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11-10-95

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November 10, 1995

*Trudy Cox, Secretary
Executive Office of
Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street
Boston, MA 02202*

**RE: PROPOSED RETAIL DEVELOPMENT
-ENF (EOEA #10221)
ROUTE 57/MILL STREET/TENNIS ROAD
AGAWAM, MASSACHUSETTS**

*Called 11/10/95
@ 10:16*

Dear Trudy Cox:

As you are aware, I have been engaged to represent Citizens Against Reckless Development (C.A.R.D.) with regard to the above-captioned matter.

Please advise me of the status of said proposal and if any alternative proposals for said project have been or are being submitted by the same proponent.

Thank you.

Very truly yours,

Anthony C. Bonavita

ACB:cbs

To: Douglas Vigneau@MEPA@EOEA
Cc:
Bcc:
From: Gary Snoonian@COMMISSIONER@DPW_BOS
Subject: Agawam - WalMart
Date: Monday, January 16, 1995 14:59:23 EST
Attach:
Certify: Y
Forwarded by:

Doug-

You didn't miss much last week...we laid out what would need to get done for a break-in-access petition and gave them our current opinion about the idea (not favorable). Vanasse seemed determined to go ahead with the petition as part of the DEIR for the project. Hopefully (for their sake) they'll come to some degree of resolution on the access ? before the DEIR is filed. We suggested strongly that they do arrive at some degree of closure on the issue ASAP. Please call with any ?s. Thanks

Gary Snoonian
973-7341

well as a National Pollutant Discharge Elimination System (NPDES) Permit issued by EPA in consultation with DEP for construction runoff and control mitigation. Massachusetts Highway Department (MHD) review for curb cut and access permits is required as well.

The EIR should focus on the following issues associated with project related impacts: traffic, air quality, wetlands, wetlands replication (compliance with the Massachusetts Wetlands Protection Act (310 CMR 10.00)), drainage/stormwater runoff quantity and quality, water resources and wastewater disposal, and construction mitigation.

SCOPE

General

The alternatives analysis included in the ENF must be expanded. The purpose of the alternative analysis is to consider what effects changing the parameters and siting of a project will have on the environment, keeping in mind that the objective of the MEPA review process is to avoid or minimize damage to the environment to the greatest extent feasible.

The EIR should follow the MEPA regulations at 301 CMR 11.07, as modified by this scope, for outline and content. The EIR must include a copy of this Certificate and copies of the attached comments, which must be addressed as they relate to this Scope. I specifically refer the proponent to 301 CMR 11.07 (2) (c) which requires an identification of all federal and state permits and approvals sought for the project with their current status, and 301 CMR 11.07 (6) which requires the EIR to demonstrate how regulatory standards will be met.

The analysis should address regional impacts and consistency with local zoning and regional planning. I note the proponent's response to the ENF, Page 10 question IV, that "[r]etail development is not allowed within these zones." The EIR should elaborate, therefore, on how this project will achieve "consistency with federal, state and local land use, transportation, open space, recreation and environmental plans and policies."

Project Description

As much information should be provided as possible, including a site plan which depicts the project's overall

natural screening (and indicate if any additional physical buffer will be necessary to protect inadvertent lighting and noise impacts on the nearby residences on Mill Street and Tennis Road), parking (including bus stops and bicycle parking areas), and all components of the proposed drainage system.

Traffic

For consistency among traffic studies reviewed by the state agencies, the traffic study included in the EIR must conform fully with the Guidelines for EIR/EIS Traffic Impact Assessment, formally endorsed October 7, 1988 and published in the Environmental Monitor on July 26, 1989. The traffic analysis should take into account the full build-out potential (of those projects either currently in the MEPA review process or having completed the MEPA process but not yet constructed (e.g., Route 187 Reconstruction, EOE #9379)), as well as any other large scale development projects that have been proposed or are being planned.

The traffic analysis should be based on ITE-LUC 820 (shopping center) and on total square footage (i.e. include mezzanine areas and explain why only gross floor area should be counted), and should include all truck traffic, the volume of which should be specified separately.

The traffic study should analyze, at a minimum, the intersections under state jurisdiction and identified in the MHD comment letter. Note the additional commentary that pertain to state highway issues in the MHD letter as well as that from various Town of Agawam boards. The regional state highway network identified by MHD to be studied in the EIR traffic analysis includes the following interchanges and intersections:

- * Relocated Route 57/Route 187 (South Westfield Street)
- * Relocated Route 57/Garden Street
- * Relocated Route 57/Mill Street
- * Route 57/Route 75 (Suffield Street)
- * Route 147 (Springfield Street)/Route 75/Main Street

The Town of Agawam and the Pioneer Valley Regional Planning Commission have requested that several other locations be included in the traffic analysis as well. I encourage the proponent to include these areas (e.g., Tennis Road/Mill Street and Garden Street/Poplar Street) in the analysis of traffic impacts. In addition, I note the concerns expressed with regards to pedestrian movements and the close proximity of Agawam High

School. I recommend that the proponent consult with local officials to try and address their concerns, and report on the results in the EIR.

