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June 22, 2018

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

PROJECT NAME : Del Webb Chauncy Lake
PROJECT MUNICIPALITY : Westborough
PROJECT WATERSHED : Sudbury-Assabet-Concord
EEA NUMBER : 15864
PROJECT PROPONENT : Pulte Homes of New England, Inc
DATE NOTICED IN MONITOR : May 23, 2018

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** the preparation of an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project consists of the construction of 700 housing units in 14 buildings, including seventy affordable units (five per building). The project includes 1,277 parking spaces, driveways, a stormwater management system, water and sewer systems, a clubhouse and other recreational facilities for residents. Parking will be located on the ground level below each building (700 spaces, 50 per building) and in surface lots (577 spaces). The project will include the demolition of vacant buildings associated with the former Westborough State Hospital, including abatement of asbestos and any other hazardous materials.

Project Site

The 36.8-acre project site is part of a 95-acre property purchased by the Town of Westborough from the Department of Capital Asset Management and Maintenance (DCAMM) in 2014. The Town

convened a State Hospital Reuse Committee that recommended that portions of the site be reserved for recreational and conservation purposes and that a portion of the site be developed for either residential or commercial uses. The Town extended its Senior Living Overlay Zone to include the parcel and issued a Request for Proposals (RFP) for the purchase and development of the 36.8-acre portion of the site. The Town has established recreational uses on the remaining 58.2 acres of land adjacent to Chauncy Lake.

The project site is bordered to the north by undeveloped land in Northborough, to the east by Lyman Street, to the southeast by facilities managed by the Department of Youth Services (DYS), to the southwest by the aforementioned recreational area and Chauncy Lake and to the west by undeveloped land and Allen Hall, a juvenile detention facility. It is located more than 100 feet north of a Zone II groundwater supply protection zone associated with the Town of Westborough's water supply. Parts of the site are adjacent to groundwater protection areas designated by the Town of Northborough. The site is located beyond the 100-foot Buffer Zone of wetlands associated with Chauncy Lake.

The site includes 46 vacant buildings associated with the former Westborough State Hospital, which closed in 2010. The site is listed in the State and National Registers of Historic Places as part of the Westborough State Hospital District. The ENF included a copy of a Memorandum of Agreement (MOA) among DCAMM, the Massachusetts Historical Commission (MHC) and the Town of Westborough regarding the redevelopment of the site. In the event that historical preservation was not proposed in response to the RFP, the MOA specified measures for the photographic recordation and documentation of the site prior to demolition. In 2017, the Westborough Historical Commission issued a demolition permit and waived the demolition delay.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include alteration of 36.1 acres of land, generation of 2,788 new average daily trips (adt), creation of 862 new parking spaces, and use and generation of approximately 94,000 gallons per day (gpd) of water and wastewater, respectively. Measures to avoid, minimize, and mitigate impacts include reducing impervious area by 1.25 acres, constructing a new stormwater management system and providing open space and recreational facilities.

Permitting and Jurisdiction

The project is undergoing MEPA review and requires preparation of an ENF because it required a State Agency Action and meets or exceeds the following thresholds: 310 CMR 11.03(1)(b)(1), Direct alteration of 25 or more acres of land; 301 CMR 11.03(6)(b)(13), Generation of 2,000 or more adt on roadways providing access to a single location; and 301 CMR 11.03(6)(b)(14), Generation of 1,000 or more adt on roadways providing access to a single location and construction of 150 or more new parking spaces at a single location. The project includes a Land Transfer from DCAMM. It may require a Beneficial Use Determination (BUD) from the Massachusetts Department of Environmental Protection (MassDEP). It will require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA).

The site was transferred by the Commonwealth to the Town of Westborough in 2014. In accordance with an agreement between DCAMM and the Town, MEPA review is required for any

project at the site that exceeds a MEPA threshold that is proposed within 5 years of the Land Transfer. Because the project involves a Land Transfer, MEPA jurisdiction is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment, as that term is defined in the MEPA regulations

Review of the ENF

The ENF provided a description of the project, preliminary project plans, and an analysis of alternatives. It identified measures to avoid, minimize and mitigate environmental impacts. It included a transportation analysis and provided a copy of the Technical Assistance Panel Report prepared in 2014 by the Urban Land Institute that reviewed potential uses and for the site.

