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January 11, 2019

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

PROJECT NAME : Westfield Turnpike Industrial Park  
PROJECT MUNICIPALITY : Westfield  
PROJECT WATERSHED : Westfield River  
EEA NUMBER : 15845  
PROJECT PROPONENT : City of Westfield  
DATE NOTICED IN MONITOR : November 7, 2018

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Draft Environmental Impact Report (DEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations. The Proponent may prepare and submit for review a Final Environmental Impact Report (FEIR).

Project Description

As described in the DEIR, the project consists of a multi-use development totaling 988,000 gross square feet (sf), including 105,000 sf of office space, 550,000 sf of warehouse and distribution space, 211,000 sf of light industrial/manufacturing space and 122,000 sf of light industrial/research and development (R&D) space ("Flex Tech"). The project includes the construction of 1,458 parking spaces, a stormwater management system, infrastructure for water, wastewater and other utilities, and driveways to provide access from Cabot Road and Turnpike Industrial Road. An existing rail spur serving businesses southeast of the site may be extended to the site if a future tenant desires rail access.

According to the DEIR, the buildings can be constructed simultaneously or in phases over a period of eight to ten years. Development is likely to occur first at the southern end of the site with the extension of infrastructure, including water and sewer mains, from Turnpike Industrial Road. The City of Westfield (City) anticipates that the mix of uses, project configuration, and building dimensions may change in response to market demand. The DEIR indicates the project will be constructed within the limits described in the DEIR.

### Project Site

The project site is comprised of seven parcels with a combined area of 74.88 acres. Four parcels comprising 68 acres are owned by the City; three parcels (approximately 8 acres) are owned by the Massachusetts Economic Development and Finance Agency (MassDevelopment) and will be conveyed to the City prior to construction. The site is wooded except for an approximately 1,275-sf house on Cabot Road and an approximately 10.5-acre cleared field in its northwest corner that is in agricultural use. The site is bordered by the Massachusetts Turnpike (MassPike)/Interstate-90 (I-90) to the south, an industrial park to the southeast, Sabrina Brook Lane to the east, Cabot Road to the north and cleared fields to the west. Apart from the industrial park, the area surrounding the site is generally comprised of low-density residential neighborhoods, farmland and undeveloped land.

A proposal by the City to construct a solid waste management facility at the site was reviewed by MEPA in the early 1990s (EEA# 8518). Water and sewer service was extended to the south side of the site in connection with the proposal. The facility was not constructed because a moratorium was placed on the creation of new landfills in 2001. The City has since rezoned the site for industrial and other uses.

Powdermill Brook is located west of the site and flows south under the MassPike to the Powdermill Brook Dam, a component of the City's flood control system. The site does not contain wetlands and is not located within a floodplain. According to the 14<sup>th</sup> Edition of the Massachusetts Natural Heritage Atlas prepared by the Natural Heritage and Endangered Species Program (NHESP), the project site does not contain mapped rare species habitat. The site does not contain historic structures listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth; an archaeological survey conducted in 1992 determined that the site lacks historic or archaeological significance.

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the development of the 74.88-acre parcel, the roadway and associated infrastructure improvements include alteration of 56 acres of land and creation of approximately 44 acres of impervious area. The project will generate 3,530 average daily vehicle trips (adt) and add 1,458 parking spaces. It will use 82,333 gallons per day (gpd) of water and generate 74,100 gpd of wastewater. Greenhouse Gasses (GHG) are associated with on-site energy use and transportation.

Measures to avoid, minimize and mitigate impacts include providing a buffer between project activities and residences east of the site. The project will include a stormwater management system designed in accordance with the Stormwater Management Standards (SMS) of the Wetlands Protection Act Regulations (310 CMR 10.00). Roadway improvements to mitigate traffic impacts include

modifications to the intersection of Southampton Road (Route 10/202) at MassPike Interchange 3 and Friendly's Way. The building designs incorporate energy efficiency measures to minimize GHG emissions. During the construction period, mitigation measures will include sedimentation and erosion controls, designated truck routes, measures to minimize emissions of air pollutants by construction vehicles, and noise, dust and odor controls.

### Jurisdiction and Permitting

The project is subject to the preparation of a Mandatory EIR pursuant to the MEPA regulations because it requires Agency Actions and will directly alter 50 or more acres of land (301 CMR 11.03(1)(a)(1)); create ten or more acres of impervious area (301 CMR 11.03(1)(a)(2)); generate 3,000 or more new trips on roadways providing access to a single location (301 CMR 11.03(6)(a)(6)); and construct 1,000 or more new parking spaces at a single location (301 CMR 11.06(a)(7)). The project requires a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT). It is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol ("GHG Policy").

The project will require a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the United States Environmental Protection Agency (EPA).

The project has received Financial Assistance from the Commonwealth through the Site Readiness Program administered by MassDevelopment and may seek additional funding. Therefore, 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 defined in the MEPA regulations.

