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

PROJECT NAME : Otis Stage Road Solar Photovoltaic Project
PROJECT MUNICIPALITY : Blandford
PROJECT WATERSHED : Connecticut River
EEA NUMBER : 15994
PROJECT PROPONENT : Blandford Sun, LLC
DATE NOTICED IN MONITOR : March 6, 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** an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project entails the construction of an approximately 4.7-Megawatt (MW) solar photovoltaic (PV) facility consisting of 17,767 solar panel modules mounted on 8-foot (ft) high pile-supported racks. The 25.45-acre PV facility will include three blocks of PV panels, three concrete equipment pads (20-ft by 30-ft) for inverters and a transformer, two stormwater detention basins and an access road. The facility will be enclosed by a 7-ft high chain link fence with two 24-ft wide double swing gates. The inverters and transformer will be connected by a buried cable. Approximately 150 ft south of Otis Stage Road, the cable will be supported on five new utility poles to form an interconnection at the distribution lines within the roadway right-of-way (ROW).

A 16-ft wide gravel access road extending south from Otis Stage Road will be constructed along the west side of the facility. A 15-inch culvert will be installed under the access road near Otis Stage Road to maintain a hydraulic connection between wetlands on either side of the driveway. Additional clearing to reduce shading is also proposed within the vicinity of the facility.

Project Site

The project site comprises approximately 33 acres in the northwestern part of a 187-acre parcel. The site is undeveloped and consists of forested land. It is relatively flat except for an eight percent slope along its western edge with a forested wetland in the eastern and southeastern section. The site is bordered by Otis Stage Road (Route 23) to the north, a single-family residence to the northwest and undeveloped land and the Otis municipal boundary to the west. The remainder of the 187-acre parcel is located south and east of the project site and includes forested land and wetlands.

The southeastern section of the facility will be located within the watershed of a public water supply associated with the Westfield River basin; the Zone A protection area is located east of the site and will not be directly impacted by project components. A narrow band of Bordering Vegetated Wetland (BVW) is located along the northern part of the site adjacent to Otis Stage Road. According to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) (number 25013C0120E, effective July 16, 2013), a small area on the southern portion of the site and much of the eastern part of the 186-acre site are located in the 100-year floodplain (Zone A) with no Base Flood Elevation (BFE) determined. Otis Stage Road (Route 23) is under the jurisdiction of the Massachusetts Highway Department (MassDOT) and is classified as a rural major collector.

Environmental Impacts and Mitigation

Potential environmental impacts of the project include alteration of approximately 33 acres of land and creation of 0.98 acres of impervious area. The project will alter a 6,098 sf of BVW, including 1,245 sf of permanent fill for the driveway and 4,853 sf of clearing to provide adequate sight lines along Old Stage Road. Measures to avoid, minimize, and mitigate environmental impacts include providing a 1,900-sf BVW replication area, which is approximately 1.5 times the area of permanent alteration; construction of a stormwater management system; and implementation of measures to control runoff, noise and dust during the construction period.

Jurisdiction and Permitting

This project is undergoing MEPA review and requires an ENF pursuant to 301 CMR 11.03(1)(b)(1) because it requires an Agency Action and involves direct alteration of 25 acres or more of land. The project requires a Highway Access Permit from MassDOT.

The project requires an Order of Conditions from the Blandford Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions from the Massachusetts Department of Environmental Protection (MassDEP)). It requires the filing of a Self-Verification Notification Form with the Army Corps of Engineers (ACOE) pursuant to Section 404 of the Clean Water Act and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the Environmental Protection Agency (EPA).

Because the Proponent is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required State Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations. In this case, MEPA jurisdiction extends to land alteration, transportation, wetlands and water quality.

Review of the ENF

The ENF provided a description of existing and proposed conditions, preliminary project plans, and identified measures to avoid, minimize and mitigate project impacts. During the review period, the Proponent provided supplemental information regarding alternative driveway locations.¹ The ENF included a Stormwater Report that documented existing and proposed drainage conditions and the design of the stormwater management system.

Alternatives Analysis

The ENF provided an alternatives analysis that reviewed a No Build, Smaller PV Facility and Larger PV Facility and alternative sites. Under the No Build alternative, impacts associated with the project would be avoided, but the project goal of producing renewable energy would not be met. The Smaller PV Facility alternative would minimize land alteration compared to the Preferred Alternative, but would have similar impacts to BVW associated with construction of the driveway. According to the ENF, a smaller facility would not be financially feasible. The Larger PV Facility alternative would include additional PV arrays on the land owned by the Proponent to the east and south of the site. This alternative would have greater impacts on BVW located east of the project site.

According to the ENF, no previously-developed properties suitable for a PV facility are located within the vicinity of the project site. The nearest developed sites are located in Westfield to the east or the Great Barrington/Sheffield area to the west. The project is intended to supply the local grid with electricity and the land uses in the area are similar to the proposed site.