Alternatives Analysis

During the review period, the Proponent provided a supplemental alternatives analysis describing a No Build option and three alternatives received by the Town in response to its RFP, including a Photography Studio, Mixed Use Development and Independent Senior Residences (the Preferred Alternative). The No Build alternative would leave the site and buildings as they are, with the potential rehabilitation and reuse of some of the historic buildings. According to the ENF, this alternative is not feasible because of the poor condition of the buildings and hazardous materials at the site.

The Photography Studio alternative would include the renovation of one of the buildings (the laundry building) and 1.9 acres of surrounding land to accommodate the expanded operations of an existing studio in Northborough. The remaining 34.9 acres would remain under the Town's ownership and control until other uses were found. This alternative would involve limited new impacts to the site, but it was determined to be infeasible because it would underutilize the site and not address the need to demolish or renovate the other buildings. The Mixed Use Development would redevelop the 36.8-acre site with a 125-room hotel, a 600-seat conference center, 44,000 sf of retail, 300 housing units, 235,000 sf of office space and a 110,000-sf building for indoor kart racing. This alternative would rehabilitate five buildings and construct new buildings to accommodate the proposed uses. According to the ENF, this alternative would directly alter 29.7 acres, increase impervious area by 6.1 acres, generate 7,934 adt, require 1,085 new parking spaces, use 98,000 gpd of water and generate 98,000 gpd of wastewater. This alternative was not selected because the area may not have sufficient demand for the amount of proposed office space and the hotel use could be incompatible with the adjacent juvenile detention facility. This alternative would have greater impacts with respect to impervious area, trip generation, water demand and wastewater generation.

The Preferred Alternative is consistent with the Town goal to increase senior housing. It will provide 700 Independent Senior housing units, including 70 affordable units. It will include 862 new parking spaces of which 700 will be provided within the footprint of the residential buildings, resulting in a decrease of 1.25 acres of impervious area compared to existing conditions. The Preferred Alternative involves the demolition of all buildings and removal of all hazardous materials. It will generate fewer adt than the Mixed Use Development alternative and most of the trips are expected to occur outside of peak travel times.

Traffic and Transportation

The ENF included a TIA prepared in conformance with the MassDOT/EEA *Transportation Impact Assessment Guidelines*. The project site does not directly abut a State Highway and the project will not require a Highway Access Permit from the Massachusetts Department of Transportation (MassDOT). Route 9 is located approximately one mile south of the site. The regional highway system can be accessed via ramps to and from Interstate-495 (I-495) approximately two miles east of the intersection of Lyman Street and Route 9.

During the review period, the Proponent provided revised trip generation estimates based on trip rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Handbook, 10th Edition*; the trip generation estimate provided in the ENF was based on the 9th edition of the ITE manual. The project will generate 2,788 adt using ITE land use code (LUC) 252 (Senior Adult Housing-Attached). Of those trips, 140 would occur in the morning peak hour and 170 trips would occur in the evening peak hour. The revised trip generation estimate is higher than that listed in the ENF. The Proponent did not revise the transportation analysis because the number of peak hour trips did not change.

The TIA analyzed existing and proposed transportation facilities, roadway conditions and traffic operations within a transportation study area comprising the following intersections:

- Route 9 at Lyman Street;
- Lyman Street at Chauncy Street;
- Lyman Street at Fuller Way (Hospital Road);
- Lyman Street at Haskell Street;
- Lyman Street at Proposed site driveway; and,
- Lyman Street at Bartlett Street.

According to the TIA, sidewalks are present only along the west side of Lyman Street south of Fuller Way; no bicycle facilities were identified in the study area. The only public transportation service is provided by the Westborough Shuttle operated by the Worcester Regional Transit Authority (WRTA). The shuttle operates between the Massachusetts Bay Transportation Authority's (MBTA) Westborough Commuter Rail station and office parks located near the Route 9/I-495 intersection. The shuttle features flexible routing ("flex") which allows the bus to deviate from its designated route by up to ¾ mile to pick up passengers upon request on the day prior to the requested service.

Only the intersection of Route 9 at Lyman Street is signalized. The intersection was listed as a Highway Safety Improvement Program (HSIP) crash cluster and MassDOT is implementing roadway safety improvements based on a Roadway Safety Audit completed in 2012. All of the other intersections have crash rates below the MassDOT District 3 average. According to the TIA, the proposed site driveway will have adequate site lines for both left and right turns based on the standards of the American Association of State Highway and Transportation Officials (AASHTO).