### Changes Since the Filing of the Environmental Notification Form (ENF)

The design of the project has been refined since the ENF was filed. The number of parking spaces was reduced by 430 and the impervious area has decreased by four acres. By eliminating parking spaces previously proposed on the east side of the site, the internal roadways were shifted to the west. This shift resulted in a minimum of 150 feet of undisturbed woodlands between the project roadways and buildings and the residences along Sabrina Brooke Lane. The DEIR noted that all seven parcels comprising the project site are now publicly-owned.

### Review of the DEIR

The DEIR included a description of the project, reviewed its impacts and identified mitigation measures. It included plans of the proposed buildings, driveways, parking lots, and open space areas. The DEIR provided a plan showing the ownership of each of the seven parcels in the project site. It included descriptions and maps of existing and proposed drainage patterns, subsurface hydrology and water and sewer infrastructure. The DEIR provided a GHG analysis, included a response to comments received on the ENF and provided draft Section 61 Findings.

The City requested two extensions of the comment period to provide a supplemental transportation analysis requested by MassDOT. The City also provided corrected water and sewer flow

data and an update on its application for funding from the federal Natural Resources Conservation Service (NRCS) to rehabilitate the Arm Brook Flood Control Dam.

I received many comment letters opposed to the project which identify concerns with potential impacts on flooding, groundwater resources, habitat and traffic. The Scope included in this Certificate identifies additional information and analysis that should be provided in the FEIR. I note that many, but not all, of the concerns raised by commenters are issues of local zoning, planning and economic development. MEPA is an environmental review process through which the Proponent identifies potential environmental impacts, considers alternatives to avoid impacts, and proposes mitigation measures. A key purpose of MEPA is to assist each State Agency “in using (in addition to applying any other applicable statutory and regulatory standards and requirements) all feasible means to avoid Damage to the Environment or, to the extent Damage to the Environment cannot be avoided, to minimize and mitigate Damage to the Environment to the maximum extent practicable” (301 CMR 11.01(1)(a)). MEPA provides a valuable forum for review of the project and public input; however, MEPA does not approve or deny a project.

### *Alternatives Analysis*

The DEIR Scope required an analysis of at least one alternative that minimizes land alteration, impervious area and traffic impacts. In addition, the Scope recommended that the City review an alternative site layout based on the extension of the rail spur onto the site and an alternative that maintains and maximizes a forested buffer area between the site and abutting residences. The DEIR compared four alternatives: the No Build and Preliminary Concept Plan alternatives described in the ENF, a Single User Alternative and the Preferred Alternative. All three of the development alternatives would alter 56 acres of land, a reduction of approximately 19 acres from the Preferred Alternative presented in the ENF, and include an expanded wooded buffer between on-site uses and the residential neighborhood to the east.

The Preliminary Concept Plan alternative would be limited to the 68-acre site currently owned by the City. An approximately 795,000-sf mixed-use development would be constructed, including 100,000 sf of office space, 450,000 sf of warehouse and distribution space, 172,000 sf of light industrial/manufacturing space, 73,500 sf of research and Flex Tech space and 1,224 parking spaces. This alternative would create 33.1 acres of impervious area, generate 2,915 adt, use 66,291 gpd of water and generate 59,662 gpd of wastewater. According to the DEIR, this alternative was dismissed because it makes less efficient use of the land configuration and infrastructure.

The Single User Alternative would include a one story, one million-sf (23 acre) building designed to serve as a large-scale distribution facility and 1,158 parking spaces. It would add 39 acres of impervious area, generate 1,390 adt, use 83,333 gpd of water and generate 75,000 gpd of wastewater. This alternative would minimize traffic impacts because it does not include office or Flex Tech uses. According to the DEIR, this alternative is potentially feasible but not selected because the City considers a mix of uses to be more likely to provide a greater diversity of employment opportunities.

According to the DEIR, the Preferred Alternative would generally have greater impacts than any of the other alternatives with respect to creation of impervious area and traffic generation and require similar water and sewer use as the Single Use Alternative. As noted previously, changes since the ENF

have provided a larger buffer to the residential neighborhood and reduced the amount of parking and impervious area. The Preferred Alternative includes a mix of uses that will meet the City's development goals, create a variety of job opportunities and generate tax revenue.

### *Land Alteration*

The site is comprised primarily of woodlands and agricultural land and is almost entirely pervious. The City anticipates that development will begin at the southern end of the site where infrastructure is present in Turnpike Industrial Road and proceed to the north as market demand builds for the other proposed buildings. The project includes a wooded buffer of at least 150 ft between the site and the residential neighborhood to the east. The DEIR included a commitment to construct surface parking lots on an as-needed basis to minimize land alteration and impervious area until necessary to accommodate the project build out. The DEIR did not include a cut-and-fill analysis to demonstrate site regrading necessary to establish proposed conditions.

