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November 25, 2019

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

PROJECT NAME : Westfield Turnpike Industrial Park  
PROJECT MUNICIPALITY : Westfield  
PROJECT WATERSHED : Westfield River  
EEA NUMBER : 15845  
PROJECT PROPONENT : City of Westfield  
DATE NOTICED IN MONITOR : October 18, 2019

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

Project Description

As described in the FEIR, the project consists of a multi-use development in six buildings totaling 988,000 gross square feet (sf), including 105,000 sf of office space, 550,000 sf of warehouse and distribution space, 211,000 sf of light industrial/manufacturing space and 122,000 sf of light industrial/research and development (R&D) space ("Flex Tech"). The project includes the construction of up to 1,458 parking spaces, a stormwater management system, infrastructure for water, wastewater and other utilities, and driveways to provide access from Cabot Road and Turnpike Industrial Road.

Construction of the buildings may occur simultaneously or in phases over a period of eight to ten years. Development is likely to occur first with the construction of the warehouse and distribution building in the center of the site, followed by light industrial and Flex Tech buildings at the southern end of the site and concluding with a group of smaller office and Flex Tech buildings at the northern end of the site along Cabot Road. Infrastructure, including water and sewer mains, will be extended from Turnpike Industrial Road adjacent to the southern end of the site. The City of Westfield (City) anticipates that the mix of uses, project configuration, and building dimensions may change in response to market demand. MEPA review may be required if changes to the project result in greater environmental impacts.

### Project Site

The project site is comprised of seven parcels with a combined area of 74 acres. Four parcels comprising 66 acres are owned by the City; three parcels (approximately 8 acres) are owned by the Massachusetts Economic Development and Finance Agency (MassDevelopment) and will be conveyed to the City prior to construction. The site is wooded except for an approximately 1,275-sf house on Cabot Road and an approximately 10.5-acre cleared field in its northwest corner that is in agricultural use. The site is bordered to the south by undeveloped land adjacent to the Massachusetts Turnpike (MassPike)/Interstate-90 (I-90), to the southeast by an industrial park, to the east by Sabrina Brook Lane, to the north by Cabot Road and to the west by cleared fields. Apart from the industrial park, the area surrounding the site is generally comprised of low-density residential neighborhoods, farmland and undeveloped land.

A proposal by the City to construct a solid waste management facility at the site was reviewed by MEPA in the early 1990s (EEA# 8518). Water and sewer service were extended to the south side of the site in connection with the proposal. The facility was not constructed because a moratorium was placed on the creation of new landfills in 2001. The City-owned parcels are zoned for industrial and other uses; the parcels owned by MassDevelopment are zoned for residential use and will be rezoned prior to construction of the project.

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

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the development of the site include alteration of approximately 66 acres of land and creation of approximately 42 acres of impervious area. The project will generate 3,530 average daily vehicle trips (adt) and add 1,458 parking spaces. It will use 82,333 gallons per day (gpd) of water and generate 74,100 gpd of wastewater. Greenhouse Gas (GHG) emissions will be released by on-site energy use and transportation.

Measures to avoid, minimize and mitigate impacts include providing a buffer between project activities and residences east of the site. The project will include a stormwater management system designed in accordance with the Stormwater Management Standards (SMS) of the Wetlands Protection Act Regulations (310 CMR 10.00). Roadway improvements to mitigate traffic impacts include modifications to the intersection of Southampton Road (Route 10/202) at MassPike Interchange 3 and Friendly's Way. The building designs incorporate energy efficiency measures to minimize GHG emissions. During the construction period, mitigation measures will include sedimentation and erosion controls, designated truck routes, measures to minimize emissions of air pollutants by construction vehicles, and noise, dust and odor controls.

### Jurisdiction and Permitting

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

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

The project has received Financial Assistance from the Commonwealth through the Site Readiness Program administered by MassDevelopment. The City may seek a MassWorks Infrastructure Program grant from the Executive Office of Housing and Economic Development (EOHED). Therefore, MEPA jurisdiction is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations.

### Changes Since the Filing of the Draft Environmental Impact Report (DEIR)

Since the DEIR was filed, the City sold 2.5 acres of the southern portion of the site to the owner of the adjacent 70 Industrial Turnpike Road property to accommodate potential expansion of the existing industrial building. As a result, the layout of the driveways, buildings, parking lots and stormwater management system have been modified to conform to the new site boundaries; however, the proposed development program and number of parking spaces have not changed.

### Review of the FEIR

The FEIR was generally responsive to the Scope included in the Certificate on the DEIR. It included a description and plans of the project, reviewed its impacts and identified mitigation measures. The FEIR provided supplemental GHG and transportation analyses, included a response to comments received on the DEIR and provided draft Section 61 Findings.

I received comments that continue to express concerns about the project's potential impacts on flooding, groundwater resources, habitat and traffic and the lack of adequate response to these issues by the City. As noted in the DEIR Certificate, many of the concerns are issues of local zoning, planning and economic development. The City has described the project as conceptual in nature that may be subject to change depending on market conditions. The FEIR included a commitment to limit disturbance of the site to those activities necessary for each phase of the project; constructing the project this way will minimize impacts associated with activities for future phases that may not be constructed due to the lack of demand. As noted below, I encourage the City and MassDOT to carefully monitor the use of area roadways by truck traffic generated by the project and to implement additional measures to minimize and mitigate impacts associated with increased truck traffic on residential streets.

### *Segmentation*

The MEPA regulations include provisions (301 CMR 11.01 (2)(c)) to ensure that projects, including any future expansion thereof, are not segmented to evade, defer or curtail MEPA review. This provision addresses what constitutes a "single project" under MEPA and thereby ensure that projects are not phased or segmented to "evade, defer or curtail MEPA review."

*...The Proponent, any Participating Agency, and the Secretary shall consider all circumstances as to whether various work or activities constitute one Project, including but not limited to: whether the work or activities, taken together, comprise a common plan or independent undertakings, regardless of whether there is more than one Proponent; any time interval between the work or activities; and whether the environmental impacts caused by the work or activities are separable or cumulative.*

Since the filing of the DEIR, the City has sold a 2.5-acre parcel of land at the southern end of the site to the owner of the abutting parcel at 70 Turnpike Industrial Road. The additional parcel could accommodate future expansion of the industrial building at that site by providing access to the roadway to be constructed as part of the City's project. According to the City, it is not aware of any specific expansion plans at the adjacent site. During the review period, the City provided conceptual-level information about potential expansion of the building at 70 Turnpike Industrial Road, including potential impacts and State permitting requirements.<sup>1</sup> The City's analysis concluded that construction of a 150,000-sf addition to the existing building would be unlikely to exceed MEPA review thresholds related to land alteration, impervious area, traffic, wetlands or water and sewer use. The City indicated it does not believe that any State Agency Actions would be required for the building expansion.

Based on the limited information available, it is unclear whether the expansion of the adjacent building would be subject to MEPA review. A connection to the roadways constructed as part of the City's project could indicate a "common plan" between projects at the sites. The Proponent of any expansion of the 70 Turnpike Industrial Road facilities should consult with the MEPA office if or when a project is under consideration. I note that the MEPA regulations at 301 CMR 11.10 indicate that a Notice of Project change can be submitted by the Proponent or any other person or agency if there is a material change in a project before all State Agency Actions are taken.

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<sup>1</sup> Letter dated November 20, 2019 from Kyle G. Greaves of Vanasse Hangen Bristlin, Inc.

### *Land Alteration*

According to the FEIR, the project may be constructed in four phases depending on market demand for the uses. The City has committed to constructing only the infrastructure required to support each phase in order to minimize land clearing and maintain woodlands at the site during intermediate phases of development. A 150-ft woodland buffer will be maintained permanently between the project buildings and residences along Sabrina Brooke Lane to the east.

