



*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>

June 21, 2019

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

PROJECT NAME : Cabotville Mill Redevelopment  
PROJECT MUNICIPALITY : Chicopee  
PROJECT WATERSHED : Chicopee River  
EEA NUMBER : 16022  
PROJECT PROPONENT : 4 Perkins LLC  
DATE NOTICED IN MONITOR : May 8, 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 rehabilitation and reuse of mill buildings located along Front Street in Chicopee. The project will renovate 689,310 square feet (sf) of the three six-story masonry mill buildings, the Boiler House, and Engine Rooms A and B to create up to 550 new market rate residential apartments and related amenity space. Existing surface parking will be redesigned to increase landscaping and reduce impervious coverage and parking spaces. The project will also include construction of a stormwater management system and associated utilities, and replacement of two deteriorated pedestrian bridges over the Chicopee Canal. Access to the site will continue to be provided via Springfield Street (a full-access southern driveway and a secondary entrance-only northern driveway). The site will be served by municipal water and sewer.

The project will be phased. Phase 1 will consist of renovation of Mill 1 for 280 residential units, and the Boiler House and Engine Rooms A and B for the leasing office and amenity space. Phase 1 is anticipated to commence June 2019 and be completed by May 2020. Phase 2 will consist of the

renovation of Mills 2 and 3 for 270 residential units and is not anticipated to commence construction until 2021.

### Project Site

The project site is located just west of Chicopee Center in the West End area. The site is comprised of 11.2 acres of a former industrial mill complex at 165 Front Street and 0 Exchange Street (main project site) and a second parcel which is a vacant paved lot south of Front Street. The main project site contains the Dwight Manufacturing Company's Mills 1, 2, and 3, a Boiler House, Engine Rooms A and B, two pedestrian bridges and paved parking areas. The mill complex was constructed in the 1840s. The site is bounded by the Chicopee River to the north, Springfield Street to the east, the Chicopee Canal to the south and southwest, Depot Street to the southwest, and Interstate 391 (I-391) to the west. Springfield Street and I-391 are under the jurisdiction of the Massachusetts Department of Transportation (MassDOT). A portion of the Chicopee Canal passes under Mill 2 and joins the Chicopee River to the north of the site. The buildings have remained largely vacant since the early 1930s. It is surrounded by residential and commercial development. Access is off Springfield Street and Depot Street.

The site contains a floodwall adjacent to the Chicopee River. According to the Federal Emergency Management Agency's (FEMA) National Flood Insurance Rate Map (FIRM) (25013C0213E, effective July 16, 2013), a small portion of the northern part of the project site is located in an Area with Reduced Flood Risk due to Levee.

The industrial mill complex buildings and bridges (Dwight Manufacturing Company complex) are listed on the Inventory of Historic and Archaeological Assets of the Commonwealth (Inventory).

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include generation of 2,992 new average daily trips (adt), use of 61,050 gallons per day (gpd) of water and generation of 54,945 gpd of wastewater. Measures to avoid, minimize, and mitigate impacts include removal of 4.18 acres of impervious area; redevelopment of a site; rehabilitation and reuse of an historic building; decrease of parking spaces by 489 spaces; implementation of construction period best management practices (BMPs); and installation and maintenance of a stormwater treatment system.

### Permitting and Jurisdiction

The project is undergoing MEPA review and requires preparation of an ENF pursuant to 301 CMR 11.03(6)(b)(13) and 301 CMR 11.03(10)(b)(1) because it requires an Agency Action and will generate 2,000 or more New adt on roadways providing access to a single location and demolish all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the Inventory. The project requires a Vehicular Access Permit from MassDOT. The project will require funding from the Department of Housing and Community Development (DHCD) and the Proponent is seeking state historic rehabilitation tax credit funds.

The project will require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA) and is subject to review by MHC in compliance with M.G.L. Chapter 9, Section 26-27C.

