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June 25, 2021

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE

PROJECT NAME : Connect. Construct. Create: A Plan for the Revitalization
of Center City Holyoke
PROJECT MUNICIPALITY : Holyoke
PROJECT WATERSHED : Connecticut
EEA NUMBER : 15483
PROJECT PROPONENT : Holyoke Redevelopment Authority
DATE NOTICED IN MONITOR : May 26, 2021

Pursuant to the Massachusetts Environmental Policy Act (MEPA) (M.G. L. c. 30, ss. 61-62I) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project change **does not require** an Environmental Impact Report (EIR).

MEPA review of the Notice of Project Change (NPC) has allowed an opportunity for State Agency and public comment prior to implementation of this Urban Renewal Plan (URP) amendment by the Holyoke Redevelopment Authority (HRA). The issues identified and guidance provided by commenters should assist the HRA as it advances through subsequent approval processes. Privately developed projects within the project area may be subject to future individual MEPA review should they exceed MEPA thresholds and require State Agency Actions, or are otherwise deemed to be related to the URP.

Original Project Description

As described in the Environmental Notification Form (ENF), the original project consisted of a series of public actions as outlined in the *Connect. Construct. Create: A Plan for the Revitalization of Center City Holyoke* Urban Renewal Plan (URP). The URP is a 20-year planning document prepared by the HRA which identifies potential development areas, community revitalization goals and objectives, and conceptual approaches to redevelopment. In addition, it identifies a series of public improvements to

roadways, open space, infrastructure, transportation, and parking, as well as selective demolition/site preparation work that will be undertaken by the HRA to support or enhance private redevelopment initiatives. These improvements are proposed within ten targeted areas located throughout the Urban Renewal Area (URA) and will be implemented in the following phases:

- Short-Term Expected Completion (1-5 Years)
 - Area 2 – Veterans Park
 - Streetscape improvements
 - General park upgrades (completed in 2012)
 - Area 5 – Passenger Rail/Transit Oriented Development Area (TOD)
 - Streetscape improvements on Lyman and Main Streets
 - Create an improved pedestrian connection to the Flats neighborhood
 - Extend Phase 2 Canalwalk along Race Street from Dwight Street to Appleton Street with a new pedestrian walkway, railings, benches, lighting and landscaping along the Second Level Canal, relocate overhead utilities underground, and repair abutments to existing railroad bridge (completed in 2016)
 - Construct a passenger rail stop along the Amtrak Vermonter Line with 21 parking spaces (completed in 2015)
 - Area 6 – High Performance Computing Area
 - Streetscape improvements along Appleton and Cabot Streets
 - Extend Phase 3 Canalwalk along Race Street with added streetscape improvements
 - Area 7 – Parsons Paper Redevelopment Site
 - Site preparation, including demolition, site assessment and remediation to prepare for redevelopment (completed in 2016)
- Mid-Term Expected Completion (1-10 Years)
 - Area 8 – South Holyoke Area
 - Pedestrian access and walkway improvements
 - Lighting improvements
 - Construct new police substation
 - Area 9 – Cabot Street Gateway Area
 - Streetscape improvements including new sidewalks, lighting and street trees to enhance connection to the Flats neighborhood;
 - Extend Canalwalk (now called the Center City Connector) system along the Third Level Canal with streetscape improvements
 - Incorporate a “gateway” treatment along Cabot Street
- Long-Term Expected Completion (1-20 Years)
 - Area 1 – Dwight Street Gateway Area
 - Create a “gateway” through the use of art and visual elements
 - Area 3 – Cabot and Chestnut Streets Area
 - No public actions proposed
 - Area 4 – High Street Area
 - Replace old Police Station parking deck next to City Hall and construct a small parking lot with green space
 - Reconstruct Suffolk Street parking deck (near completion)

- Rehabilitate Dwight Street parking garage (complete)
- Area 10 – Riverfront Area along Second and Third Level Canal
 - Construct a new public parking facility to support redevelopment of North Canal Street by Appleton Street
 - Construct streetscape improvements with the extension of the Canalwalk along Second and Third Level Canal and add dedicated bike lanes
 - Construct improvements to the water service system
 - Rehabilitate old bridges that cross the canal

The URP also noted a series of general area-wide public actions including:

- the elimination of combined sewer overflows (CSOs) as streets are upgraded or when feasible
- upgrades or replacement of waterlines when feasible
- address truck clearances at some railroad bridge underpasses

The URP identified up to 80 privately-owned parcels for acquisition (totaling 13.83 acres) and transfer of an additional 51 parcels owned by the City of Holyoke (City) to the HRA (totaling 25.66 acres). The URP identified 15 buildings for demolition (249,540 square feet (sf) total floor area) and 13 parcels with structures slated for rehabilitation (667,026 sf total floor area). As noted in the ENF, almost 80 percent of these buildings are currently vacant.