During the review period, the Proponent provided additional information about an alternative driveway location that would follow the path of an old logging road on the Proponent's property east of the project site. The logging road is not paved and includes BVW. According to the Proponent, a driveway in this location would require a wetland crossing of between 150 to 300 linear feet (lf), which would permanently impact up to 9,000 sf of BVW. The Preferred Alternative requires a wetland crossing of 30 lf.

The Preferred Alternative will generate 4.7 MW of renewable energy that will be distributed through an interconnection with the electrical grid. The arrays have been sited to avoid direct impacts to wetland resource areas at the site, including BVW and the 100-year floodplain. The location of the driveway has been selected to minimize impacts to BVW in the northern part of the site. Expansion of renewable energy sources within the Commonwealth is consistent with the mandates outlined in the Global Warming Solutions Act of 2008 for sectors of the economy to reach a target of a 25 percent reduction of Greenhouse Gas (GHG) emissions by 2020 and an 80 percent reduction by 2050. This project furthers the Commonwealth's goal of installation of 1,600 megawatts (MW) to be generated by

¹ Emails from David Klinch (VHB) to Alex Strycky (MEPA Office) on 03/21/2019 and 04/09/19.

solar installations as articulated in the Solar Massachusetts Renewable Target Program regulations (225 CMR 10.00).

Land Alteration /Wetlands

The project will remove trees and regrade an area of approximately 33 acres, including 25.45 acres for the generating facility and 7.5 acres of tree clearing to prevent shading of the PV array. The area below the PV racks will continue to be pervious. Approximately 0.98 acres of impervious area will be created in connection with the gravel access road and concrete equipment pads. The project includes a stormwater management system that has been designed to meet the Stormwater Management Standards (SMS) of the Wetlands Protection Act Regulations (310 CMR 10.00). The eastern part of the site will continue to drain via overland flow toward the wetland area. Runoff from the access road and other impervious areas will be directed to two biofiltration basins. According to the ENF, the stormwater management system will maintain pre-development peak discharge flows and rates for the 2-, 10- and 100-year, 24-hour storm events and remove 80 percent of the Total Suspended Solids (TSS) in runoff prior to discharge. In accordance with Standard 8 of the SMS, the Proponent must prepare a plan to control construction-period sedimentation and erosion for the review and approval of the Blandford Conservation Commission.

The Proponent will replicate 1,870 sf of BVW to mitigate permanent impacts associated with the construction of the site driveway. Wetland soils from the area of impact will be excavated, stored and reused at the replication area. Tree clearing to improve sight lines will occur within approximately 4,853 sf of BVW along Otis Stage Road. This area will not be regraded or cleared of shrubs and understory vegetation. The area will be allowed to revegetate naturally and no mitigation has been proposed. According to the Proponent, clearing of vegetation to maintain sight lines will not be necessary in the future because of the limited vehicular traffic generated by the project after the construction period.

According to MassDEP, it is unclear whether the logging road was constructed pursuant to a Forest Cutting Plan approved in accordance with the Massachusetts Forest Cutting Act (M.G.L. Chapter 132). The Proponent should provide the Blandford Conservation Commission and MassDEP with any relevant documentation of an approved Forest Cutting Plan for the site. Impacts to BVW caused by the logging road may require additional mitigation in accordance with the Wetlands Protection Act (M.G.L. Chapter 131 section 40, 310 CMR 10.00).

Construction Period

During the MEPA site visit, representatives of the Town of Blandford expressed concern regarding installation and maintenance of adequate sedimentation and erosion controls after the site has been cleared and regraded. In addition to complying with Standard 8 of the SMS, the Proponent must prepare a Stormwater Pollution Prevention Plan (SWPP) in compliance with the NPDES CGP to address construction-period stormwater management. The PV facility is located in proximity to BVW and the Zone A of the public water supply. I encourage the Proponent to emphasize the importance of stormwater management to its contractors to avoid impacts to these resource areas.

The Proponent must prepare a Traffic Management Plan (TMP) for MassDOT’s review and approval. The TMP should be prepared in coordination with the MassDOT District 1 and identify measures for minimizing impacts and the duration of activity within state highways.

The Proponent should implement measures to prevent and minimize nuisance conditions such as dust, noise, and odors during construction. According to the ENF, construction activities will take place during typical daylight work hours over a 6- to 8-month period. To minimize noise and emissions of air pollutants from construction equipment, all work should conform to the anti-idling measures of the Air Quality regulations (310 CMR 7.11), which limit vehicle idling to five minutes. I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). All construction activities should be undertaken in compliance with the conditions of all State and local permits.

Conclusion

Based on a review of the ENF and comments received, and in consultation with State Agencies, I have determined that 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 can be avoided, minimized and/or mitigated to the extent practicable. No further MEPA review is required. The project may proceed to permitting.



April 19, 2019

Date

Matthew A. Beaton

Comments received:

- 12/04/2018 Natural Heritage and Endangered Species Program (NHESP)
- 12/10/2018 Town of Amherst
- 12/11/2018 Massachusetts Department of Environmental Protection (MassDEP)/Western Regional Office (WERO)
- 12/11/2018 Bruce Parkin

MAB/AJS/ajs