The TIA reviewed traffic operations under Existing (2017), 2024 No Build, and 2024 Build scenarios at the study area intersections. The 2024 No Build and 2024 Build scenarios were modelled based on plans by MassDOT to improve Route 9, including the intersection of Route 9 at Lyman Street,

with traffic signal changes, widening of intersection approaches, traffic markings and bicycle and pedestrian facilities. Future conditions include a background growth rate of 0.5 percent compounded on an annual basis (3.6 percent increase over the 7-year planning horizon).

The TIA provided an intersection capacity analysis that documented vehicle to capacity (v/c) ratios, delays and levels of service (LOS) for each intersection under Existing, No Build 2024 and Build 2024 conditions. The LOS reflects the overall peak period operations of an intersection, including traffic speed, delay, and capacity; LOS D would reflect an acceptable level of operations. Under existing conditions, the intersection of Route 9 at Lyman Street operates at LOS F in the morning and evening peak hours, indicating long delays and congestion. According to the TIA, traffic operations at the intersection will improve slightly to LOS E in the morning peak period and remain at LOS F in the evening peak period under both 2024 No Build and 2024 Build conditions. The following unsignalized intersections will also experience degraded conditions under both No Build 2024 and Build 2024 conditions compared to Existing conditions:

- Northbound turns at the intersection of Lyman Street at Bartlett Street will degrade from LOS D to LOS E in the morning peak period; and
- Westbound turns at the intersection of Lyman Street at Haskell Street will degrade from LOS E to LOS F in the evening peak period.

Impacts to operations at the three intersections noted above will occur under No Build 2024 conditions, indicating that project-related traffic is not expected to have significant impacts during peak periods. All other intersections will operate at LOS D or better under Build 2024 conditions. The TIA did not identify any necessary traffic mitigation, but recommended that a sidewalk be provided along Fuller Way to provide a pedestrian connection to the sidewalks along Lyman Street south of the site. The Proponent may also provide a connection from the site to proposed paths east of Lyman Street. Commenters noted the lack of adequate bicycle and pedestrian facilities along Lyman Street and highlighted the need for a crosswalk at Haskell Street. I encourage the Proponent to work with the Town to improve bicycle and pedestrian facilities and other opportunities for promoting the use of alternate modes of transportation by future residents. The Proponent should provide an informational packet to future residents that identifies bicycle and pedestrian facilities and shuttle bus routes, including the Westborough flex service.

Water Quality

The site includes a stormwater management system that provides little treatment of runoff prior to discharge. The project will reduce impervious area by approximately 1.25 acres. It includes the construction of a new stormwater management system that has been designed to meet MassDEP's Stormwater Management Standards (SMS), including additional requirements for land uses with higher pollutant potential pollutants loads (LUHPPL). The stormwater management system will remove 80 percent of Total Suspended Solids (TSS) from stormwater, maintain or reduce pre-development peak discharge rates and volumes and recharge groundwater. The system will include the use of Best Management Practices (BMPs) such as deep sump catch basins, water quality treatment units, three infiltration basins and three subsurface infiltration systems.

The site is not within mapped Zone II or Interim Wellhead Protection Area public water supply groundwater sources. The Town of Northborough has designated additional wellhead protection areas that may abut the site; in these areas, the Town generally requires that neither impervious area nor post-development discharge volumes may increase by more than 15 percent over pre-development conditions. As described in the ENF, it appears that the project will meet these standards by reducing impervious area and constructing BMPs. I encourage the Proponent to consult with the Town of Northborough on the final design of the stormwater management system. Comments from MassDEP indicate that these measures may also contribute to mitigation that may be required when the Town seeks a renewal of its Water Management Act (WMA) permit for groundwater withdrawals.

Construction

The project must comply with MassDEP Solid Waste and Air Pollution Control regulations, pursuant to M.G.L. c.40, s.54 during construction and demolition (C&D). All C&D activities should be undertaken in compliance with the conditions of all State and local permits. I refer the Proponent to the comments from MassDEP regarding building demolition and solid waste management, including the management of asbestos containing material (ACM), asphalt, brick, and concrete (ABC) and contaminated soil. The on-site reuse of brick and concrete demolition materials will require a BUD permit from MassDEP. I encourage the Proponent to set an aggressive goal for recycling construction waste. According to MassDEP, there has been a report of lead in the soil at the site. The Proponent should ensure that soils are properly handled during the construction period. The Proponent is advised that if oil and/or hazardous material are identified during the construction of this project, notification pursuant to the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) must be made to MassDEP.