Because the Proponent is seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction is broad in scope 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 provides a description of the project, preliminary project plans, and analysis of alternatives. It identifies measures to avoid, minimize and mitigate environmental impacts. The Proponent submitted supplemental information during the MEPA review period including a Traffic Impact Assessment (TIA) and discussion of multimodal accommodations and transportation demand management (TDM) measures.<sup>1</sup>

The Proponent considered two alternatives in addition to the Preferred Alternative including the No-Build and a Reduced Development. The analysis provides a tabular comparison of impacts associated with each alternative for impervious area, traffic generation, water use, and wastewater generation. The No-Build alternative would leave the site mostly vacant and poorly utilized. While it would create no new impacts, it would not realize the site's economic potential, remove 4.18 acres of impervious area, treat stormwater currently entering the Chicopee River, or provide housing with access to public transportation. The Reduced Development Alternative would construct Phase 1 only which would decrease trip generation, water use and wastewater generation by approximately 50 percent. This alternative was dismissed because it would not realize the site's economic potential and would leave two mill buildings vacant and poorly utilized.

### *Transportation*

The project requires a Vehicular Access Permit from MassDOT because Springfield Street is under its jurisdiction. MassDOT comments indicate that the TIA generally conforms to the MassDOT/EEA *Transportation Impact Assessment Guidelines*. MassDOT does not request further MEPA review.

Access to the site is proposed via three existing driveways, two on Springfield Street and one on Depot Street. The north site driveway along Springfield Street will operate as entrance only and the south site driveway along Springfield Street and the Depot Street driveway will provide full access. The TIA includes seven study area intersections along Springfield Street, Front Street, Depot Street and the three site driveways. The site driveways have sufficient site distances.

Based on data from MassDOT (continuous period from 2011 through 2015), the Front Street/Depot Street intersection exceeds the MassDOT District 2 average crash rate for an unsignalized intersection. The ENF indicates that because of low traffic volumes at this intersection during peak hours, any crash occurring will cause the calculated crash rate to increase. MassDOT comments indicate that the Springfield Street/Chicopee Street/Granby Road intersection is listed as 2014-2016 Highway Safety Improvement Program (HSIP)-eligible. MassDOT recently implemented improvements at this intersection to reduce vehicle lanes and provide a bicycle lane. In addition, the intersection was reconstructed in 2012 when the bridge on Springfield Street was replaced. MassDOT comments do not identify any safety-related improvements at this intersection that should be completed by the Proponent.

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<sup>1</sup> Emails from Stephanie Krueel, VHB, on behalf of the Proponent, on May 28, 2019 and June 11, 2019

Based on the Institute of Transportation Engineers (ITE) *Trip Generation Manual's* Land Use Codes (LUC) 221 (Multifamily Housing – Mid-Rise), the project is expected to generate 2,992 unadjusted adt on weekdays<sup>2</sup>, including 195 and 240 vehicle trips during the weekday morning and evening peak hours, respectively. No credit was taken for mode share.

The project will include 657 parking spaces<sup>3</sup>, of which 184 spaces would be provided in the auxiliary lot across Front Street. To further limit traffic generation and impervious area, I strongly encourage the Proponent to reduce the number of spaces to the extent feasible. The Proponent should consider banking land that would only be constructed for parking if warranted by demand.

Traffic operations and vehicle queue analyses were performed at the study area intersections for the 2019 Existing, 2026 No-Build and 2026 Build conditions. Future conditions included regional background traffic growth and planned roadway improvements. All signalized intersections and state-owned approaches of unsignalized intersections will operate at a Level of Service (LOS) D or better under 2026 Build conditions with minor increases to the overall delay experienced compared to the No Build condition. The eastbound movement of the intersection of Springfield Street/South Site Drive reflects higher delays and a LOS E during the 2026 Build weekday evening condition. The TIA maintains that a LOS E or F along a minor approach to an unsignalized intersection is not uncommon and does not impact the traffic flow on the mainline street; there is a longer wait time for vehicles to safely maneuver from the minor approach to the major street traffic stream.

Supplemental information was provided regarding pedestrian, bicycle and public transit services and facilities in the study area. It is anticipated that all pedestrian and bicycle access to the site will be through the South Site Driveway, which proposes an accessible sidewalk connection to Springfield Street. The Proponent will provide a pedestrian sidewalk connections and a crosswalk to access the auxiliary parking lot. The project will include reconstruction of the two pedestrian bridges on-site. Pedestrian and bicyclists are provided connectivity to Chicopee Center and the adjacent Chicopee Center Canal Walk. Any proposed mitigation within the State highway layout and all internal site circulation must be consistent with a Complete Streets design approach that safely accommodates all roadway users, including bicyclists, pedestrians, and transit riders. Where these criteria cannot be met, the Proponent should provide justification for and work closely with MassDOT to obtain a design waiver.