### *Traffic and Transportation*

The DEIR provided a transportation analysis prepared in conformance with the EEA/Massachusetts Department of Transportation (MassDOT) *Transportation Impact Assessment (TIA) Guidelines* issued in March 2014. It included a detailed description of existing and proposed roadway conditions, traffic patterns and on-site parking capacity. The TIA provided traffic counts in the study area, trip generation estimates and likely travel routes for vehicles arriving to and departing from the site under proposed conditions. The TIA reviewed crash data and described future No Build and Build traffic operations over a seven-year planning period. It identified mitigation measures that will be implemented to minimize impacts to the local transportation network, including roadway improvements and TDM measures. The TIA analyzed the transportation impacts of the project in a study area including the following intersections:

- Cabot Road at Russellville Road;
- Cabot Road at Lockhouse Road;
- Turnpike Industrial Road at Lockhouse Road;
- Southampton Road at MassPike Interchange 3 and Friendly's Way;
- Servistar Industrial Way at Southampton Road; and,
- Southampton Road at Arch Road and Westfield Industrial Park Road.

### *Trip Generation*

According to the DEIR, the project will generate 3,530 adt based on the ITE *Trip Generation Manual* 10<sup>th</sup> edition using Land Use Codes (LUC) 110 (Light Industrial), 154 (High-Cube Transload and Short-Term Storage Warehouse) and 710 (General Office Building). The project will generate 405 vehicle trips in the morning peak hour and 385 in the evening peak hour. Approximately 70 percent of vehicles will enter and exit the site via the MassPike Interchange 3.

The TIA did not provide an estimate of truck traffic generated by the project, as required in the DEIR Scope. This information should be included in the FEIR.

### *Site Access*

The project will be served by three driveways. Two STOP-controlled driveways at Cabot Road will be limited to passenger vehicles. A third driveway onto Turnpike Industrial Road will be accessible by both trucks and passenger vehicles. A central internal roadway will connect one of the Cabot Road entrances to the Turnpike Industrial Road access and provide connections between buildings and parking lots. The internal roadway system will include sidewalks to provide pedestrian access between buildings.

### *Traffic Operations*

During the review period, MassDOT requested that the City provide a revised analysis of traffic operations at the interchange of Southampton Road at MassPike Interchange 3 and Friendly's Way. The City distributed this information on December 20, 2018. The revised analysis accounted for long queue lengths observed at the intersection that were not reflected in the modelling results provided in the DEIR. The results of the TIA, as revised by the December 20, 2018 supplemental information, is reviewed herein.

The TIA evaluated the impact of added vehicle trips generated by the project on area roadways. The analysis compared Existing 2018, No Build 2025 and Build 2025 conditions. Both of the 2025 scenarios included a background traffic growth rate of one percent per year. The TIA provided capacity analyses for the Build 2025 condition with and without consideration of the traffic impacts and mitigation measures associated with the proposed Westpark development on Southampton Road.

The DEIR provided a capacity analysis, including volume-to-capacity (v/c) ratios, queue lengths and Level of Service (LOS) designations, for each intersection under Existing 2018, 2025 No Build and 2025 Build conditions. The LOS reflects the overall peak period operations based on the average delay per vehicle entering an intersection, including traffic speed, delay, and capacity. In general, LOS D reflects an acceptable level of operations. The analysis indicated that under Existing 2018 conditions, intersections generally operate at an overall LOS D or better, except for the following:

- The intersection of Southampton Road at MassPike Interchange 3 and Friendly's Way, which operates at an overall LOS E in the morning and evening peak periods;
- The northbound left turn movement at the unsignalized intersection of Friendly's Way at Westfield Industrial Park Road operates at LOS E during both peak periods; and,
- The eastbound left turn movement at the unsignalized intersection of Servistar Industrial Way at Southampton Road operates at LOS E in the evening peak period.

Under the No Build 2025 scenario, traffic operations at the intersection and turning movements listed above decrease from LOS E to LOS F in at least one peak period, with increased v/c ratios and long delays. The addition of project-related traffic under the Build 2025 scenario will degrade operations to LOS F at the intersections listed above, and at left-turn movements at the intersections of Southampton Road at Arch Road and Westfield Industrial Park Road and Lockhouse Road at Turnpike Industrial Road in the evening peak period.

The City has proposed the following mitigation measures at the intersection of Southampton Road (Route I 0/202) at MassPike Interchange 3 and Friendly's Way:

- Two northbound travel lanes will be provided along the jughandle as it approaches Friendly's Way and through the intersection to provide adequate vehicle queueing for motorists accessing the MassPike;
- Additional pavement markings, signage and potentially roadway modifications will be provided to direct vehicles destined for the eastbound MassPike into the right-hand lane;
- The lane configuration of the MassPike Interchange 3 eastbound approach will be modified to provide an exclusive left-turn lane, a shared through/right-turn lane, and an exclusive right-turn lane; and,
- The phasing of the traffic signal will be modified to reflect the new lane configuration.

With the implementation of these mitigation measures, the Southampton Road at Masspike Interchange 3 and Friendly's Way intersection will operate at LOS D. According to MassDOT, the City may be required to upgrade the signal equipment at this intersection.