The project will require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES CGP to control erosion and sedimentation during the construction period. The Proponent should adopt measures to avoid, minimize and mitigate construction period impacts (including but not limited to, land disturbance, noise, dust, odor, nuisance, vehicle emissions and construction and demolition debris). The Proponent should specify truck routes to minimize impacts to residential areas from construction-related traffic.

I encourage the Proponent to 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). The Proponent should ensure compliance with the Massachusetts Idling Regulations including signage limiting idling to less than five minutes.

Greenhouse Gas Emissions (GHG)

I encourage the Proponent to voluntarily incorporate energy-efficient features into the design of the residential buildings. Passive house design, including high-performing building envelopes, would reduce energy use and greenhouse gas (GHG) emissions, while reducing utility costs for residents of the units. Two Passive house methods are recognized by the Massachusetts State Building Code as alternative compliance methods: Passive House Institute US (PHIUS) and Passive House Institute (PHI). Passive house buildings use about 70 percent less energy than code construction, but do not necessarily cost

more as investment in the envelope can be bought down by reduction and elimination of some HVAC systems. In addition, Passive house buildings usually use heat pump heating and cooling, which may be eligible for credits and incentives from Mass Clean Energy Center (MCEC)¹ or eligible for Alternative Energy Credits which can be sold.² Passive house buildings also qualify for incentives from utilities.

The Proponent should consider taking advantage of a new feature of the Commonwealth's solar PV SMART plan that allows building owners to receive financial incentives by providing solar production directly to the utility, without requiring the participation of tenants as offtakers. For more information, please consult the Massachusetts Department of Energy Resources' (DOER) web site at <https://www.mass.gov/service-details/development-of-the-solar-massachusetts-renewable-target-smart-program>. I also encourage the Proponent to pursue the following:

- Massachusetts Clean Energy Center rebates for variable refrigerant flow systems, and solar thermal.
- MassSave utilities for rebates and incentives on energy efficiency equipment and for performance-based incentives.³
- Credits associated with the Alternative Energy Portfolio Standards for solar thermal systems and combined heat and power.

Conclusion

The ENF 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. Based on review of the ENF and comments received, and in consultation with State Agencies, I have determined that no further MEPA review is required.

June 22, 2018

Date



Matthew A. Beaton

Comments received:

06/01/2018	Andrew Koenigsberg
06/09/2018	Karen Yeowell
06/11/2018	Town of Northborough Public Works Department
06/13/2018	Massachusetts Department of Environmental Protection (MassDEP)- Central Regional Office (CERO)

¹ <http://www.masscec.com/residential/clean-heating-and-coolingaddition>,

² <https://www.mass.gov/service-details/statutes-regulations-and-guidelines>

³ <https://www.masssave.com/>

MAB/AJS/ajs

Strysky, Alexander (EEA)

From: Andrew Koenigsberg <amk32@cornell.edu>
Sent: Friday, June 01, 2018 3:29 PM
To: Strysky, Alexander (EEA)
Cc: Bruce Tretter; Don Burn; Jim Robbins; Jim Malloy; Mark Silverberg
Subject: MEPA Comments on 15864 Del Webb Chauncy Lake

Following up on the verbal comments I made today at the site visit:

Although the traffic study indicates insignificant impacts to traffic in the area, I disagree with this assessment, based both on my extensive experience driving and bike riding on Lyman Street and discussions with other residents in the area.

In addition to adding sidewalks from the development to connect to new/existing sidewalks further south, we need to make Lyman Street is safer for bicyclists who use this street. The shoulders at this time are insufficient for riders to safely avoid traffic. This project is a prime opportunity to improve the shoulders from the Westborough/Northborough line down to Route 9, to make them safer for cyclists. The project owner says he has talked with the Westborough Bicycle Pedestrian Advisory Committee about connecting the development to proposed bicycle paths across the street from the project. That is all well and good, but what about the rest of the Westborough residents who will not live at the development? Don't they deserve access to these amenities as well? Don't they deserve safe street access to these new paths?