Public transportation within the study area is provided by the Pioneer Valley Transit Authority (PVTA) and is readily accessible to residents of the site. Two PVTA bus routes are located immediately adjacent to the project site off Front Street and Cabot Street. Pedestrian connections to the nearest bus stops are present or will be constructed from building entrances on-site. MassDOT comments encourage the Proponent to consult with PVTA regarding opportunities to promote and encourage transit ridership among residents, including relocating or adding bus stops closer to the project site or providing bus shelters at existing stops.

Supplemental information identifies the following transportation demand management (TDM) measures to reduce single occupancy vehicle trips:

- Pedestrian connectivity from Springfield Street to the southern entrance of Mill 1;

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<sup>2</sup> The TIA indicates weekday trip generation of 2,970 based on 545 residential units.

<sup>3</sup> The TIA indicates the project will provide 632 parking spaces.

- Reconstructed pedestrian bridges and a proposed crosswalk on Front Street providing connectivity from the proposed auxiliary parking lot to the proposed raised pedestrian sidewalks along the southern side of the redeveloped buildings;
- Provision of raised pedestrian sidewalks on-site to encourage residents to walk to adjacent PVTA bus stops along Front Street and Cabot Street; and
- Provision of bicycle racks and priority parking spaces for electric vehicles on-site.

MassDOT comments recommend that the Proponent consider additional TDM measures such as provision of bicycle repair equipment; posting of public transportation information within building lobbies and other locations; and encouraging carpooling among residents, including providing matching services. The Proponent should consult with MassDOT regarding bicycle and pedestrian accommodations and implementation of the TDM program.

#### *Wetlands and Stormwater*

MassDEP comments advise the Proponent to review potential impacts with the Chicopee Conservation Commission to ensure compliance with regulatory requirements for work conducted outside of the building and for replacement of the foot bridge over the canal.

The project will remove 4.18 acres of impervious area. The stormwater management system will be designed to comply with the City of Chicopee's Stormwater Regulations. Existing systems provide no treatment of runoff. Proposed conditions will reduce peak runoff rates and improve water quality. In addition to considering land banking of parking areas until warranted by demand, I strongly encourage the Proponent to incorporate Low Impact Development (LID) measures such as bio-retention basins and rain gardens in the project design. As recommended by MassDEP, the Proponent should develop a Stormwater Management Plan for redevelopment in compliance with the Stormwater Management Standards to the maximum extent practicable.

#### *Historic Resources*

The project will rehabilitate Mills 1, 2, and 3, the Boiler House and Engine Rooms A and B in compliance with the requirements of the Massachusetts Historic Rehabilitation Tax Credit program. Building modifications will include replacement of windows, roofs, and select (non-historic) doors and some repairs to the masonry. Two steel pedestrian bridges over the Chicopee Canal will be replaced in-kind because they are structurally unstable. MHC comments indicate that the Dwight Manufacturing Company complex meets the criteria of eligibility for listing in the National Register of Historic Places. MHC requests the Proponent submit additional to allow it to evaluate the potential effects of the proposed work including color photographs of buildings and bridges, proposed building elevations, and project plan and elevations of existing and proposed conditions for the pedestrian bridges.

#### *Climate Change*

The project may be vulnerable to the effects of climate change including more frequent and intense storms and higher temperatures. I encourage the Proponent to evaluate final design elements to maximize adaptability of the site and structures over time such as placing equipment at higher elevations, operable windows, shade trees and shrubs and high reflective roof materials. I note that the City of Chicopee is participating in the Municipal Vulnerability Preparedness (MVP) program. The City

has received a grant to begin the process of planning for climate change resiliency and implementing priority projects. Communities who complete the MVP program become certified and are eligible for MVP Action grant funding and other opportunities. I encourage the Proponent to consult with the City of Chicopee regarding the findings of the vulnerability assessments.