The FEIR identified areas of cut and fill and included a plan showing site elevations under proposed conditions. Under existing conditions, the site generally slopes from a maximum elevation of approximately 264 ft NAVD 88 in the northern part of the site to 222 ft NAVD 88 in the southern part of the site. The ends of the north-south driveway through the site will match the grades of Cabot Road and Turnpike Industrial Road. First floor elevations (FFE) of the southernmost buildings will be up to 10 ft higher than existing grades, ranging from at approximately 242 ft NAVD 88 to 246 ft NAVD 88. Buildings in the central and northern part of the site will be generally within two feet of existing elevations. The City does not anticipate the need for off-site fill to raise the southern portion of the site.

### *Traffic and Transportation*

The FEIR provided additional information and analyses regarding the project's transportation impacts and mitigation measures. It included data in support of the parking supply proposed in the DEIR, a description of pedestrian and bicycle facilities in the area and a review of existing and potential public transportation service to the site. The City's Transportation Demand Management (TDM) plan includes measures to encourage multi-modal transportation options to and from the site. The FEIR included detailed descriptions and plans of roadway improvements that will be undertaken by the City and/or tenants of the proposed industrial site to minimize the project's traffic impacts. According to MassDOT, the mitigation measures will be implemented upon occupancy of 150,000 sf of building space at the site. Mitigation measures to minimize the project's transportation impacts are listed below.

The FEIR included estimates of the project's generation of truck trips based on the Institute of Transportation Engineers' *Trip Generation Manual* 10<sup>th</sup> edition and from empirical data collected from a similar industrial park. According to the ITE manual, truck trips would account for approximately 19 percent (684 trips) of the project's daily trip generation (3,530 adt). The empirical data indicated that truck trips would account for approximately 12 percent of the daily trips, or approximately 424 daily trips. Comments from MassDOT indicate that the projected range of daily truck trips is a reasonable estimate based on the data. The majority of truck traffic is expected to travel between the site and the MassPike. Signage within the site and on Lockhouse Road will direct trucks to use Turnpike Industrial Road to avoid the residential area along Cabot Street. I encourage MassDOT to require that the City monitor the use of area roadways by trucks associated with the construction and operation of the project.

As required by the Scope in the DEIR Certificate, the FEIR included an analysis estimating the number of truck trips that could be avoided by extending rail service to the site from the adjacent industrial park to the east. According to the FEIR, a single rail car could carry the same volume of material as 10 to 15 tractor trailers. Conceptual project plans indicate that rail service could only be extended to the 211,000-sf light industrial building proposed at the southern end of the site, which is expected to generate 28 percent of the project's truck trips. The City estimated that if half of the truck

trips associated with the light industrial use could be accommodated instead by rail service, the number of truck trips could be reduced by up to 96 trips per day. I encourage the City to continue to consider extending rail service to the site. The City should work with the owner of the adjacent 70 Turnpike Industrial Road site to ensure that any future building addition at that site is designed to accommodate an extension of the rail spur onto the project site.

### *Climate Change*

The FEIR included a supplemental GHG analysis that included: an estimate of the one-time loss of carbon due to loss of tree stock and soil disturbance; an analysis of GHG emissions from vehicular use; the potential for on-site renewable energy generation; and the feasibility of electrification of heating. It included an analysis to confirm that the stormwater management system has been designed to accommodate future climate conditions, including more severe and intense storm events.

The FEIR included additional analysis of GHG mitigation measures, including installation of rooftop solar photovoltaic (PV) systems to generate electricity and the use of air source heat pumps (ASHP) for domestic water and space heating to serve laboratory space in the proposed light industrial buildings. The GHG analyses submitted with both the DEIR and FEIR evaluated an alternative building design that used ASHP for space heating in all the buildings. The analysis indicated that the alternative using ASHP would achieve significant overall energy savings and reduced GHG emissions compared to the Preferred Alternative using high-efficiency natural gas heating systems; the Department of Energy Resources (DOER) has estimated that electrification of heating could reduce emissions by up to a factor of 20 in the warehouse buildings. According to the FEIR, electrification of laboratory space is not feasible due to the high ventilation demand and ASHP use in other spaces would have higher capital and operating costs than the Preferred Alternative. The FEIR included a list of potential financial incentives to offset the cost of ASHP, but did not clarify whether electrification is a feasible option. According to DOER, the project may be eligible for Alternative Energy Credits (AEC) worth up to \$60,000 per year.

The FEIR analyzed the potential energy that could be generated by rooftop PV systems. The project could reduce GHG emissions by 1,243 tons per year (tpy) by installing PV systems covering 18 percent of the roof area of the warehouse building and 50 percent, the minimum required by the Building Code, of the roof area of other buildings. Coupled with the use of ASHP, the electricity generated by a PV system on 34 percent of the warehouse building roof would eliminate all GHG emissions from that building. Electrification of heating and rooftop PV systems in the other buildings could reduce GHG emissions by nearly 50 percent or more compared to a Building Code-compliant building. The City has committed to the Building Code minimum requirement of making 50 percent of the roof area solar-ready. I encourage the City to exceed that requirement and to pursue installation of PV systems on the buildings.

Stationary-source GHG emissions from the Preferred Alternative would be 4,533.6 tpy, a reduction of 1,196.1 tpy (20.8 percent) from the Base Case. The project's mobile-source emissions will be 1,329 tpy, a reduction of 1,497 tpy from the Base Case after implementation of roadway improvements and Transportation Demand Management (TDM) measures. The FEIR estimated that the GHG emissions associated with lost sequestration from clearing of the site will be 50.9 tpy, with a one-time loss of 16,680 tons of carbon stored in trees and other vegetation and soil that will be removed from

the site. The project's total GHG emissions under the Preferred Alternative will be 5,862.6 tpy, a reduction of 2,693.1 tpy (32 percent) from the Base Case scenario.

### Mitigation and Section 61 Findings

The FEIR provided a list of mitigation commitments and draft Section 61 Findings. The Proponent will provide a GHG self-certification document to the MEPA Office that is signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) and indicates that all of the required mitigation measures, or their equivalents, have been completed. The certification should describe any PV generating facilities that have been installed and identify heat pumps used for space or water heating.

### *Traffic and Transportation*

#### *Roadway Improvements*

The following mitigation measures must be completed no later than occupancy of 150,000 sf of building space at the site.

#### Southampton Road at MassPike Interchange 3 and Friendly's Way

- The lane configuration of the MassPike Interchange 3 eastbound approach will be modified to provide an exclusive left-turn lane, a shared through/right-turn lane, and an exclusive right-turn lane;
- The phasing of the traffic signal will be modified to reflect the new lane configuration and new signal equipment will be provided; and,
- New signal heads will be installed at the southwest corner of the intersection.

#### Friendly's Way at Westfield Industrial Park Road and "Jughandle" Departure Lane

- Two northbound travel lanes will be provided along the jughandle as it approaches Friendly's Way and through the intersection to provide adequate vehicle queuing for motorists accessing the MassPike; and,
- Restriping of the jughandle approach.

#### Southampton Road at Arch Road and Westfield Industrial Park Road

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

#### Friendly's Way

- Provide signage indicating that vehicles should stack in both lanes to access I-90 eastbound.

### I-90 Ramp

- Modify departing I-90 ramp to provide two lanes accessing the ramp before merging into a single lane;
- Reconfigure the ramp so that the I-90 West Ramp will branch off the two eastbound lanes feeding the I-90 East Ramp; and,
- Provide additional signage and pavement markings.

### Site Driveways

- Install signage to direct all truck traffic to Turnpike Industrial Road;
- Install signage on Lockhouse Road to direct trucks to access the site via Turnpike Industrial Road.

