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August 2, 2024

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

PROJECT NAME PROJECT MUNICIPALITY PROJECT WATERSHED EEA NUMBER PROJECT PROPONENT DATE NOTICED IN MONITOR : Sierra Vista Commons
: Easthampton
: Connecticut
: 16729
: Tasty Top Development, LLC
: June 26, 2024

Pursuant to the Massachusetts Environmental Protection Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08(8) 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 proposed project consists of the construction of a mixed-use residential and commercial center, consisting of a 9,000 square foot (sf) Roots Learning Center (Daycare facility); a 7,000-sf Roots Gymnastic Center; a 5,000-sf sit-down restaurant with a 220-seat capacity; a 3,200-sf bank; a 4,000-sf standalone retail building; two 7,400-sf mixed-use warehouse buildings; a 16,000-sf mixed-use retail/office building with 14 apartments above; and ten mid-rise (3-floor) apartments buildings (nine 13,600-sf buildings and one 18,000-sf building). The project will also construct 478 surface parking spaces; a stormwater management system; and landscaping. The bank and sit-down restaurant are proposed to have priority visibility on the site and will be set back from Northampton Street (Route 10), a roadway controlled by the Massachusetts Department of Transportation (MassDOT), on the western portion of the site. The standalone retail building as well as the Roots Learning Center and Roots Gymnastic Center (collectively the Roots Building) will be

positioned directly to the east/northeast of the bank. Seven of the ten residential buildings will be located within the northern portion of the site, across an intermittent stream that bisects the property, with surface parking and other site amenities (including a swimming pool, community garden, and playground) located within a central plaza. The remainder of the project will be located within the southern portion of the site, immediately east of the commercial/retail buildings. Access to the site will be provided by an internal roadway that will utilize a new roundabout intersection with Northampton Street, and will include sidewalks, crosswalks, and speed humps as necessary at critical points. Access to the northern portion of the property will be provided by a new bridge that will span the intermittent stream. The project will also be serviced by existing municipal sewer and water with connections to the Easthampton Main Sewer Interceptor, which runs along the northeastern property boundary, and an existing water main located in Northampton Street. In addition, a minimum 35-foot (ft) vegetative buffer will be provided along the abutting residential properties to the south.

According to the FEIR, the primary goals of the project are to redevelop an underutilized property with infill development and create a variety of affordable and mixed-income housing to advance the City of Easthampton (the City)'s Housing Production Plan goals.

Project Site

The project site occupies approximately 33 acres of land, consisting of a mix of partially developed land, agricultural fields, wetlands, and forest, with 332 ft of frontage along Northampton Street. The majority of the residential units are proposed within the City's Residential – Suburban A (R-15) zoning district with the remainder of the project proposed within the Highway Business (HB) zoning district. The site previously supported a variety of uses that have altered approximately 17.1 acres, including approximately 10 acres of the southern portion of the site which operated as a driving range known as Easthampton Golf since at least the 1990s. Easthampton Golf included a paved parking area, a small building supporting a sales office, an artificial turf and natural grass tee box area, and a mowed lawn range. Within the immediate frontage on Northampton Street, the site supported a retail ice cream stand and paved parking lot as well as a single-family home and barn. Approximately 6.5 acres within the northern portion of the site was historically used as an agricultural field, though it has not been actively farmed in at least two years. Access to the field is currently provided by a pre-existing, unauthorized wooden bridge that crosses an intermittent stream which bisects the property. The site is bounded by mixed commercial uses to the north and west, vacant land to the east, and residential neighborhoods to the south.

State and local wetland resource areas located within the project area include Bank, Bordering Vegetated Wetlands (BVW), and Riverfront Area (RA). According to the Massachusetts Natural Heritage and Endangered Species Program (NHESP) Atlas (15th Edition), a portion of the project site is located within Estimated and Priority Habitat of Rare Species. A portion of the project site is also located in a Massachusetts Department of Environmental Protection (MassDEP) Approved Zone II Wellhead Protection Area. Additionally, the site formerly contained a structure listed in the Massachusetts Historical Commission's (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth.

The project site is located within an Environmental Justice (EJ) Population characterized by Income within the City of Easthampton. The site is located within one mile of three additional EJ

Populations characterized by Income within the City of Easthampton. The site is also located within five miles of 15 additional EJ Populations.¹ As described below, the EENF identified the "Designated Geographic Area" (DGA) for the project as one mile around EJ Populations, included a review of potential impacts and benefits to the EJ Populations within this DGA, and described public involvement efforts undertaken to date.

Changes Since the DEIR

Since the filing of the Draft Environmental Impact Report (DEIR) there have been no substantive changes to the project's design. However, the FEIR states that mitigation commitments have been revised to include an expanded community garden (approximately 20,000 sf) and an approximately 10.8-acre Conservation Restriction (CR), which includes approximately seven acres of prime farmland soils, to be placed on portions of the project site outside the limits of the development. Project plans have also been updated to identify carpool parking spaces and electric vehicle charging stations. In addition, the Proponent has committed to designing the residential buildings to meet Passivehouse standards.²

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include the direct alteration of 21.5 acres of land (including 4.4 acres of new land alteration and tree clearing) and the creation of 11.8 acres of impervious surface (including the construction of 202 housing units with 54 units being affordable units). The project will also construct 478 parking spaces; is expected to generate 4,382 New average daily trips (adt); and is anticipated to result in 68,820 gallons per day (gpd) of water use and wastewater generation.

Measures to avoid, minimize, and mitigate environmental impacts include the use of erosion and sedimentation controls during construction; the construction of a stormwater management system; the installation of landscaping features and vegetative screening throughout the site; new housing units built to Passivehouse standards; and the implementation of a comprehensive Transportation Demand Management (TDM) program. The project also proposes to place a CR on 10.8 acres of the project site and to beneficially reuse prime farmland soil either as part of the on-site landscaping efforts, within the community garden, or to be sold for reuse locally.

Jurisdiction and Permitting

This project is subject to MEPA review and a mandatory EIR because it requires Agency Action and meets/exceeds the MEPA thresholds 301 CMR 11.03(1)(a)(2) for the creation of 10 or more acres of impervious area and 301 CMR 11.03(6)(a)(6) for the generation of 3,000 or more New adt on roadways providing access to a single location. It also exceeds the ENF thresholds at 301 CMR 11.03(1)(b)(2) for the creation of 5 or more acres of impervious area; 301 CMR 11.03(1)(b)(4) for the conversion of land in active agricultural use to nonagricultural use, provided the land includes soils classified as prime, state important, or unique by the USDA; 301 CMR 11.03(6)(b)(13) for the generation of 2,000 or more New adt on roadways providing access to a single location; 301 CMR 11.03(6)(b)(14) for the generation

¹ The EEA EJ Mapper is available at: <u>https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts</u>

² See email from Adrienne Dunk (GZA) to Nicholas Moreno (MEPA) dated August 1, 2024.

of 1,000 or more New adt on roadways providing access to a single location and construction of 150 or more New parking spaces at a single location; and 301 CMR 11.03(6)(b)(15) for the construction of 300 or more New parking spaces at a single location. The project is also required to prepare an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA of one or more EJ Populations.

The project will require a Vehicular Access Permit from MassDOT. The project obtained coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA) on May 6, 2024. The project was issued an Order of Conditions (OOC) by the Easthampton Conservation Commission (MassDEP File No. 151-0322) on January 23, 2024, which was not appealed. The project also received Site Plan Approval and Special Permit Approval from the Easthampton Planning Board on November 14, 2023, and Demolition Delay approval from the Easthampton Historical Commission on February 8, 2023.³

Because the Proponent will seek Financial Assistance from one or more Agencies, MEPA jurisdiction is broad in scope and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in MEPA regulations.⁴

Review of the FEIR

The FEIR included a project description, existing and proposed conditions plans, revised estimates of project-related impacts, an updated Traffic Impact Assessment (TIA), a revised GHG analysis, a precipitation analysis, and an identification of measures to avoid, minimize and mitigate environmental impacts. The FEIR provided a response to comments on the DEIR and draft Section 61 Findings.

