



*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

Matthew A. Beaton  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1181  
<http://www.mass.gov/envir>

February 15, 2019

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

PROJECT NAME : Ferry Street Mill Redevelopment Project  
PROJECT MUNICIPALITY : Easthampton  
PROJECT WATERSHED : Manhan River  
EEA NUMBER : 15942  
PROJECT PROPONENT : One Industrial Lofts, LLC  
DATE NOTICED IN MONITOR : January 19, 2019

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 redevelopment of a historic mill complex. The site is bisected by a canal into western and eastern sections. The project includes:

- Demolition of all or parts of four buildings and other structures;<sup>1</sup>
- Renovation of four buildings for residential, office, and retail uses;
- Rooftop solar photovoltaic (PV) systems on the four buildings to be renovated;
- Construction of two new residential buildings;
- Regrading of the site, including use of demolition debris as fill material;
- Installation of water, sewer and stormwater infrastructure; and,

<sup>1</sup> According to the ENF, a building in the eastern part of the site was demolished several years ago.

- Construction of new access drives and parking areas.

The project will provide a total of 138 residential units, 54,553 square feet (sf) of office space, 20,162 sf of retail space and up to 304 parking spaces. The four buildings to be renovated include:

- Building 1: 26,553 sf of office space;
- Building 5: 40 apartments and 38 parking spaces;
- Building 7: 80 apartments, 14,838 sf of retail space and 58 parking spaces; and
- Hydro-plant Building: 5,162 sf of retail uses.

The renovated buildings will be constructed with rooftop solar photovoltaic (PV) systems. Two new buildings will be constructed on the eastern side of the canal. One of the buildings will include 28,000 sf of office space and the other will include 18 apartment units. Between 191 and 198 parking spaces will be provided in surface lots. Surface parking lots on the east and west sides of the site will provide 191 to 198 parking spaces, respectively. The project includes the construction of two pedestrian bridges across the canal, renovation of a vehicular bridge across the canal, a pedestrian and bicycle connection to the Manhan Rail Trail, internal driveways and a stormwater management system and other utilities.

The City of Easthampton (City) has been awarded a MassWorks Infrastructure grant by the Executive Office of Housing and Economic Development (EOHED) to undertake several projects that will support redevelopment of the site. The projects include:

- Reconstruction of the STOP-controlled intersection of Ferry Street at Lovefield Street and Pleasant Street as a roundabout;
- Construction of parking spaces along Lovefield Street adjacent to the Manhan Rail Trail;
- Construction of retaining walls and a paved access way across the project site to provide a link between Ferry Street and the rail trail;
- Construction of retaining walls, drainage and parking areas adjacent to the Manhan Rail Trail and Lower Mill Pond;
- Reconstruction and streetscape improvements, including a mixed-use path, along a portion of Ferry Street;
- Installation of recreational docks and access improvements at Lower Mill Pond; and,
- Construction and maintenance of a pump station to deliver wastewater from the project site to the municipal wastewater collection system.

### Project Site

The 6.1-acre project site is located in the northeastern section of Easthampton. It is bordered to the north by the Manhan Rail Trail and undeveloped land adjacent to Broad Brook, to the east by industrial and commercial uses, to the south by Ferry Street, Lower Mill Pond and a residential neighborhood and to the west by the rail trail and Lovefield Street. The Manhan Rail Trail extends throughout Easthampton and into Northampton.

A dam under Ferry Street impounds Lower Mill Pond. According to the ENF, the Department of Conservation and Recreation's (DCR) Office of Dam Safety (ODS) has determined that the dam has a



significant hazard risk. Water from the pond discharges over the dam's spillway, through a culvert under Ferry Street to the lined canal bisecting the site, then north to Broad Brook and the Manhan River. According to the Massachusetts Department of Environmental Protection's (MassDEP) 2014 Integrated List of Waters, the Manhan River is designated as an impaired waterway due to concentrations of *Escherichia coli*. As shown on the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) (number 2501600010B, effective August 15, 1979), the canal is located within the 100-year floodplain with a Base Flood Elevation (BFE) of 123 feet National Geodetic Vertical Datum of 1929 (NGVD 29). Plans submitted with the ENF delineated parts of the site, primarily on the east side, that are below the flood elevation and classified as Bordering Land Subject to Flooding (BLSF). The site is located within a mapped Zone II groundwater protection area.

The site is located in the Ferry Street Mills (EAH.G) and Easthampton Mill Villages (EAH.F) areas listed in the Massachusetts Historical Commission's (MHC) Inventory of Historic Assets of the Commonwealth (Inventory). It is the opinion of MHC that the Easthampton Mill Villages area meets the criteria for eligibility for listing in the National Register of Historic Places. As detailed below, MHC has determined that the project will have an adverse effect on the Easthampton Mill Villages area.

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include generation of 2,102 new average daily trips (adt), creation of 304 new parking spaces, and use and generation of approximately 22,488 gallons per day (gpd) of water and wastewater, respectively; alteration of and demolition of historic structures. Measures to avoid, minimize, and mitigate impacts include reducing impervious area by 0.4 acres, constructing a new stormwater management system that meets the requirements of the Wetland Regulations' Stormwater Management Standards (SMS), providing a multi-use path connection to the rail trail, remediating the site and reconstructing the intersection of Ferry Street at Pleasant Street and Lovefield Street as a roundabout.