I strongly encourage the Proponent to incorporate energy efficiency measures into the building rehabilitation to reduce energy use and offset GHG emissions. Measures that may be appropriate for this project include improvements to the building envelope, a high efficiency HVAC system, high efficiency lighting and certification under the EnergyStar rating system. The Proponent should contact utility providers as early as possible in the design process to discuss potential incentives available for the purchase and installation of energy efficient building materials and systems such as air source heat pumps. I also encourage the Proponent to evaluate the feasibility of a third-party photovoltaic (PV) system to offset GHG emissions. The following programs and incentives are available to support energy efficiency and renewable energy:

- Massachusetts Clean Energy Center rebates for air source heat pumps, ground source heat pumps, variable refrigerant flow systems, and solar thermal at <http://www.masscec.com/get-clean-energy/business>.
- MassSave utilities for rebates and incentives on energy efficiency equipment and for performance-based incentives at <https://www.masssave.com/>.
- Credits associated with the Alternative Energy Portfolio Standards for ground source heat pumps, air source heat pump, solar thermal systems, and combined heat and power at <https://www.mass.gov/alternative-energy-portfolio-standard>.

More information is available on the Massachusetts Department of Energy Resources' (DOER) website at <https://www.mass.gov/service-details/development-of-the-solar-massachusetts-renewable-target-smart-program>.

### 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. All construction activities should be undertaken in compliance with the conditions of all State and local permits. The Proponent will install BMPs on the project site to control erosion and sedimentation during the construction period. The project will require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES CGP. I refer the Proponent to the comments from MassDEP regarding requirements for boilers, generators and emergency generators; spills contingency plan; solid waste management and recycling; and building rehabilitation including the management of asbestos containing material (ACM) and asphalt, brick, and concrete (ABC). The Proponent should evaluate measures to avoid, minimize and mitigate construction period impacts (e.g., noise, dust, odor).

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, driver

training, and periodic inspections by site supervisors. The Proponent is advised that if oil and/or hazardous material are identified during the implementation of this project, notification pursuant to the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000) must be made to MassDEP.

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 the information in the ENF and after consultation with State Agencies, I find that an EIR is not required. Remaining issues can be addressed through the local, State and federal permitting and review processes.

June 21, 2019  
Date



Kathleen A. Theoharides

Comments received:

- 06/03/2019 Massachusetts Historical Commission (MHC)
- 06/10/2019 City of Chicopee Department of Planning and Development
- 06/11/2019 Massachusetts Department of Transportation (MassDOT)
- 06/12/2019 Massachusetts Department of Environmental Protection (MassDEP) –  
Western Regional Office (SERO)

KAT/PPP/ppp



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

May 24, 2019

Secretary Kathleen Theoharides  
Executive Office of Energy & Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RECEIVED

JUN 03 2019

MEPA

ATTN: Purvi Patel, MEPA Unit

RE: Cabotville Mill Redevelopment, 165 Front Street, Chicopee, MA: MHC# RC.66330,  
EEA# 16022

Dear Secretary Theoharides:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Environmental Notification Form (ENF), received at this office on May 2, 2019, for the project referenced above.

This project proposes the redevelopment and rehabilitation of an existing industrial mill complex, located at 165 Front Street in Chicopee, into a residential development. The project includes the rehabilitation of three mill buildings, the boiler house, and engine rooms A and B, as well as the redesign of parking, landscaping work, and the replacement of pedestrian bridges over the Chicopee Canal.

The ENF indicates that the project will require an access permit from the Massachusetts Department of Transportation (MassDOT) and funding from the Department of Housing and Community Development (DHCD).

Review of the MHC's *Inventory of Historic and Archaeological Assets of the Commonwealth* indicates that the Dwight Manufacturing Company (CHLE), which includes all of the buildings and bridges in this proposed project, is in the Inventory. It is the opinion of MHC staff that the Dwight Manufacturing Company complex meets the criteria of eligibility for listing in the National Register of Historic Places under criteria A and C at the local level of significance (36 CFR 60).