I acknowledge comments from residents which highlight concerns regarding potential impacts of the project regarding land alteration, addition of impervious surface, and stormwater runoff, as well as air emissions and traffic from up to 4,382 daily vehicle trips. In an effort to address these concerns, the project has implemented design changes to avoid and minimize environmental impacts, and has incorporated mitigation measures where impacts could not be avoided. Notably, the project is proposing to place a CR on 10.8 acres of the project site and will construct a stormwater management system, utilizing Low Impact Development (LID) measures, designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (8.07") The project is also proposing commendable, above-code, solar and EV commitments as well as designing the residential buildings to Passivehouse standards. Traffic impacts were also fully analyzed as part of this review, and anticipated road improvements and TDM measures were identified to minimize vehicular travel.

Environmental Justice (EJ) / Public Health

As noted above, the project site is located within an EJ Population characterized by Income within the City of Easthampton. The site is located within one mile of three additional EJ Populations

³ The Easthampton Demolition Delay Ordinance requires that any proposed demolition of buildings over 50 years old be reviewed and approved by the Easthampton Historical Commission.

⁴ According to the FEIR, the Proponent intends to seek various forms of Financial Assistance, including tax credits and deferred payment loans, from the Executive Office of Housing and Livable Communities and the Massachusetts Housing Finance Agency.

characterized by Income within the City of Easthampton. The site is also located within five miles of 15 additional EJ Populations. No languages were identified as being spoken by 5% or more of Limited English Proficiency ("LEP") residents within one mile of the project site, which is the identified DGA for the project.

The FEIR describes the public involvement activities undertaken since the filing of the DEIR to engage with EJ Populations. In accordance with the Scope, the Proponent developed an updated "EJ Distribution List," using information obtained from the MEPA office, which included a list of Community Based Organizations (CBOs) and tribes/indigenous organizations, for purposes of circulating the Single EIR prior to filing. The Proponent also updated the project website with the latest information on the project, including the FEIR, and provided notice of the FEIR's availability to a list of stakeholders, including individuals and organizations that commented on the EENF and DEIR.

In accordance with the Scope, the FEIR clarifies the geographic radius covered by the traffic study area, specifically noting that the traffic study area extends for approximately two miles along Northampton Street and includes six intersections (including five intersections located within EJ Populations), 25 existing roadway segments⁵, and five planned roadway segments. The FEIR also provides additional discussion regarding the anticipated increase in volatile organic compounds (VOCs) of more than one ton per year (tpy) between the 2030 No Build and 2030 Build with TDM (Mitigation Case), as noted in the DEIR. The FEIR provides the following figure detailing the modeled change in VOCs resulting from vehicle emissions:

	2023 Existing (kg/day)	2030 No-Build (kg/day)	2030 Build (kg/day)	2030 Build with Mitigation (kg/day)	Mitigation Change from 2023 Existing Condition	Mitigation Change from 2030 Build Condition
VOC	28.70 kg/day	20.72 kg/day	25.61 kg/day	24.97 kg/day	-13.0%	-2.5%
	11.5 tpy	8.34 tpy	10.30 tpy	10.04 tpy	-12.7%	-2.5%

According to the FEIR, VOCs are projected to decrease from existing conditions under all three future scenarios as emissions from vehicles are projected to decrease through improved fuel economy and electrification. However, the FEIR states that emissions of VOCs are anticipated to increase by 1.7 tpy across the traffic study area, inclusive of both EJ and non-EJ Populations, between the 2030 No-Build and the 2030 Build with TDM due to the increase in vehicle trips resulting from the project as the area surrounding the project site is largely rural and most of the populace relies on personal vehicles for many or most of their trips. Nevertheless, the Proponent has proposed a number of TDM measures to incentivize multi-modal forms of transportation over single occupancy vehicles, including incentives for vanpooling/carpooling; encouraging pedestrian and bicycle commuting through the installation of secure bike storage in residential building; installing bike racks in front of buildings; providing a Valley Bike Share station; constructing bike-friendly shared use concrete paths to connect the development to Northampton Street; and installing 40 electric vehicle charging stations in priority parking locations. In addition, MassDOT, through the Northampton Street Complete Streets Project (MassDOT Project No. 608423) and Pedestrian Improvement Plan, will improve multi-modal access to/from the project site and

⁵ Roadway segments are sections of a roadway between intersections.

the surrounding areas by improving bicycle and pedestrian accommodations along Northampton Street. As noted above, mitigation measures are anticipated to reduce VOCs by 2.5% from the future build condition.

Land Alteration, Impervious Surfaces, and Agricultural Soils

In accordance with the Scope, the FEIR includes a narrative describing the project's consistency with the Massachusetts Department of Agricultural Resource (MDAR) Agricultural Land Mitigation Policy to provide mitigation for the loss of prime farmland, which is a valuable resource for the Commonwealth. The FEIR states that providing for on-site agricultural use of the land is not proposed as there are extremely limited areas available for farming that would not encroach on adjacent wetland resources, cause changes to the stormwater management system, or increase the removal of trees on-site. However, the Proponent has consulted with MDAR regarding the proposed project which would result in the permanent conversion of 6.5 acres of farmland and has committed to implementing several mitigation strategies, including:

- The reuse of farmland soils on-site for landscaping and agricultural use within an expanded (20,000 sf) community garden, with excess farmland soils to be sold locally for agricultural use;
- Locating the community garden in a larger central green area (located over the more recently used agricultural soils) and minimizing ground disturbance and grading within this area;
- Utilizing pollinator species (including species listed within the New England Conservation/Wildlife Mix) in stormwater basins, rain gardens, and areas adjacent to wetlands; and
- Placing a CR across portions of the site that will not be developed (approximately 10.8 acres), including approximately seven acres of mapped prime farmland soils.

The FEIR states that consultation with MDAR about the proposed mitigation measures is ongoing; however, the Proponent is committed to finalizing mitigation with MDAR prior to project implementation. Alteration of agricultural soils outside of the work area will be avoided through the use of proper erosion and sediment control barriers. These barriers will be maintained until exposed soils are stabilized either through installation of permanent cover or temporary cover with vegetation. In addition, the stormwater management system will be constructed ahead of significant construction to provide for on-site management of stormwater runoff during and following construction.

Traffic and Transportation

Site Access

According to the FEIR, a roundabout remains the preferred intersection design alternative, in lieu of a traffic signal, to provide access to the site from Northampton Street. In response to the Scope, the FEIR describes the supportive analyses conducted for both the signalized intersection design alternative (including a project phasing analysis, signal warrant analysis, and proposed transportation conditions for approval evaluation) and the roundabout intersection design alternative. The FEIR states that the roundabout was selected in consultation with the City, the City's peer review traffic consultant, and an abutter-retained traffic consultant. The FEIR also states that recalibrating signal timings at various

intersections along Northampton Street (specifically at the intersections of Northampton Street/Florence Road/Highland Avenue, Northampton Street/West Street, and Northampton Street/Oneil Street) would further enhance traffic efficiency.

In accordance with the Scope, the Proponent has consulted with MassDOT regarding the timing of implementation as well as the funding for the design and construction of the roundabout. The FEIR states that based on the most recent discussions, MassDOT has indicated a preference to control the design and timeline of the roundabout implementation as part of the Northampton Street Complete Streets Project (MassDOT Project No. 608423). It is anticipated that funding provided by the Proponent will support the design and construction of the roundabout, and a framework for implementation has been agreed to by both parties; however, final negotiations regarding the exact contribution by the Proponent are currently pending. Implementation of the Northampton Street Complete Streets Project is anticipated to commence in 2028.

Comments provided by MassDOT state that the Proponent has committed to funding the design and construction of the roundabout at the project site's intersection with Northampton Street as part of the mitigation commitments.⁶ These improvements would be constructed by MassDOT as part of the Northampton Street Complete Streets Project (MassDOT Project No. 608423). Comments also state that approval to proceed with additional development on-site, beyond the phase 1 work, will only be granted if the Proponent is able to demonstrate that traffic operations would not be significantly impacted prior to the construction of the roundabout.