### Permitting and Jurisdiction

The project is undergoing MEPA review and requires preparation of an ENF because it requires an Agency Action and meets or exceeds the following thresholds: 301 CMR 11.03(6)(b)(13), generation of 2,000 or more adt on roadways providing access to a single location; 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; and 301 CMR 11.03(10)(b), demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory. The project may require a Beneficial Use Determination (BUD) and Treatment Works Plan Approval from MassDEP. It requires a Dam Safety Permit from ODS. The City will be required to obtain a Chapter 91 (c. 91) License from MassDEP for the docks at Lower Mill Pond.

The project will require review by the MHC. The project has received Orders of Conditions (DEP File #'s WE151-0298 and WE151-0299) from the Easthampton Conservation Commission that were not appealed. It will require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA).



The project has received Financial Assistance from the Commonwealth through a loan to the Proponent from the Massachusetts Economic Development and Finance Agency (MassDevelopment) and a MassWorks grant from EOHEd to the City. 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.

### 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 summary of a transportation analysis performed in connection with roadway improvements at the intersection of Ferry Street at Pleasant Street and Lovefield Street. It identified components of the City's infrastructure projects adjacent to the site that will be funded through the MassWorks grant.

### *Alternatives Analysis*

Approximately 5.59 acres of the 6.13-acre site is covered by impervious surface, including the deteriorating brick warehouse buildings. According to the ENF, the buildings cannot be reused in their current condition and the No Build alternative would maintain the site as a vacant parcel. The Proponent provided an analysis of a previously-proposed development program (Alternative A) that would include a more intense use of the existing and proposed buildings. Alternative A would include 150 residential units, 66,500 sf of office space and 20,000 sf of retail space. Compared to the Preferred Alternative, it would generate 2,286 adt, require the use of slightly more water and generate more wastewater. It would be similar to the Preferred Alternative with respect to impervious area and the number of parking spaces.

The Preferred Alternative includes the redevelopment of a vacant site with a total of 138 residential units, 54,554 sf of office space and 20,162 sf of retail uses. It will address one of the City's redevelopment goals by rehabilitating vacant warehouse buildings and generating activity at a prominent location in the city. The project will minimize impacts by constructing a stormwater management system that will improve water quality, generating renewable energy with rooftop solar PV systems, removing stockpiled debris and asbestos-containing material and reusing demolition debris to regrade the site. The Preferred Alternative will generate fewer vehicle trips than Alternative A and will not degrade traffic operations at the proposed roundabout at the intersection of Ferry Street at Pleasant Street and Lovefield Street. The Proponent will provide an easement across the site to the City for the purpose of constructing a multi-use path between Ferry Street and the Manhan Rail Trail.

### *Wetlands and Stormwater*

According to MassDEP, the canal is classified as a river according to the Wetlands Regulations, with associated Bank and Land Under Water (LUW) resource areas. Pursuant to the Wetlands Regulations at 310 CMR 10.58(2)(g), human-made canals do not have Riverfront Areas. Approximately 67,586 sf of the site is located in BLSF, including the canal, most of the proposed parking lot east of the canal and a small area west of the canal. According to the ENF, grading of the site will increase flood storage capacity. In addition, the new buildings proposed in the 100-year floodplain will comply with the Building Code by elevating the first floors above the 100-year flood elevation.



The existing stormwater management system discharges runoff directly into the canal through numerous outfalls. These discharges will be discontinued and two new outfalls will be constructed to discharge to the canal. The outfalls will be located above the Mean Annual High Water Line to avoid impacts to the Bank resource area associated with the canal. The project includes a new stormwater system that will meet the SMS requirements for redevelopment projects. The impervious area will be reduced from 5.39 acres to 4.99 acres under post-development conditions and peak discharge rates and volumes for the 2-, 10-, 25- and 100-year storms will be lower than they are under existing conditions. Because the site is located within a Zone II, the stormwater management system will be designed to treat the first one-inch storm volume; the use of deep-sump catch basins and proprietary water quality units will remove 85 percent of the Total Suspended Solids (TSS) from runoff prior to discharge into the canal. I encourage the Proponent to incorporate additional Low Impact Design (LID) features, such as rain gardens and other infiltration measures, into the project design to address water quality of the Manhan River.

The ENF described, at a conceptual level, the City's intent to remove debris, manage vegetation and construct docks at Lower Mill Pond. The goal of this work is to improve the aesthetics of Lower Mill Pond and enhance its public recreational use. According to the ENF, only the docks will have direct impacts to wetland resource areas. The City's projects in and adjacent to the Lower Mill Pond will require approval by MassDEP and the Easthampton Conservation Commission.

### *Traffic and Transportation*

The ENF included a trip generation estimate based on trip rates published in the Institute of Transportation Engineers' (ITE) *Trip Generation Handbook, 10<sup>th</sup> Edition* for Land Use Codes (LUC) 221 (Multifamily Housing Midrise), 710 (General Office) and 820 (Shopping Center). The project will generate 2,102 adt, including 144 trips in the morning peak hour and 202 trips in the evening peak hour.

The ENF did not provide a full transportation analysis. It included a capacity analysis of the intersection of Ferry Street at Pleasant Street and Lovefield Street under its proposed configuration as a roundabout for No Build and Build conditions. According to the ENF, left turns from Ferry Street to Pleasant Street currently operate at Level of Service (LOS) F during weekday peak periods under the STOP-controlled configuration of the intersection. Traffic operations at the intersection with the proposed roundabout configuration will improve to LOS A or LOS B under both No Build and Build conditions; project-generated traffic will add minor delays during peak periods.