### *Transportation Demand Management*

- Designate an on-site Transportation Coordinator to promote alternative means of transportation to the site, including facilitating ride-share programs, providing information on alternate modes of travel, encouraging use of public transportation and monitoring effectiveness of the TDM program;
- Provide preferential parking for carpools and vanpools;
- Allow pre-tax purchases of transit passes;
- Provide telecommuting options for appropriate jobs;
- Provide bicycle racks;
- Offer direct deposit to employees;
- Install at least 10 electric vehicle (EV) charging stations;
- Allow staggered work hours and flexible schedules;
- Work with the Pioneer Valley Transit Authority (PVRTA) to provide bus service to the site;
- Promote staggered arrival and departure times for tractor trailer trucks; and,
- Evaluate extension of the rail spur onto the site, including coordination with adjacent properties to plan structures and uses that do not conflict with extension of rail service onto the site.

### *Traffic Monitoring Program*

The Proponent will conduct a Traffic Monitoring Program annually for five years beginning after full build-out of the site. Annual reports will be provided to MassDOT. The monitoring program will include:

- Automatic traffic recorder (ATR) counts for a continuous 24-hour period on a typical weekday at the project site driveways;
- Ongoing collection of traffic data used in the Transportation Impact Assessment, including data on the number of trucks using residential streets, or as directed by MassDOT; and,
- Annual travel surveys of employees.



### *Greenhouse Gas Emissions*

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

To ensure all GHG emissions reduction measures adopted by the Proponent as the Preferred Alternative are implemented, the Proponent will submit a self-certification to the MEPA Office at the completion of the project that will be signed by an appropriate professional (e.g. engineer, architect, transportation planner, general contractor) indicating that all of the required GHG mitigation measures, or equivalent measures that are designed to collectively achieve identified reductions in stationary source GHG emissions and transportation-related measures have been incorporated into the project.

### *Climate Change Resiliency*

- Construct a stormwater management system designed for future storm events;
- Install Low Impact Design (LID) techniques such as bioretention areas, tree box filters, and bioswales to mitigate stormwater runoff and reduce urban heat island effect;
- Design buildings to include backup generators, backflow prevention valves and other measures to minimize water infiltration, and to elevate critical infrastructure and equipment to minimize damage in the event of flooding;
- Use rain sensors in irrigation systems; and,
- Use drought-resistant species in landscaping.

### *Stormwater Management*

- Construct a stormwater management system incorporating BMPs and LID techniques to conform to the SMS, including removing at least 80 percent of Total Suspended Solids from stormwater and maintaining predevelopment runoff peak discharges volumes and rates.

### *Construction Period*

- Implement construction period erosion and sedimentation control measures as specified by the Stormwater Pollution Prevention Plan (SWPPP);

- Develop a Construction Management Plan specifying construction activities and mitigation measures for approval by regulatory agencies;
- Minimize air quality impacts by using dust and air emissions controls;
- Minimize noise impacts of construction activities by using mitigation measures to control noise from construction vehicles and equipment;
- Direct all construction trucks to use specified truck routes to minimize use of residential streets; and,
- Develop a Construction Waste Management Plan to identify measures for reusing and recycling construction waste.

### Conclusion

Based on a review of the FEIR, comments letters, and consultation with State Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. Outstanding issues can be addressed during State and local permitting and review. No further MEPA review is required and the project may proceed to permitting and completion of land transfers by Agencies. State Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

*K. Theoharides*

November 25, 2019

Date

Kathleen A. Theoharides

### Comments received:

11/18/2019	Nicholas Beluzo and Amy Beluzo
11/18/2019	Department of Energy Resources (DOER)
11/18/2019	Kristen Mello
11/18/2019	Massachusetts Department of Environmental Protection (MassDEP) – Western Regional Office (WERO)
11/19/2019	Massachusetts Department of Transportation (MassDOT)
11/20/2019	Kyle Greaves, VHB on behalf of the City

MAB/AJS/ajs



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

November 18, 2019

Kathleen A. Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
Massachusetts Environmental Policy Act Office  
Alex Strycky, EEA No. 15845  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114-2524

Re: Westfield Turnpike Industrial Park - FEIR  
Westfield, MA

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Final Environmental Impact Report (FEIR) submitted for the Westfield Turnpike Industrial Park project located in Westfield, MA (EEA #15845). The applicable MassDEP regulatory and permitting considerations regarding wetlands, waterways, air pollution, solid waste, and waste site cleanup are discussed.

### **I. Project Description**

The City of Westfield (Proponent) proposes predevelopment of a mixed-use commercial, industrial project including warehouse and distribution, commercial, manufacturing, office, and research and development facilities. The approximately 72-acre parcel is presently undeveloped and is located between Cabot and Turnpike Industrial Road and had previously been intended for landfill expansion. The City pre-development will include conceptual design and infrastructure and a phased industrial park project to be developed over the next eight to ten years.

Conceptually the project will include 105,000 square feet (sf) of office space, 550,000 sf of warehouse/distribution, 211,000 sf of light industrial manufacturing, 122,000 sf of flex tech and 1,458 parking spaces. Presently there are no structures or infrastructure on site. Timing of phases will be dictated by market forces.

Potential environmental impacts associated with this project include:

- 72 acres of land alteration,
- 48.15 acres of new impervious surface,
- 988,000 sf of structures,
- Approximately 17,170 gpd increased use of potable water,

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

TTY# MassRelay Service 1-800-439-2370  
MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

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- Approximately 15,875 gpd increased wastewater generation,
- 0.47 increased miles of water and sewer mains,
- 3,530 increased vehicle trips per day, and
- 1,458 new parking spaces

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

### Wetlands & Waterways

310 CMR 10.00

### Drinking Water

310 CMR 22.00

### 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**

### **Bureau of Resource Protection**

Previous comments remain valid.

### **Bureau of Waste Prevention**

Previous comments remain valid.

### Solid Waste

Previous comments remain valid. Particular attention is paid to waste ban requirements. MassDEP recommends that the Proponent include in a tenant agreement, a commitment that tenants and their contractors agree to recycle all unused building materials, cardboard, paper, plastic wrapping and containers associated with the new construction materials as well as drywall cutoffs and scraps as part of their contracts.

### **Bureau of Waste Site Cleanup**

Previous comments remain valid.

### **Greenhouse Gas (GHG) Policy**

Previous comments remain valid and MassDEP offers the following additional comments. MassDEP encourages the Proponent to consider a tenant agreement to install solar ready roofs and a preference and/or incentive for tenants who commit to installation of solar panels or other clean energy facilities such as air source heat pumps. This would facilitate the Proponent's commitment to GHG reduction of the project.

MassDEP also recommends installation of charging stations at the outset of the project and encourages the Proponent to explore subsidies for installation as a tenant incentive.

## **Mobile Source**

### **Mesoscale Modeling**

The Proponent updated the mesoscale analysis based on revised traffic patterns and mitigation measures. The Proponent appropriately utilized the EPA's Motor Vehicle Emission Simulator (MOVES 2014s) November 2016, to model the future vehicle emissions from the site. The model predicts the increased emissions from the development and potential mitigation following implementation of Traffic Demand Management (TDM) program. MassDEP encourages the Proponent to work with MassDOT and assess the viability and the costs associated with the proposed mitigation and TDM program to ensure implementation of the program as described or propose alternatives. In addition, MassDEP advises a long-term traffic study to ensure the reductions from the proposed roadwork and TDM is realized.

### **Rail Spur**

The initial proposal for the rail spur is no longer viable due to the sale of the 2 acres parcel. Use of a rail spur was potentially to decrease the truck traffic and trips per day onto the project site. MassDEP encourages the Proponent to continue to explore other options for decreasing truck traffic at the project either through an alternate spur location or other means.

