

For Office Use Only Executive Office of Environmental Affairs
MEPA Analyst: <i>Rick Bourgo</i>
Phone: 617-626- <u>1130</u>

NPC

Notice of Project Change

The information requested on this form must be completed to begin MEPA Review of a NPC in accordance with the provisions of the Massachusetts Environmental Policy Act and its implementing regulations (see 301 CMR 11.10(1)).

Project Name: South Worcester Industrial Park		EOEA #: 12773
Street: Canterbury St/Southgate St/Southgate Place/Armory St		
Municipality: Worcester	Watershed: Blackstone	
Universal Transverse Mercator Coordinates: X: 267923.08108 Y: 4681126.408465 Zone 19N	Latitude: -71.813097 Longitude: 42.247841	
Status of project construction:	10	%complete
Proponent: City of Worcester, Office of Economic and Neighborhood Development. Economic Development Division		
Street: 44 Front Street, Suite 530		
Municipality: Worcester	State: MA	Zip Code: 01608
Name of Contact Person From Whom Copies of this NPC May Be Obtained: Marc J. Richards		
Firm/Agency: Tighe & Bond	Street: 446 Main Street	
Municipality: Worcester	State: MA	Zip Code: 01608
Phone: 508-471-9621	Fax: 508-795-1087	E-mail: mjrichards@tighebond.com

In 25 words or less, what is the project change? The project change involves demolition of a state-listed historic building; demolition of an abandoned steel foundry, off-site disposal of spent casting sand materials in accordance with 310 CMR 19.060, environmental cleanup, and construction of a 250 foot by 40 foot road extension. See full project change description beginning on page 3.
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Date of ENF filing or publication in the Environmental Monitor: April 24, 2002

Was an EIR required? Yes No; if yes,
 was a Draft EIR filed? Yes (Date:) No
 was a Final EIR filed? Yes (Date:) No
 was a Single EIR filed? Yes (Date:) No

Have other NPCs been filed? Yes (Date(s):) No

If this is a NPC solely for lapse of time (see 301 CMR 11.10(2)) proceed directly to "ATTACHMENTS & SIGNATURES" on page 4.

PERMITS / FINANCIAL ASSISTANCE / LAND TRANSFER

List or describe all new or modified state permits, financial assistance, or land transfers not previously reviewed:

- **Massachusetts Historical Commission review**
- **Department of Environmental Protection: Beneficial Use Determination (BUD)**

Are you requesting a finding that this project change is insignificant? (see 301 CMR 11.10(6))

Yes No; if yes, attach justification.

Are you requesting that a Scope in a previously issued Certificate be rescinded?

Yes No; if yes, attach the Certificate

Are you requesting a change to a Scope in a previously issued Certificate? Yes No; if yes, attach Certificate and describe the change you are requesting:

Summary of Project Size & Environmental Impacts	Previously reviewed	Net Change	Currently Proposed
LAND			
Total site acreage	25.3 +/-	-14.3+/-	11+/-
Acres of land altered	n/a ¹	n/a ²	n/a ²
Acres of impervious area	n/a ¹	n/a ²	n/a ²
Square feet of bordering vegetated wetlands alteration	0	0	0
Square feet of other wetland alteration	0	0	0
Acres of non-water dependent use of tidelands or waterways	0	0	0
STRUCTURES			
Gross square footage	300,000	-100,000	200,000
Number of housing units	n/a ¹	n/a ²	n/a ²
Maximum height (in feet)	n/a ¹	n/a ²	n/a ²
TRANSPORTATION			
Vehicle trips per day	n/a ¹	n/a ²	n/a ²
Parking spaces	n/a ¹	n/a ²	n/a ²
WATER/WASTEWATER			
Gallons/day (GPD) of water use	n/a ¹	n/a ²	n/a ²
GPD water withdrawal	n/a ¹	n/a ²	n/a ²
GPD wastewater generation/ treatment	n/a ¹	n/a ²	n/a ²
Length of water/sewer mains (in miles)	n/a ¹	n/a ²	n/a ²

1: ENF indicated that existing conditions were not known because a comprehensive inventory had not been conducted for the 25.3 acre area.