In addition to the roundabout, the City will construct a number of multimodal transportation improvement projects in the vicinity of the site, including:

- A 10-ft wide mixed-use path across the eastern boundary of the site to connect Ferry Street to the Manhan Rail Trail north of the site;
- Reconstruction of Ferry Street adjacent to the site with one 12-ft travel lane in each direction, 5-ft wide sidewalks on both sides of the street and an 8-ft wide parking lane on the south side of the street;
- Reconstruction of Lovefield Street with 11-ft travel lanes and 5-ft wide sidewalks on both sides of the street; and,



- Reconstruction of Pleasant Street with 12-ft travel lanes and 5-ft sidewalks on both sides of the street.

The City will also establish new connections between the rail trail and Ferry Street and Lovefield Street and provide parking spaces for users of the rail trail along Lovefield Street. Connections to the rail trail at and adjacent to the site will increase the use of the trail for commuting and recreational purposes. Bicycle racks will be provided throughout the site.

### *Historic Resources*

The site is located in the Easthampton Mill Villages (EAH.F) area, which MHC has determined meets the criteria for eligibility for listing in the National Register of Historic Places. The buildings proposed for demolition include the Williston Spinning Mill (EAH.596), Hampton Company Powerhouse (EAH.731), Hampton Company Chemical Recovery Building (EAH.741) and the Brown Paper Company Warehouse (EAH.743). According to the ENF, the Easthampton Historical Commission has approved the demolition of these buildings.

The buildings to be renovated include the Hampton Company Powerhouse extension (EAH.733), Hampton Company Mercerizing Building (EAH.735)/Hampton Company Rayon Plant (EAH.738), Hampton Company Dye House (EAH.736), and Hampton Company Office and Storehouse (EAH.737). According to MHC, all of the buildings except for the Hampton Company Office and Storehouse contribute to the Ferry Street Mills area and the Easthampton Mill Villages area. The Proponent will be required to consult with MHC in accordance with 950 CMR 71: Protection of properties included in the State Register of Historic Places. MHC has requested that the Proponent evaluate alternative rehabilitation treatments (for the buildings proposed for rehabilitation) that are more consistent with the surrounding Ferry Street Mill Complex and the larger Easthampton Mill Villages area.

### *Hazardous Material*

The ENF included an Environmental Site Assessment of soil and groundwater conditions at the site. The assessment documented concentrations of arsenic, lead and Extractable Petroleum Hydrocarbons (EPH), including polycyclic aromatic hydrocarbons (PAH) that exceed reportable limits pursuant to M.G.L. Chapter 21E, the Massachusetts Contingency Plan (MCP). The Proponent has acknowledged that MassDEP must be notified of the releases and that the assessment and cleanup of the site will be required in accordance with the MCP.

### *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.



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.

### 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. The Proponent should consult with the MEPA office if there are any changes to the project.

February 15, 2019

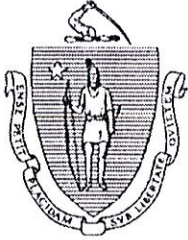
Date

Matthew A. Beaton

### Comments received:

|            |   |
|------------|---|
| 01/25/2019 | Board of Underwater Archaeological Resources (BUAR)   |
| 01/29/2019 | Pioneer Valley Planning Commission (PVPC)   |
| 02/04/2019 | Massachusetts Historical Commission (MHC)   |
| 02/04/2019 | Massachusetts Department of Environmental Protection (MassDEP)/Western Regional Office (WERO) |
| 02/04/2019 | Department of Conservation and Recreation (DCR)   |

MAB/AJS/ajs



The COMMONWEALTH OF MASSACHUSETTS  
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES  
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS  
251 Causeway Street, Suite 800, Boston, MA 02114-2136  
Tel. (617) 626-1141 Fax (617) 626-1240  
[www.mass.gov/orgs/board-of-underwater-archaeological-resources](http://www.mass.gov/orgs/board-of-underwater-archaeological-resources)

January 25, 2019

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
Attention: Alex Strysky, MEPA Unit  
100 Cambridge St., Suite 900  
Boston, MA 02114

RECEIVED  
JAN 29 2019  
MEPA

RE: Ferry Street Mill Redevelopment, 1 Ferry Street, Easthampton (EEA #15942)

Dear Secretary Beaton,

The staff of the Massachusetts Board of Underwater Archaeological Resources has completed its review of the above referenced project's ENF (EEA#15942) and supporting materials prepared by R. Levesque Associates, Inc., on behalf of One Industrial Lofts, LLC. We offer the following comments.

The Board has conducted a preliminary review of its files and secondary literature sources to identify known and potential submerged cultural resources in the proposed project area. While the project includes MACRIS identified an historic mill complex, no record of any underwater archaeological resources was found. Based on the results of this review and prior disturbance at the existing bridge, the Board expects that this project is unlikely to impact submerged cultural resources.

However, should heretofore-unknown submerged or terrestrial cultural resources be encountered during the course of the project, the Board expects that the project's sponsor will take steps to limit adverse effects and notify the Board and the Massachusetts Historical Commission, as well as other appropriate agencies, immediately in accordance with the Board's *Policy Guidance for the Discovery of Unanticipated Archaeological Resources*.