The City also modelled 2025 Build with Westpark conditions. This scenario takes into account traffic generated by the proposed Westpark development and mitigation measures to be undertaken by the proponent of that project, including the signalization of the intersection of Industrial Park Road at Friendly's Way. Under 2025 Build with Westpark conditions, traffic operations at study area intersections will generally operate at or better than 2025 No Build conditions with the implementation of proposed mitigation measures. According to MassDOT, if the signalization required in connection with the Westpark project is not completed, the queue at the jughandle approach to Friendly's Way may impact operations at the Southampton Road at MassPike Interchange 3 and Friendly's Way intersection. The City should continue working with MassDOT to reduce the queues at this approach or ensure the signalization of this intersection is implemented prior to full build.

### *Traffic Safety*

The DEIR reviewed crash rates at study area intersections for the period 2011-2015. None of the study area intersections have crash rates that exceed the MassDOT statewide and District 2 averages.

The City conducted Roadway Safety Audits (RSA) at the intersections of Southampton Road at MassPike Interchange 3 and Friendly's Way and Southampton Road at Arch Road and Westfield Industrial Park Road, which were listed as Highway Safety Improvement Program (HSIP) crash clusters for 2012-2014. According to the DEIR, roadway improvements recently completed by MassDOT, including roadway resurfacing to eliminate rutting and installation of a peer-to-peer traffic control system to improve vehicle progression through the area, have significantly improved safety conditions at these intersections.

The City has proposed the following measures to improve safety in the study area:

- Provide supplemental signal heads for eastbound traffic exiting Arch Road to be seen by vehicles when behind heavy vehicle; and,
- Provide advance warning such as "Signal Ahead" signs on the eastbound Arch Road

approach to the Southampton Road at Arch Road and Westfield Industrial Park Road intersection

MassDOT has requested that the City commit to installing backplates with retroreflective borders on all signal heads at the Southampton Road at Arch Road and Westfield Industrial Park Road intersection.

#### *Parking*

The project design includes 1,458 parking spaces which has been reduced compared to the ENF. I encourage the City to commit to further minimize the parking supply to encourage multi-modal access to the site and reduce associated impervious area. The DEIR included a commitment to “banking” land designated for parking which would not be constructed until needed for each phase of the project.

#### *Multimodal Facilities*

The project will include sidewalks along internal driveways and bicycle racks. The DEIR did not include an assessment of existing and proposed pedestrian and bicycle facilities and transit service in the study area.

#### *Rail Access*

The Pioneer Valley Railroad (PVRR) owns and operates a rail line that includes a freight spur serving nearby businesses. The owner of the property adjacent to the project site at 70 Turnpike Industrial Road has been consulting with the PVRR regarding extension of the spur to its site. The DEIR included a conceptual configuration of a rail spur extension onto the southern portion of the site adjacent to a proposed light industrial building. As noted in the DEIR, the rail spur could potentially facilitate the transfer of goods in connection with a cross-dock in the light industrial building.

#### *Transportation Demand Management (TDM)*

The project will implement a TDM plan to minimize single-occupant vehicle (SOV) trips to the site. As proposed in the DEIR, the TDM plan will include the following:

- Staggered work hours in order to reduce peak hour trips on adjacent roadways;
- Staggered arrival/departure times for tractor trailer trucks accessing the project site in order to reduce peak hour trips on adjacent roadways;
- Provision of bicycle racks on-site;
- Consultation with PVTA regarding transit service to the site; and
- Continuing to explore the possibility of extending the rail spur onto the site.

#### *Transportation Monitoring Program*

The Proponent should conduct annual traffic monitoring for a period of five years beginning six months after occupancy of the project. The goal of the monitoring program is to evaluate the



transportation-related assumptions made in the TIA, the adequacy of mitigation measures, and the effectiveness of the TDM program. The monitoring program will include:

- Simultaneous automatic traffic recorder (ATR) counts at site driveways for a continuous 24-hour period on a typical weekday;
- Travel survey of employees, patrons, and residents of the site;
- Weekday morning and evening peak hour turning movement counts (TMC) and, operations analysis at mitigated intersections and site driveways.

According to MassDOT, the monitoring program could be used to adjust the timing of the implementation of mitigation measures based on observed impacts to study area intersections.

### *Climate Change*

The DEIR provided an analysis of stationary- and mobile-source GHG emissions and measures to offset emissions. It reviewed projected future temperature and precipitation conditions and described design features to improve resiliency to the effects of climate change.

#### *Greenhouse Gas (GHG) Emissions*

The DEIR included a GHG analysis based on the MEPA GHG Policy. The Policy requires projects to quantify carbon dioxide (CO<sub>2</sub>) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis quantified the direct and indirect CO<sub>2</sub> emissions associated with the project's energy use (stationary sources) and transportation-related emissions (mobile sources). The DEIR outlined and committed to mitigation measures to reduce GHG emissions.