Traffic Operations

According to the FEIR, the capacity analysis previously performed identified several intersections where the Level-of-service (LOS) was projected to deteriorate between 2023 Existing and 2030 No-Build conditions. LOS is represented using letter grades "A" through "F," with LOS A representing very low delays and free flow conditions and LOS F representing unacceptable conditions for most drivers and conditions in which vehicle demand generally exceeds roadway capacity. The FEIR also identified four intersections or turning movements where the LOS deteriorated to an LOS F between the 2030 No-Build and 2030 Build conditions; however, LOS at those intersections improved when incorporating proposed mitigation measures, including updated signal timing and construction of the roundabout. As further detailed in the table below, the analysis indicated that the two signalized intersections (Northampton Street/West Street and Northampton Street/Oneil Street) will be returned to an acceptable LOS following mitigation and the Northampton Street/Mountainview Street intersection will also be returned to an acceptable LOS following construction of the roundabout.

⁶ Comments provided by MassDOT state that the Proponent has agreed to advance \$75,000 towards the design of the roundabout upon request by MassDOT with the balance of the funding (total funding contribution will be \$750,000) will be required upon MassDOT issuing a Notice to Proceed for the construction of the roundabout.

Intersection/Movement	Existing (2023)	No-Build (2023)	Build (2030) LOS	Build (2030)	
	LOS	LOS		Mitigated LOS	
	AM Pea	ak Hour			
WB Pleasant St right turn	D	E	F	Not Modeled	
PM Peak Hour					
Northampton St/West St (signalized)	D	E	F	D	
SB Northampton St left/thru/right at	С	E	F	В	
Oneil St. (signalized)					
EB Mountainview St left/right at	D	D	F	С	
Northampton St					

The FEIR states that since the westbound Pleasant Street right turn movement will not be incorporated into the roundabout and is not currently signalized, it was not modeled as part of the 2030 Mitigated Build condition. Therefore, this turning movement may continue to experience a decline in LOS from both 2023 Existing and 2030 No-Build conditions. As noted below, this intersection will be subject to five years of monitoring with an expectation of further mitigation should LOS decline to F conditions.

Transportation Demand Management (TDM) and Monitoring

As detailed in the FEIR, the Proponent has committed to implementing a program of TDM strategies with a goal of reducing the number of single-occupancy vehicles on the road by 35% due to the implementation of strategies that promote ridesharing and encourage the use of alternative transportation modes. Specific TDM measures include:

- Providing designated parking spaces for carpooling conveniently located in the parking area between Buildings 13 and 14, which is centrally located to all commercial buildings. All designated parking spaces will be clearly identified with signage.
- Construction of an eight-ft wide shared use path connecting the project site to Northampton Street. The path will run adjacent to the main roadway through the development, and loop around the eastern residential portion of the development.
- Construction of a concrete pad with a bike rack outside of every building. In addition, each residential apartment building will have secure bike storage rooms inside the buildings open to the residents.
- Installation of a Valley Bike Share station along the sidewalk adjacent to Northampton Street.
- Providing on-site recreational services for residents including a pool, community garden, and playground.
- Designating a Transportation Coordinator (proposed to be the Proponent) to provide onsite support and education that encourage the use of alternative modes of travel.
- On-site commercial businesses will provide services to the residents/employees within the development, including a daycare facility, restaurants, a bank, and a retail building.
- Traffic signal retiming at the intersections of Northampton Street/Florence Street/Highland Avenue and Northampton Street/West Street.
- Installation of four electric vehicle (EV) charging stations with designated parking spaces in front of each residential building (for a total of 40 EV charging stations) and designating 20% of all residential spaces EV-ready spaces.

The Proponent has also committed, as required, to implement a five-year annual Traffic Monitoring Program (TMP) starting six months following the completion of each phase of the project. According to the FEIR, the TMP includes requirements to collect post-development data including automatic traffic recorder counts and turning movement counts at multiple intersections in order to evaluate the success of the proposed TDM measures and the assumptions made in the TIA. The results of the TMP will be submitted to MassDOT, the City, and the Pioneer Valley Planning Commission (PVPC) for their review. The FEIR states that should the TDM measures not prove successful or should the LOS at westbound Pleasant Street right turn movement deteriorate to an LOS F, the Proponent will coordinate with MassDOT and the City to identify additional actions or measures to be incorporated before proceeding to the next phase of construction. Specific components of the TMP would include:

- Conducting Automatic Traffic Recorder (ATR) counts including vehicle classification for a continuous seven-day period at the site driveway.
- Performing Turning Movement Counts (TMCs) including vehicles, pedestrians, and bicycles, during the weekday morning (7:00 9:00 a.m.) and weekday evening (4:00 6:00 p.m.) peak periods at six monitored intersections (including Northampton Street/Mountainview Street/Site Driveway; Northampton Street/Florence Road/Highland Avenue; Northampton Street/West Street; Northampton Street/Oneil Street; Main Street/Union Street; and Northampton Street/Main Street/Pleasant Street/Lyman Avenue)
- Performing parking inventory and occupancy of both vehicle and bicycle parking on-site. The occupancy study shall include weekday morning (8:00 10:00 a.m.), weekday midday (11:00 a.m. 1:00 p.m.), weekday evening (4:00 6:00 p.m.), and weekday late night (after 9:00 p.m.) to capture the range of parking occupancy at different times of day.
- Comparing the site driveway ATR data to the signal warrants and coordinate with MassDOT should the warrants be met.
- Reviewing the analysis of Study Area intersections to determine whether the proposed signal timing changes proposed as mitigation are necessary yet subject to approval of MassDOT.

Wastewater

According to the FEIR, the project will result in the construction and operation of a privately owned sewer system within the development that will discharge to the City's sewer system. Therefore, the proposed sewer system is subject to 314 CMR 12.00 as a privately owned treatment works. However, the FEIR states that the system has been designed to qualify as a sewer extension, pursuant to 314 CMR 7.05(1), which is an activity that does not require approval from MassDEP. The Proponent intends to obtain approval from the City's Department of Public Works (DPW) for the sewer connection, and will prepare and submit an Operation and Maintenance manual prepared in accordance with the standards at 314 CMR 12.04(1) to MassDEP and City's DPW for review.

Comments provided by MassDEP affirm that the proposed sewer system is subject to 314 CMR 12.00 and other requirements described therein. In addition, comments state that 314 CMR 12.04 (2) includes the requirement that all sewer authorities develop a plan for controlling Infiltration and Inflow (I/I) including mitigation of the volume of stormwater runoff discharged into combined sewers when a new connection or extension is permitted. Comments advise the Proponent to consult with the DPW as plans are finalized to ensure compliance with the City's plan and any I/I removal requirements therein.

Climate Change

Adaptation and Resiliency

In accordance with the Scope, the Proponent performed a "Tier 2" analysis to evaluate the stormwater management system under future climate conditions associated with the 24-hour 50-year storm (2% annual chance) in 2070 (10.2"), utilizing information available through the Resilient MA Climate Change Projections Dashboard.⁷ According to the FEIR, a hydrology and hydraulics (H&H) analysis was performed to simulate the site hydrology including rainfall and runoff and potential stormwater impacts under existing and proposed conditions. Although the stormwater management system has been designed to convey and provide groundwater recharge for stormwater runoff up to the current 100-year storm event (8.07"), utilizing NOAA Atlas 14 precipitation data, the basins have been designed to include one ft of freeboard. Therefore, the analysis indicates that during a 2070 50-year storm event the stormwater management basins will reach or near capacity but are not overtopped, and will still decrease post-development peak runoff rates below pre-development runoff rates. In addition, the current design allows for increased stormwater management capacity if needed under future conditions as the stormwater basins can be excavated to an increased depth while still meeting groundwater separation distances, and berms can be added around basins to increase their storage capacity while maintaining peak water surface elevations below the first-floor elevations of adjacent buildings.

Greenhouse Gas (GHG) Emissions

This project is subject to review under the May 5, 2010, Revised MEPA Greenhouse Gas Emissions Policy and Protocol (MEPA GHG Policy), which requires Proponents to quantify carbon dioxide (CO₂) emissions and identify measures to avoid, minimize or mitigate such emissions. In accordance with the Scope, the FEIR included an updated discussion demonstrating the project's compliance with International Energy Conservation Code (IECC) 2021 Edition with Massachusetts Stretch Energy Code Amendments (the Stretch Code), and a revised Passivehouse gap analysis.