On April 8, 2016, a Certificate on the ENF was issued with a determination that the project did not require an EIR.

Project Site

The URA encompasses approximately 749.24 acres, including streets and water area, in and around the historic downtown and canal/waterfront area of Holyoke. The URA is generally bounded to the northeast, east and southeast by the Connecticut River, to the south/southwest by Interstate 391 and Resnic Boulevard, and the west by Beech Street (Route 202). The URA contains the downtown Canal District, consisting of three canals (First Level, Second Level, Third Level) that have provided hydro power to adjacent uses since the mid-1800s.

Four neighborhoods, with approximately 21.8 million sf of building area, are located in the URA: Downtown/Prospect Heights, Churchill, The Flats, and South Holyoke. Collectively, these neighborhoods make up the Center City and include Holyoke's central business district, and former manufacturing/mill operations, employee housing and neighborhood-scale retail/commercial uses. As noted in the ENF, loss of manufacturing companies in Center City has led to significant divestment and an increase in vacant and underutilized properties that currently characterize the URA.

While the URA is predominately characterized by developed, impervious areas, portions of it contain regulated environmental resources including: Bordering Vegetated Wetlands (BVW); Land Under Water (LUW), Bank, 100-year floodplain and 200-foot Riverfront Area associated with the Connecticut River; *Priority* and *Estimated Habitat* in the Connecticut River and canal system according to the latest Natural Heritage Atlas; parks and open spaces designated as Article 97 Land; properties

regulated under the Massachusetts Contingency Plan (MCP) with Activity and Use Limitations (AULs); and National and State Register-listed Historic Districts and Individual Properties.

Project Change

As described in the NPC, the HRA is updating the URP with an amendment (Amendment #3)¹ classified as a Major Plan Change because it includes properties identified as future acquisitions. The purpose of this major plan change is to further support the HRA's efforts and goals of the original URP. The change will reclassify 11 properties already in the URP from "not to be acquired" to "to be acquired" and add another 55 vacant and underutilized properties to the plan. Including the 66 properties in the URA will allow the HRA to facilitate current and future redevelopment opportunities (15 of the properties are City-owned and 51 are privately-owned). Approximately 94 percent (58 properties) of all parcel acquisitions are vacant or abandoned lots and buildings. The NPC includes a list of properties and proposed uses as well as a plan showing the currently proposed build condition. It also includes a preliminary build out analysis. Implementation of the public actions in support of the URP is expected to result in minimal temporary impacts and offer many long-term benefits to the City and its residents. There are no other changes to the original plan characteristics affecting area boundaries, character, objectives, public improvements, and redeveloper's obligations or disposition as defined in the original URP. This Major Plan Change was conditionally approved by DHCD on March 9, 2021 (Exhibit C in the NPC) contingent on the HRA undergoing MEPA review.

Jurisdiction and Permitting

The original project was required to undergo MEPA review with submission of an ENF pursuant to 301 CMR 11.03(1)(b)(7) of the MEPA regulations because it required Agency Action and approval in accordance with M.G.L. c. 121B of a new Urban Renewal Plan. The project required an approval of the URP from the Massachusetts Department of Housing and Community Development (DHCD). The project potentially required approval from the Massachusetts Department of Transportation (MassDOT) in conjunction with roadway and bridge improvements proposed by the HRA.

The project also potentially required Orders of Condition from the Holyoke Conservation Commission, or in the case of an appeal, Superseding Orders of Condition from the Massachusetts Department of Environmental Protection (MassDEP) and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA).

The proposed change will require a Major Plan Change approval from DHCD.

The project will be undertaken by a municipal redevelopment authority acting in accordance with M.G.L. c. 121B and funded through grants or loans from State Agencies.² Therefore, MEPA jurisdiction for this project 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.