The City has adopted the Massachusetts Stretch Energy Code (SC). Therefore, the project will be required to meet the applicable version of the SC in effect at the time of construction. The SC increases the energy efficiency code requirements for new construction (both residential and commercial) and for major residential renovations or additions in municipalities that adopt it. The current SC requires a reduction in energy use of 10 percent compared to that achieved by complying with the baseline energy provisions of the State Building Code.

The stationary source GHG analysis evaluated designs of prototypical office, warehouse and light industrial buildings. For each prototype, the analysis evaluated CO<sub>2</sub> emissions for the Base Case and the Design Case. The Base Case was designed to meet the minimum energy requirements of the 9<sup>th</sup> Edition of the Massachusetts Building Code, which references the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013. The Design Case included additional energy-efficiency measures proposed in the Preferred Alternative.

The GHG analysis used eQuest v3.65 modeling software to quantify emissions from the project's stationary sources. The project's overall stationary source CO<sub>2</sub> emissions were estimated at 5,749.7 tons per year (tpy) under the Base Case scenario for the three building types. The mitigation measures included in the Design Case will reduce GHG emissions to 4,533.6 tpy, a reduction of 1,196.1 tpy (20.8 percent). The estimates of GHG emissions were calculated using the CO<sub>2</sub> emission factor of 710 pounds

per megawatt-hour for grid electricity published by the Independent System Operator- New England (ISO-NE) in the *2016 ISO New England Electric Generator Air Emissions Report*.

According to the DEIR, energy efficiency measures proposed as part of the project include, but are not limited to the following:

- Energy efficient windows and building envelope with wall insulation, roof insulation and window U-values meeting or exceeding Building Code requirements for the office and light industrial buildings;
- Window to wall ratios equal to Building Code requirements, including 40 percent for the light industrial, 6 percent for the warehouse and 31 percent for the office;
- High-efficiency Heating, Ventilation, and Air Conditioning (HVAC) meeting or exceeding Building Code requirements;
- High efficiency electric resistance storage water heaters;
- Reduced lighting power density (LPD) in interior areas and parking lots;
- Energy STAR appliances and equipment;
- Building commissioning and energy tracking and monitoring systems;
- Low-flow and water-efficient plumbing; and
- Green Tenant guidelines to inform tenants on how to conserve energy.

The Proponent evaluated the feasibility of using rooftop solar photovoltaic (PV) systems to generate energy on-site. By installing a 346-kiloWatt (kW) system on the light industrial buildings, a 539-kW system on the warehouse and a 39-kW system on the office building, the project could generate 1,015,373 kW on an annual basis, which would reduce GHG emissions of the project by 360 tpy. According to the DEIR, the system would have a payback period of 11.9 years without incentives from the Solar Massachusetts Renewable Target (SMART) program, or 8.3 years with federal rebates. The Proponent indicated that it will continue to evaluate installation of rooftop PV systems as the project design of each building progresses and will construct all roofs to be solar-ready.

The DEIR included an evaluation of using air source heat pumps (ASHP) instead of the HVAC systems modelled in the Design Case in the warehouse and office buildings. According to the DEIR, ASHP may not be suitable for laboratory space in the light industrial buildings. The use of ASHP in all three building types would increase capital costs of the project and would reduce GHG emissions by 35.9 percent compared to the Base Case. According to the Department of Energy Resources (DOER), Alternative Energy Credits (AEC) may be available for qualifying heat pump equipment with a value of \$33,000 per year, or \$58,000 per year if ASHP were also used in the laboratory space. As noted in the DEIR, the use of ASHP would have the added benefit of removing the need to install natural gas and provide a pathway to net zero energy with appropriate renewable energy sources.

#### *Mobile Source GHG Emissions*

The DEIR analyzed the project's mobile-source CO<sub>2</sub> emissions using the EPA's MOVES2014a emissions model and data from the traffic study. The MOVES2014a model calculates emissions factors for vehicles expressed in a volume per distance travelled. Total emissions of vehicles are estimated by applying Vehicle Miles Travelled (VMT) data to vehicles in the study area and emissions from idling vehicles. Under 2025 Build conditions, estimated project-related emissions would be 1,579 tpy of CO<sub>2</sub>.

The DEIR estimated that the implementation of roadway and TDM mitigation measures presented in the DEIR would reduce mobile-source emissions by 32 tpy (two percent). The FEIR should provide a revised mobile-source GHG assessment based on the supplemental traffic modelling and proposed mitigation.

#### *Land Alteration*

Projects that alter over 50 acres of land are required to analyze the carbon associated with removal of trees and soil disturbance during the construction period and loss of carbon sequestration. The project will remove 56.2 acres of woodlands on the site. The DEIR calculated the annual carbon sequestration that would be lost due to the removal of trees using the Environmental Protection Agency's (EPA) estimate that 1.17 short tons of CO<sub>2</sub> are sequestered by one acre of forest annually. According to the DEIR, GHG emissions associated with land alteration are estimated to be 52.7 tpy. The analysis did not estimate the one-time loss of carbon due to the loss of tree stock.