2: Potential development impacts associated with the build out of the SWIP project area are not considered in this

NPC.

Does the project change involve any new or modified:

1. Conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97? Yes No
 2. Release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction? Yes No
 3. Impacts on Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities? Yes No
 4. Impact on any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?
Yes No; if yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources? Yes No
 5. Impact upon an Area of Critical Environmental Concern? Yes No
- If you answered 'Yes' to any of these 5 questions, explain below:

PROJECT CHANGE DESCRIPTION (attach additional pages as necessary). The project change description should include:

- (a) a brief description of the project as most recently reviewed
- (b) a description of material changes to the project as previously reviewed,
- (c) the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and
- (d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any previously issued Section 61 Finding, include a proposed modification of the Section 61 Finding (or it will be required in a Supplemental EIR).

ENF Project Description

An Environmental Notification Form (ENF) was submitted in April 2002 for the South Worcester Industrial Park (SWIP) Conceptual Master Plan. As outlined in the ENF, the project consisted of the revitalization of an approximately 68-acre South Worcester neighborhood located south of Hammond Street between Southbridge Street and the CSX railway line to Grand Street, including an area east of Southbridge Street. The project as submitted in the ENF was subject to MEPA review pursuant to 301 CMR 11.03(1)(b)(6), "approval in accordance with MGL c. 121A of a New urban redevelopment project or a fundamental change in an approved urban redevelopment project, provided that the project consists of 100 or more dwelling units or 50,000 or more sf of non residential space".

At the time of the ENF filing, the City owned or planned to acquire approximately 25 acres in the area that could accommodate approximately 300,000 sf of new or redeveloped industrial, commercial and office space. The ENF did not examine the potential impacts of any redevelopment within the 25 acres because no specific redevelopment projects had been proposed in the area at the time of the ENF submission. The ENF outlined two phases of roadway improvements: Phase I included lowering the grade of Southgate Street under the railroad bridge and realigning the curve west of the bridge. Phase II included additional roadway work between Southgate Street and Canterbury Street, and the possible abandonment of a portion of Armory Street.

The Secretary's Certificate on the ENF issued on May 24, 2002 determined that the project did not require further MEPA review. However, due to the preliminary nature of information presented in the ENF, the Certificate also required that a Notice of Project Change (NPC) be filed for any future project

in the SWIP area that exceeded a MEPA review threshold. In addition, the Certificate also required that plans for each individual project in the SWIP area be submitted to the Massachusetts Historical Commission (MHC), whether or not a MEPA filing is required, in order for MHC to determine potential project-related impacts to historic and archaeological resources.

Tighe & Bond has consulted with the MEPA office who requested that a NPC be filed for the current project. As outlined below, the requirement for the NPC is triggered by the Secretary's Certificate of May 24, 2002, because on its own it would require the submittal of an ENF, and not because the project constitutes a material change to the project proposed in the ENF in accordance with 301 CMR 11.10.

Current Project Description

The City proposes to demolish two City-owned buildings within the SWIP project area located at 25 Southgate Street and 17 Southgate Place. The building at 25 Southgate Street is the 103,996 square foot former Standard Foundry complex. Located at 17 Southgate Place is the 68,894 square foot Adriatic Mill building. The Adriatic Mill is listed on the State and National Register of Historic Places and in the MHC's Inventory of Historic and Archaeological Assets of the Commonwealth (the Inventory). The former Standard Foundry complex is not historically significant and is not listed on the State and National Register of Historic Places, nor is it included in the Inventory. The current project also involves the construction of the Gardner Street extension (known as Janet Nadeau Way), the off-site disposal of spent casting sand in accordance with 310 CMR 19.060 (solid waste regulations), and site cleanup in accordance with the Massachusetts Contingency Plan (MCP, 310 CMR 40.00).