Air Quality

To be consistent with the provisions of the State Implementation Plan (SIP) for ozone attainment, the proponent must conduct an indirect source review (mesoscale) analysis. This analysis must include both an estimate of the total hydrocarbon emissions associated with all project-related vehicle trips and a demonstration that the hydrocarbon emissions associated with the preferred alternative will be less than those from the no-build case in both the short and long term; in case hydrocarbon emissions from the preferred alternative are expected to be greater, the analysis should include identification and review of all reasonable and feasible reduction/mitigation measures. Prior to proceeding with the analysis, consultation with the DEP's Division of Air Quality Control is recommended for guidance as well as confirmation of the study area.

In order to alleviate traffic congestion and air quality impacts to the greatest extent possible, the EIR should examine the potential for traffic demand management strategies. Such strategies may include:

- * Ridesharing, which may be enhanced by incentives for reserved parking areas in close proximity to the entrance of the stores.
- * Restricting truck traffic deliveries to off peak hours; providing delivery services/phone orders and implementing bus service to the project.
- * Promoting alternative transportation through posting of bus schedules; courtesy van services from downtown areas; peak season shuttles; service to elderly housing; subsidizing a portion of employee public transportation costs.
- * Pedestrian improvements such as sidewalks and bike racks; Providing security for the bicycle racks.
- * Provide signage with the proper direction to the quickest routes back to the state highway system (i.e. Route 57 east to Route 91).

Wetlands

The resource area boundaries, associated buffer zones and the 100-year flood elevations should be clearly identified on a plan at a scale of not greater than 1" = 100'. The wetlands must be delineated in the field, surveyed, mapped and placed on the plans indicating easily identifiable bench marks in the field. Each wetland resource area should be characterized according to M.G.L. c. 131, s. 40. The EIR must address itself to the significance of the resource values of each wetland area including: public and private water supplies, flood control, storm damage prevention, prevention of pollution and protection of fisheries and of wildlife habitat. The text should explain whether the Agawam Conservation Commissions has accepted the boundaries and identify any disputed areas. Proposed activities, including construction mitigation, erosion and sedimentation control, phased construction, and drainage directly or indirectly (i.e. overland flow) into wetland areas must be evaluated. The locations and distances of detention basins to wetland resource areas and the expected water quality emanating from said basins should be evaluated. This analysis should address the current and expected post-construction water quality of final receiving waterbodies (as identified or predicted based on a review of the literature).

The Commonwealth has endorsed a policy that seeks avoidance of wetlands alteration (i.e. no net loss) wherever possible. Where the proponent has chosen a route through wetlands, the alternatives examined must be described explicitly. The plans should clearly depict those wetland areas where trees are proposed to be cut and the EIR text should explain the tree removal process and end-use. Furthermore, this analysis should include a discussion of predicted changes in hydrology, sunlight, water temperature, vegetation and wildlife habitat. Where wetland impacts are unavoidable, the EIR must propose acceptable mitigation measures to protect the resource areas, and minimize short and long term impacts to the greatest extent possible.

Finally, applicable federal permitting issues should be discussed as well as any local wetlands by-law and/or protection zones. This discussion should indicate how the project will be designed to conform with the requirements to protect these districts.

Wetlands Replication

For any amount of wetlands alteration (currently unknown) requiring wetlands replication, a detailed wetlands replication

plan must be included in the EIR which, at a minimum, includes: replication location(s) delineated on plans at a scale no greater than 1"=100', elevations, typical cross sections, test pits or soil boring logs, groundwater elevations, hydrology of areas to be altered and replicated, list of wetland plant species of areas to be altered and the proposed wetland replication species, planned construction sequence and a discussion of how compliance with applicable performance standards will be achieved and monitored.

Drainage/Stormwater Runoff

The EIR should provide a complete drainage analysis to show the changes in runoff quality and quantity between pre- and post-development. The information in the report should include at least: a soils map of the site, existing and proposed watershed maps, and pre- and post-development runoff peaks for the 1, 25, and 100 year storm events. Associated data and computation sheets should be available in a technical appendix. The report should also briefly explain the model(s) used in the calculations, provide the input parameters, RCN, Tc, and Tt values, and the computations for detention/retention basin sizing.

Characterization of the flows, based on nutrient, sediment, and contaminant loadings, should be predicted for stormwater discharges, overland runoff and any point source releases. The expected level of contaminant attenuation and the water quality of the discharge from the detention basins should be predicted.