If the plan is to extend sidewalks from the new development down to Route 9, then adding a marked cross walk at the Haskell Street intersection is an important mitigation. Cars move very fast down Lyman Street and a cross walk with the flashing warning signals that have been put into use elsewhere in town will make such a crossing much safer.

--

Andrew Koenigsberg
3 Smith Street
Westborough, MA 01581

"Always do right. This will gratify some people and astonish the rest." - Mark Twain

Strysky, Alexander (EEA)

From: Karen Yeowell <karen@mkoconnell.com>
Sent: Saturday, June 09, 2018 9:36 AM
To: Strysky, Alexander (EEA)
Subject: proposed development at the Westborough State Hospital

Dear Sir,

I was told that you were accepting public comments on the proposed development at the Westborough State Hospital.

I have 2 concerns as a Westborough resident:

1. Open space should be preserved and being able to safely walk all the way around Lake Chauncy would be great for everyone – so the trail around the lake should be preserved, and then a sidewalk added to the part that goes along the road past the swimming area.
2. Traffic – already, one regularly has to wait through 3-4 cycles of the light to cross Rt 9 while on Lyman St. There need to be extensive bike lanes and sidewalks put in along Lyman, Oak St, and Milk St and Rt 30 so that residents from North of rt 9 can safely walk/bike to/from town instead of using a car. And there needs to be a good way for non-motorized folks to get across rt 9. Simply adding more residents north of rt 9 without addressing this issue would be irresponsible.

Thank you,
Karen Yeowell
68 South St
Westborough, MA 01581
508-329-1200

PUBLIC WORKS DEPARTMENT

Water, Wastewater, Highway, Cemetery & Tree Divisions
Scott D. Charpentier, P.E., Director



TOWN OF NORTHBOROUGH

63 MAIN STREET
NORTHBOROUGH, MA 01532
T: (508) 393-5030
F: (508) 393-6996

June 11, 2018

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office - Alex Stryisky
100 Cambridge Street, Suite 900
Boston, MA 02114

**Re: Town of Northborough Comments
Del Webb Chauncy Lake – EEA#15864**

Dear Mr. Stryisky:

The Town of Northborough received notice of the Environmental Notification Form for the Del Webb Chauncy Lake project located at the site of the old Westborough State Hospital in Westborough Massachusetts. We attended the site visit on June 1, 2018 and heard the details of the project. Northborough Public Works, Engineering, and Planning Departments offer the following comments to MEPA for consideration:

1. Our concern is that the heavy construction vehicle traffic exiting the site will seek a route along Lyman Street through Northborough to access Route 495. The more appropriate route to 495 for construction vehicles would be the short distance along Lyman Street in Westborough to the recently reconfigured Route 9 intersection, thence east to 495. Mapping shows that this route is over a mile shorter and utilizes wider travel lanes.
2. The Town of Northborough has a Groundwater Overlay map for wellhead protection (see attached map excerpt) which indicates some of the land in the Westborough State Hospital Campus may fall with our Groundwater Areas 2 and 3 (Our Area 2 is defined similar to the Massachusetts DEP Zone 3). While residential development of single family dwellings is allowed by right in both Areas 2 and 3, there are some restriction, which are:

Area 2: Residential development of single-family dwellings on lots of at least forty thousand (40,000) square feet in area, such that the increase in post-development net runoff volume shall not exceed existing conditions by more than fifteen percent (15%) or such that the impervious cover of the building lot is increased over existing conditions by no more than fifteen percent (15%), such determination to be made by the Building Department in conjunction with the Town Engineer.

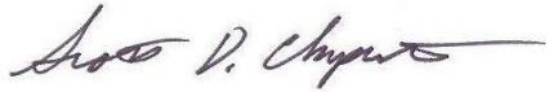
Area 3: Residential development of single-family dwellings as allowed in the underlying district, such that the increase in post-development net runoff volume shall not exceed existing conditions by more than fifteen percent (15%) or such that the impervious cover of the building lot is increased over existing conditions by no more than fifteen percent (15%), such determination to be made by the Building Department in conjunction with the Town Engineer.

Town of Northborough Comments
Del Webb Chauncy Lake – EEA#15864
June 11, 2018

While the Town of Northborough understands we cannot regulate work outside our Town limits, we would however request any development on the Westborough State Hospital Campus follow the above stated limits on impervious cover and if these limits cannot be met that recharge of the excess impervious cover be provided in accordance with State Stormwater Management Regulations.