The project as outlined in the NPC triggers the MEPA review threshold at 301 CMR 11.03(10)(b)(1) because it proposes the demolition of the Adriatic Mill, a State Register-listed historic structure, and a property included in the MHC Inventory. As outlined below the SWIP project continues to receive funding from a variety of state and federal sources, and therefore MEPA jurisdiction over the project is broad pursuant to 301 CMR 11.01(2)(a)(2).

The SWIP project is a City-led revitalization initiative that consists of infrastructure improvements, demolition, and environmental remediation. Since the submittal of the ENF for the project in 2002, the City has downsized the SWIP project area from 68 acres to an 11-acre brownfield site. Of the 11-acre site, the City has acquired eight acres through tax title or eminent domain. At this time, the City does not intend on acquiring any additional parcels of land. The City-owned land consists of a total of five parcels: 65 Armory Street, 49 Canterbury Street, 17 Southgate Place, 26 Southgate Place, and 25 Southgate Street. The goal of the SWIP project is to develop "pad-ready" sites for light manufacturing/industrial use. It is anticipated that the SWIP redevelopment project has the potential to result in 200,000 square feet of development. This NPC does not evaluate the impacts of the build-out of the City-owned land, which will be developed privately. Pursuant to the original MEPA Certificate on the ENF, if future individual projects within the SWIP area trigger ENF review thresholds, subsequent NPCs will be required.

The demolition of the SWIP buildings is part of an overall effort to restore and revitalize abandoned properties throughout the City. The City has been involved with redevelopment planning in the SWIP area since the mid-1990s and has successfully completed a series of phased improvements including roadway extensions along Southgate Street and the abatement and removal of the majority of asbestos-containing and oil/hazardous materials located within buildings scheduled for demolition. The SWIP Task Force Committee, formerly known as the SWIP Citizen's Participation Committee, continues to meet on a monthly basis to discuss the project. The Task Force consists of neighborhood residents, businesses and city staff.

Following the development of the SWIP Conceptual Master Plan in April 2001, the BSC Group, Inc. prepared a South Worcester Industrial Park Draft Urban Revitalization Plan (URP) in December 2005. However the City has since decided not to move forward with URP efforts.

Projects Completed to Date in SWIP Area

The City has completed two phases of roadway improvements in the project area since the review of the ENF. Phase I infrastructure improvements, completed in 2004, addressed a portion of Southgate Street from Southbridge Street to Southgate Place. As part of these improvements, the roadway profile beneath the bridge on Southgate Street was lowered to increase truck access into the project area. Phase II infrastructure improvements, completed in 2007, consisted of roadway, drainage, and lighting improvements along Southgate Street from Southgate Place to Gardner Street, and along Gardner Street from Southgate Street to Canterbury Street. A cul-de-sac was created at Armory Street. In addition, sidewalks were replaced in the Phase II area.

Environmental assessment and remediation of underground storage tanks identified release site under the Massachusetts Contingency Plan (MCP) occurred at the 49 Canterbury Street. An Activity and Use Limitation has been placed on a portion of the site and all environmental close-out documents have been submitted to MassDEP. The 49 Canterbury Street site has been designated a Priority Development Site (PDS) under M.G.L. Chapter 43D. This site is anticipated to be privately developed with a 35,000 +/- sf building.

Historic Status of Adriatic Mill

The Adriatic Mill, located at 17 Southgate Place, is listed on the State and National Register of Historic Places, and is also included in MHC's Inventory of Historic and Archaeological Assets of the Commonwealth. According to information on file at MHC, the Mill is historically known as the Lower Junction Shop. This industrial building was constructed in 1854, and was likely commissioned by Eli Thayer, a local businessman, abolitionist, and politician, who would become a member of the United States House of Representatives in 1857. Thayer was firmly connected to the City of Worcester, having graduated from Worcester Academy in 1840 and founding the Oread Female Institute in 1849.