The Board appreciates the opportunity to provide the comments. Should you have any questions regarding this letter, please do not hesitate to contact me at the address above, by telephone at (617) 626-1141, or by email at [victor.mastone@mass.gov](mailto:victor.mastone@mass.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Victor T. Mastone".

Victor T. Mastone  
Director

/vtm





Catalyst for Regional Progress

PVPC

Timothy W. Brennan, Executive Director

January 23, 2019

Mr. Matthew A. Beaton, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, Massachusetts 02114

Attention: MEPA Unit

Reference: Review Comments on the Resubmittal of the Environmental Notification Form (ENF) for the Proposed Ferry Street Mill Redevelopment in Easthampton, Massachusetts, EEA # 15942.

Dear Secretary Beaton:

The Pioneer Valley Planning Commission (PVPC) has the following review comments on the resubmittal of the ENF for the above-cited project. As proposed, the project consists of the redevelopment of a former mill site to provide a mix of residential and commercial uses. This includes the demolition of some portions of existing buildings, the renovation of four former mill buildings, the construction of two new buildings, renovation of existing bridges and pedestrian catwalks and a new connection spur to the Manhan Rail Trail.

We believe this project is a key part of the City of Easthampton's efforts to revitalize their former mill district. This property has stood vacant for many years and the opportunity for redevelopment is of critical importance to provide options for housing and commercial uses while preserving portions of the original site. Accordingly, we believe this is a redevelopment project of high merit.

#### Water Resource Comments

While the resubmittal of the ENF notes that the project is within a half mile of the Lower Mill Pond, an impaired water resource, it is also important to include the nearby Manhan River in this discussion. The Manhan River is located within a quarter mile of the proposed project and is indicated as impaired for E. coli in both the *Year 2014* and draft *Year 2016 Massachusetts Integrated List of Waters*. In addition, the Broad Brook, which will receive project area drainage via the project's canal, flows directly into the Manhan River. Additional information is requested on the potential impacts of this project on the Manahan River.

#### Stormwater Comments

The project site appears to present challenges for stormwater management. We are specifically concerned that conveyance of all stormwater from the site to discharge at the canal could produce highly erosive flows. Given that, it is recommended that consideration be given to opportunities to capture rainfall from rooftops on the site for appropriate uses inside the buildings.

#### Office of Dam Safety Jurisdiction

It is important that the project now recognizes in the resubmittal of the ENF the need to work with the Office of Dam Safety to understand what work may be required relative to the Lower Mill Pond Dam. The dam itself and a large area of Lower Mill Pond had been part of the ownership of this property previously and the roadway that fronts the project—Ferry Street—is also tied into the dam's infrastructure. Additional information on the condition, ownership, and hazard index rating of the dam is requested.

#### Historic Preservation Comments

Based on existing information in the state database and the 2018 state register of historic places list, these buildings are not currently listed on the National Register or the State Register. They are inventoried in the state database as part of an AREA (EAH.G) and the property has been found to meet the criteria of a "qualified historic structure" and is considered eligible for listing on the National Register by the Massachusetts Historical Commission, related to a Part 1 MHRTC application (June 27, 2018 MHC letter). It is unclear if state historic rehabilitation tax credits and federal historic tax credits (to include a National Register listing) will be sought as part of the financing package for this project. The proposed demolitions and proposed rehabilitation may impact tax credit eligibility, particularly on the buildings which are very significant to the historic integrity of the site, such as Building 1, Samuel Williston's First Spinning Mill (1860).

Section 3 of the Historical and Archaeological Resources Section of the ENF which can be found on pages 8 and 9 of the document only talks about the demolition associated with the project with a minimal mention of proposed restoration work. We recommend that additional information be provided on the restoration work that's associated with the project. Specifically, we request supplemental information on the aspects of the historic buildings that will be repaired and restored in accordance with the Historic Preservation section of the City of Easthampton's Master Plan. That plan mentions prioritizing the



incorporation of historical information such as signage along trails, preserving the unique history of the mills, protecting the beauty of historic building facades, developing a mill museum, rebuilding historic pedestrian bridges across the canal, and creating a park along the canal.

Finally, information on how this proposed project complies with the Historic Preservation section of the City of Easthampton's Master Plan would be very useful given that this area is significant to the local industrial and social history of the City. We are specifically interested in any proposed reuse of materials from the buildings that are slated for demolition. Applying the Secretary of the Interior's Standards for the Rehabilitation of Historic Properties to the project design also would promote the preservation of these buildings for the benefit of the public. These standards are typically required if historic rehabilitation tax credits are part of the financing plan for the project.

<https://www.nps.gov/lps/standards/rehabilitation/rehab/stand.htm>.

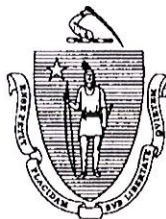
Thank you for the opportunity to offer our comments on this proposed project.

Sincerely,



Timothy W. Brennan  
Executive Director

cc: N. LaChapelle, Mayor of Easthampton  
J. Belcher-Timme, PVPC Commissioner – Easthampton  
J. Bagg – Easthampton Planner  
R. Levesque, R Levesque Associates, Inc.