¹ According to the NPC, Amendments #1 and #2 to the URP, completed in 2017 and 2018, included minor plan changes.

² According to the HRA, funding has been awarded from MassDevelopment and the MassWorks Infrastructure Program.

Environmental Impacts and Mitigation

The URP and Amendment#3 do not propose specific development projects; they are both planning documents that will serve as the basis for implementing the City's redevelopment goals for the area. However, the original URP did propose a series of improvements to infrastructure and selective demolition/site preparation to be undertaken by the HRA to facilitate implementation of the URP. As discussed below, and as previously analyzed in relation to the 2016 URP, environmental impacts associated with these public improvements are expected to be limited in nature and generally confined to the construction period. These public improvements may include impacts to wetland resource areas, stormwater, historic resources, and MCP-regulated properties. Additional potential environmental impacts may result from individual projects that may be developed by the City and/or private proponents. If required, separate MEPA review will be undertaken for these projects.

Measures to avoid, minimize and mitigate environmental impacts will include construction period erosion and sedimentation controls, traffic controls (as appropriate) during roadway and Canalwalk improvements, and recycling of demolished building materials to the extent feasible and in accordance with State regulations. Additionally, the HRA anticipates that future public/private or private development projects will construct stormwater management controls in accordance with State and local requirements and implement sustainable design and greenhouse gas (GHG) emissions reduction measures consistent with the City of Holyoke's Green Community designation.

Review of the NPC

The NPC includes a description of the proposed changes and proposed conditions plans. The development of the URP and Amendment#3 was the result of extensive and iterative public processes designed to identify overall goals and implementation actions. The NPC includes a description of both existing and proposed conditions for the URA and existing conditions plans illustrating environmental resources, existing land uses, and the ten targeted areas for public improvements by the HRA. The NPC discusses the current status of land ownership, the age and condition of structures, and zoning within the URA for the 66 new property acquisitions.

Redevelopment objectives identified in the URP and Amendment#3 emphasize sustainable design and economic opportunities associated with green energy sources, most notably hydropower from the canal system. I encourage the HRA to investigate potential energy efficiency incentives as projects develop within the URA, both for its own projects and those undertaken through leases or development agreements with private developers. These may include, but not be limited to, funding or grant resources from utilities, public, and quasi-public agencies, establishing design standards with a focus on energy efficient and/or zero net energy buildings, and promoting operational energy efficiency measures for all end users.

Comments from State Agencies on the ENF and NPC, including MassDEP, the Massachusetts Historical Commission (MHC) and the Massachusetts Department of Transportation (MassDOT), do not request further review but identified issues that the HRA should consider as future private or public/private development initiatives are advanced consistent with the URP and Amendment#3. MassDEP comments note that staff are available for pre-permitting and planning discussions to facilitate efficient permitting, solid waste management, and site management.

Buildout Analysis

The NPC includes a buildout analysis of conceptual future development within the URA for the 66 properties (in addition to those reviewed in the ENF). This buildout was calculated only for those parcels where buildings are proposed. Building square footage and parking estimates were based on the Holyoke Zoning Ordinance. Traffic generation estimates were calculated using Institute of Transportation Engineers' data based on land use. Water and wastewater generation rates were estimated based on MassDEP Title 5 data.

Estimated conceptual build-out for building rehabilitation and new construction for the 66 properties includes a mixture of residential, commercial, mixed-use (residential, retail, office) and light industrial uses totaling 97,000 sf for new construction and 377,700 sf for building rehabilitation, 556 new parking spaces, 5,252 new average daily trips (adt) and 66,030 gallons per day (gpd) each of water use and wastewater generation.

Wetlands and Stormwater

Based on the information in the ENF and NPC, it does not appear that public improvements proposed by the HRA will result in permanent alteration to wetland resources. I note that while there is a 200-foot Riverfront Area along the Connecticut River, the Holyoke Conservation Commission reviews the applicability of the Riverfront Protection Act on a case-by-case basis in accordance with the Historic Mill Complex exemption at 310 CMR 10.58(6)(k). Potential impacts to Bank or LUW are anticipated to be temporary in nature and associated with the Canalwalk improvements. The HRA will obtain Orders of Conditions for individual public projects, if necessary, from the Holyoke Conservation Commission. I refer the Proponent to comments from MassDEP regarding permitting associated with wetland resource areas and stormwater. Erosion and sedimentation controls will be implemented in work areas proximate to the canal system or Connecticut River to prevent short-term and long-term impacts to wetland resource areas. It is anticipated that as project sites are redeveloped within the URA that new design elements will be introduced that will improve the control and treatment of stormwater runoff. Additional landscaped areas are also expected to reduce impervious coverage leading to increased groundwater recharge and enhanced treatment of stormwater runoff.