The information submitted is incomplete. The MHC requests that the following information be submitted in order to evaluate the potential effects of the work proposed on this property:

- Current color photographs of all buildings proposed for rehabilitation, as well as current photographs of the existing pedestrian bridges;
- Project elevations shows the proposed rehabilitation work on the three mill buildings, boiler house, and engine rooms A and B; and
- Project plans and elevations depicting the existing and proposed pedestrian bridges.



Please note that these comments are offered to assist in compliance with M.G.L. Chapter 9, sections 26-27C, (950 CMR 71.00) and 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 Linda Santoro of my staff if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Brona Simon".

Brona Simon  
State Historic Preservation Officer  
Executive Director  
Massachusetts Historical Commission

xc: Lou Martin, DHCD  
MassDOT District 2 Office  
Aaron Papowitz, 4 Perkins, LLC

City of Chicopee  
Department of Planning & Development

City Hall Annex • 274 Front Street • 4<sup>th</sup> Floor • Chicopee, Massachusetts 01013  
Tel (413) 594-1515 • Fax (413) 594-1514  
www.chicopeema.gov

Lee M. Pouliot  
Director, AICP, ASLA

Patrick J. McKenna  
Assistant Planner

Nathan A. Moreau  
Associate Planner



Michelle Santerre  
GIS Coordinator

James J. Dawson  
Development Manager

Kristen Pope  
Senior Clerk

June 10, 2019

Secretary Kathleen A. Theoharides  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**Re: MEPA Review Cabotville Mill Redevelopment – EEA#/MEPA ID# 16022**

Dear Secretary Theoharides,

The City of Chicopee's Department of Planning & Development has been working with 4 Perkins, LLC / the SilverBrick Group on plans for redevelopment of the Cabotville Mill Complex located at 165 Front Street in Chicopee for a number of years.

The conversion of the Cabotville Mill Complex to a mixed-use development is consistent with neighborhood plans including the West End Brownfields Area-Wide Plan (AWP) (<http://chicopeema.gov/191/West-End-Area-Wide-Plan>). Cabotville is identified as a significant redevelopment project that has the potential to catalyze further redevelopment in the West End neighborhood.

The City of Chicopee has been preparing for this project to advance. Through a \$2.64 million MassWorks Infrastructure Grant award in 2015, the City upgraded water, sewer, sewer pump station, and electrical infrastructure that serve the Cabotville Mill Complex and the neighboring Dwight Manufacturing Complex to ensure adequate utility services for redevelopment projects at both complexes.

Additionally, the project has been reviewed by the City Council, through the City's Mill Conversion and Commercial Center Zoning Overlay District, and was issued a Special Permit from the City Council on May 10, 2018. The Special Permit required additional review of updated plans for the project. Updated plans were submitted to the Planning Department on February 19, 2019 and May 8, 2019. Reviews by City Departments that are members of the Overlay District Review Committee (ODRC) were completed on April 9, 2019 and May 30, 2019. Notification was made to the City Council on June 7, 2019 that all requirements and regulations pertaining to the project had been met

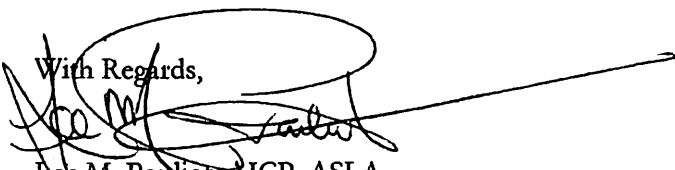
and the Special Permit for the project can be released by the City Council. It is my understanding that SilverBrick Group is in the process of preparing Building Permit Applications.

Cabotville is included in the City's West End Housing Development Zone (WEHDZ) as defined by the Housing Development Incentive Program (HDIP) with the project addressing a desire to increase market rate housing within the Zone's boundaries. Cabotville is also considered one of the City's major Brownfields sites (as studied as part of the West End AWP) prioritized for redevelopment. Additionally, the project has been reviewed by the Chicopee Historical Commission, which has voted to support the project during two (2) review meetings.

With a variety of City Departments, Boards and Commissions reviewing the project in preparation for construction, I am confident that the City is well prepared for this project to advance. We look forward to the issuance of a Certificate via the MEPA process and seeing Cabotville's redevelopment advance to construction.