MassDEP has insufficient information to comment at this time, regarding the environmental impacts from the development of the 2 acres parcel sold for expansion of the neighboring facility.

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

The Proponent has included Mitigation and Draft Section 61 Findings. No MassDEP permits were identified in the FEIR and therefore MassDEP has no comments relative to the Section 61 Findings. If as the project develops, MassDEP permits are identified, the project may require additional MEPA review. Following a determination by MEPA if further review is required, MassDEP will ensure that any environmental impacts are avoided, minimized and/or mitigated through permitting.

As this project progresses, if needed, MassDEP staff are available to provide guidance to the Proponent upon request. If you have any questions regarding this comment letter or pre-permitting, please do not hesitate to contact Kathleen Fournier at (413) 755-2267.

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



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

**massDOT**  
Massachusetts Department of Transportation

November 18, 2019

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

RE: Westfield: Turnpike Industrial Park – FEIR  
(EEA #15845)

ATTN: MEPA Unit  
Alex Strysky

Dear Secretary Theoharides:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the proposed Turnpike Industrial Park in Westfield, 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  
Peter Cavicchi, District 2 Highway Director  
Neil Boudreau, Assistant Administrator of Traffic and Safety Engineering  
Planning Department, City of Westfield  
Pioneer Valley Transit Authority  
Pioneer Valley Planning Commission  
PPDU Files



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



## MEMORANDUM

TO: David Mohler, Executive Director  
Office of Transportation Planning

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

DATE: November 18, 2019

RE: Westfield: Turnpike Industrial Park – FEIR  
(EEA #15845)

The Public/Private Development Unit (PPDU) has reviewed the Final Environmental Impact Report (FEIR) for the Westfield Turnpike Industrial Park project in Westfield. The approximately 76-acre site currently consists of forested, open space, and agricultural land. The Proponent seeks to develop an approximately 988,000 square foot mixed-use project, comprised of approximately 105,000 square feet (sf) of office space; 550,000 sf of warehouse and distribution space; 211,000 sf of light industrial/manufacturing space, and 122,000 sf of light industrial/research and development space. The project will be developed in several phases over an estimated eight to ten-year term.

Based on the information presented in the FEIR, the Full-Build project is expected to generate 3,530 weekday vehicle trips, including 405 vehicle trips during the weekday morning peak hour and 385 vehicle trips during the weekday evening peak hour. The project will include provision for 1,458 parking spaces. The project exceeds the Massachusetts Environmental Policy Act (MEPA) thresholds for trip generation (3,000 new trips) and parking (1,000 spaces) and thus is categorically included for preparation of an EIR.

Access to the site is planned via three site driveways, including two stop-controlled approaches on Cabot Road, which abuts the site to the north, and one driveway primarily intended for heavy vehicle access at the end of Turnpike Industrial Road to the east. A Vehicular Access Permit from MassDOT will be required as the site abuts I-90 (Mass Turnpike), a state-owned roadway.

The FEIR includes an updated transportation study that generally addresses the comments raised in the MassDOT DEIR comment letter. The transportation study includes requested estimates of the Project's truck-trip generation, clarification of parking supply derivation, an inventory of multimodal facilities within the study area, and justification for not pursuing the Pioneer Valley Railroad (PVRR) spur extension into the project site. Taking into account the additional information and updates, the site access and off-site improvements based were revised and as well as the mitigation commitment. The key aspects of MassDOT review of the transportation study are summarized as follows.



### Trip Generation

The truck-trip generation projections are based on two sets of data: trip rates from the ITE Trip Generation Manual using the appropriate land use codes and empirical data from a mix of comparable land uses from a project site in Middleborough, Massachusetts. Based on this information, the project is estimated to generate between 424 and 684 truck-trips on an average weekday. We found the projections within an acceptable range and the supporting documentation provided adequate. According to the trip distribution, the majority of the truck traffic is expected to travel to and from the Mass Turnpike and use the Turnpike Industrial Road to access the site. Therefore, potential violations, if any, of the truck restriction on Cabot Road (which was raised as a concern in the DEIR) would result in minimal traffic impacts.

### Parking

The FEIR continues to propose 1,458 parking spaces to accommodate the need of the project site. The parking supply is compared with parking estimates based on information contained in the most recent edition of ITE's *Parking Generation*. The number of parking spaces generally falls below the critical 85<sup>th</sup> percentile demand calculated using the ITE Manual. We find the methodology adequate but still encourage the Proponent to investigate land banking of parking spaces until needed as the project reaches Full-Build.

### Rail Access

The Pioneer Valley Railroad (PVRT) owns and operates a rail line in the vicinity of the project site, which functions as a connection to an existing freight spur which provides access for deliveries and removal of goods for nearby businesses. MassDOT generally encourages the use of other modes where available and believes the extension of the rail spur would be beneficial to the project and to overall traffic within the study area. In our DEIR comment, MassDOT requested that justification be provided to support the Proponent's contention that extending the spur into their site is not feasible. In the FEIR, the Proponent indicates that the rail extension project would preclude the abutting property at 70 Industrial Road, an existing user of the rail spur, from moving forward with their expansion plan. In addition, the Proponent has documented that their use of the rail spur would not result in a significant reduction of truck traffic to the site.

### Multimodal Access and Facilities

According to the FEIR, the availability of transit within the study area is limited. Currently, the Pioneer Valley Transit Authority (PVTA) runs service along the Route 10/202 corridor with a one-hour frequency. In the vicinity of the project, the service is provided in the form of a "flag stop" as there are no designated bus stops or facilities in the area. The Proponent has not consulted with PVTA as part of the preparation of the FEIR, but committed to do so as the Project site is further developed to determine if it would be an appropriate location for a transit stop. If then deemed appropriate by PVTA, the Proponent must commit to construct the bus stops, to include shelters and amenities, as per PVTA standards. The Proponent should

provide MassDOT with a revised letter of commitment/Draft Section 61 finding to reflect this commitment.

The Proponent also conducted a comprehensive inventory of all bicycle and pedestrian accommodations within the study area, and noted the deficiencies within the study area. The FEIR has identified several locations where bicycle and pedestrian facilities are not present but contend that the nature of the abutting land use was not conducive to pedestrian and bicycle travel. There are other locations where existing pedestrian and bicycle facilities are in need of expansion or reconstruction to provide seamless, continuous pedestrian and bicycle travel; however, to bring the facilities to current standards would result in environmental impacts and/or right of way taking beyond the scope of this project mitigation requirement. The Proponent has nonetheless committed to construct or improve pedestrian and bicycle facilities where they are proposing mitigation in addition to providing pedestrian sidewalks throughout the project site to connect parking areas with associated project site buildings, as well as providing bicycle racks.

#### Off-Site Improvements

The Proponent has met with MassDOT and the City of Westfield to refine the off-site mitigation improvements, particularly at the I-90 Ramps/Route 10/202/Friendly Way intersection, where the transportation study has previously identified concerns regarding queuing and operational deficiencies. As a result, the designs of off-site improvements have advanced to include these additions:

- New traffic signal equipment to reflect the “split-phase” operation resulting from the lane use modification at the I-90 eastbound ramp approach;
- Construction of the second right-turn lane that will require modification to the existing island in the southwest corner of the interchange;
- Widening along the southerly side of the ramp;
- Installation of a new traffic signal head to accommodate the right-turn movements; and
- Minor widening along the I-90 Ramp to improve merge and diverge movements towards the Mass Turnpike.