By 1859, Thayer sold the property to a Mr. Freeman of New York and B.F. Joslyn, a prominent inventor and gun manufacturer. Under their ownership, the building was used as the Joslyn Pistol Manufactory, and between 1861 and 1862, the building was utilized as a soldiers' barracks and known at the time as the Pistol Shop Barracks.

In 1863, the building was purchased by Jordan March & Company of Boston. The building was subsequently converted into a woolen mill and renamed the Adriatic Mill. Under the Jordan March & Company ownership, the first floor of the building was used for finishing and weaving, while the second story housed the spinning and carding operations of the woolen mill. Years later, from 1881 until the 1920s, the mill property was purchased by the Worcester Woolen Company, which continued to produce woolen goods in the mill.

The original portion of the Mill is a two-story, 400-foot long by 40-foot wide, stone, brick and stucco building covered by a gabled roof with evenly spaced gabled dormers with side walls. The original building features twelve-over-twelve sash throughout the first and second floors. Throughout its 150+ year history, the Mill building has undergone the construction of a series of substantial additions, including an L-shaped addition constructed on the south end of the Lower Junction Shop ca. 1863 (probably for the Jordan Marsh Woolen Mill), a two-story, gabled, brick addition constructed along the east elevation of the original building between 1860 and 1870 (again, probably for the Jordan Marsh Woolen Mill), a two-story, flat roofed, brick addition constructed on the north end of the original building between 1911 and 1912 (for the Worcester Woolen Mill), a four-story, flat roofed, brick loft

area, constructed on the south end of the first (pre-1860) addition constructed after 1922 (again, for the Worcester Woolen Mill), and a pair of one-story concrete block sheds constructed along the west elevation of the Lower Junction Shop, sometime in the mid-twentieth century.

Structural Status of Mill

Tighe & Bond has conducted a structural evaluation of the Adriatic Mill. The main buildings form an "L" shape with pitched roofs and gable ends. The building construction consists of multi-wythe stone load bearing exterior walls and an interior support system of wood deck, wood and steel beams and wood or cast iron columns. Due to the building's current structural condition and partial building collapses, not all areas of the building were accessible during the evaluation.

As outlined above, a single story concrete masonry unit structure was built next to the Mill building along the west side, with a separation of approximately 6 feet between the buildings. Another brick building was constructed adjacent to the west wall of the Mill, using the stone masonry wall as the north wall of the brick building. The brick building extends approximately ½ story above the roof of the Mill building. The additional ½ story appears to be constructed on top of and is supported by the existing exterior stone wall of the Mill building.

The Mill has a wood-framed pitched roof that has collapsed in several locations and water damage to the structure is evident. Due to the roof failure, the interior floor framing also shows signs of significant water damage and has several locations of failure. In the locations where the wood deck and floor beams have not failed, there are signs of considerable deterioration to a point where their load carrying capacity would be significantly reduced.

Overall, the exterior walls are in poor condition, with several areas having deteriorated to the point where failure has occurred or is imminent. The exterior walls are constructed of multi-wythe stone masonry with mortar joints. Due to the roof leaking or failing in several areas, the mortar in the walls has been exposed to years of water penetration and freeze thaw cycles. As a result of this process, the mortar has deteriorated and is no longer binding the stones together by any significant magnitude.

The portion of the stone wall that appears to support the adjacent building wall is currently in fair to poor condition. At present, the roof of the Adriatic building in the area of the common wall at the north end of the adjacent building is intact. There are areas of the wall that show significant signs of deterioration consistent with the conditions described above. The upper portions of the wall were not visible from the Adriatic side since the third floor was inaccessible. From the interior of the adjacent building the wall appeared to be intact but did show spalled areas of stone and mortar. There was no existing information available regarding the foundation construction of the attached abutting building nor were the foundations accessible to review. It appears the foundations of the abutting attached building are performing adequately, as there were no signs of excessive or differential settlement observed.