As noted above, the project proposes a total of 60,000 sf of commercial space (consisting of a restaurant, bank, retail, gymnastics studio, day care center, and warehouse/storage units) and 350,000 sf of residential space (consisting of 202 residential units in 10 buildings). The mixed-use retail building includes one floor for retail activity and two floors for residential units. The retail activity was evaluated in the commercial building analysis while the residential units were evaluated in the analysis of residential space.

According to the FEIR, for commercial buildings, the project proposes to fully comply with the July 2023 (updated) Stretch Code through the Prescriptive Compliance pathway, incorporating additional energy mitigation measures, for each of the commercial building components. The FEIR states that in response to comments provided by the Massachusetts Department of Energy Resources (DOER) on the DEIR, the Proponent has committed to incorporating Energy Recovery Ventilation (ERV) units in the two warehouse buildings with approximately 70% heat recovery in addition to the

⁷ Available at <u>https://resilientma-mapcenter-mass-eoeea.hub.arcgis.com/</u>.

other proposed energy mitigation measures. Specific mitigation measures will include:

- energy efficient windows (including triple panes and a U-value⁸ of 0.25)
- energy efficient building envelopes (including Low-Thermal Energy Demand Intensity (TEDI), roof insulation with a U-value of 0.024, and wall insulation with a U-vale of 0.071 or lower);
- thermally broken window and wall components will be used to eliminate thermal bridges;
- low air infiltration to ensure low heating and cooling TEDI;
- higher-efficiency heating, ventilation, and air conditioning (HVAC) systems (utilizing air-source heat pumps (ASHP) for all space heating and cooling;
- Energy Recovery Ventilation (ERV) units for all buildings (70% heat recovery), except for the warehouse buildings;
- electric hot water heaters;
- Energy STAR equipment and appliances (for cooking and refrigeration);
- energy efficient interior and exterior lighting; and
- low-flow fixtures and plumbing.
- roof-top Photovoltaic (PV) arrays on the Roots Building and stand-alone retail buildings, which would accommodate 20,000 sf of PV arrays across the four buildings.
- designating 25% of commercial parking spaces (except for the warehouse buildings) EV-ready spaces, for a total of 48 EV-ready spaces.

In accordance with the Scope, the FEIR includes a revised Passivehouse analysis that includes a gap analysis comparing the proposed case for the residential buildings (HERS 45 meeting mandatory code provisions plus envelope features and electrification) to Passivehouse with a life cycle evaluation and a professionally-estimated cost evaluation of first costs, netted against the Passivehouse \$0.6M incentive. The gap analysis also estimated the peak electric demand in summer and winter with the proposed HERS 45 case and the Passivehouse case. As noted above, the Proponent has committed to designing the residential buildings to meet Passivehouse standards, consistent with current state of practice.⁹ In addition, the project proposes to allocate 7,500 sf of residential parking spaces to be solar-ready (greater than the 40% required by the Stretch Code); allocate 20% of all residential parking spaces to be EV-ready (for a total of 58 EV-ready spaces); and install 4 EV charging stations per residential building (for a total of 40 EV charging stations), which as an above-code mitigation measure.

Comments provided by DOER acknowledge that the project is proposing commendable, abovecode, solar and EV commitments and taking notable measures to reduce emissions through efficient electrification; low thermal demand intensity (TEDI); thermal bridge mitigation; high envelope performance; high levels of ventilation energy recovery; and low air infiltration.

Construction Period

All construction and demolition 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

⁸ Thermal transmittance, also known as U-value, is the rate of transfer of heat through a material or structure. Lower U-values equate to higher levels of insulation.

⁹ Comments provided by DOER note that the City of Easthampton has adopted the Specialized Energy Code and that Passivehouse will become a mandatory requirement as of January 1, 2025.

Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). 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 require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). 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 construction and demolition (C&D) debris to the maximum extent.

Mitigation and Section 61 Findings

The FEIR provides final mitigation commitments and draft Section 61 Findings for use by Participating Agencies, which are summarized below. The Section 61 Findings should be provided to Participating Agencies to assist in the permitting process and issuance of final Section 61 Findings.

Environmental Justice (EJ) / Public Health

- Continue to support and update the project website as the project progresses.
- Construct commercial spaces which can provide services to the community, including a childcare center and gymnastics center.
- Maintain and enhance existing vegetative buffers along residential property boundaries, including a 35-ft vegetative buffer along the abutting residential properties south of the project site.
- Enhance pedestrian and bicyclist infrastructure within the project site and along the Northampton Street frontage through the installation of an eight-foot-wide shared use concrete path, bicycle racks, and a Valley Bike Share station.
- Provide funding to MassDOT for the design and construction of a roundabout at the Northampton Street (Route 10)/Site driveway/Mountainview Street intersection.
- Construct a driveway connection to the adjacent Starbucks property should the Proponent come to a reasonable agreement with the adjacent property owner.
- Provide designated parking spaces for carpooling conveniently located in the parking area between Buildings 13 and 14, which is centrally located to all commercial buildings. All designated parking spaces will be clearly identified with signage.
- Construction of an eight-ft wide shared use path connecting the project site to Northampton Street. The path will run adjacent to the main roadway through the development, and loop around the eastern residential portion of the development.
- Construction of a concrete pad with a bike rack outside of every building. In addition, each residential apartment building will have secure bike storage rooms inside the buildings open to the residents.
- Installation of a Valley Bike Share station along the sidewalk adjacent to Northampton Street.
- Providing on-site recreational services for residents including a pool, community garden, and playground.

- Designating a Transportation Coordinator (proposed to be the Proponent) to provide onsite support and education that encourage the use of alternative modes of travel. The transportation coordinator will also work with tenants and subcontractors such as waste disposal to schedule truck deliveries and traffic for off-hours to the extent practicable.
- On-site commercial businesses will provide services to the residents/employees within the development, including a daycare facility, restaurants, a bank, and a retail building.
- Pursue traffic signal retiming at the intersections of Northampton Street/Florence Street/Highland Avenue, Northampton Street/West Street, and Northampton Street/Oneil Street to improve traffic operations.
- Installation of two electric vehicle (EV) charging stations with designated parking spaces in front of each of the commercial buildings, except the warehouse buildings/storage units, and designating 25% of all commercial spaces EV-ready spaces.
- Installation of four EV charging stations with designated parking spaces in front of each residential building (for a total of 40 EV charging stations) and designating 20% of all residential spaces EV-ready spaces.
- Construction of a stormwater management system, (including deep-sump, hooded catch basins; oil and grit separators/hydrodynamic separator units to remove total suspended solids (TSS); two open air detention/infiltration basins equipped with sediment forebays, outlet control structures, level spreaders, and armored emergency spillways, and 13 rain gardens) designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (8.07").
- Place a Conservation Restriction (CR) across portions of the site that will not be developed (approximately 10.8 acres), including approximately seven acres of mapped prime farmland soils.
- Plant and maintain a landscape plan with at least 203 shade trees and 271 shrubs around buildings, and along roadways and parking areas.

Land Alteration, Impervious Surfaces, and Agricultural Soils

- Designate 85 parking spaces as green space that will only be converted to parking if necessary based on assessed demand.
- Maintain and enhance existing vegetative buffers along residential property boundaries, including a 35-ft vegetative buffer along the abutting residential properties south of the project site.
- Reuse of farmland soils on-site for landscaping and agricultural use within an expanded (20,000 sf) community garden, with excess farmland soils to be sold locally for agricultural use.
- Locate the community gardens (for residents) in a larger central green area (located over the more recently used agricultural soils) and minimizing ground disturbance and grading within this area.
- Utilize pollinator species (including species listed within the New England Conservation/Wildlife Mix) in stormwater basins, rain gardens, and areas adjacent to wetlands.
- Place a Conservation Restriction (CR) across portions of the site that will not be developed (approximately 10.8 acres), including approximately seven acres of mapped prime farmland soils.
- Plant and maintain a landscape plan with at least 203 shade trees and 271 shrubs around buildings, and along roadways and parking areas.