At the Friendly’s Way at Westfield Industrial Park Road/”Jughandle” Departure Lane intersection, the Proponent would provide minor geometric modifications, lane configuration, and traffic control to provide for better operations and reduce queuing that currently extend to the Route 10/202/Arch Road intersection. The Proponent is also proposing an overhead lane-use sign along Friendly’s Way approaching its intersection with Route 10/202 and the I-90 Ramp. MassDOT is concerned that the proposed overhead lane assignment sign would block traffic signal head visibility and recommends instead the installation of the overhead sign on the jughandle approach and a ground mounted sign on Friendly’s Way to help promote a more balanced lane usage.

Last, at the Route 10/202 at Arch Road/Westfield Industrial Road intersection, the Proponent would provide some of the improvements from the Road Safety Audit identified in the

DEIR. The FEIR has updated the mitigation commitment at this intersection to include the commitment to also installing backplates on all signal heads at the Southampton Road (Route 10/202) at Arch Road/Westfield Industrial Park Road intersection as requested by MassDOT.

#### Mitigation Implementation

The Proponent notes that no tenants have yet been identified for the project, and the expected full-occupancy date of the site is currently unknown. The full buildout of the project is anticipated to occur in a phased manner over an estimated eight to ten-year term. As such, the Proponent has requested that proposed mitigation measures not be implemented until a significant commercial commitment to occupy the site is obtained. MassDOT and the City of Westfield are supportive of the request and have identified substantial occupancy at an amount greater than 150,000 square feet of development. Therefore, MassDOT will include this threshold in the project Section 61 Finding and will work cooperatively with the City of Westfield to enforce this requirement and ensure that the required mitigation is implemented in a timely manner.

#### Section 61 Finding

The FEIR includes a Draft Section 61 Finding, outlining the mitigation measures the Proponent has committed to implementing in conjunction with this project. The Draft Section 61 Finding reflects the updated mitigation program resulting from addressing the DEIR comment letter as well as the Transportation Demand Management measures and the Transportation Monitoring program previously committed for the project. The Draft Section 61 Finding revised letter of commitment will be the basis for MassDOT to issue a Final Section 61 Finding for the project.

MassDOT recommends that no further environmental review be required based on transportation issues. The Proponent should consult as appropriate with MassDOT units, including PPDU and the District 2 Office during the permitting process for the project. If you have any questions regarding these comments, please contact me at (857) 368-8862.



COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF  
ENERGY AND ENVIRONMENTAL AFFAIRS  
**DEPARTMENT OF ENERGY RESOURCES**  
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**Charles D. Baker**  
Governor

**Karyn E. Polito**  
Lt. Governor

**Kathleen Theoharides**  
Secretary

**Judith F. Judson**  
Commissioner

18 November 2019

Kathleen Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
100 Cambridge Street  
Boston, Massachusetts 02114  
Attn: MEPA Unit

RE: Westfield Turnpike Industrial Park, Westfield, Massachusetts, EEA #15845

Cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resources  
Judith Judson, Commissioner, Department of Energy Resources

Dear Secretary Theoharides:

We've reviewed the Final Environmental Impact Report (FEIR) for the above project. The proposed project consists of warehouse, office, and industrial buildings totaling about 1M-sf.

### Summary

The office and warehouse buildings are proposed to have an emissions footprint that is marginally smaller than would occur if the buildings were built strictly to code. Mitigation Level<sup>1</sup> for these buildings ranges from **2 to 3%**. A Mitigation Level of **0%** means no mitigation. In contrast, the proposed industrial use buildings are proposed to have a Mitigation Level of 17%.

The project is missing an excellent opportunity to improve Mitigation Level (ML) by switching to efficient electrification of space heating. With electrification, the ML for the office can be improved by a factor of more than 3 (to 10%) while the warehouse ML can be improved by a factor of more than 20 (to 34%). Note that even the industrial building ML could be almost doubled, as well, with efficient electrification.

Also, with efficient electrification, the project could be eligible to Alternative Energy Credits (AECs) worth up to **\$60,000 per year** using an AEC value of \$15/AEC.

<sup>1</sup> Mitigation Level is the percent points of GHG reduction beyond the reduction that would occur as a result of following state and local building codes.

These same findings were presented in our response to the DEIR. Based on those findings, we recommended that the project commit to efficient electrification of space heat. In the FEIR, the proponent raised potential concerns for the portions of the development which may be highly ventilated laboratories, making efficient electrification of heat for the laboratory use potentially less feasible. However, despite the GHG and AEC benefits, the FEIR provided no evidence or analysis as to why the non-laboratory portion of the proposed project could not be electrified.

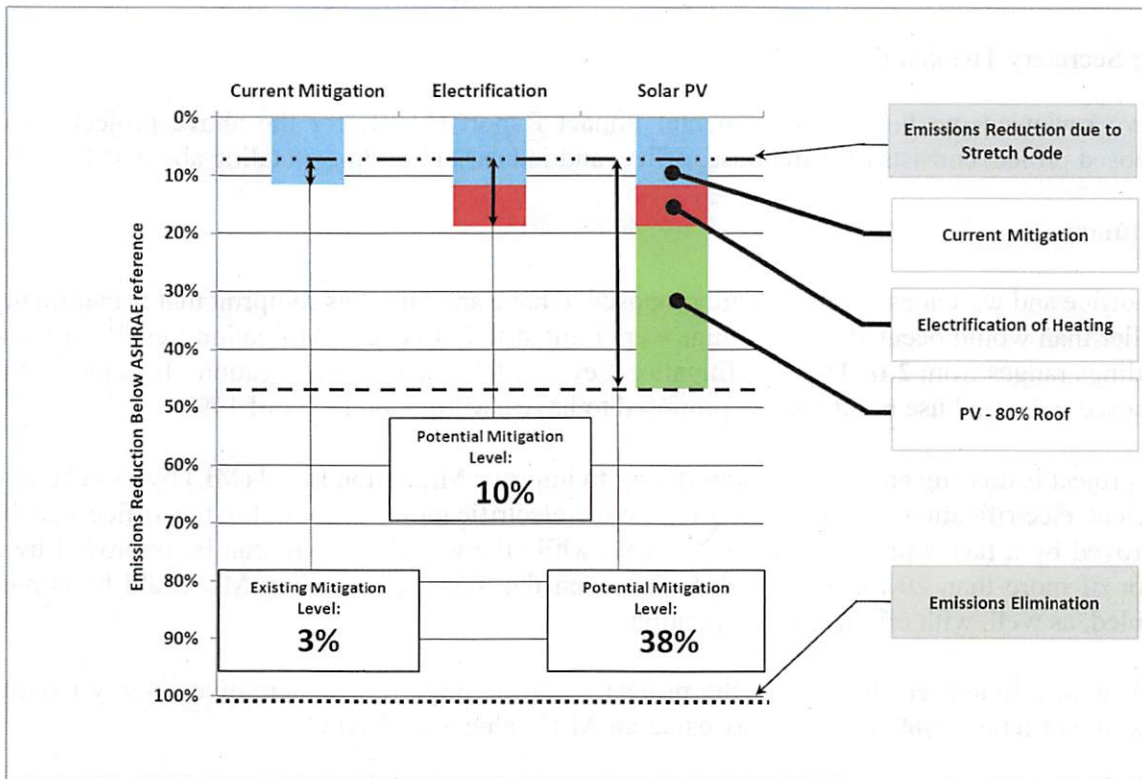
In summary, we recommend that the project be committed to efficient electrification of space heating of all non-laboratory uses spaces. This approach would address the project's relatively low Mitigation Level and yield significant AEC revenue.

### Mitigation Levels

The currently proposed Mitigation Levels for the office, warehouse, and industrial buildings are presented below.