#### *Adaptation and Resiliency*

The DEIR reviewed how climate change could affect the site due to higher temperatures, changes in precipitation and extreme weather conditions. It included data from the *Massachusetts Climate Change Projections - Statewide and for Major Drainage Basins* report prepared by the Northeast Climate Service Center, which is available on the Climate Change Clearinghouse for the Commonwealth website ([www.resilientma.org](http://www.resilientma.org)). Future weather conditions are expected to include more frequent occurrences of extreme heat in the summer, increased precipitation in the winter and spring and longer periods of dry days in the summer and fall, and more frequent and intense precipitation events.

The DEIR identified design measures that will be incorporated into the landscaping and buildings, including Low Impact Design (LID) techniques such as bioretention areas, tree box filters, and bioswales, and planting strategies to mitigate stormwater runoff and reduce urban heat island effect. The buildings will be designed to include backup generators, backflow prevention valves and other measures to minimize water infiltration, and critical infrastructure and equipment will be elevated to minimize damage in the event of flooding. The DEIR did not address the capacity of the site, including the stormwater management system, to convey storm flows under future climate change scenarios.

#### *Water Resources*

The DEIR reviewed groundwater conditions and pre- and post-construction drainage patterns at the site. It identified drinking water wells and associated protection zones in the vicinity of the site, described the proposed stormwater management system, provided supporting plans and described its consistency with the SMS.

The site is located over a high- to medium-yield aquifer that provides drinking water to public and private wells in Westfield. Many commenters on the ENF and DEIR referred to the contamination of two of the City's drinking water supply wells with perfluorinated chemicals (PFC) and expressed concern that the project would be developed over a potential source of water. I note that the site is not within any designated wellhead protection zones and that MassDEP has indicated that the project does not require any permits from its Drinking Water Program. The City is conducting routine water

sampling and investigating potential treatment methods to address the PFC contamination. I encourage the City to consider all options for ensuring a safe and sustainable water supply for its residents, including treatment, watershed protection and development of new wells.

The project will alter 56 acres of land and create 44 acres of impervious area. The DEIR described the hydrological characteristics of the site's drainage areas under existing and proposed conditions. It provided data on subsurface conditions, calculations in support of the design of infiltration basins, documentation of the removal of Total Suspended Solids (TSS) by the system and the results of hydrological modelling for existing and proposed conditions. Impacts to water quality and changes to drainage patterns will be mitigated through installation of a new stormwater management system, which will include Best Management Practices (BMP) such as oil/grit separators, deep-sump hooded catch basins, six infiltration basins and two subsurface infiltration systems. The DEIR reviewed how the stormwater management system will comply with the SMS, which require removal of 80 percent of the Total Suspended Solids (TSS) in runoff prior to discharge and maintenance of pre-development peak discharge flow rates and volumes to ensure that the project will not cause off-site flooding. Because the site is considered a land use with higher pollutant load (LUHPPL), the BMPs will be designed to treat the first 1-inch runoff volume and remove 44 percent of TSS prior to infiltration. According to the DEIR, the site is comprised of sandy soils that are conducive to infiltration and runoff generated by the project is not anticipated to cause off-site flooding.

#### *Infrastructure*

The project will use 82,333 gpd and generate 74,100 gpd of wastewater. The site will be connected to the municipal water and sewer systems located in Cabot Road and Turnpike Industrial Road. Wastewater flow from the site will be directed to the 10-inch diameter gravity sewer main in Turnpike Industrial Road that discharges into an 18-inch diameter interceptor in Lockhouse Road. According to the DEIR, the capacity of the sewer main based on its size and slope is approximately 1.8 million gpd. A 10-inch gravity sewer will be installed through the site to convey wastewater flows to the sewer main in Turnpike Industrial Road.

A 16-inch diameter water main is located in Cabot Road and a 10-inch diameter main is located in Turnpike Industrial Road. The project will include a 10-inch diameter loop connected to the Cabot Road main at one end and the Turnpike Industrial Road main at the other. The water main loop will have sufficient capacity to provide the site's domestic and fire protection water needs. The project design will include water conservation measures, such as low-flow plumbing fixtures and low-flow aerators. The landscaping will be designed so as to not require an irrigation system; if an irrigation system is necessary, it will use a drip-type system that minimizes water use.

#### *Air Quality*

The DEIR included a mesoscale analysis of the impact to regional air quality associated with vehicle trips generated by the project. The method used was similar to mobile-source GHG analysis described above and included calculations of vehicle emissions in the 2018 Existing, 2025 No Build and 2025 Build conditions. The mesoscale analysis was used to determine whether and to what extent the project will increase precursors to the development of ozone, including volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>). It analyzed the mobile source emissions generated by the project

with respect to consistency with the National Ambient Air Quality Standards (NAAQS), as applicable, in the project area. According to the DEIR, project-related traffic emissions will be 1.98 kilograms per day (kg/day) of VOC and 1.66 kg/day of NO<sub>x</sub>. Implementation of the proposed roadway improvements and TDM measures will reduce VOC emissions to 1.94 kg/day and NO<sub>x</sub> emissions to 1.63 kg/day in the 2025 Build scenario.