The ground floors of the Adriatic Mill consist of wood decking that is in poor condition, showing signs of structural failure. An approximate two foot crawl space exists beneath the wood decking. Building columns and floor joists are supported on brick footings, some of which were partially visible and damaged.

Overall, the building is in poor condition with several areas of floor and roof failure. There are sections of the stone masonry walls that have significant deficiencies, sections where failure is imminent, and sections that have failed. The mortar in the stone walls has been broken down over the years and the extent of the deterioration could not be verified.

For the existing building to remain and comply with minimum loading requirements of current building codes, it would require an extensive reconstruction effort. Moreover, portions of the mill have mortar joints that are deteriorating with ambiguous stability under lateral pressures. Currently the walls provide vertical support for the portions of the floor and roof structures. During the repair/replacement procedures on the walls, the floor and roof would require temporary shoring. However, due to the water damage, the majority (if not all) of the floor and roof framing will need to be replaced as well. Due to their condition, it will be difficult to adequately shore the floor structures and it would be impractical to provide temporary shoring for portions of the structure. Therefore, removing sections of the floor prior to repairing the walls would likely be necessary.

The floor and roof systems, when intact, provide a diaphragm and lateral bracing and stability to the stone walls. The areas of floor and roof framing that are intact are likely the main elements holding the deteriorated walls in place; prior to removing portions of the floor, framing the walls would require bracing and temporary shoring. Similar to the floor framing, due to their deterioration, shoring the walls could be problematic and impractical.

Following the structural evaluation of the building, Tighe & Bond concluded that to facilitate the City's overall effort to revitalize the South Worcester Industrial Park, the Adriatic Mill complex should be demolished in lieu of retaining the structure or portions of the structure. Rehabilitation efforts are not considered feasible and would require the majority of the structure to be rebuilt. The majority of the exterior walls would also not likely withstand any significant rehabilitation efforts and would likely deteriorate/collapse during potential attempts to rebuild the walls.

Consultation with Massachusetts Historical Commission

As required in the Secretary's Certificate, the City has consulted with the MHC regarding the project, specifically, the proposed demolition of the Adriatic Mill. In 2005, the City initiated consultations with the MHC about the project (MHC# RC.29040). Consultations with MHC, which included the Worcester Historical Commission and Preservation Worcester, included a thorough analysis of prudent and feasible alternatives to the proposed demolition. In response to requests made by MHC, the City submitted the following documentation:

- Original photographs of the building keyed to a site plan documenting its condition
- Minutes from an October 2005 meeting with the Worcester Historical Commission
- Structural and cost analysis for the stabilization of the building
- Information regarding the City's efforts to market the building for redevelopment
- Documentation of the City's efforts to stabilize and secure the building

Following a three year consultation process, MHC concluded that there were no prudent and feasible alternatives to the proposed demolition. Following a submittal made by the City in the fall of 2008, MHC determined that no further review was warranted, thereby concluding the consultation process.

Demolition Activities

Proposed building demolition for the site will progress using traditional construction methods. All asbestos and other inventoried hazardous materials, underground storage tanks and other regulated building materials will be removed prior to and during building demolition. Processing of asphalt, brick, and concrete (ABC) will comply with DEP notification requirements. Appropriate engineering controls with respect to noise and dust will be implemented. Misting of work area during demolition will occur to control dust migration from the work zone. All demolition debris will be segregated by material type based on specific receiving facility locations. All metal and steel building components will be recycled. Salvageable wood will also be recycled. All processed ABC will be reused at the

Greenwood Street Landfill in Worcester as grading and shaping material in support of the landfill's ongoing capping activities.