Rare Species

Rare species habitat identified by the Massachusetts Natural Heritage and Endangered Species Program (NHESP) is associated with aquatic and flying species within the Connecticut River and canal systems. NHESP comments indicate that a determination of "no take" of state-listed rare species (and no adverse effect on the Resource Area Habitat of state-protected rare wildlife species) was issued in 2012 for Phase 2 of the Canalwalk and associated improvements that are located within Priority and Estimated Habitat proposed by the HRA. The HRA will likely be required to file with NHESP under the Massachusetts Endangered Species Act (MESA; 321 CMR 10.00) for Phase 3 of Canalwalk; any changes to the proposed project; or other projects that may directly impact mapped rare species habitat to determine whether additional mitigation measures or permitting may be necessary under MESA.

Historic Resources

The Center City neighborhood contains numerous historic building and properties, many of which are over 100 years old. They are reflective of the time period in which Holyoke's manufacturing industry was at its prime. The URP proposes enhancement of the historic character of the URA through reuse of buildings where feasible, and rehabilitation in a manner which preserves the historic characteristics and attributes of the buildings and remains complementary to adjacent uses. The NPC indicates that no demolition is proposed for the 66 parcels included in the URP amendment. However, the URP acknowledges that demolition of other historic structures may be unavoidable due to unsafe and dilapidated condition of some of the buildings. The HRA intends to support the URP's historic preservation goals through implementation of design guidelines and standards, a preference towards rehabilitation projects, and the establishment of cultural programming with walking, historic, and/or cultural tours, etc.

Projects undertaken by the HRA, acting under M.G.L. c. 121B, are subject to review by MHC under M.G.L. Chapter 9, Sections 26-27c, as amended (950 CMR 71.00). MHC will review all proposed demolition, rehabilitation, and new construction to determine their potential effects on properties that are listed in the State and National Registers of Historic Places and/or included in MHC's *Inventory of Historic and Archaeological Assets of the Commonwealth*. The MHC comment letter on the ENF indicated that it would require more details and specific information from the HRA as plans for each area are developed. The HRA should review this detailed comment letter to determine additional review requirements and information that should be forwarded to MHC to facilitate review.

Article 97 Land

The ENF identified the location of properties held in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth within the URA. While several of these properties are located outside the ten targeted areas, Veteran's Park, Holyoke Library Park, and Heritage Park (a property owned by the Massachusetts Department of Conservation and Recreation (DCR)), are located within targeted areas for public improvement. The HRA should review the Article 97 designation for each of these properties prior to undertaking these public improvements to ensure consistency with Article 97 and the EEA Article 97 Land Disposition Policy, and should consult MEPA thresholds (301 CMR 11.03(1)(b)(3) and (5)) when assessing the need for MEPA review.

Transportation and Parking

The URA currently contains an extensive sidewalk and crosswalk system and Phase 1A of the Canalwalk along First Level Canal between Dwight and Appleton Streets. According to a 2012 parking analysis, there is significant excess parking capacity within downtown Holyoke and opportunities were identified to use parking demand management measures, in lieu of expanded parking supply, to meet parking demand on the most popular streets to support long-term, monthly, commuter, and residential parking that may be spurred by the URP. Public roadway improvements will be designed to adequately address traffic issues and concerns to the extent feasible given the urban nature of the URA.

The URA includes the Holyoke Transportation Center, a multi-use transportation center with a bus port and parking facility. Regional bus service is provided via Peter Pan Bus Lines. Fixed route local

bus service is provided by the Pioneer Valley Transit Authority (PVTA). Passenger train service is provided by the Amtrak Vermonter, which travels between Washington D.C. and Vermont with a stop at the new Depot Square station platform located at the intersection of Main and Dwight Streets.