Should you have any questions regarding the comments provided in this letter, please feel free to contact me at any time.

With Regards,



Lee M. Poulton, AICP, ASLA  
Director



Charles D. Baker, Governor  
Karyn E. Polito, Lieutenant Governor  
Stephanie Pollack, MassDOT Secretary & CEO

**massDOT**  
Massachusetts Department of Transportation

June 11, 2019

Kathleen Theoharides, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114-2150

RE: Chicopee: Cabotville Mill Redevelopment – ENF  
(EEA # 16022)

ATTN: MEPA Unit  
Purvi Patel

Dear Secretary Theoharides:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Cabotville Mill Redevelopment project in Chicopee, as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler  
Executive Director  
Office of Transportation Planning

DJM/jll

cc: Jonathan Gulliver, Administrator, Highway Division  
Patricia Leavenworth, P.E., Chief Engineer, Highway Division  
Neil Boudreau, Assistant Administrator of Traffic and Safety Engineering  
Peter Cavicchi, District 2 Highway Director  
Pioneer Valley Planning Commission  
Pioneer Valley Transit Authority  
Department of Planning and Development, City of Chicopee  
PPDU Files



Charles D. Baker, Governor  
Karyn E. Polito, Lieutenant Governor  
Stephanie Pollack, MassDOT Secretary & CEO

**massDOT**  
Massachusetts Department of Transportation

TO: David J. Mohler, Executive Director  
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager  
Public/Private Development Unit

DATE: June 11, 2019

RE: Chicopee – Cabotville Mill Redevelopment: ENF  
(EEA #16022)

The Public/Private Development Unit (PPDU) has reviewed the Environmental Notification Form (ENF) for the Cabotville Mill Redevelopment project in Chicopee. The 12-acre site currently consists of three existing mill buildings used for industrial purposes. The project proposes to redevelop approximately 689,310 square feet of industrial space into 545 residential units across multiple buildings. The project would be completed in two phases, with the first phase resulting in the creation of 280 residential units and the second phase the creation of 265 residential units.

Based on the information presented in the ENF, the project is expected to generate 2,992 new unadjusted vehicle trips on an average weekday, with 195 new vehicle trips occurring during the weekday morning peak hour and 240 new vehicle trips occurring during the evening peak hour. The project will include 632 parking spaces, of which 184 spaces would be provided at an auxiliary parking lot. The project exceeds the Massachusetts Environmental Policy Act (MEPA) threshold for trip generation (2,000 new trips) as well as combined trip generation (1,000 new trips) and parking (150 spaces).

Site access is proposed via three existing driveways, two on Springfield Street and one driveway on Depot Street. The north site driveway along Springfield Street is proposed to operate as entrance only with the south site driveway along Springfield Street and the Depot Street driveway operating as full-access driveways. A Vehicular Access Permit from MassDOT will be required because Springfield Street (Route 116) is a state-owned roadway.

The ENF includes a Traffic Impact Assessment (TIA) prepared in general conformance with the current MassDOT/EOEEA *Transportation Impact Assessment Guidelines*. The Proponent provided supplemental information to MassDOT regarding multimodal access and facilities as well as detailing transportation demand management measures for the project.

### Study Area

The TIA study area includes the following intersections:

- Springfield Street (Route 116) at Chicopee Street/Granby Road;
- Springfield Street at Front Street;
- Front Street at Cabot Street;
- Front Street at Depot Road;
- Springfield Street at North Site Driveway;
- Springfield Street at South Site Driveway; and
- Depot Street at West Site Driveway.

The study area is considered to be acceptable and adequate in capturing the impact of the project on area roadways.

### Trip Generation

The TIA includes trip generation rates that were calculated using the Institute of Transportation Engineers (ITE)'s *Trip Generation Manual* (10<sup>th</sup> Edition). As presented in the ENF, trip generation was calculated based on Land Use Code (LUC) 221 – Multifamily Housing (Mid-Rise). The site is expected to generate 2,970 unadjusted vehicle trips on an average weekday, with 195 trips during the weekday morning peak hour and 240 trips during the weekday evening peak hour. No credit was taken for mode share.

