Street and the north side of West Silver Street in addition to the multi-use path and sidewalks proposed in the Preferred Alternative. For the segment adjacent to Holcomb Park, this alternative would provide sidewalks on the northern and southern edges of the park. The City determined that providing paths through the park with connections to both Court Street and West Silver Street would enhance the recreational use of Holcomb Park to a greater degree than sidewalks along its edges. To the east of Holcomb Park, the Court Street ROW narrows to 66 feet; according to the NPC, adding a sidewalk on the south side of the street is infeasible because it would require relocation of utility poles and acquisition of permanent easements to expand the ROW. A sidewalk on the north side of West Silver Street in addition to the sidewalk proposed on the south side is infeasible because it would similarly require the City to obtain permanent easements and would impact additional public shade trees.

The Preferred Alternative includes a 10-ft wide multi-use path on the north side of Western Avenue and Court Street, a five-ft wide sidewalk on the south side of Western Avenue and West Silver Street and pedestrian paths through Holcomb Park. The proposed roadway cross-section includes 10-ft travel lanes and five-ft wide shoulders, which will provide suitable bicycle accommodations. The project will minimize new impervious area and impacts to public shade trees by reducing the width of the existing vehicular travel lanes from 11 or 12 feet to 10 feet so that the project can be constructed mostly within the existing roadway alignment; new impervious area will be limited to approximately 0.15 acres in connection with widening West Silver Street to provide five-ft shoulders for use by bicyclists. The 51 public shade trees to be removed will be replaced by 75 trees, including 18 trees to be planted in Holcomb Park, 40 trees along Western Avenue and Court Street and 12 trees on Lloyds Hill Road.

### *Construction Period*

The City should consult the comment letter submitted by the Massachusetts Department of Environmental Protection (MassDEP) regarding regulatory standards applicable to the project. All construction 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 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). Consistent with the GreenDOT policy directive, MassDOT requires that contractors install emission control devices in all off-road vehicles. MassDOT's Revised Diesel Retrofit Specification also requires that emissions control standards must be met or technology must be used for non-road, diesel-powered construction equipment in excess of 50 horsepower. Contractors will be instructed to limit engine idling and use ultra-low sulfur diesel fuel. 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

Based on a review of the NPC and comments received, and in consultation with State Agencies, I have determined that the NPC has sufficiently defined the nature and general elements of the project for the purposes of MEPA review and demonstrated that the project's environmental impacts will be avoided, minimized and/or mitigated to the extent practicable.



January 22, 2021

Date

\_\_\_\_\_  
Kathleen A. Theoharides

### Comments received:

01/08/2021     Massachusetts Department of Environmental Protection (MassDEP) – Western Regional Office (WERO)

KAT/AJS/ajs



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

January 8, 2021

Kathleen A. Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
Massachusetts Environmental Policy Act Office  
Alex Strysky, EEA No. 15835  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114-2524

Re: Access Improvements to Western Ave-  
Central and East Phases, Westfield- NPC

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Notice of Project Change (NPC) submitted for the proposed roadway improvements at Western Avenue, in Westfield, Massachusetts (EEA #15835). An ENF was submitted in Spring 2018 for Phase 1 of this project and MassDEP issued a comment letter dated April 9, 2018. Partial funding will be provided by the Massachusetts Department of Transportation.

The applicable MassDEP regulatory and permitting considerations regarding air pollution, solid waste, hazardous waste and waste site cleanup are discussed.

### **I. Project Description**

The project Proponent, the City of Westfield, is proposing incorporating the East Phase (Phase 2) of the project as a continuation of the Central Phase (Phase 1) under a single ENF. The East Phase involves the reconstruction of the Western Avenue and Court Street corridor in Westfield. The project begins on Western Avenue at the intersection with Llewellyn Drive and extends easterly through the Westfield State University campus area and continues to the intersection with Lloyds Hill Road for a total length of 1.4 miles, ending approximately 175 feet east of Fairview Avenue.

The project involves intersection reconstruction and widening, roadway widening, installing center turning lanes, sidewalk construction and reconstruction, replacement of some utilities and drainage system improvements. A multiuse path will likely be constructed as part of this project.

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

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

Printed on Recycled Paper

Environmental Impacts associated with this project include:

Total project size: 30.22 acres

Acres of land altered – 26.5

Acres new impervious area – 1.95

14,500 vehicle trips per day

## **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 construction and demolition activity must conform to current Air Pollution Control Regulations. The proponent should implement measures to abate asbestos containing materials and alleviate dust, noise, and odor nuisance conditions that may occur during the construction and demolition activities. Such measures must comply with the MassDEP's Bureau of Air and Waste (BAW) Regulations 310 CMR 7.01, 7.09, 7.10 and 7.15.

#### 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 this proposed project pursuant to 310 CMR 16.00 and 310 CMR 19.000, including the regulations at 310 CMR 19.017 (waste ban).

Asphalt, brick and concrete (ABC) generated through crushing and reuse on-site must be handled in accordance with regulation and policy. More information regarding the handling of ABC, and a copy of the 30-day notification form may be found at the following website:

<http://www.mass.gov/eea/agencies/massdep/recycle/reduce/using-or-processing-asphalt-pavement-brick-and-concrete-.html>.

The project proponent should be advised that construction activity at the site must comply with both Solid Waste and Air Quality Control regulations. The appropriate Solid Waste provisions addressing this include M.G.L. Chapter 40, Section 54.

#### Solid and Hazardous Waste Management (Contaminated Soils)

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 and disposal as a hazardous or solid waste, then the disposition of the soils 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 soils 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

Any hazardous wastes exposed during the excavation activities or universal wastes such as mercury containing lamps or mercury thermostats, or lead-based paint from street markings, etc., must be properly managed in accordance with 310 CMR 30.0000.

If any hazardous waste, including waste oil, is generated at any of the sites the proponent must ensure that such generation 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 has identified release sites in the proposed work area with release tracking numbers (RTNs) within the project area. In addition, there are several sites within a 0.5-mile radius from the project site. If soil and/or groundwater contamination is encountered during excavation 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.

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**

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