**The Commonwealth of Massachusetts**  
William Francis Galvin, Secretary of the Commonwealth  
Massachusetts Historical Commission

February 4, 2019

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street  
Boston, MA 02114

ATTN: Alex Strysky, MEPA Office

RE: Ferry Street Mill Redevelopment Project, 1 Ferry Street, Easthampton, MA;  
MHC# RC. 65415; EEA# 15942

Dear Secretary Beaton:

Staff of the Massachusetts Historical Commission (MHC) have received the Environmental Notification Form (ENF) submitted for the above referenced project. After review of the information submitted, MHC staff have the following comments.

The proposed project consists of the demolition of various site features including four existing mill buildings. The following are the buildings proposed for demolition:

- Williston Spinning Mill (EAH.596)
- Hampton Company - Powerhouse (EAH.731)
- Hampton Company - Chemical Recovery Building (EAH.741)
- Brown Paper Company - Warehouse (EAH.743)

The project also consists of the renovation of the following four existing mill buildings:

- Hampton Company - Powerhouse extension (EAH.733)
- Hampton Company - Mercerizing Building (EAH.735)/ Hampton Company - Rayon Plant (EAH.738)
- Hampton Company - Dye House (EAH.736)
- Hampton Company - Office and Storehouse (EAH.737)

The project also consists of the construction of two new buildings on the site and site improvements.

Review of the MHC's *Inventory of Historic and Archaeological Assets of the Commonwealth* indicates that the Ferry Street Mills area is included in the Inventory (EAH.G) and is part of the larger Easthampton Mill Villages area (EAH.F). The Easthampton Mill Villages are comprised of three distinct worker housing villages and two mill complexes active from the 1860s through the 1960s. In addition to residential and industrial buildings, the area also contains a cemetery, school, mill pond and dam, footbridge pilings, and other industrial structures. It is the opinion of MHC staff that the Easthampton Mills Area meets the criteria of eligibility for listing in the National Register of Historic Places.

The Williston Spinning Mill (EAH.596), Hampton Company - Powerhouse (EAH.731), Hampton Company - Chemical Recovery Building (EAH.741), Hampton Company - Powerhouse extension (EAH.733), Hampton Company - Mercerizing Building (EAH.735), Hampton Company - Dye House (EAH.736), Hampton Company - Rayon Plant (EAH.738), and Hampton Company - Office and Storehouse (EAH.737) contribute to the Ferry



Street Mills area and the Easthampton Mill Villages area. The Brown Paper Company – Warehouse does not contribute to the Ferry Street Mills area and the Easthampton Mill Villages area.

After review of MHC's files and the information submitted, MHC has determined that the proposed project will have an "adverse effect" (950 CMR 71.05(a) and 950 CMR 71.07(2)(b)(3)) on the Easthampton Mill Villages area through the demolition of three historic buildings and the alteration of four historic mill buildings with treatments that do not meet the Secretary of the Interior's Standards for Rehabilitation.

The MHC hereby initiates its consultation process pursuant to 950 CMR 71.07(3).

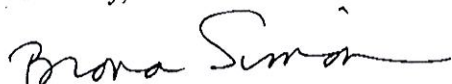
The MHC recognizes the deteriorated state of the Williston Spinning Mill, referred to as building 1 in the ENF (EAH.596), the Hampton Company - Powerhouse, referred to as building 3 in the ENF (EAH.731), the Hampton Company - Chemical Recovery Building, referred to as building 13 in the ENF (EAH.741) and Brown Paper Company - Warehouse, referred to as building 15 in the ENF (EAH.743). The MHC understands that these buildings have been inspected by the Easthampton Building Inspector and Easthampton Fire Chief and have been found to not be structurally sound and a significant risk to the public. The MHC understands that the Easthampton Historical Commission has voted to allow the demolition of these buildings.

The MHC requests that alternative rehabilitation treatments are explored for the buildings proposed for rehabilitation that are more sympathetic to the surrounding Ferry Street Mill Complex and the larger Easthampton Mill Villages.

Pursuant to 950 CMR 71.07(3), the MHC looks forward to consulting with MassDevelopment, MassWorks, and One Industrial Lofts, LLC to explore alternatives that would eliminate, minimize, or mitigate the adverse effect of the proposed project.

Please note that these comments are offered to assist in compliance with M.G.L. Chapter 9, sections 26-27C, (950 CMR 71.00), MEPA (301 CMR 11), and do not serve as comments or approval regarding submissions for State or Federal Historic Rehabilitation Tax Credits. MHC's comments regarding the historic rehabilitation tax credit applications are submitted separately under those program regulations. Please do not hesitate to contact Elizabeth Sherva of my staff if you have any questions.

Sincerely,



Brona Simon  
State Historic Preservation Officer  
Executive Director  
Massachusetts Historical Commission

xc: Michael Michon, One Industrial Lofts, LLC  
Ferry Street Partners Investment Trust  
Steve Chilton, MDFA  
MassWorks  
R Levesque Associates, Inc.  
Easthampton Historical Commission



February 5, 2018

Secretary Matthew A. Beaton  
Executive Office of Energy and Environmental Affairs  
Attn: Alex Strysky, MEPA Office  
100 Cambridge Street, Suite 900  
Boston, Massachusetts 02114

Re: MEPA File No. 15942 – Ferry Street Mill Redevelopment Project

Dear Secretary Beaton:

The Department of Conservation and Recreation (“DCR” or “the Department”) is pleased to submit the following comments in response to the Environmental Notification Form (“ENF”) filed for the proposed Ferry Street Mill Redevelopment Project (the “Project”) in Easthampton.