#### Office

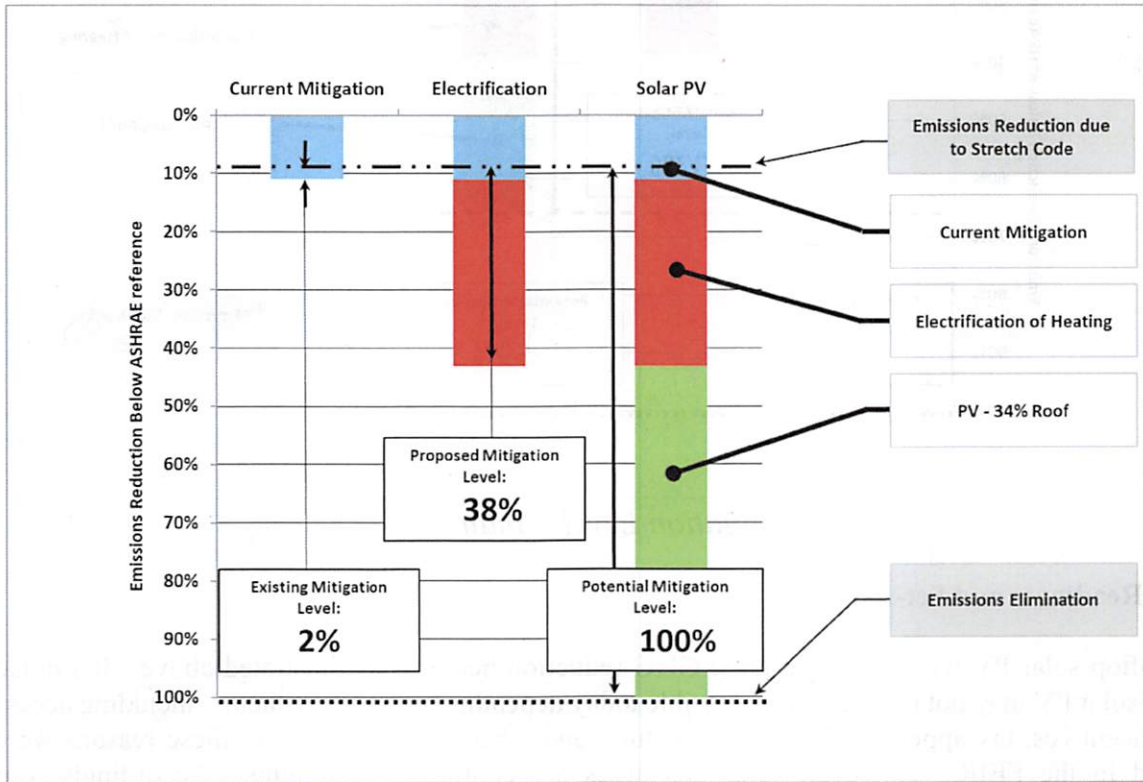
The office Mitigation Level is currently proposed to be 3% (left bar). This can be improved by more than a factor of 3 to 10% with efficient electrification of space heating (middle bar). If an opportunity arises in the future to put solar on 80% of the roof, ML can be improved to 38% (right bar).



Mitigation Level – Office

Warehouse

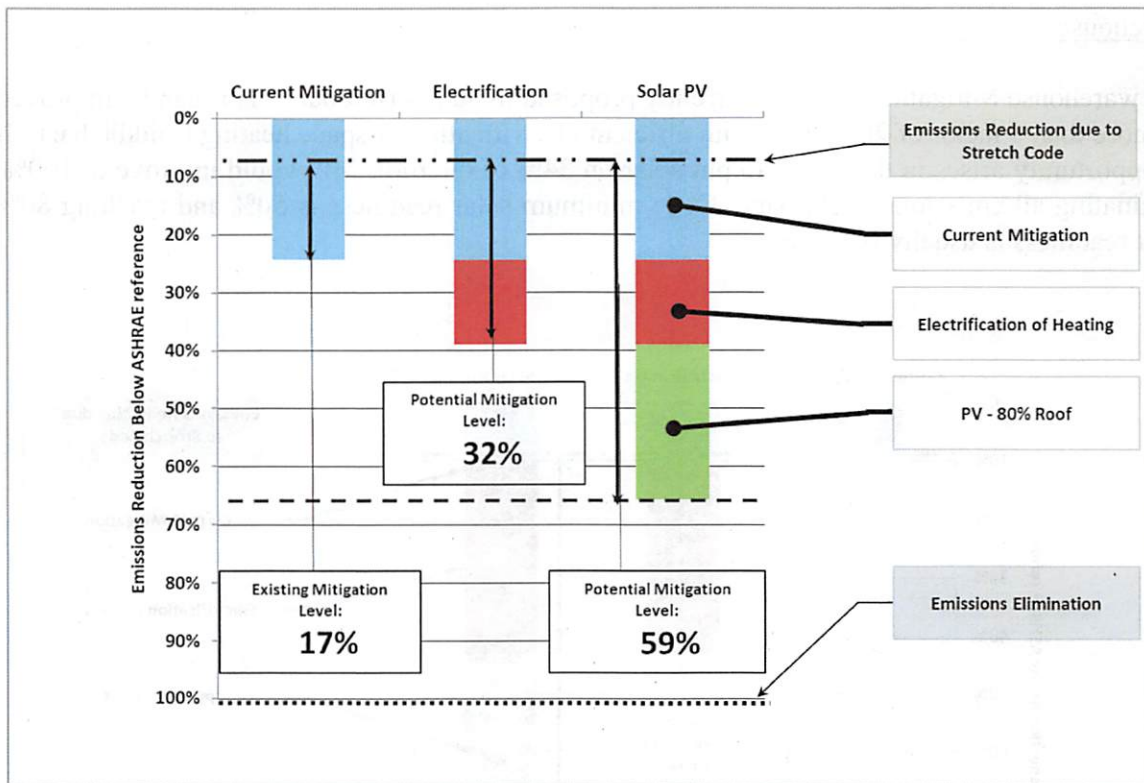
The warehouse Mitigation Level is currently proposed to be 2% (left bar). This can be improved by more than a factor of 20 to 38% with efficient electrification of space heating (middle bar). If an opportunity arises in the future to put solar on 34% of the roof, ML would improve to 100%, eliminating all emissions (right bar). Code-minimum solar readiness is 50% and reaching 80% solar readiness is usually feasible.



*Mitigation Level – Warehouse*

Industrial

The industrial use building Mitigation Level is currently proposed to be 17% (left bar). This can be almost doubled to 32% with efficient electrification of space heating (middle bar). If an opportunity arises in the future to put solar on 80% of the roof, ML would improve to 59%.



*Mitigation Level – Industrial*

### PV Readiness and Set-Aside

Rooftop solar PV would provide large GHG reduction benefits, as illustrated above. It's noted that solar PV may not necessarily be feasible today depending upon many factors including access to incentives, tax appetite, ownership structure, and other factors. Some of these reasons were cited in the FEIR. However, solar incentives are continually changing. Accordingly, our recommendation is that the project plan to be as solar ready as possible to accommodate solar in the future. Pre-planning rooftop solar would help ensure that the roofs do not become unnecessarily cluttered with equipment, appurtenances, and other obstructions which can impact solar deployment in the future.

Massachusetts code already requires that at least 50% of these roofs be made solar ready for these low-rise buildings. We recommend that, as a mitigation measure, the project be required to commit to more than this code requirement, to at least 80% solar readiness.

Our DEIR recommended that the FEIR provide detailed rooftop plans to help identify and set aside space for rooftop solar. The FEIR took a first step at pre-planning rooftop PV, though the committed set aside above and beyond the code required 50% is not clear in the submission for the office and industrial buildings. The rooftop plan for the warehouse appears to show less PV set aside than the code requires for the warehouse.

### Summary of Current FEIR Commitments

The following is a summary of the project's current above-code commitments.