We thank you in advance for your consideration.

Regards,
NORTHBOROUGH PUBLIC WORKS DEPARTMENT

A handwritten signature in black ink, appearing to read "Scott D. Charpentier". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott D. Charpentier, P.E., Director

Attachment
Copy: File

Westborough State Hospital Land



Property Information

Property ID 066.0-0010-0000.0
Location 1 LYMAN STREET
Owner GOW IAN






**MAP FOR REFERENCE ONLY
NOT A LEGAL DOCUMENT**

Town of Northborough, MA makes no claims and no warranties, expressed or implied, concerning the validity or accuracy of the GIS data presented on this map.

Map Theme Legends

Ground Water Overlay Districts

-  Area 1
-  Area 2
-  Area 3



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

June 13, 2018

Secretary Matthew A. Beaton
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Attention: MEPA Unit – Alex Strycky

Re: Environmental Notification Form (ENF)
Del Webb Chauncy Lake
Westborough
EEA #15864

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the ENF for the Del Webb Chauncy Lake Project (the "Project") in Westborough. The Project is proposed by Pulte Homes of New England, LLC (the "Proponent").

The Project is for the construction of 700 Independent Senior housing units totaling 1,342,000 gross square feet (sf) on the site of the former Westborough State Hospital (the "Property"). The Project includes the demolition of the existing buildings, construction of 14 buildings with 50 units each, 700 garage parking spaces, 577 surface parking spaces, utilities, a stormwater management system, landscaping, lighting and recreational facilities. The Project will include 70 affordable units. It will generate 2,108 average daily trips (adt), use 94,000 gallons per day (gpd) of water and generate 94,000 gpd of wastewater. The Project will alter 36.1 acres of land and reduce the impervious area from 17.4 acres to 16.15 acres.

This Project is under MEPA review because it meets or exceeds the following review thresholds:

- 11.03(1)(b)(1) - direct alteration of 25 acres of land;
- 11.03(6)(b)(13) - generation of 2,000 or more adt on roadways providing access to a single location; and
- 11.03(6)(b)(14) - generation of 1,000 or more adt on roadways providing access to a single location and construction of 150 or more new parking spaces at a single location

The Project requires MEPA review pursuant to a “MEPA Agreement” dated November 13, 2014.

- The site was the subject of a land transfer from the Commonwealth to the Town of Westborough in 2014, and under the MEPA Agreement, any work or activities on the land exceeding a MEPA review threshold must undergo MEPA review.

MassDEP offers the following comments on the Project:

Solid Waste

The Project will involve the razing of the existing buildings, parking, and utility infrastructure of the former Westborough State Hospital for the development of 700 new Independent Senior housing units. The Proponent indicates in the ENF that the Project will generate solid waste demolition materials, such as asphalt, brick, concrete and metal during demolition or construction that will be recycled in accordance with MassDEP requirements. The demolition material should be reused or recycled to the extent feasible and managed in accordance with all other applicable local, state and / or federal requirements.

Unpainted brick and concrete materials generated from demolition and to be crushed / processed and re-used on-site is subject to a MassDEP Asphalt, Brick & Concrete Recycling Notification Form or should be transported to a licensed recycling Facility in accordance with the Massachusetts Solid Waste Management Regulations. The Proponent checked off “No” to ENF Question I.B (“Does the Project require any state permits related to solid and hazardous waste”). However, on page 10 of the ENF, the Proponent correctly states that painted /coated brick and concrete materials generated from demolition for reuse at the site will be subject to a Beneficial Use Determination (BUD) Permit from MassDEP in accordance with the Massachusetts Solid Waste Management Regulations.

The Proponent did not respond to ENF Question II C “If the project will generate solid waste (for example, during demolition or construction), however, the Proponent indicated in the ENF that the Project will generate solid waste demolition materials, such as asphalt, brick, concrete and metal during demolition or construction. Additionally, the Proponent did not answer ENF Question II D “If the Project involves demolition, do any buildings to be demolished contain asbestos”. In the Building Abatement Section of the ENF, the Proponent indicates that many of the buildings contain asbestos and will require significant abatement.

The Department encourages the reuse/recycling of construction and demolition materials. This type of waste diversion is important to conserve the state’s declining supply of landfill space if accomplished in an environmentally sound manner.