Wetlands and Stormwater

- Comply with all Standard and Special Conditions included in the Order of Conditions (MassDEP File No. 151-0322) issued by the Easthampton Conservation Commission on January 23, 2024.
- Prepare and implement a Stormwater Pollution Prevention Plan (SWPPP).
- Protect wetland resource areas from secondary impacts during construction through the implementation of erosion and sedimentation controls, incorporating BMPs.
- Remove the existing stream crossing and implement the approved restoration plan in accordance with the Enforcement Order issued by the Easthampton Conservation Commission.
- Construct a new stream crossing designed to meet the Massachusetts Stream Crossing Standards.
- Demarcate wetland boundaries near the development with Conservation Commission approved signage and bollards.
- Construction of a stormwater management system, (including deep-sump, hooded catch basins; oil and grit separators/hydrodynamic separator units to remove total suspended solids (TSS); two open air detention/infiltration basins equipped with sediment forebays, outlet control structures, level spreaders, and armored emergency spillways, and 13 rain gardens) designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (8.07").

Traffic and Transportation

- Provide funding to MassDOT for the design and construction of a roundabout at the Northampton Street (Route 10)/Site driveway/Mountainview Street intersection.
- Construct a driveway connection to the adjacent Starbucks property should the Proponent come to a reasonable agreement with the adjacent property owner.
- Provide designated parking spaces for carpooling conveniently located in the parking area between Buildings 13 and 14, which is centrally located to all commercial buildings. All designated parking spaces will be clearly identified with signage.
- Construction of an eight-ft wide shared use path connecting the project site to Northampton Street. The path will run adjacent to the main roadway through the development, and loop around the eastern residential portion of the development.
- Construction of a concrete pad with a bike rack outside of every building. In addition, each residential apartment building will have secure bike storage rooms inside the buildings open to the residents.
- Installation of a Valley Bike Share station along the sidewalk adjacent to Northampton Street.
- Providing on-site recreational services for residents including a pool, community garden, and playground.
- Designating a Transportation Coordinator (proposed to be the Proponent) to provide onsite support and education that encourage the use of alternative modes of travel. The transportation coordinator will also work with tenants and subcontractors such as waste disposal to schedule truck deliveries and traffic for off-hours to the extent practicable.
- On-site commercial businesses will provide services to the residents/employees within the development, including a daycare facility, restaurants, a bank, and a retail building.
- Pursue traffic signal retiming at the intersections of Northampton Street/Florence Street/Highland Avenue, Northampton Street/West Street, and Northampton Street/Oneil Street to improve traffic operations.
- Implement an annual Traffic Monitoring Program (TMP) for a period of five years, beginning six months after building occupancy, to include the following elements:

- Conduct Automatic Traffic Recorder (ATR) counts including vehicle classification for a continuous seven-day period at the site driveway.
- Perform Turning Movement Counts (TMCs) including vehicles, pedestrians, and bicycles, during the weekday morning (7:00 – 9:00 a.m.) and weekday evening (4:00 – 6:00 p.m.) peak periods at six monitored intersections (including Northampton Street/Mountainview Street/Site Driveway; Northampton Street/Florence Road/Highland Avenue; Northampton Street/West Street; Northampton Street/Oneil Street; Main Street/Union Street; and Northampton Street/Main Street/Pleasant Street/Lyman Avenue)
- Perform parking inventory and occupancy of both vehicle and bicycle parking on-site. The occupancy study shall include weekday morning (8:00 – 10:00 a.m.), weekday midday (11:00 a.m. – 1:00 p.m.), weekday evening (4:00 – 6:00 p.m.), and weekday late night (after 9:00 p.m.) to capture the range of parking occupancy at different times of day.
- Compare the site driveway ATR data to the signal warrants and coordinate with MassDOT should the warrants be met.
- Review analysis of Study Area intersections to determine whether the proposed signal timing changes proposed as mitigation are necessary yet subject to approval of MassDOT.
- Installation of two electric vehicle (EV) charging stations with designated parking spaces in front of each of the commercial buildings, except the warehouse buildings/storage units, and designating 25% of all commercial spaces EV-ready spaces.
- Installation of four EV charging stations with designated parking spaces in front of each residential building (for a total of 40 EV charging stations) and designating 20% of all residential spaces EV-ready spaces.

Climate Change

Adaptation and Resiliency

- Construction of a stormwater management system, (including deep-sump, hooded catch basins; oil and grit separators/hydrodynamic separator units to remove total suspended solids (TSS); two open air detention/infiltration basins equipped with sediment forebays, outlet control structures, level spreaders, and armored emergency spillways, and 13 rain gardens) designed to convey and provide peak attenuation for stormwater runoff up to the current 100-year storm event (8.07") and future (2070) 25-year storm event (7.48").
- Limit overall tree removal on-site, specifically around wetlands and waterways to minimize heating and/or degrading these resources.
- Configure stormwater basins between buildings or along tree lines to provide at least partial shading of the basins to limit water warming prior to release or infiltration.
- Design the parking areas to be several separate parking areas to support additional shading of paved surfaces.
- Use high albedo roof materials including white roofs on all buildings except for the Roots Building and the contractor storage units which will have light grey metal roofs.
- Locate stormwater basins and other site development features outside the RA.
- Designate at least 85 parking spaces to be built only if demand requires it. Prior to site demand for these spaces, the areas will be maintained with vegetative cover to limit heat absorption.

- Place a Conservation Restriction (CR) across portions of the site that will not be developed (approximately 10.8 acres), including approximately seven acres of mapped prime farmland soils.
- Plant and maintain a landscape plan with at least 203 shade trees and 271 shrubs around buildings, and along roadways and parking areas.
- Create a recreational area for residents that includes a swimming pool.

Greenhouse Gas Emissions

- Design and construct the proposed buildings and structures to achieve compliance with updated Stretch Code requirements through the use of energy mitigation measures, including:
 - Commercial Buildings
 - Energy efficient windows (including triple panes and a U-value¹⁰ of 0.25);
 - Energy efficient building envelopes (including Low-Thermal Energy Demand Intensity (TEDI);
 - Roof insulation for the restaurant, small retail, mixed retail, and bank of U-0.026 (R-38 equivalent);
 - Roof insulation for the gymnastics center, daycare facility, and warehouse of U-0.024 (R-42 equivalent) at the exterior, with an additional interior insulation of U-0.077 (R-13 equivalent);
 - Thermally broken window and wall components will be used to eliminate thermal bridges;
 - Low air infiltration to ensure low heating and cooling TEDI;
 - Higher-efficiency heating, ventilation, and air conditioning (HVAC) systems (utilizing electric air-source heat pumps (ASHP) for all space heating and cooling;
 - Energy Recovery Ventilation (ERV) units for all buildings (70% heat recovery);
 - Electric hot water heaters;
 - Energy STAR equipment and appliances (for cooking and refrigeration);
 - Energy efficient interior and exterior lighting;
 - Low-flow fixtures and plumbing;
 - Roof-top Photovoltaic (PV) arrays on the Roots Building and stand-alone retail buildings, which would accommodate 20,000 sf of PV arrays across the four buildings; and
 - Two EV charging station with designated parking spaces in front of each of the commercial buildings, except the warehouse buildings/storage units, and designating 25% of all commercial spaces EV-ready spaces.
 - Residential Buildings
 - Design residential buildings to be Passivehouse;
 - Designate 7,500 sf of residential roof space as solar-ready (greater than 40% required by the Stretch Code); and
 - Four electric vehicle (EV) charging stations with designated parking spaces in front of each residential building (for a total of 40 EV charging stations) and designating 20% of all residential spaces EV-ready spaces.

¹⁰ Thermal transmittance, also known as U-value, is the rate of transfer of heat through a material or structure. Lower U-values equate to higher levels of insulation.

• Submit a self-certification to the MEPA Office, prepared in accordance with the MEPA GHG Policy, that identifies the GHG mitigation measures incorporated into the building and will detail the compliance to the GHG reduction commitments detailed above.

Construction Period

- Limit construction to Phase 1 and 2 until the water supply line in Northampton Street has been upgraded.
- Minimize alteration of steep slopes by limiting the work to only the installation of stormwater outfalls in these areas.
- Implement mitigation measures to prevent stormwater contamination including among others, use of erosion and sedimentation controls, settling basins, and infiltration of non-treated stormwater.
- Develop and implement a Waste Management Plan which will include information on waste assessment and planning; source reduction; reuse and recycling; material handling and segregation; hazardous waste management; construction debris management; and waste disposal measures.
- Limit fugitive dust emissions using industry-best practices, such as watering, sweeping, and wheel-washing.
- Reduce potential air emissions through the use of heavy equipment retrofitted with diesel emissions control devices, using Ultra Low Sulfur Diesel for all trucks and construction machinery, and minimizing idling.
- Minimize construction period noise impacts to the extent feasible through the use of mufflers, selection of quieter equipment, and minimizing idling.