### *Construction Period*

The DEIR reviewed measures to mitigate construction-period impacts to air quality, noise levels, traffic and water quality. The project will control fugitive dust by using wet suppression, compacting soil on site, washing vehicle wheels, street cleaning, installing a fence around the site, and covering trucks carrying soil. Noise levels will be controlled by minimizing vehicle idling, using mufflers on construction equipment and scheduling noisy construction activities during periods of high ambient noise levels. Construction vehicles will be required to comply with state and federal emissions standards. A construction-period Storm Water Pollution Prevention Plan (SWPPP) will be developed to identify locations where sedimentation and erosion controls are necessary and to identify measures to maintain these controls throughout the construction period. All construction truck traffic to the site will be required to use designated routes defined in coordination with the City. Contractors will be required to establish staging areas at which truck will be required to wait and trucks will be prohibited from stopping on public roads for extended periods. The draft s. 61 Findings should list all construction period mitigation commitments.

### Conclusion

The DEIR was generally responsive to the Scope issued in the ENF Certificate. It provided a more detailed description of the project and its impacts and identified mitigation measures. It provided a detailed transportation analysis and identified roadway improvements to be implemented in connection with the project. The DEIR provided an analysis of the project's impacts on drainage patterns, described the proposed stormwater management system and provided supporting documentation. Due to the conceptual nature of the project design and uses, the DEIR did not include commitments for on-site renewable energy generation and other potential GHG mitigation measures. As described below, the FEIR must provide additional analysis and information regarding land alteration, transportation and climate change.

## SCOPE

### General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. The FEIR should clearly demonstrate that the City has sought to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible. The FEIR should identify proposed mitigation measures and clearly describe how these measures will minimize impacts to the environment and the neighborhood.

### Project Description and Permitting

The FEIR should describe the project and identify any changes to the project since the filing of the DEIR. It should include updated site plans, if applicable, for existing and post-development conditions at a legible scale. Conceptual plans should be provided at a legible scale and clearly identify buildings, impervious areas, driveways and internal circulation roads, stormwater and utility infrastructure and any off-site roadway mitigation.

The FEIR should identify and describe State, federal and local permitting and review requirements associated with the project including requests for Financial Assistance and Land Transfers and provide an update on the status of each of these pending actions. It should include a description and analysis of applicable statutory and regulatory standards and requirements, and a discussion of the project's consistency with those standards.

### Land Alteration

As noted in the DEIR, development of the site is likely to occur over a long time period and incrementally in response to market demand. The FEIR should provide potential build-out scenarios that maximize retention of woodlands during initial and intermediate phases of development. It should provide conceptual plans of potential development scenarios showing areas to be left undisturbed with the phased development of the site from its southern end. The FEIR should provide a detailed description of proposed regrading of the site, including a plan showing areas to be excavated and filled. This information was requested in the Scope for the DEIR but not provided. The FEIR should indicate whether any off-site fill will be required to establish final site grades. It should include plans showing proposed ground elevations across the site.

### Traffic and Transportation

The TIA did not provide anticipated volumes of truck traffic expected to enter and exit the site during peak hours and on a daily basis, as required in the DEIR Scope. This information should be included in the FEIR. The FEIR should review likely routes to be used by trucks and identify any potential impacts and mitigation measures. The FEIR should explain the derivation of the proposed parking supply for the project. It should provide a more detailed explanation for the proposed number of parking spaces based on a comparison of information contained in the most recent edition of ITE's *Parking Generation* as well as local zoning requirements. The FEIR should provide an inventory of bicycle and pedestrian facilities in the study area and identify measures that could improve access to the site. It should describe transit services provided by the Pioneer Valley Transit Authority (PVTA) and identify any opportunities for extending PVTA service to the site.

The FEIR should provide conceptual plans of the proposed driveway intersections. As noted above, most vehicles will pass through MassPike Interchange 3 to access and leave the site. The FEIR should provide an analysis of how passenger vehicles will access the site from Cabot Road. It should describe measures to prevent project-related truck traffic from using Cabot Road.

The FEIR should include conceptual plans for all roadway mitigation measures. It should note whether the median island currently in place at the Friendly's Way and Westfield Industrial Park Road

intersection will be present under 2025 Build With Improvements conditions. Due to the long-term build out of the project, the City has requested that the implementation of the mitigation measures be phased consistent with occupancy of the site. MassDOT has indicated that the monitoring program could be used to adjust the timing of the implementation of mitigation measures based on observed impacts to study area intersections. The FEIR should include a detailed mitigation phasing plan, including mitigation thresholds. The City should consult with MassDOT regarding the monitoring plan and mitigation phasing before completing the FEIR. The City should commit to project build-out triggers for providing all mitigation measures.