The ENF identified four bridges under MassDOT jurisdiction within the URA. It indicated that an Access Permit from MassDOT may be required for some public improvements, including but not limited to, streetscape improvements, roadway improvements to increase bridge clearance, or bridge replacements to replace aging infrastructure. The HRA should work with MassDOT during the advancement of its projects to ensure that all permitting and design standards are adequately met. As noted, the impacts associated with specific development projects, including impacts on the surrounding roadway network, will be reviewed as part of future reviews to the extent such projects fall under MEPA jurisdiction.

I encourage the HRA to continue to evaluate the enhancement of pedestrian and bicycle accommodations throughout the URA in a systematic fashion to facilitate the creation of an interconnected pedestrian and bicycle network. Roadway improvements undertaken by the HRA should be designed and constructed consistent with a Complete Streets approach that provides adequate and safe accommodations for all roadway users, including pedestrians, bicyclists, and public transit users.

Greenhouse Gas (GHG) Emissions

The City of Holyoke is a designated Green Community pursuant to the Green Communities Act of 2008. As a Green Community, the City is eligible for grants and technical assistance to improve energy efficiency and increase the use of renewable energy in public buildings, facilities, and schools. I strongly encourage the City to engage in energy infrastructure planning within the URA to consider how design and construction of infrastructure could support energy efficiency, reduce GHG emissions and provide resiliency to the effects of climate change. This may include encouraging developers to incorporate Passivehouse design principles in residential buildings and identifying opportunities to support roof-top solar photovoltaic (PV) systems. I refer the HRA to the detailed comment letter from the Massachusetts Department of Energy Resources (DOER) which provides guidance on reduction of GHG emissions from new development, use of financial incentives to lower construction costs, ensure lower energy costs for residents on a long-term basis, and increase the resiliency of the buildings. Key strategies include efficient electrification of space and water heating; Passivehouse or HERS 45 building standards (for residential); maintaining envelope integrity with framed, insulated walls with continuous insulation; reduced air infiltration; avoiding glass curtain wall assemblies and excessive windows; mitigation of solar heat gains; energy recovery; rooftop solar photovoltaics (PV); and electric vehicle (EV) Ready Parking. The URP, as amended, provides an excellent opportunity to embed building design criteria into the Design Guidelines. I encourage the HRA and City to consult with DOER Green Communities Regional Coordinator regarding these opportunities.

The City should consider the implementation of a Transportation Demand Management (TDM) program for the URA to require future developments to reduce GHG emissions by reducing project-generated vehicle trips and encouraging alternative modes of travel to and from the project area. The City should work with private development partners and area employers to adopt measures to encourage employee use of alternate modes of transportation, including public transportation, biking, and walking.

Water and Wastewater

The ENF did not identify any concerns regarding the ability of existing water and wastewater capacity to meet development goals proposed in the URP. It acknowledged that while there is ample sewer capacity at the wastewater treatment facility (designed for 17.5 million gallons per day (mgd) of flow, approximately 6 mgd actual flow), the City continues to experience long-term issues with CSOs. The URP indicates that improvements to CSOs will continue to be implemented where feasible. The Proponent is advised to continue consultation with Holyoke Water Works and Department of Public Works as projects develop and comply with all requirements for municipal cross-connection control and to ensure adequate infrastructure and capacity are available for wastewater disposal, respectively. To ensure that new wastewater flows from both public projects undertaken by HRA and those undertaken through public/private partnerships do not increase surcharging or overflows in large storms, the HRA or other Proponent should fully offset new flows with I/I removal in compliance with MassDEP regulations and in accordance with the City's I/I mitigation policy.

Hazardous Materials

The URA contains numerous properties currently or formerly under review pursuant to the MCP. Many properties have received Response Action Outcome (RAO) Statements and/or Permanent Solutions with or without conditions (PS/PSC) under the MCP. The ENF indicated that site preparation undertaken by the HRA to ready parcels for redevelopment will be conducted by qualified specialists (i.e., Licensed Site Professional (LSP)) in compliance with the MCP. Prior to project start up, the LSP should review MassDEP's disposal sites list and associated files periodically and throughout the duration of the project to determine any previous or newly listed contaminated areas that could pose a problem with on-site excavation activities. Site assessment and remediation activities may be required in accordance with the MCP. Any future reconstruction activities and uses near sites with AULs must be consistent with the current AUL and obligations/conditions specified within the AUL must be adhered to in accordance with 310 CMR 40.1070(2). In addition, a spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction 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 releases.