### Safety

The TIA includes a summary of crash rates derived from MassDOT for the continuous five-year period of 2011 through 2015. With the exception of the Front Street at Depot Street intersection, the crash rates at all of the study area intersections are lower than MassDOT Statewide and District 2 averages.

The Springfield Street/Chicopee Street/Granby Road intersection is listed as a 2014-2016 Highway Safety Improvement Program (HSIP)-eligible intersection, although this was not reflected in the ENF. MassDOT recently implemented improvements at this intersection to reduce the four-lane cross-section of Chicopee Street to two lanes and install a bicycle lane. Furthermore, the intersection was reconstructed in 2012 when the bridges on Springfield Street were replaced. As a result, we are not requesting at this time that the Proponent evaluate and implement any safety-related improvements at this intersection.

### Traffic Operations

Capacity analyses were conducted for the weekday morning and weekday evening peak periods for existing, 2026 No-Build, and 2026 Build conditions. All signalized intersections and state-owned approaches of unsignalized intersections are reflected as operating at a Level of Service (LOS) D or better under 2026 Build conditions.

### Multimodal Access and Facilities

The Proponent provided supplemental information detailing pedestrian, bicycle, and transit services and facilities present in the study area. As the south site driveway along Springfield Street is intended to operate as a drop-off/pick-up driveway with short-term parking, project-generated pedestrian and bicycling activity is expected to access the project site through this access point. Accessible sidewalk connections will also be provided from the auxiliary parking lot, including the reconstruction of pedestrian bridges across the canal to facilitate access to the project site.

The Pioneer Valley Transit Authority (PVTA) operates the G1 and P21 bus routes in the vicinity of the project site; pedestrian connections to the nearest bus stops serving these routes are present or will be constructed from building entrances within the project site. We encourage the Proponent to consult with PVTA regarding opportunities to promote and encourage transit ridership among project residents, including whether any bus stops could be added closer to the project site or bus shelters constructed at existing stops.

### Conceptual Plans

Any proposed mitigation within the state highway layout and all internal site circulation must be consistent with a healthy transportation design approach that provides adequate and safe accommodations for all roadway users, including pedestrians, bicyclists, and public transit riders. Guidance on healthy transportation design is included in the MassDOT *Project Development and Design Guide*. Where these criteria cannot be met, the Proponent should provide justification, and should work with the MassDOT Highway Division to obtain a design waiver.

### Transportation Demand Management Program

The Proponent has committed to Transportation Demand Management (TDM) measures including providing bicycle racks on-site and priority parking spaces for electric vehicles. We encourage the Proponent to commit to further measures such as providing bicycle repair equipment to residents and visitors of the project and posting information on transit services made available in building lobbies and other central locations. The Proponent should also work to encourage carpooling among residents, including providing matching services. The Proponent is invited to consult with MassDOT to help implement the TDM program.

MassDOT recommends that no further environmental review be required based on transportation issues. The details of the above and any other access-related issues can be addressed during the permitting process for the project. If you have any questions regarding these comments, please contact me at (857) 368-8862 or Michael Clark at (857) 368-8867.





Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Kathleen A. Theoharides  
Secretary

Martin Suuberg  
Commissioner

June 12, 2019

Kathleen A. Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
Massachusetts Environmental Policy Act Office  
Purvi Patel, EEA No. 16022  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114-2524

Re: Cabotville Mill Redevelopment,  
Chicopee - ENF

Dear Secretary Theoharides,

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 Cabotville Mill Redevelopment, Chicopee, MA (EEA #16022). The project is proposed by 4 Perkins, LLC). 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 site is a 11.0 acres former mill complex known as the Cabotville Mill on 165 Front Street and 0 Exchange Street built in the 1840's and primarily vacant since the 1930's. The Proponent proposes a Phased project to renovate the three linear, 6-story mill buildings, the Boiler House and Engine Rooms to create 545 residential apartments related amenities. Although the building footprint will remain the same, the parking area will be modified for an overall decrease of impervious surface. The project is proposed to be constructed in 2 phases and result in 2,992 new vehicle trips per day. Stormwater improvements will be reviewed under Chicopee's Stormwater Regulations and will include additional stormwater inlets and a reduction in impervious area.