Conclusion

Based on a review of the FEIR, comment letters, and in consultation with Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. No further MEPA review is required, and the project may proceed to permitting. Participating Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

August 2, 2024 Date

Rebecca L. Tepper

Comments received:

Comments submitted on the MEPA Public Comment Portal

7/25/2024Catherine Wauczinski7/26/2024Jean Pao Wilson

Comments submitted by email

- 7/25/2024 Massachusetts Department of Environmental Protection (MassDEP)
- 7/30/2024 Massachusetts Department of Energy Resources (DOER)
- 8/1/2024 Massachusetts Department of Transportation (MassDOT)

RLT/NJM/njm



Nicholas.Moreno@mass.gov

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16729	Catherine	22 overlook dr	Easthampton Active Citizens
Comments Submit Date 7-25-2024	Last Name Wauczinski	Address Line 2	Affiliation Description
Certificate Action Date	Phone	State	Status
7-26-2024		MASSACHUSETTS	Opened
Reviewer Nicholas Moreno (617)699-4254, Nicholas Moreno (2000)	Email easthamptonactivecitizens@proton.me	Zip Code 01027	

Comment Title or Subject

Topic: Opposed to the development

Comments		
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First there was no option for voicing opposition to the project. I would like to make it very clear that Easthampton Active Citizens opposes this project in its current form. The impact to the health of the community would be hard to measure. Let's review a few considerations. 1) The project adds significant hard top and other impervious surfaces potentially contaminating runoff that would jeopardize the health of the near by river and other smaller streams. Additionally this property is listed as a zone 2 protection area for the Barnes Aquifer our source of drinking water. 2) The impact on the migration and movement of the wildlife is not sufficiently addressed in the study. There are several species living in that area that move along existing game trails that will be disrupted by this monstrous development. The loss of owl habitat and habitats for other tree nesting birds will be devastating to the local ecosystem. 3) The addition of over 4000 vehicle trip per day to our roadways increase Ms carbon emissions further polluting out air. To name a few.

The fact that the environmental impact study is paid for and contracted by the developer raises significant concerns for me as a resident. I am beyond frustrated that any State official would deem that to be appropriate. An environmental impact study independent of the contractor needs to be completed. The contractor is attempting to push the city into allowing construction to begin before two of the conditions are finalized, the MEPA process and the mass DOT. It feels to me that this developer is rushing forward to get started prior to appropriate safeguards being enacted to protect our dwindling wilderness and agricultural land in our community.

Attachments

Update Status

Status

Accepted



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Department of Environmental Protection

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

Maura T. Healey Governor Rebecca L. Tepper Secretary

Kimberley Driscoll Lieutenant Governor Bonnie Heiple Commissioner

July 25, 2024

Rebecca Tepper, Secretary Executive Office of Energy & Environmental Affairs Massachusetts Environmental Policy Act Office Nicholas Moreno, EEA No. 16729 100 Cambridge Street, 9th Floor Boston, MA 02114-2524

> Re: Sierra Vista Commons Easthampton - FEIR

Dear Secretary Tepper,

The Massachusetts Department of Environmental Protection (MassDEP), Western Regional Office (WERO) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) submitted for the proposed Sierra Vista Commons project to be constructed at 93, 94, 95, 97 Northampton Street and 1 Groveland Street (Route 10) in Easthampton (EEA #16729). The site previously held a driving range, ice cream stand, single-family home, a barn and agricultural fields. An intermittent stream bisects the site.

MassDEP attended a site meeting on July 20, 2023. The applicable MassDEP regulatory and permitting considerations regarding wetlands, wastewater, air pollution, solid waste, hazardous waste and waste site cleanup are discussed.

I. <u>Project Description</u>

The Proponent, Tasty Top Development, LLC, is proposing to construct a mixed-use commercial and residential center to include 202 housing units contained within 10 mid-rise buildings, a restaurant, a bank, a daycare facility, a gymnastic center, a mixed-use retail/office building with apartments above, a separate retail building and 2 warehouse/storage units. Internal roadways are proposed to be constructed for building access with 478 new parking spaces.

The Proponent proposes removal of an existing noncompliant stream crossing and construction of a new, compliant stream crossing. The Proponent states that work will have no direct impacts to wetland resource areas. Internal potable water and wastewater utilities will be connected to the

existing Easthampton infrastructure. An on-site stormwater management system, not connected to the city stormwater system, is proposed. The Proponent states that the Project has not been materially revised since filing the DEIR. A 10.8-acre Conservation Restriction has been added to the Mitigation plan and the community garden has been doubled in size to approximately 20,000 square feet.

Four Environmental Justice populations are identified within a one-mile radius of the project site in the communities of Easthampton and Northampton. All four EJ populations are categorized as Income. The Proponent posits the project will have neither short-term nor long-term environmental or public health impacts affecting Environmental Justice Populations.

Environmental Impacts associated with this project include:

- Total site acreage 33.9 acres
- New acres of land altered 4.4 acres
- Acres of impervious area existing 0.3 acres, change 12.1 acres, Total 12.4 acres
- Structures Gross square footage (SF) new 422,000 SF, Footprint: 180,128 SF
- Number of housing units new 202 units
- Vehicle trips per day 4,382
- Parking spaces existing- 10, change 468, Total 478
- Water use (gallons per day) new- 68,820 GPD
- Wastewater generation-new 68,820 GPD

II. <u>Required Mass DEP Permits and/or Applicable Regulations</u>

Wetlands 310 CMR 10.000 Wastewater 314 CMR 7.00 Drinking Water 310 CMR 22.00 Underground Injection Control 310 CMR 27.00 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. <u>Permit Discussion</u>

Bureau of Water Resources

Wetlands Protection Act

MassDEP has no additional comments. See prior comment letter dated March 22, 2024.

Wastewater

The project includes construction, operation and ownership of a private treatment works consisting of a sewer system that will discharge to the City of Easthampton's sewer system and flow to the City of Easthampton Wastewater Treatment Plant. The sewer system as proposed will qualify as a sewer extension. The proposed sewer system is subject to 314 CMR 12.00 and other requirements described therein. The Proponent will submit to MassDEP for review, an Operation and Maintenance manual prepared in accordance with 314 CMR 12.04. Regulation 314 CMR 12.04 (2) includes the requirement that all sewer authorities develop a plan for controlling Infiltration and Inflow (I/I) including mitigation of the volume of stormwater runoff into combined sewers when a new connection or extension is permitted. The Proponent is advised to consult with the Easthampton Department of Public Works as plans are finalized to ensure compliance with the City's plan and any I/I removal requirements therein.

MassDEP's comments submitted August 9, 2023, and March 22, 2024, remain valid.

Bureau of Air and Waste

Asbestos

It is common for antiquated buildings and existing utility infrastructure to contain asbestos materials. The owner/operator shall ensure that all buildings are properly inspected for asbestos material which will then be removed from the buildings prior to any demolition or renovation activity. This includes the investigation of any existing utilities excavated during the redevelopment operations. Asbestos removal must comply with all applicable state and federal

Bureau of Waste Site Cleanup

MassDEP has no additional comments. See prior comment letter dated March 22, 2024.

IV. Other Comments/Guidance

Greenhouse Gas Policy (GHG)

MassDEP works collaboratively with the Department of Energy Resources (MassDOER) to review the proposed GHG analysis and mitigations. MassDOER comments will be addressed under separate heading.

Section 61 Findings

There are no identified permits required from MassDEP for this proposed project. Should there be impacts identified that require mitigation and any MassDEP permits identified in future filings, Section 61 Findings must be included.