As proposed, the Project involves activities within a 100-year floodplain as delineated on the current effective Flood Insurance Rate Map (“FIRM”) for Easthampton, dated August 15, 1979. In its role as the state coordinating agency for the National Flood Insurance Program (“NFIP”), DCR submits the following comments.

DCR’s Flood Hazard Management Program (“FHMP”), under agreement with the Federal Emergency Management Agency (“FEMA”), is the state coordinating agency for the NFIP. As such, the FHMP provides technical assistance to communities that participate in the NFIP related directly to the program and also related to floodplain management in general. Communities that participate in the NFIP are required by FEMA, as a condition of their participation, to regulate development within the 100-year floodplain in a manner that meets or exceeds the minimum standards established by FEMA, located at 44 CFR 60.3. Participating communities such as Easthampton are required to adopt the NFIP requirements through locally enforceable measures. In Massachusetts, many of the requirements contained in 44 CFR 60.3 are enforced through existing state regulations such as the State Building Code (780 CMR) and Wetlands Protection Act regulations (310 CMR 10.00). Communities typically adopt the remainder of the requirements as part of a zoning ordinance or other locally enforceable measure. Easthampton has a zoning ordinance that includes a Floodplain District section which has been accepted by FEMA as meeting their requirements under the NFIP.

In our role as NFIP coordinator, the FHMP offers comments on the proposed Project’s relationship to many of the above regulations and requirements. The FHMP does not directly administer any of these requirements and therefore does not provide official determinations as to compliance with them; rather, our comments are provided as an overview of the requirements and the documentation necessary to demonstrate compliance with these requirements.

The Project includes renovation of four former mill buildings into a mix of residential and commercial uses. Based on information submitted with the ENF, the structures adjacent to the canal are located within the 100-year floodplain on the current effective FIRM, specifically a zone A14 with a base flood elevation of 123 feet above National Geodetic Vertical Datum (“NGVD”). Because of its location in the 100-year

COMMONWEALTH OF MASSACHUSETTS · EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS

Department of Conservation and Recreation  
251 Causeway Street, Suite 600  
Boston MA 02114-2119  
617-626-1250 617-626-1351 Fax  
www.mass.gov/orgs/department-of-conservation-recreation



Charles D. Baker  
Governor  
Karyn E. Polito  
Lt. Governor

Matthew A. Beaton, Secretary, Executive  
Office of Energy & Environmental Affairs  
Leo Roy, Commissioner  
Department of Conservation & Recreation



Secretary Matthew A. Beaton  
February 5, 2018  
Page 2

floodplain, compliance with the requirements of several federal, state and local measures related to floodplain development is required. The Massachusetts State Building Code (780 CMR) Ninth Edition, includes specific standards for structures newly constructed or substantially improved in the floodplain.

Information in the ENF does not include building design details. The proponent should be aware that should the Easthampton Building Department determine that the renovations are "substantial improvements," as defined in the Building Code, the buildings will be required to comply with the provisions of the State Building Code, 9<sup>th</sup> Edition, Section 1612 and ASCE 24-14.

Additionally, projects within the 100-year floodplain involving any federal action (e.g., permit, funding) must also comply with federal Executive Order 11988, Floodplain Management. This executive order requires an eight-step decision-making process which includes analysis of alternatives, avoiding impacts when possible, and minimizing impacts when avoidance is not possible. Because this project requires filing a National Pollutant Discharge and Elimination System ("NPDES") Notice of Intent under the EPA Construction General Permit, compliance with this process is necessary. Given the expected impacts of climate change, DCR questions the advisability of building in a floodplain.

DCR appreciates the opportunity to comment on the ENF. If you have any questions regarding these comments, or to request additional information or coordination with DCR, please contact Eric Carlson at (617) 626-1362.

Sincerely,



Leo P. Roy  
Commissioner



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

Matthew A. Beaton  
Secretary

Martin Stueberg  
Commissioner

February 4, 2019

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Massachusetts Environmental Policy Act Office  
Alex Strysky, EEA No. 15942  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114-2524

Re: Ferry Street Redevelopment Project  
Easthampton, MA

Dear Secretary Beaton,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted for the proposed Ferry Street Redevelopment Project, Easthampton, MA (EEA #15942). The project is proposed by One Industrial Lofts, LLC (the Proponent). The applicable MassDEP regulatory and permitting considerations regarding drinking water, wastewater, air pollution, solid waste, and waste site cleanup are discussed.

### **I. Project Description**

The project is redevelopment of the underutilized property, 1 Ferry Street complex. The Ferry Street complex is located on a 3.4 acres parcel on the corner of Lovefield Street in Easthampton. The Stevens Mill textile complex was constructed and operated from the early 1900's to the 1960's. Although some cleanup and remediation was previously attempted, the facility remains in disrepair with debris remaining on site. The Lower Mill Pond lies to the south of Ferry Street and the outflow discharges north through a lined canal to a wetland and waterway discharging north to the Manhan River.

The Proponent proposes to remove or renovate four mill buildings for residential and commercial uses, construct two new mixed-use buildings, install/upgrade utility services, and add parking and access roads. The project also includes renovating an existing bridge over a canal, constructing two pedestrian bridges and providing recreational amenities, including a connection to the Manhan bike trail. Existing structures such as portions of buildings, concrete slabs and retaining walls will be demolished.

The project thresholds requiring an ENF include ½ acre of other wetland, 2,102 additional trips per day, addition of 304 parking spaces and demolition of historic places. The project, through the City and the Proponent will receive State Financial Assistance from MassDevelopment and MassWorks.