Construction Period

All construction and demolition (C&D) activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). I refer the Proponent to MassDEP comments regarding air quality. Erosion and sedimentation BMPs must be installed for each project during the construction period. The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to use construction equipment with engines manufactured to Tier 4 federal emission standards, or selection of project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur

diesel fuel (ULSD). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle C&D debris to the maximum extent. These measures should be followed both for public projects undertaken by HRA and those undertaken through public/private partnerships.

Conclusion

The NPC has defined the nature and general elements of the project change for the purposes of MEPA review and identified measures to avoid, minimize and/or mitigate impacts. The review of the NPC has identified issues that should be addressed during the permitting process. Based on the information in the NPC, consultation with State Agencies and a review of comment letters, I have determined that an EIR is not required. As noted above, future development projects that are proposed to implement the URP, as amended through this modification, may be subject to MEPA review if they independently trigger MEPA review thresholds and require Agency Actions, or are otherwise deemed related to the URP.

June 25, 2021

Date



Kathleen A. Theoharides

Comments received:

| | |
|------------|---|
| 06/15/2021 | Massachusetts Department of Environmental Protection (MassDEP) – Western Regional Office (WERO) |
| 06/15/2021 | Massachusetts Natural Heritage and Endangered Species Program (NHESP) |
| 06/25/2021 | Massachusetts Department of Energy Resources (DOER) |

KAT/PPP/ppp



MassWildlife

Commonwealth of Massachusetts

Division of Fisheries & Wildlife

Wayne F. MacCallum, *Director*

December 04, 2012

Holyoke Conservation Commission
Korean Veterans Plaza
Holyoke MA 01040

Karen Mendrala
Holyoke Office of Planning and Development
One Court Plaza
Holyoke MA 01040

RE: Applicant: Karen Mendrala
 Project Location: Second Level Canal
 Project Description: Canal Walk Phase II: Pedestrian Walkway, Abutment Repairs
 DEP Wetlands File No.: 186-0248
 NHESP File No.: 10-28815

Dear Commissioners & Applicant:

The Natural Heritage & Endangered Species Program (NHESP) of the Massachusetts Division of Fisheries & Wildlife received a Notice of Intent with site plans (dated October 2012) in compliance with the rare wildlife species section of the Massachusetts Wetlands Protection Act Regulations (310 CMR 10.58(4)(b), 10.59). The NHESP also received the MESA Review Checklist and supporting documentation for review pursuant to the MA Endangered Species Act Regulations (321 CMR 10.18).

WETLANDS PROTECTION ACT (WPA)

Based on a review of the information that was provided and the information that is currently contained in our database, the NHESP has determined that this project, as currently proposed, **will not adversely affect** the actual Resource Area Habitat of state-protected rare wildlife species. Therefore, it is our opinion that this project meets the state-listed species performance standard for the issuance of an Order of Conditions.

Please note that this determination addresses only the matter of **rare** wildlife habitat and does not pertain to other wildlife habitat issues that may be pertinent to the proposed project.

MASSACHUSETTS ENDANGERED SPECIES ACT (MESA)

Based on a review of the information that was provided and the information that is currently contained in our database, the NHESP has determined that this project, as currently proposed, **will not result in a prohibited "take"** of state-listed rare species. This determination is a final decision of the Division of Fisheries and Wildlife pursuant to 321 CMR 10.18. Any changes to the proposed project or any additional work beyond that shown on the site plans may require an additional filing with the NHESP pursuant to the MESA. This project may be subject to further review if no physical work is commenced within five years from the date of issuance of this determination, or if there is a change to the project.

www.masswildlife.org

Division of Fisheries and Wildlife

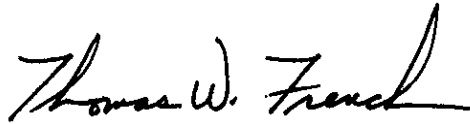
Temporary Correspondence: 100 Hartwell Street, Suite 230, West Boylston, MA 01583

Permanent: Field Headquarters, North Drive, Westborough, MA 01581 (508) 389-6300 Fax (508) 389-7890

An Agency of the Department of Fish and Game

Please note that this determination addresses only the matter of state-listed species and their habitats. If you have any questions regarding this letter please contact Lauren Glorioso, Endangered Species Review Assistant, at (508) 389-6361.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. French". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Thomas W. French, Ph.D.
Assistant Director

cc: MA DEP Western Region
City of Holyoke
David Pickart, Vanasse Hangen Brustlin, Inc.