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 Sean Gonsalves at (781) 400-4272

Sincerely,

Sean Gonsalves, R.S. for Michael Gorski Regional Director

cc: MEPA File



Public Commental Affairs

Nicholas.Moreno@mass.gov

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16729	Jean	PO Box 1016	
Comments Submit Date	Last Name	Address Line 2	Affiliation Description
7-26-2024	Pao Wilson	377 Main St.	
Certificate Action Date	Phone	State	Status
7-26-2024		MASSACHUSETTS	Opened
Reviewer	Email	Zip Code	
Nicholas.Moreno (617)699-4254,	JeanPW58@proton.me	01027	

Comment Title or Subject

Topic: Oppose-Need separate Environmental Impact study, not pd. by developers

Comments					
$\square \square $					
1. The environmental impact study on a proposed project is paid by the developer? How can that be appropriate? Please get an independent environmental study that has no financial ties to the developer. This does not seem athical. This seems to be a conflict of interest.					
2. This Tasty Top area needs to be maintained as a source of drinking water. The proposed plan may have too much pavement, and this could affect the quality of the drinking water.					
3. The traffic of 4000 additional vehicles / per day in that area is problematic especially on that 2 lane road. Emissions and oil runoff may also affect water quality in that area.					
4. Please DO NOT let the developer rush forward to begin construction. This is a BIG and Complex project. It is important to obtain the necessary certifications before anything starts. It is important that we understand the environmental ramifications before we go into this. Clearly, habitats of animals and plants would be disturbed in this area.					
Easthampton Active Citizens who are concerned about the environment in Easthampton is against this project in its current form. Please do a separate 3rd party environmental impact study, NOT one funded by the developers.					

Attachments

Update Status

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COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS **DEPARTMENT OF ENERGY RESOURCES** 100 CAMBRIDGE ST., SUITE 1020 BOSTON, MA 02114 Telephone: 617-626-7300 Facsimile: 617-727-0030

> Rebecca Tepper Secretary

Elizabeth Mahony Commissioner

30 July 2024

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

RE: Sierra Vista Commons, Easthampton, MA, EEA #16729

cc: Jo Ann Bodemer, Director of Energy Efficiency, Department of Energy Resources Elizabeth Mahony, Commissioner, Department of Energy Resources

Dear Secretary Tepper:

We've reviewed the Draft Environmental Impact Report (DEIR) for the proposed project. The project includes 140,400-sf of new multifamily buildings (ten, 3-story, 13,600-sf apartment buildings and one, 3-story, 18,000-sf building, total of 188 dwelling units) and the following commercial buildings:

14,800-sf, total
4,000-sf
5,500-sf
7,000-sf
9,000-sf
3,200-sf

There is also a 16,000-sf building with retail/office and 14 residential units.

Executive Summary

Maura Healey Governor

Kim Driscoll Lt. Governor The project is taking notable measures to reduce emissions using the following strategies: efficient electrification, low thermal demand intensity (TEDI), thermal bridge mitigation, high envelope performance, high levels of ventilation energy recovery, and low air infiltration. We have no further comments.

COMMERCIAL BUILDINGS

All the buildings are less than 20,000-sf and thus qualify for the prescriptive pathway of the Stretch Code. This project has committed to be in compliance with Section C401.3, C402 through C406, and Section C408 of IECC 2021 Edition and the 2023 Stretch Code.

The proposed buildings include improved envelope which yields the following TEDI improvements:

Building	Base Case Cooling (kBtu/sf/vr)	Mitigation Case Cooling (kBtu/sf/vr)	Cooling Improvement (kBtu/sf/vr)	Base Case Heating (kBtu/sf/vr)	Mitigation Case Heating (kBtu/sf/vr)	Heating Improvement (kBtu/sf/vr)
Warehouse/Storage	13.18	11.31	14.2%	-9.97	-10.884	-9.1%
Small Retail	19.91	18.04	9.4%	-53.98	-49.63	8.1%
Restaurant	44.69	38.53	13.8%	-53.94	-52.11	3.4%
Naive d Detecil	12.29	10.62	14.10/	10.22	19 52	2.70/
IVIIXed Retail	12.38	10.63	14.1%	-19.23	-18.55	3.7%
Gymnastics Studio and Daycare Center	9.32	8.08	13.4%	-36.39	-35.34	2.9%
Bank	11.02	9.1	17.5%	-37.46	-35.47	5.3%
kBtu/sf/yr = thousand British thermal units per square foot per year						

 Table 5.21 Heating and Cooling Thermal Load Demand Intensity (TEDI)

Thermally broken window and wall components will be used to eliminate thermal bridges. Wood construction buildings will have continuous insulation on exterior walls, while pre-engineered metal buildings will have foam on face of framing members to provide thermal break.

The roof insulation for the restaurant, small retail, mixed retail, and bank will be U-0.026 (R-38 equivalent). The roofs for the gymnastics center, daycare facility, and warehouse will provide U-0.024 (R-42 equivalent) at the exterior, with an additional interior insulation of U-0.077 (R-13 equivalent).

The project is proposing triple-pane low-E windows with a U-Factor of 0.24 and Solar Heat Gain Coefficient of 0.615.

All buildings will be space heated with electric air source heat pumps. Water heating in all buildings will be electric resistance. No propane, gas, or other fossil fuels will be used.

Sierra Vista Commons, EEA No. 16729 Easthampton, Massachusetts

The HVAC units will have EER values more than 10% higher than IEC 2021 values. Energy Recovery Ventilation (ERV) units will be used for each building with approximately 70% heat recovery. Except for the Gymnastics Center and Warehouse, electric air-source Variable Refrigerant Flow (VRF) systems will be capable of energy recovery during concurrent heating and cooling.

The warehouse building will have energy recovery ventilation with approximately 70% heat recovery.

Low air infiltration will be confirmed with whole-building testing in the field to ensure low heating and cooling TEDI.

All buildings except the gymnastic center and warehouse will have air infiltration of 0.25 cfm/sf at 75 Pa or less. The gymnastics center and warehouse will have standard-code air infiltration of 0.3 cfm/sf at 75 Pa.

RESIDENTIAL BUILDINGS

The residential buildings will be Passivehouse.

Solar and EV

The project is proposing commendable, above-code, solar and EV commitments, as noted below.

Approximately 7,500-sf of residential rooftop will be dedicated to solar PV. This will provide more than 40% of flat rooftop for solar PV readiness. In addition, solar PV is planned for the Daycare Center, Gymnastics studio, and stand-alone retail buildings (with arrays of 5,000 SF or less per building). Additional roofs will be flat with 80% solar PV readiness which exceeds minimum solar readiness requirement.

Per the code, 20% of the residential parking spaces will be EV ready. As an above-code mitigation measure, 4 EV stations per residential building will be provided. For the commercial buildings, 25% of new garage spaces for the restaurant, bank, small retail, mixed-use retail, gymnastics studio & daycare center will be EV-ready, totaling 48 spaces.

Sincerely, Massachusetts Department of Energy Resources Sierra Vista Commons, EEA No. 16729 Easthampton, Massachusetts

Run q

Becca Edson Decarbonization Architect

Paul F. Ormond, P.E. Energy Efficiency Engineer



Maura Healey, Governor Kimberley Driscoll, Lieutenant Governor Monica Tibbits-Nutt, Secretary & CEO



August 1, 2024

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

RE: Easthampton: Sierra Vista Commons Project – FEIR (EEA #16729)

ATTN: MEPA Unit Nicholas Moreno

Dear Secretary Tepper:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Final Environmental Impact Report (FEIR) filed for the proposed Sierra Vista Commons Project in Easthampton 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,

onone

David J. Mohler Executive Director Office of Transportation Planning

DJM/jll

Ten Park Plaza, Suite 4160, Boston, MA 02116 Tel: 857-368-4636, TTY: 857-368-0655 www.mass.gov/massdot cc: Jonathan Gulliver, Administrator, Highway Division Carrie Lavallee, P.E., Chief Engineer, Highway Division Patricia Leavenworth, P.E., District 2 Highway Director James Danila, P.E., State Traffic Engineer Pioneer Valley Planning Commission (PVPC) Town of Easthampton Planning Board





MEMORANDUM

TO:	David J. Mohler, Executive Director Office of Transportation Planning
FROM:	J. Lionel Lucien, P.E., Manager Public/Private Development Unit
DATE:	August 1, 2024
RE:	Easthampton: Sierra Vista Commons Project – FEIR (EEA #16729)

The Public/Private Development Unit (PPDU) has reviewed the Final Environmental Impact Report (FEIR) for the Sierra Vista Commons Project at 93, 95, and 97 Northampton Street (Route 10) in Easthampton as submitted by GZA GeoEnvironmental, Inc. (GZA) on behalf of Tasty Top Development, LLC. (the "Proponent"). The project site was formerly occupied by six buildings that were demolished prior to October 2022 and is bounded by mixed commercial uses to the north and west, vacant land to the east, and residential neighborhoods to the south ("Site").