The project site is served by municipal water and sewer and stormwater infrastructure which will be upgraded; a new sewer pumping station will also be added. The project will require an Order of Conditions from the Easthampton Conservation Commission, (Superseding Order of Conditions from MassDEP, if appealed), potentially a treatment works modification permit, a Beneficial Use Determination for reuse of demolition debris on-site, potentially a non-traditional asbestos abatement approval and remediation of hazardous waste release(s).

MassDEP and the Proponent held a pre-permitting meeting prior to the MEPA filing detailing permitting pathways and regulatory issues related to this site.

Environmental impacts associated with this project include:

- 68,436 sq.ft. of buildings,
- 0.40 acres of decreased impervious surface,
- 2,102 new vehicle trips,
- 60,330 sq. ft. total permanent impacts to Bordering Land Subject to Flooding (BLSF),
- Upgrade of stormwater management and treatment (below grade) with discharge to canal, and
- Approximately 22,500 gpd of proposed total potable water consumption and wastewater generation.

## II. Required Mass DEP Permits and/or Applicable Regulations

### Drinking Water

310 CMR 22.00

### Wetlands

310 CMR 10.000

### Wastewater

314 CMR 7.00

### 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 Water Resources

#### Wetlands

Based on the information provided, this project is subject to the Wetlands Protection Act and the associated regulations. The site appears to contain BLSF and Bank. The applicant submitted two Notices of Intent to the Easthampton Conservation Commission on October 16, 2018 and MassDEP issued a file number and comments regarding the work. The Conservation Commission has issued the Orders of Conditions

#### Stormwater Management

The Proponent has developed a detailed Stormwater Management plan for redevelopment in compliance with the *Stormwater Management Standards*, to the maximum extent practicable. It includes environmentally sensitive site design and planning, low impact development techniques, stormwater best management practices (BMP) utilizing source control (nonstructural control measures), structural BMPs and follow-up maintenance.

The Proponent has been advised that the canal wall is a regulatory Bank. If it is deemed necessary to construct a stormwater outfall into the wall of the canal, the outfall invert must be located above the elevation of the "upper boundary" of Bank, as defined at 310 CMR 10.54(2)(c). On canals with vertical walls, the upper and lower boundary of Bank are on the face of the canal wall, and should be established by identifying coloration, waterline, or other means to ensure accurately establishing the elevation of the upper boundary of Bank.

MassDEP notes that jurisdictional resources areas must also be protected from impacts throughout the demolition, remediation and future redevelopment activities at the site. Sedimentation and erosion controls will be necessary for management of water generated during dust control and decontamination procedures as well as during jurisdictional work.

#### Drinking Water

There are no MassDEP permits for this proposed work. MassDEP recommends continued detailed consultation with the Easthampton Water Department to ensure adequate capacity and compliance with City requirements. In addition, MassDEP advises compliance with all cross connection requirements, including coordination with the City and the use of backflow prevention devices on municipal water sources used for dust control during demolition.

#### Wastewater

A new wastewater pumping station owned by the City may require a permit from MassDEP depending on the details of the station and design criteria. It is recommended that if the pumping station will be owned and constructed by the City, that the City contact MassDEP during the design phase of the pumping station to discuss if permitting will be required. A privately-owned station will be permitted through the City and must demonstrate, but not be limited to, the following requirements: ownership, operation and maintenance details, financial assurance, emergency and long-term repair details, infiltration and inflow removal and other requirements.

In addition, Regulation 314 CMR 12.04 (2) includes the requirement that all sewer authorities develop a plan for controlling Infiltration and Inflow (I/I) including mitigation of the volume of stormwater runoff into combined sewers when a new connection or extension is permitted. Easthampton is finalizing an Integrated Water Resource Management Plan which incorporates an I/I plan. The Proponent has developed a detailed stormwater management plan and is advised to continue to consult with the City as plans are finalized to ensure compliance with the City's plan and any I/I removal requirements.

### **Bureau of Air and Waste**

#### Air Quality

##### Construction and Demolition Activities

The Proponent has acknowledged they will comply with appropriate regulations. To clarify, construction and demolition activity must conform to current Air Pollution Control Regulations. The Proponent states they will implement measures to 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 Regulations 310 CMR 7.01, 7.09, and 7.10.

In addition, the Proponent should be aware of the requirements for the Adhesives and Sealants used during construction relative to the Volatile Organic Compounds (VOC) content of the Adhesives and Sealants, pursuant to 310 CMR 7.18 (30).

#### Construction Period Air Quality Mitigation Measures

MassDEP recommends that the project proponent participate in the MassDEP Diesel Retrofit Program. All non-road engines are required to be operated using only ultra low sulfur diesel (ULSD) with a sulfur content of 15 ppm pursuant to 40 CFR 80.510.

#### Boilers/Generators/Emergency Generators

The Proponent should be aware that there are air approval/permit or registrations requirements for boilers, stationary turbines, reciprocating engines, emergency generator sets and other internal combustion engines (e.g. those associated with power generation units) that may or may not be applicable to this project. If any energy needs will be met through the combustion of liquid, gaseous, or solid fuels then such systems, may need to be certified (certain boilers depending upon their heat input capacities, and engines and turbines depending upon their rated power outputs) by the MassDEP pursuant to 310 CMR 7.26 and 310 CMR 70.00, may comply with 310 CMR 7.03, or approved by MassDEP pursuant to 310 CMR 7.02 unless otherwise exempted in 310 CMR 7.00.