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Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

June 15, 2021

Kathleen A. Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Massachusetts Environmental Policy Act Office
Purvi Patel, EEA No. 15483
100 Cambridge Street, 9th Floor
Boston, MA 02114-2524

Re: Center City Revitalization
Holyoke NPC 15483

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Notice of Project Change (NPC) submitted for the proposed Revitalization of Center City in Holyoke, MA (EEA #15483).

The applicable MassDEP regulatory and permitting considerations regarding wetlands, wastewater, drinking water, air pollution, solid waste, hazardous waste and waste site cleanup are discussed. MassDEP attended a site visit on June 8, 2021.

I. Project Description

An Environmental Notification Form was submitted in 2016. The project Proponent is the Holyoke Redevelopment Authority and the project site is the 749.24-acre Center City Holyoke as detailed in the Urban Renewal Plan. The full project proposes to reconstruct and revitalize the City center, streets, waterways (canals) and the former industrial areas and waterfront areas. The project is planned in accordance with the Massachusetts Urban Renewal Act and subject to approval by Department of Housing and Community Development. The plan is a 20-year plan with initially proposed projects and others to be developed and implemented as funds become available to the City or as proposed by private developers.

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

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Individual projects may require local sewer connection permitting and wetlands permitting through the local Conservation Commission. There are currently no firm proposed impacts to water use or wastewater generation until actual future projects are proposed.

The proposed redevelopment includes commercial, residential and industrial as well as mixed use, commercial/residential. The plan describes potential short, medium and long-term projects evaluating infrastructure and resources estimating adequate water and wastewater disposal infrastructure and capacity. The plan also incorporates stormwater management improvements incorporating elimination of CSOs as part of the long-term plan.

The Notice of Project Change submitted in May 2021, adds sixty-six additional properties to the conceptual plan for urban renewal. Many of those are vacant and blighted. The properties are residential, commercial, light industrial and mixed use. As the NPC is a plan rather than a specific project, the sixty-six properties are discussed in terms of preliminary property reuses based on the conceptual plan.

There were no Environmental Impacts listed in the Notice of Project. Environmental Impacts described in the Environmental Notification Form included:

- total site acreage - 5.53 acres
- acres of impervious area existing 2.12, change + 2.33 Total - 4.40 acres
- gross sq ft - 56,964 existing, change + 99,086, Total 155,990 gross sq ft
- vehicle trips per day - increase of 1,181, total daily 1,776 vehicle trips per day
- parking spaces increase of 119 spaces, total of 164 parking spaces
- wastewater increase of 8,600 gpd for a total of 10,600 gpd

Some of the sixty-six properties noted in the Notice of Project are adjacent to the canals and/or near the Connecticut River. Potential environmental impacts may require MEPA filings specific to those projects and will be addressed when the plan is finalized.

II. Required MassDEP Permits and/or Applicable Regulations

Wetlands

310 CMR 10.0000

Wastewater

314 CMR 7.00

Drinking Water

310 CMR 22.00

Air Pollution

310 CMR 7.00

Solid Waste

310 CMR 16.00

Hazardous Waste

310 CMR 30.00

Bureau of Waste Site Cleanup

310 CMR 40.000

III. Permit Discussion

Bureau of Water Resources

Wetlands

The full work area appears to include Bordering Vegetated Wetlands, Bank, Land Under Water Bodies and Waterways and Riverfront Area. Any work proximate to the canals or the Connecticut River will require submittal of Notices of Intent.

Due to the complexities of this project, MassDEP offers to conduct pre-permitting prior to wetlands submittals to clarify Historic Mill exemptions, Limited Project provisions and other permitting issues as may be necessary based on the specific project.

Riverfront Area General Performance Standards

Work conducted in undisturbed Riverfront Area must meet General Performance Standards; an alternatives analysis may be required.

Redevelopment

Work conducted within existing degraded Riverfront Area may be considered under the “redevelopment” provisions.