The FEIR should evaluate additional measures to minimize SOV trips to and from the site and include the City's commitment to actively implement the TDM plan. The City should consider providing preferential parking for carpools and vanpools, providing electric vehicle charging stations and/or low-emission vehicle parking spaces, and designating an on-site transportation coordinator to facilitate and assist with TDM measures.

The FEIR should provide an update on the proposed extension of the rail spur to the adjacent site. It should review the process involved in extending the rail spur, including potential permitting requirements. The FEIR should include an assessment of the potential benefits of extending the rail spur onto the project site in terms of reductions in truck traffic to and from the site. According to the DEIR, the rail spur could be extended if a future tenant expresses an interest in doing so. The City should consider commencing the initial steps involved in extending the rail spur to the site as a means of minimizing future truck trips.

### Climate Change

The FEIR should respond to comments submitted by DOER. It should provide a detailed roof plan for all buildings showing the potential layout of PV systems, report on the feasibility of using ASHP in the laboratory spaces in addition to the other buildings and include a commitment to make all roofs solar-ready at a minimum. The FEIR should provide a revised mobile-source GHG analysis based on the revised capacity analyses submitted during the review period.

The DEIR provided an estimate of annual lost sequestration due to removal of trees, including above-ground and below-ground biomass. It did not estimate the one-time loss of carbon due to loss of tree stock and soil disturbance. This information should be provided in the FEIR. The FEIR should commit to an extensive set of GHG mitigation measures to offset its stationary, mobile-source and land-related GHG impacts.

The DEIR indicated the effects of climate change include potential flooding of the site and overflows from the stormwater management system under future climate conditions. The FEIR should review the capacity of the proposed stormwater management system to address the future precipitation events identified in the DEIR. I encourage the City to design the site's drainage systems to handle flows anticipated under future storm conditions.

Mitigation and Section 61 Findings

The DEIR should include a separate chapter that summarizes measures to avoid, minimize and mitigate environmental impacts and to provide public benefits. The DEIR should include draft Section 61 Findings for all State Permits required. The proposed Section 61 Findings should specify in detail all feasible measures that the Proponent will take to avoid, minimize and mitigate potential environmental impacts to the maximum extent practicable. The draft Section 61 Findings should clearly identify parties responsible for funding and implementation, and the anticipated implementation schedule that will ensure mitigation is implemented when appropriate in relation to environmental impacts.

To ensure that all GHG emissions reduction measures adopted by the Proponent in the Preferred Alternative are actually constructed or performed, the Proponent must provide a self-certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the required mitigation measures, or their equivalent, have been completed as a condition of a Certificate approving a DEIR. The commitment to provide this self-certification should be incorporated into the draft Section 61 Findings included in the DEIR.

Responses to Comments

The DEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the DEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the DEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the FEIR to those parties who commented on the ENF and/or DEIR, to any State Agencies from which the Proponent will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. A copy of the FEIR should be made available for public review at the Westfield Public Library.

January 11, 2019

Date



Matthew A. Beaton

## Comments received:

12/20/2018 Jean Carpenter  
 01/02/2019 Nicholas Beluzo and Amy Beluzo  
 01/04/2019 City Councilor Mary Ann Babinski



01/04/2019 Annie Bartlett  
01/04/2019 Basia Belz  
01/04/2019 Dan Bienvenue  
01/04/2019 Neal Burke  
01/04/2019 Margo Chapski  
01/04/2019 Gina Crossetti  
01/04/2019 Department of Energy Resources (DOER)  
01/04/2019 Susan Dubilo  
01/04/2019 Raeanne Fanion  
01/04/2019 Eileen Fitzgerald  
01/04/2019 Mark and Stephanie French  
01/04/2019 Deb Godbout  
01/04/2019 Heidi Leonard  
01/04/2019 Yana Khomichuk  
01/04/2019 Kristen Mello  
01/04/2019 Dan Kosynoski  
01/04/2019 Karen Pighetti  
01/04/2019 Judy E. Lieb  
01/04/2019 Patricia Mahoney  
01/04/2019 Virginia Maldonado  
01/04/2019 Massachusetts Department of Transportation (MassDOT)  
01/04/2019 Dawn McCann  
01/04/2019 Abigail McNutt  
01/04/2019 Stacey Nubile  
01/04/2019 Mary O'Connell  
01/04/2019 Diane Pighetti  
01/04/2019 Patrick Leonard  
01/04/2019 Ariel Reyes  
01/04/2019 Liam Rodrigues  
01/04/2019 Barbara Rokosz  
01/04/2019 Samantha Sherman  
01/04/2019 John Slattery  
01/04/2019 City Councilor Andrew Surprise  
01/04/2019 Kerri Tabb  
01/04/2019 Thomas Mello  
01/04/2019 Karen Walker  
01/04/2019 Jim Whatley  
01/04/2019 William Rodrigues  
01/07/2019 Massachusetts Department of Environmental Protection (MassDEP) – Western  
Regional Office (WERO)

MAB/AJS/ajs