The project site is served by municipal water and sewer and the proposed water use and wastewater generation is expected to increase by 61,050 gallon per day (gpd) and 54,945 gpd, respectively. There are no MassDEP permits required for this project.

Environmental impacts associated with this project include:

- 4.18 acres of decreased impervious surface, and
- 2,992 new vehicle trips,

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

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

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- 61,050 gpd of new water use, and
- 54,945 gpd of new wastewater generation.

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

Drinking Water

310 CMR 22.00

Underground Injection Control

310 CMR 27.00

Wastewater

314 CMR 7.00

Air Pollution

310 CMR 7.00

Solid Waste

310 CMR 16.00

Bureau of Waste Site Cleanup

310 CMR 40.000

**III. Permit Discussion**

**Wetlands and Waterways**

The Proponent has not identified any wetlands resource area impacts as part of this phased project. However, due to the proximity of the project to the Chicopee River and a canal, MassDEP advises the Proponent to review potential impacts with the Conservation Commission to ensure compliance with regulatory requirements for work conducted outside of the building and for replacement of the foot bridge over the canal.

**Stormwater Management**

The Proponent is advised to develop a detailed Stormwater Management plan for redevelopment in compliance with the *Stormwater Management Standards*, to the maximum extent practicable. The plan should include 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.

MassDEP notes that jurisdictional resources areas must also be protected from impacts throughout any demolition, remodeling and future redevelopment activities at the site. Sedimentation and erosion controls may be necessary for management of water generated if dust control measures are necessary during work.

**Bureau of Water Resources**

**Drinking Water**

There are no MassDEP permits for this proposed work. MassDEP recommends close consultation with the Chicopee Water Department to ensure adequate capacity and compliance with City requirements. In addition, MassDEP recommends compliance with all cross-connection requirements.

### Wastewater

There are no MassDEP permits required for this proposal but MassDEP recommends continued consultation with the City Department of Public Works regarding any sewer design and connection.

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. The Proponent has developed a stormwater management plan and is advised to continue to consult with the City, as your plans are finalized, to ensure compliance with any I/I removal requirements as required by the City.

### 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. the following link provides additional information regarding the required notification prior to Construction or Demolition:

<https://www.mass.gov/files/documents/2018/09/14/aq06.pdf>

The Proponent should also 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

The Proponent commits to use of compliant 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.

### Solid Waste

The Proponent shall properly manage and dispose of all solid waste generated by this proposed project pursuant to 310 CMR 16.00 and 310 CMR 19.000, including the regulations at 310 CMR 19.017 (waste ban).

Urban soils may be contaminated to some degree by previous land use. The Proponent is advised to manage any potentially hazardous materials encountered appropriately. 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 (i.e. lead paint, PCB contaminated or PCB containing construction materials).

Property owners are required to identify asbestos containing materials present in structures prior to conducting demolition or modification and to remove asbestos prior to conducting work. Some of the materials may be associated with the former heating and process systems, cement pipes or asbestos coated gas lines or roofing and flooring materials. 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. In addition, regulated asbestos and asbestos-containing waste material must be managed as special wastes 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. Otherwise, the proponent may need to obtain a site assignment and facility permit for the crushing activity and a Beneficial Use Determination (BUD) for the reuse of the crushed material. More information regarding the handling of ABC, and a copy of the 30-day notification form may be found at the following website:

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

The BUD regulation (310 CMR 19.060) establishes levels of assessment for four categories of beneficial use. These regulations would be applicable to reuse of any materials generated by this project that would otherwise be considered solid waste.

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.

If any hazardous waste or waste oil is generated at any of the sites, the Proponent must ensure that proper registration with MassDEP and management in accordance with 310 CMR 30.0000.

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

There are no identified disposal sites governed by the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, M.G.L. c. 21E, and the Massachusetts Contingency Plan (MCP) within the project site. However, there are adjacent properties that have a Permanent Solution under the MCP. If soil contamination is encountered during work activities, the Proponent should retain a Licensed Site Professional (LSP); the MCP details procedures to follow for the parties conducting remediation and cleanup work. MassDEP staff are available for guidance.

#### **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**

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