In addition, major sources are subject to the operating permit program and may be subject to New Source Review requirements. The Proponent, if subject to these programs may seek a federally enforceable restriction to limit its emissions in order to avoid certain requirements. The proponent should refer to the aforementioned regulations to determine if any approval/permit or registration threshold is met by any on-site combustion units being proposed for the project and should evaluate its approval/permitting/registration requirements/options.

#### Asbestos

Historically, the site is known to have asbestos containing materials. Property owners are required to identify asbestos containing materials present in structures prior to conducting demolition or modification and remove asbestos prior to conducting demolition/reconstruction. Some of the materials may be associated with the former heating and process systems or roofing and flooring materials. The Proponent should include assessment of transmission mains that may contain asbestos. MassDEP must be notified using form *BWP AQ 04 (ANF-001) - Asbestos Removal Notification* at least 10 working days prior to initiating work. The handling and removal of asbestos from a facility and/or facility components must be conducted by properly licensed professionals and adhere to the requirements of 310 CMR 7.15.

There may be instances when specific work practices prescribed in the Asbestos Regulation cannot be implemented safely such as within structurally unstable buildings, fire damaged buildings, areas near high-voltage electrical equipment or other situations where wetting or access would be dangerous. To account for these scenarios, the *BAW AQ 36 Application for a Non-Traditional Asbestos Abatement Work Practice Approval* application would be applicable.

#### Solid Waste

There are existing stockpiles of debris on site and the current property owner has outstanding



solid waste requirements under a Unilateral Order issued by MassDEP. The Proponent anticipates taking ownership of the facility and complying with requirements of the Unilateral Order. MassDEP has met with the Proponent and, if necessary, is willing to develop a Consent Agreement to establish a mutually agreeable work schedule to comply with the solid waste requirements.

The Proponent has stated that one building and portions of other buildings will be demolished with the metal segregated and the concrete crushed and repurposed or reused on site in accordance with MassDEP policy. The Proponent is aware that all solid waste currently stockpiled on-site and new solid waste generated, must be properly managed and disposed of in accordance with 310 CMR 16.00 and 310 CMR 19.000, including the waste ban provisions - 310 CMR 19.017. Regulated asbestos and asbestos-containing waste shall be managed in accordance with 310 CMR 19.061.

Asphalt, brick and concrete (ABC) generated through crushing and reuse on-site must be handled in accordance with regulation and policy. Solid waste exemption requirements of 310 CMR 16.03 (1)(b)(5), for ABC require that the rubble be clean (i.e. not painted or coated or containing solid wastes). More information regarding the handling of ABC, and a copy of the 30-day notification form may be found at the following website:

- <https://www.mass.gov/files/documents/2018/03/19/abc-rubble.pdf>

The use of painted or coated ABC rubble from building demolition, or the use of the existing ABC rubble piles on-site, will require a *Beneficial Use Determination (BUD)* permit in accordance with 310 CMR 19.060 for use as fill material on-site. The BUD Regulation 310 CMR 19.060, establishes levels of assessment for four categories of beneficial use. These regulations would be applicable to reuse of materials generated by this project that would otherwise be considered solid waste. Guidance for a BUD permit may be found at:

- <https://www.mass.gov/service-details/massdep-solid-waste-forms#waste-determinations-and-demonstrations>
- <https://www.mass.gov/lists/managing-construction-demolition-cd-wastes>

Due to the potential for soil contamination along the driveways, parking areas and in proximity to antiquated mill buildings, excavated material may be managed in accordance with MassDEP policy COMM-97-001 "*Reuse and Disposal of Contaminated Soil at Massachusetts Landfills*" if the excavated/generated solid waste material demonstrate characteristics of hazardous waste or the presence of other contaminants at levels appropriate for such management.

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.

#### Hazardous Waste

Any hazardous wastes generated by the construction/demolition activities or universal wastes such as mercury containing lamps or mercury thermostats, must be properly managed in accordance with 310 CMR 30.0000.



## **Bureau of Waste Site Clean Up**

### **Massachusetts Contingency Plan (MCP)**

The Massachusetts Contingency Plan (MCP) and regulation 310 CMR 40.0000 governs the cleanup of confirmed oil and hazardous material releases in Massachusetts. If work is proposed that may impact sites that have not been closed out, if oil/hazardous material contamination is encountered, or a release occurs during construction activities, a Licensed Site Professional (LSP) must be retained to manage the contaminated media in compliance with the provisions of the MCP.

At this time, 1 Ferry Street has no open release tracking numbers (RTNs). A report from ATC, included in the resubmitted ENF, indicates evidence that at least one or more releases have occurred on site. The Proponent is aware that the MassDEP must be notified once they acquire ownership of the property. If it is determined, that an Imminent Hazard exists at the site, MassDEP must be notified immediately. Once notified of a reportable release of oil and/or hazardous material, MassDEP will issue a Notice of Responsibility to the PRP detailing your requirements under the law and regulation regarding assessment and cleanup of the site.

### **Spills Prevention**

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 future on-site activity releases.

## **IV. Other Comments/Guidance**

MassDEP staff have met with and will continue to be available for pre-permitting discussions as the project progresses. If you have any questions regarding this comment letter please do not hesitate to contact Catherine Skiba at (413) 755-2119.

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