Massachusetts Contingency Plan (MCP)-Regulated Sites

A series of MCP release sites exist within the 11-acre SWIP area that are either being addressed by the City of Worcester or individual private property owners. The City of Worcester received a DEP Special Project Designation (SPD) for the SWIP area for the following three Release Tracking Numbers (RTNs):

- 17 Southgate Place - RTN 2-13359
- 25 Southgate Street - RTN 2-13360
- 65 Armory Street - RTN 2-11753

An SPD allows for MCP response actions to occur on a unique schedule and includes other opportunities for project efficiencies. The three RTNs listed above have undergone initial assessment activities. Supplemental assessment and cleanup actions will be initiated by the City as funding becomes available and developers are identified.

Subsequent to the City receiving the SPD, two additional RTNs have been assigned to City-owned properties in the SWIP area. These two additional RTNs are related to vandalism of abandoned electrical transformers and include the following:

- 25 Southgate Street - RTN 2-16983
- 17 Southgate Place - RTN 2-16993

These two RTNs will be permanently closed within the MCP regulations following the completion of building demolition.

Additional RTNs within the SWIP area include:

- 65 Armory Street - RTN 2-11753. This property was a tax title acquisition by the City, who may initiate response actions in the future.
- 35 Armory Street - RTNs 2-13708 and 2-15572. This property is privately owned. The City is not currently implementing MCP response actions for these releases.

Casting Sand Disposal

The City of Worcester submitted a *Beneficial Use Determination (BUD) Application* to the MassDEP for spent casting sands currently stockpiled and/or stored at 17 Southgate Place and 25 Southgate Street. The permit application was prepared in accordance with 310 CMR 19.060 of the solid waste regulations for Beneficial Use of Solid Wastes. The casting sands are proposed to be used as grading and shaping materials in preparation for the continued capping of the Greenwood Street Landfill (MassDEP ID: SL0348.004) located in Worcester, Massachusetts. The state-issued BUD permit will permit casting sands (classified as a special waste) to be reused within the Greenwood Street landfill, which is a non-special waste landfill. The BUD permit does not allow the casting sands to be reused at any other facility unless the facility is appropriately licensed to receive special wastes. The BUD permit is a discrete site activity and is unrelated to the proposed building demolition.

Gardner Street Extension (Janet Nadeau Way)

This portion of the project involves extending Gardner Street from its existing terminus at Southgate Street through the 25 Southgate Street site to Armory Street. The approximately 40-foot wide road

will be extended for approximately 250 feet. Infrastructure including a potable water line, storm drainage, and sidewalks will also be installed.

Funding Sources

Sources of funding for the SWIP project include:

- \$3.5 million City Loan Authorization
- \$1.3 million Economic Development Administration Public Works Grant (all funding expended to date)
- \$1 million State Public Works Economic Development (PWED) Grant (Approximately \$75,000 remaining PWED funds being held for the Gardner Street Extension project)
- \$500,000 MassDevelopment Remediation Grant
- \$200,000 EPA Assessment Grant for City-owned parcels
- \$200,000 Community Development Block Grant (CDBG) Remediation set-aside
- \$50,000 MassDEP Grant of Service – 65 Armory Street (Section 128A Funding)

ATTACHMENTS & SIGNATURES

Attachments:

1. Secretary's most recent Certificate on this project
2. Plan showing most recent previously-reviewed proposed build condition
3. Plan showing currently proposed build condition
4. Original U.S.G.S. map or good quality color copy (8-1/2 x 11 inches or larger) indicating the project location and boundaries
5. List of all agencies and persons to whom the proponent circulated the NPC, in accordance with 301 CMR 11.10(7)

Signatures:

Date	Signature of Responsible Officer or Proponent	Date	Signature of person preparing NPC (if different from above)
	Heather Kamyck		Marc J. Richards
	Name (print or type)		Name (print or type)
	City of Worcester		Tighe & Bond
	Firm/Agency		Firm/Agency
	44 Front Street, Suite 530		446 Main Street
	Street		Street
	Worcester, MA 01608		Worcester, MA 01608
	Municipality/State/Zip		Municipality/State/Zip
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