- Office:
  - aggregate vertical area weighed U value: 0.15 (Vertical assembly consisting of 69% framed, insulated wall having U-0.044 and 31% window having U-0.38);
  - R-35c.i. roof;
  - 90% efficient condensing boilers;
  - 14 EER cooling;
  - LPD of 0.656 wsf or less;
  - 4.44 kW exterior lighting;
- Warehouse:
  - 90% efficient furnaces;
  - 12.5 EER;
  - LPD of 0.53 wsf or less;
  - 7 kW exterior lighting;
- Light industrial:
  - aggregate vertical area weighed U value: 0.18 (Vertical assembly consisting of 60% framed, insulated wall having U-0.044 and 40% window having U-0.38);
  - R-35c.i. roof;
  - 90% efficient condensing boilers;
  - LPD exterior lighting 0.656 wsf



Westfield Turnpike Industrial Park #15845  
Westfield, Massachusetts

### Summary of Recommended Additional Commitments

The following are the above-code mitigation measures that the DEOR recommends be added to the project commitments:

- In all non-laboratory use space in all buildings:
  - Efficient electrification of space heating using cold-climate rated heat pumps
  - Electric heat pump water heaters
- Solar PV readiness, 80% of all roof areas.

Sincerely,



Paul F. Ormond, P.E.  
Energy Efficiency Engineer  
Massachusetts Department of Energy Resources



Brendan Place  
Clean Energy Engineer  
Massachusetts Department of Energy Resources

November 18, 2019

Kathleen A. Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
Massachusetts Environmental Policy Act Office  
Alex Strycky, EEA No. 15845  
100 Cambridge Street, 9th Floor  
Boston, MA 02114-2524

Re: Westfield Turnpike Industrial Park-FEIR  
Westfield, MA

Dear Secretary Theoharides,

Thank you for the opportunity to comment on the Final Environmental Impact Report (FEIR) submitted for the Westfield Turnpike Industrial Park project located in Westfield, MA (EEA #15845). I write as the co-founder and director of Westfield Residents Advocating For Themselves (WRAFT), as a resident of the environmental justice community in the flood plain below the proposed site, and as of November 5, 2019, as a City Councilor At-Large - *Elect* of the City of Westfield.

Unfortunately, after reading the FEIR for the Westfield Turnpike Industrial Park project, it would seem our "meaningful opportunity for public review" doesn't matter to the process in any way. Residents of Westfield are concerned about the proposed project's effects on habitat loss, air pollution, noise pollution, groundwater quality degradation, flood control, traffic and increased vehicle trips. Members of the public have spoken, over and over again, and the FEIR repeatedly refers not to the information brought forth by the commenters, but the unwavering plan and justifications of the Proponent.

We brought forth questions of recognized environmental impact and because there is no enforceable regulation, our concerns have been dismissed.

From my DEIR comments:

"The BioMap2 created by the Massachusetts Division of Fisheries and Wildlife's (MassWildlife's) Natural Heritage and Endangered Species Program (NHESP) identifies this site location as:

- a Priority and Exemplary Natural Community of Pitch Pine and Scrub Oak, listed as "S2 = Imperiled communities, typically 6-20 sites or few remaining acres in the state" by the , and

- habitat for two Species of Special Concern, the Eastern Box Turtle (*Terrapene carolina*), and the Frosted Elfin butterfly (*Callophrys irus*) as identified by MassWildlife's NHESP.

**While the BioMap2 information may not be protected by enforceable regulations, over 200 commenters mentioned the loss of these species and their habitat and they were left unaddressed in the DEIR provided by the City of Westfield, despite having been instructed to address each comment raised."**

The FEIR response included only that "Project Site does not contain any priority or estimated habitat for rare or endangered species", and that the Secretary's Certificate did not require further analysis. So two Species of Special Concern and an Exemplary Natural Community of Pitch Pine and Scrub Oak aren't actually important?

We brought up concerns about the potential drinking water sources on the North side of the City of Westfield. In Spring 2019, the Westfield City Council approved money for GeoSphere to come out and perform an analysis of the property and its potential to provide clean drinking water, but this analysis has yet to be performed, and was not a "priority job" when requested by the Proponent.

Additionally, residents have asked for a moratorium on truck terminals and projects that will increase truck traffic on the North side of the City. The commute through that area is a well known problem.

Secretary Theoharides, the destruction of this forest would be a loss of potential park land, air purification, species diversity and habitat, land and water retention, flood control protection, and noise pollution reduction for an underserved, overly environmentally burdened EJ community. The Final Environmental Impact Report does not adequately address these concerns to "avoid, minimize, or mitigate" these environmental impacts to our community.

Please do what you can to protect our community from this proposed destruction of our natural resources.

Respectfully submitted for your consideration,



Kristen L. Mello  
co-founder, Director WRAFT  
Westfield Residents Advocating For Themselves  
<https://www.facebook.com/WRAFT01085>  
[klm.wraft@gmail.com](mailto:klm.wraft@gmail.com)  
*At-Large City Councilor - Elect, City of Westfield*

Dear Mr. Strysky:

We have reviewed the Final Environmental Impact Plan (FEIR) for the proposed Westfield Turnpike Industrial Park dated October 15, 2019. While we do appreciate the responses that the Proponent has supplied, we are very disappointed to see the final plan still does not adequately address many of the concerns that Westfield residents have been very vocal about regarding the further development of Westfield open space to industrial parks.

Our primary concern is for the quality of life and health of our children, and the obligation we all have to protect our environment and natural resources. The residents of this city have spoken out: they do not want another development in this area. As previously stated, the Proponent has an obligation to ensure that the need of its citizens are adequately addressed before further development of the city takes place. Our key concerns are summarized as follows:

1. This site as it stands now offers a much-needed buffer between the rural residents of the area and the current Turnpike Industrial Park. As noted in our comments against the DEIR, the residents of this area have been vocal speaking out against the further development of this area, including the zoning change from Rural Residential to Industrial A in 2010. Many cite **traffic, degradation of our road infrastructure, and the environment** as key concerns. This site is located away from routes 10 and 202 and access to the MassPike, requiring travel through many neighborhoods.
2. The FEIR does not address noise and light pollution concerns, which were noted in the letters of public comment. These factors could have considerable implications to the surrounding residents and wildlife inhabitants. This could be further compounded by the Proponent's plan to allow staggered starts to mitigate some of the traffic concerns.
3. As previously indicated, the planned site is directly over an unnamed aquifer that could potentially contribute to the city's water supply. This aquifer is separated from the Barnes aquifer by a section of underground impervious material that protects it from the contaminants found in the Barnes Aquifer.

Many residents in the area have private wells that tie into this aquifer. We are not confident that the quality of the groundwater supply in the affected area of the proposed development will be adequately protected in the future. The condition of the Barnes Aquifer which is contaminated with PFCs, including PFOA and PFAS chemicals that exceed the allowable limits set forth by the FDA shows that the Proponent does not have a good track record with water supply protection.

Additionally, while there is some controversy over the viability of this source as the DIER responses indicate, we believe that it is in the best interest of the residents of Westfield to explore these options before irreversible changes to the area are incurred. On January 31, 2019, the City Finance committee transferred an additional **\$26,000** to the Public Works Water division for an expert Geosphere assessment of the feasibility of this location for another well for the city. As of October of this year, this study has not been started. **The results of this budgeted feasibility study should be included in this FEIR.**

4. The supplementary traffic study suggests a significant degradation to already treacherous commuter traffic issues in the area. In addition to the significant burden placed on the roads and residents along Lockhouse Road and onto the Mass Pike, there are inadequate plans to ensure that unwanted truck traffic is contained to roads with the infrastructure to handle large amounts of heavy truck traffic. We are concerned that the Proponent's response to many similar comments/concerns is to address this by installing signage immediately within the property will be woefully inadequate given the difficulty the City has controlling and enforcing current truck traffic. This has been a recurring topic at city hall meetings. The Proponent's plan to engage in a traffic monitoring program for 5 years *after* the project is

complete is unacceptable. By that time, the impact to the residents of the town will already be realized, and as stated in the FEIR, commitment to mitigation steps will be limited.