The proposed project entails the construction of a 500,000 square foot (sf) mixed-use development with 478 parking spaces that would include several components: a Roots Learning Center spanning 9,000 sf, a Roots Gymnastic Center covering 7,000 sf, a 220-seat sit-down restaurant occupying 5,500 sf, and a 3,200-sf bank. Additionally, there is a stand-alone small retail space totaling 4,000 sf, two mixed-use warehouse/storage units each approximately 7,400 sf, and a mixed-use retail/office building featuring 14 apartments totaling sf. The development also comprises 10 mid-rise apartment buildings with a total of 188 units, distributed across nine buildings of 13,600 sf each and one larger building of 18,000 sf. Vehicular access to and from the site will be provided by an internal roadway that will utilize a new intersection with Route 10 and will include sidewalks, and crosswalks.

The Project is expected to be built over time in several phases. Phase I will include the construction of the Roots Learning Center and the 3,200-sf bank. The Proponent will apply to MassDOT for a Vehicular Access Permit to proceed with the first phase. The balance of the development is expected to be built and occupied following the construction of key improvements of the MassDOT project along Route 10, which is currently under design. The MassDOT project includes the construction of a new intersection (currently a roundabout) with Route 10 that would provide access to the Site.

The Project previously submitted an Expanded Environmental Notification Form (EENF) on July 10, 2023, for which the Secretary of Energy and Environmental Affairs

issued a Certificate on August 16, 2023, requiring the Proponent to prepare a Draft EIR. On February 23, 2024, the Proponent submitted a DEIR for the Project and received a Certificate from the Secretary of EEA on April 1, 2024, requiring the preparation of a FEIR.

MassDOT notes that the FEIR is generally responsive to MassDOT commentary submitted for the EENF and DEIR. The FEIR includes an updated analysis that addresses the Project's traffic impacts and the proposed measures to mitigate these impacts. The FEIR includes a Draft Section 61 Finding outlining the Project Proponent's commitments to mitigate its impacts. Following a request by MassDOT to provide clarification and detail to the Section 61 Finding, the Proponent submitted a letter of commitment.

Key mitigation measures included in the letter of commitment and agreed upon by MassDOT:

- The Proponent has committed as mitigation to funding the design and construction of a roundabout at the Project's Site intersection with Route 10. These improvements would be constructed by MassDOT as part of the Route 10 corridor project. The funding totals \$750,000, of which the Proponent has agreed to advance \$75,000 towards the design of the roundabout upon request by MassDOT. The balance of the funding will be required upon MassDOT issuing a Notice to Proceed for the construction of the roundabout.
- Phase I of the Project will be allowed to proceed subject to review and approval of the Site access plan by MassDOT. Furthermore, Phase 1 of the Project will include the construction of a driveway connection to the nearby Starbucks property, contingent upon reaching a satisfactory agreement with the property owner.
- MassDOT may allow the Proponent to proceed with additional development on site should the Proponent be able to demonstrate that traffic operations would not be significantly impacted.
- Additionally, the Proponent plans signal timing adjustments at local intersections like Northampton Street/West Street and Northampton Street/Florence Road/Highland Avenue, to be implemented based on monitoring results.

The Proponent proposes to provide a Transportation Demand Management (TDM) program with the goal of reducing vehicle trips to the Project site. This program, briefly summarized, will include:

- Vanpool/carpool incentives:
 - Designated parking spaces for carpooling will be conveniently located in the parking area between Buildings 13 and 14, which is centrally located to the commercial buildings. Designated parking spaces will be clearly identified with signage.

- Encouraging Pedestrian and Bicycle Commuting:
 - The development will include an eight-foot-wide shared use concrete path that will connect the development to Northampton Street. The path will run adjacent to the main roadway through the development, and loop around the eastern residential portion of the development. The path will be wide enough to accommodate pedestrians and bicyclists.
 - The development will include a concrete pad with a bike rack outside of every building within the development. The proposed bike rack locations are shown on plan series C-2 of the project plan set.
 - Each residential apartment building will have secure bike storage rooms inside the buildings open to the residents.
 - A Valley Bike Share station will be installed on the property along the sidewalk following Northampton Street.
- On-site Services:
 - Recreational services will be provided on-site for the residents of the apartment buildings including a pool, community garden, and playground.
 - On-site commercial businesses will provide services to the residents/employees within the development, including a daycare facility, restaurants, a bank, and a retail building. These services will help to reduce vehicle trips.
 - Tasty Top LLC. will act as the transportation coordinator and provide onsite support and education on the Trip Reduction Plan to tenants.
- Off-hour Deliveries:
 - The transportation coordinator will work with tenants and subcontractors such as waste disposal to schedule truck deliveries and traffic for off-hours to the extent practicable.

Additionally, the Proponent is committed to conducting an annual Traffic Monitoring Program (TMP) for a period of five years, beginning six months after occupancy of the full-build project. The TMP will include:

- The Proponent will conduct a post-development transportation monitoring program (TMP) to evaluate the success of the Trip Reduction Plan measures and validate trip projections and parking demand for the project. The TMP will be conducted by a licensed traffic engineer. The TMP shall:
 - Conduct Automatic Traffic Recorder (ATR) counts including vehicle classification for a continuous seven-day period at the Site driveway.
 - Perform Turning Movement Counts (TMCs) including vehicles, pedestrians, and bicycles, during the weekday morning (7:00 9:00 a.m.) and weekday evening (4:00 6:00 p.m.) peak periods at the following locations (Study Area):
 - Northampton Street (Route 10)/Site driveway/Mountainview Street;
 - Northampton Street (Route 10)/Florence Road/Highland Avenue;
 - Northampton Street (Route 10)/West Street;

- Northampton Street (Route 10)/Oneil Street;
- Main Street (Route 10)/Union Street; and
- Northampton Street (Route 10)/Main Street (Route 10)/Pleasant Street/Lyman Avenue.
- Perform parking inventory and occupancy of both vehicle and bicycle parking on-site. The occupancy study shall include weekday morning (8:00 10:00 a.m.), weekday midday (11:00 a.m. 1:00 p.m.), weekday evening (4:00 6:00 p.m.), and weekday late night (after 9:00 p.m.) to capture the range of parking occupancy at different times of the day.
- Perform analysis of TMCs collected in each monitoring period at the Study Area intersections using Synchro and compare those results to the results of the Traffic Impact Study.
- Compare the site driveway ATR data to the signal warrants and coordinate with MassDOT should the warrants be met.
- Review analysis of Study Area intersections to determine whether the proposed signal timing changes proposed as mitigation is necessary yet subject to the approval of MassDOT.
- The Proponent will perform the TMP annually beginning six (6) months after the completion and issuance of the Certificate of Occupancy for Phase 1. The TMP will be performed annually or six (6) months after the completion and occupancy of each successive phase of development, whichever time period is less, and will continue for five (5) years following completion of the full buildout of the project.
- For each monitoring period, the Proponent will submit to MassDOT, the City of Easthampton, and the Pioneer Valley Planning Commission a TMP Report, including descriptions of the TDM implementation program, trip activity, parking inventory, and occupancy, and the adequacy of the transportation mitigation. The report will be submitted to MassDOT's Public/Private Development Unit (PPDU) and District 2 Office via the Transportation Impact Assessment Monitoring Report online tool.

Based on the minimal impact of the project and the proposed measures to enhance safety and multi-modal access, MassDOT recommends that no additional environmental review is necessary for transportation-related issues. MassDOT suggests the Proponent consult with PPDU and the District 2 office to further discuss the timing of the MassDOT project and permitting of Phase I prior to the issuance of the Section 61 Finding. For any questions regarding these comments, please contact William Simon at william.m.simon@dot.state.ma.us.