Asbestos

The ENF indicates in the Building Abatement Section (Page 7) that many of the buildings contain asbestos and will require significant abatement. This statement should be verified by an asbestos survey of each building. 310 CMR 7.15 requires that an asbestos survey be conducted by a Massachusetts Department of Labor Standards licensed Asbestos Inspector prior to any demolition or renovation. Therefore each building that will be demolished will need to have such a survey done prior to demolition.

Additionally, stated in the Building Abatement section of the ENF, the buildings have been vacant for several years and are in poor condition. The Proponent should determine if the buildings are structurally unsound and asbestos abatement cannot be conducted in accordance with the work procedures

required by 310 CMR 7.15, then Non-Traditional Asbestos Abatement Applications and Work Plans would need to be written by a Massachusetts Department of Labor Standards licensed Asbestos Project Designer and submitted to MassDEP for approval for each building where non-traditional abatement is needed.

Bureau of Waste Site Clean Up

There was one reported release of petroleum at the Property (RTN 2-13490). Two gasoline USTs were removed in September 2000 and 155 tons of petroleum contaminated soil was excavated and disposed off-site. A Permanent Solution was submitted under the Massachusetts Contingency Plan (MCP) in June 2006.

A Notice of Responsibility was sent to the Massachusetts Department of Mental Health in January 2008 for the reported detection of lead in soil (RTN 2-16896). The Massachusetts Department of Mental Health has not conducted response actions for this release and it is considered category Tier ID. There is no site plan in the file to indicate where the lead is located in relation to the proposed redevelopment Project. The Proponent should note that there is lead contamination somewhere on the property and that precautions should be made while handling and moving soil during construction if these areas are encountered.

All soil was remediated to meet residential standards and groundwater results were below applicable clean-up standards because concentrations of petroleum in soil were not reduced to background conditions, a Licensed Site Professional (LSP) should be involved if soil within the disposal site is removed from the Property, to ensure that provisions of the Similar Soils Policy (WSC-13-500, September 4, 2014) at the receiving location are complied with.

Water Supply

The Proponent estimates 94,000 gpd of drinking water use for the Project based on the Title 5 design flow for 322 one-bedroom elderly housing units, 378 two-bedroom elderly housing units, and additional flow for the clubhouse. The Town of Westborough is authorized through MassDEP's Water Management Program to withdraw a maximum of 3.10 million gallons of water per day (MGD). Actual withdrawals from 2013 through 2017 ranged from 2.03 to 2.2 MGD. The Water Management Act (WMA) regulations require mitigation of withdrawals over a baseline volume. The baseline volume for Westborough is 2.30 MGD. When the renewed WMA permit is issued to Westborough, an approved mitigation plan is required to be in place prior to withdrawing more than the baseline volume.

The ENF describes some activities that may be suitable mitigation projects for the WMA program. Examples are storm water improvements that exceed regulatory standards and the removal of impervious surfaces. The Proponent should work with Westborough to record details of any potential mitigation work performed at the site for future submittal to MassDEP for consideration as mitigation. The ENF does not discuss if irrigation is desired for the Project. Ornamental shrubs and grasses should be drought tolerant and irrigation minimized if used at all. The Proponent should consider the capture and reuse of storm water for irrigation if needed.

Wastewater

The Project will generate 94,000 gpd of sanitary sewage. The sewage will be conveyed through a new sewer collection system at the Site, which will connect into existing municipally owned sewers along Fuller Way and an existing cross country sewer line located to the west of the Site.

Due to revisions to the sewer extension regulations at 314 CMR 7.00 a sewer connection or sewer extension permit from MassDEP is not required provided the Proponent designs the sewers in accordance with TR-16 and applicable Department policies and the sewer extension has been permitted by the local sewer authority (see 314 CMR 7.05(1)).

The Proponent should investigate the condition of the existing sewer line along Fuller Way and the cross country line west of the Site to verify its condition. The Proponent should closely examine whether these existing lines are experiencing any measurable infiltration and inflow (I/I) and address it accordingly with the sewer authority.

MassDEP appreciates the opportunity to comment on the Project. If you have any questions regarding these comments, please do not hesitate to contact Stella Tamul, Central Regional Office MEPA Coordinator, at (508) 767-2763.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Mary Jude Pigsley".

Mary Jude Pigsley
Regional Director

cc: Commissioner's Office, MassDEP