5. In addition to increased congestion, increased car and truck traffic adds to the degradation of our roadway infrastructure and pollutes our city. We are concerned that the City is not considering the external social costs that residents are forced to bear associated with the large increase in traffic that this proposal brings with it. For example, in a report prepared for Congress in 2014 on the *Social Cost Pricing in Freight Transportation* by the Microeconomic Studies Division, it suggests that these costs could add up to 5.9 cents per ton-mile; 6.4 cents in 2019 dollars. These costs are categorized as follows:

- Accident Risk
- Pavement Damage
- Air Pollution (Particulates and NOX)
- Traffic Congestion
- CO2 Burden.

Some economists feel that the numbers used in this report are extremely conservative. For example, the report estimates that the social costs associated with carbon emissions is somewhere between \$5 and \$45 per ton. Other credible estimates suggest that the cost in 2014 was about \$32 to \$103 per ton, rising to \$82 to 260 per ton over the next two decades.

**The Proponent has failed to provide an in-depth cost-benefit analysis that addresses these social-environmental issues that it is burdening its residents with.** Do the taxes that this site will be generating offset these costs? Warehouses are of particular concern considering how quickly their property values can deteriorate over time, and the larger relative amount of truck traffic they produce. Can we ensure that tax money generated from this and other sites will be earmarked to accommodate these items? **Access to clean air and clean water is a right of the citizens of Westfield that is protected by our state's legislature.**

Respectfully,

Nicholas Beluzo  
Amy Beluzo  
372 Montgomery Rd  
Westfield, MA 01085



November 20, 2019

Page Czepica, Assistant Director  
Alex Strycky, MEPA Reviewer  
MEPA Office  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Westfield Turnpike Industrial Park (EEA# 15845): Supplemental Information

As discussed on our call on November 18, 2019, VHB is pleased to submit this memorandum on behalf of the City of Westfield (the "Proponent"), with some additional details pertaining minor modifications to the Project Site as detailed in Section 1.3.3 of Chapter 1, *Project Description*, of the FEIR. Over the course of MEPA review, the size of the Project Site has evolved. Since the Secretary's Certificate was issued on the Draft Environmental Impact Report (DEIR), an approximately 2.5-acre portion of the City owned land associated with Westfield Turnpike Industrial Park Project (the "Project Site"), has been sold to the owner of the adjacent 70 Turnpike Industrial Road property as part of their agreement to occupy the existing light industrial building on the site. Prior to the sale of the approximately 2.5-acre parcel to the 70 Turnpike Industrial owner, public meetings related to the sale and discontinuance of the small segment of road were held before two bodies of Westfield City Government. The matter came before the Westfield City Council on December 6, 2018, was discussed on the December 20, 2018 agenda, and received final passage on January 3, 2019. The segmentation of the parcel was placed on the Westfield Planning Board agenda on April 16, 2019 and received approval on the same night. In addition, a request for proposal was issued and the potential sale of land was advertised in the public domain for 30 days in early 2019.

The existing 70 Turnpike Industrial site has rather limited expansion potential due to the presence to the Massachusetts Turnpike and existing environmental resources including Powdermill Brook to the south. It is possible, but not known for certain, that the owner of the 70 Turnpike Industrial Road site could use this newly acquired land to preserve the capacity in the future to provide a second means of site access with an effective turning radius for vehicles. Given existing site constraints, it is anticipated that any future potential expansion on this site would be modest, and for the purpose of this hypothetical analysis, we have chosen to analyze 150 thousand square feet of light-industrial development, which is consistent with the zoning and existing uses in this district. The 70 Turnpike Industrial property is zoned Industrial A as are all other properties in the immediate vicinity, and it is therefore highly unlikely that a more traffic intensive, office use would occupy this site. There is an abundance of existing manufacturing and warehousing operations, similar to 70 Turnpike Industrial, in this area. As requested by MEPA, the table below provides a summary of the insignificant environmental impacts associated with a hypothetical potential future expansion of the 70 Industrial Turnpike building. It is not anticipated that a modest expansion of the existing building would trigger any MEPA thresholds.

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PO Box 9151  
Watertown, Massachusetts 02471  
Engineers | Scientists | Planners | Designers  
P 617.924.1770  
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**Table 1 Summary of Insignificant Environmental Impacts - 70 Industrial Turnpike**

<b>MEPA Review Threshold</b>	<b>Estimated Impact</b>	<b>Status</b>	<b>Matching State Agency Action</b>
Land – Alteration	< 5.0 acres <sup>i</sup>	Below ENF Threshold	None Anticipated
Land – Impervious Surface	Approx. 4.5 acres <sup>ii</sup>	Below ENF Threshold	None Anticipated
Other Wetlands	None Anticipated	N/A	N/A
New Vehicle Trips	660 unadjusted <sup>iii</sup>	Below ENF Threshold	None Anticipated
New Parking Spaces	None Anticipated	Below ENF Threshold	None Anticipated
Water Demand	12,375 GPD	Below ENF Threshold	None Anticipated
Wastewater Generation	11,250 GPD <sup>iv</sup>	Below ENF Threshold	None Anticipated

GPD gallons per day

Note: All estimated impacts are based off a hypothetical 150 thousand square feet of light industrial/manufacturing development.

In summary, the sale of the approximately 2.5-acre parcel described in the FEIR will result in: (i) no change in the conservative impact analyses presented in the DEIR, including the total number of vehicle parking spaces (1,458) or the total developable square footage; (ii) no change in the phasing of the Project undergoing MEPA review; and (iii) does not impact or alter MEPA jurisdiction over the project, including no changes in MEPA thresholds triggered by the Project. Ultimately, the 70 Turnpike Industrial Road property and building are not a component of the Project, and the Proponent does not control what will be developed on this adjacent site. It is the Proponent’s understanding that it could be possible to construct an expansion on the existing building on the adjacent site without requiring approvals from MassDOT for construction within the State Highway Layout, or from MassDEP for impacts related to wetlands in the southern portion of the site. Therefore, it is possible that a future potential expansion of the existing 70 Turnpike Industrial building would not (i) independently require MEPA review, or (ii) require any anticipated state permits or actions. The Proponent, and this memo do not represent or speak on behalf of the owner of the 70 Industrial Turnpike Building, or what they choose to do with their property now and in the future. If the owner of this adjacent site elects to pursue a larger, more intensive expansion than what is estimated herein, this memo does not preclude the possibility of future MEPA review should the project require a State action and exceed a related MEPA threshold.

This supplemental information is provided to aid in your review. Please do not hesitate to contact me if you have questions at (617) 607-2988 or [kgreaves@vhb.com](mailto:kgreaves@vhb.com).

Very truly yours,

Kyle G. Greaves  
 Project Manager/Senior Environmental Planner  
 VANASSE HANGEN BRUSTLIN, INC.

cc:  
 Peter Miller, City of Westfield  
 Ed Starzec, MassDevelopment

<sup>i</sup> Conservative estimate assuming approximately 3.4 acres of building footprint, approximately one (1) acre of new roadway, and buffer area surrounding the hypothetical expansion.

<sup>ii</sup> Conservative estimate assuming approximately 3.4 acres of building footprint, and approximately one acre of new roadway.

<sup>iii</sup> Assumes that existing surface parking will be sufficient.

<sup>iv</sup> Generation rates based on 310 CMR 15.203 guidelines Assumes 75 GPD/KSF.