Boundary Determination and Delineation

Delineation of all jurisdictional resource areas should be accomplished through flagging in the field, surveying, and then presented on a scaled site plan. The Proponent is referred to MassDEP guidance documents and the regulations for specific requirements and methods for all resource delineations:

- Boundaries of Bordering Vegetated Wetlands (BVW) - “*Wetlands Protection Program Policy: Bordering Vegetated Wetlands Delineation Criteria and Methodology*” (MassDEP 1995), *Delineating Bordering Vegetated Wetlands Under the Massachusetts Wetlands Protection Act* (MassDEP 1995). Submittal of properly prepared “*MassDEP Bordering Vegetated Wetland Delineation Field Data Forms*” (Appendix Gs).

Bordering Vegetated Wetland General Performance Standards

The Proponent is advised to plan and construct any Bordering Vegetated Wetland “replacement area” per “*Massachusetts Inland Wetland Replication Guidelines*” (MassDEP March 2002); the issuing authority will reference these guidelines to determine compliance.

Stormwater

Regulation requires that when proposing a development or redevelopment project subject to the *Stormwater Management Standards*, proponents consider environmentally sensitive site design and planning. Considerations should include low impact development techniques, stormwater best management practices (BMP) utilizing source control (nonstructural control measures), structural BMPs and maintenance. The applicant is referred to the *MassDEP Stormwater Management Handbook* as well as MassDEP Western Regional Office guidance.

Stormwater management is an important issue that will have to be evaluated for each proposed site. Any Proponent should be aware that stormwater directed to the subsurface is currently subject to the jurisdiction of the *MassDEP Underground Injection Control (UIC) program* and the associated regulation 310 CMR 27.00 *Underground Injection Control*. These facilities are subject to a registration under the UIC program. An analysis of the capacity of the soils and depth to the water table may be required as part of the registration process. The Proponent should also be aware that locations of a UIC, such as rain gardens, must take into consideration any restrictions to land use under the *Massachusetts Contingency Plan* such as *Activities and Use Limitations*, as applicable.

Drinking Water

MassDEP advises the Proponent to continue to consult with Holyoke Water Works as projects develop and comply with all requirements for municipal cross-connection control.

Wastewater

MassDEP advises the Proponent to continue to consult with Holyoke Department of Public Works as projects develop to ensure adequate infrastructure and capacity is available for wastewater disposal.

Bureau of Air and Waste

Air Quality

Construction and Demolition Activities

The construction and demolition activity must conform to current Air Pollution Control Regulations. The proponent should 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 Waste Prevention Regulations 310 CMR 7.01, 7.09, and 7.10.

Construction Period Air Quality Mitigation Measures

All non-road engines shall be operated using only ultra-low sulfur diesel (ULSD) with a sulfur content of 15 ppm pursuant to 40 CFR 80.510.

Boilers/Generators/Emergency Generators

The applicant should be aware that there are air approval/permit requirements for boilers, incinerators, 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 threshold is exceeded by any on-site combustion process being proposed for the project and should evaluate its approval/permitting 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). 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.

Asbestos

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

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

Bureau of Waste Site Cleanup

Massachusetts Contingency Plan (MCP)

In response to the April 2016 ENF, MassDEP identified sites with open release tracking numbers (RTNs) or with Response Action Outcomes (RAOs) and/or Permanent Solutions with or without conditions (PS/PSC) including sites with an Activity and Use Limitation (AUL) within the Urban Renewal Plan (URP) project area. In addition, there have been recent sites listed with RTNs within the URP project area since 2016. Prior to project start up, the proponent should retain a Licensed Site Professional (LSP) to review MassDEP's oil and/or hazardous material disposal sites list and associated files periodically and throughout the duration of the project to determine any previous or newly listed contaminated areas that could pose a problem with onsite excavation activities. The MCP details procedures to follow for the parties conducting work in these areas where oil and /or hazardous materials may be encountered.

Any future reconstruction activities and uses near sites with AULs must be consistent with the current AUL and the obligations and conditions specified within the AUL must be adhered to in accordance with the MCP 310 CMR 40.1070 (2). MassDEP staff are available for guidance.

In addition, a spills contingency plan addressing prevention and management of potential releases of oil and/or hazardous materials from pre- and post-construction 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 releases.

IV. Other Comments/Guidance

MassDEP staff is available for discussions as the project progresses. If you have any questions regarding this comment letter, 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