The report should explain the objectives of the drainage system design. A schematic, drainage design concept plan should be provided for the proposed drainage system and for the drainage system that will be used during construction to control erosion and sedimentation. These plans should, at a minimum, show the approximate locations of the project components, the proposed drainage design features, wetlands resource areas and existing vegetation proposed to be removed. The EIR should demonstrate that the proposed drainage system meets best management practices for the discharge area, and in particular for on and off-site wetlands resource areas. Long-term impacts on wetland hydrology and vegetation should be avoided. The maintenance requirements to ensure efficiency of the drainage system should be explained and commitments should be made to ensure that the maintenance requirements will be adhered to in the future. These issues are paramount in light of the potential impact to Silver Lake. Therefore, particular attention must be given to the potential

January 6, 1995

short and long term impacts to Silver Lake as its main tributary bisects the property.

Water and Wastewater

The proponent must identify the quantity and sources of required water resources to serve the project as well as its arrangements or plans for wastewater disposal. Should the water or wastewater infrastructure need to be upgraded, any associated environmental impacts must be identified.

Construction Impacts

The EIR must provide a thoughtful evaluation of impacts relating to the construction phasing of the project, including erosion and sedimentation impacts, loss of vegetation and impacts on wildlife resource areas. The objective of the analysis should be to identify build-out alternatives (such as temporal or seasonal alternatives) and to optimize site recovery periods. State-of-the-art mitigation measures must be incorporated.

EIR Distribution

Distribute the EIR as required by the MEPA regulations at 301 CMR 11.24 and to all those listed below. In addition, two copies should be available at each of the following locations in Agawam: Planning Department, Conservation Commission, Town Clerk, and the Agawam Public Library.

January 6, 1995

DATE

TRUDY COXE
Trudy Coxe, Secretary

Comments received :

DEP-DAQC, Boston; Attn: Keith Grillo (12/21/94)
EOEA-DFA, Lancaster; Attn: Marcia Starkey (12/27/94)
MHD-P/PDU; Attn: Doug Landry (1/3/95)
Agawam Office of the Mayor (12/27/94)
Agawam Engineering Division (12/30/94)
Agawam Office of Planning and Community Development (12/27/94)
Silver Lake Corporation (12/27/94)
Pioneer Valley Planning Commission (12/28/94)
Bicycle Coalition of Massachusetts (12/23/94)
Earth Work's Action (12/27/94)

TC/DEV/dv



Commonwealth of Massachusetts
Executive Office of Environmental Affairs

Department of Environmental Protection

William F. Weld
Governor

Trudy Coxe
Secretary, EOE

Thomas B. Powers
Acting Commissioner

MEMORANDUM

TO: Secretary Coxe, Executive Office of Environmental Affairs

ATTN: Doug Vigneau, MEPA Unit

FROM: Christine Kirby, ^{ck}DEP

DATE: December 20, 1994

SUBJECT: EOE No. 10221 - Proposed Retail Development in Agawam, Review of the Notification Form

The Environmental Notification Form presented for the proposed Retail Development in Agawam has been reviewed by the Department of Environmental Protection (DEP) Division of Air Quality Control (DAQC). In exercising its responsibility to review projects for potential air quality impacts due to changes in traffic within the project area, the (DAQC) offers the following comments.

Agawam Property L.P. proposes to develop a 483,000 square foot retail center on a 82 acre site in Agawam. This site will provide parking for 2,750 vehicles and is expected to generate an average daily traffic of 18,910. Consequently, in order for this project to be consistent with the State Implementation Plan (SIP), it will be necessary for the project proponent to conduct an air quality mesoscale analysis to be presented in a Draft Environmental Impact Report.

A proposed indirect source project may have impacts on area traffic characteristics, such as volume and speed of roadway segments. An area which includes all of the project impacted roadway segments is defined as the mesoscale area. The analysis area should include the area within an approximate 0.3 to 16 km radius and include the indirect source project; the exact geographical area depends on local conditions and the impact of a project on area travel patterns. The area should be large enough to include all roadway links that will potentially experience an increase of 10% in traffic due to the project and currently operate at level of service (LOS) D or lower or will be degraded to LOS D or lower. A mesoscale analysis should be performed for volatile organic compounds (VOC). The total amount of the pollutant expected from each of the project alternatives, including "No

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Build" in the base and future years should be selected in consultation with the Massachusetts Environmental Policy Act (MEPA) staff and the DEP/DAQC staff as well as the input parameters to the Mobile 5a emissions factor model.

VOC emissions for the base case can be calculated using existing characteristics on the roadway segments. Emissions for the estimated time of completion can be calculated by changing the traffic characteristics on the roadway segments to those which are expected to occur when the indirect source project is completed. VOC emissions for the build and no build cases for future years can be similarly calculated.

Once the analysis has been completed it can be determined if the project will result in an increase or decrease in emissions of VOC. Emissions will increase or decrease based upon the effects of traffic volumes and on speeds on the roadway segments in the project area as a result of the indirect source project.

Should you have any questions regarding this memorandum please contact Keith Grillo of the Division of Air Quality Control at 292-5773.

MASS**HIGHWAY**William F. Weld
GovernorArgeo Paul Cellucci
Lieutenant GovernorJames J. Kerasiotes
SecretaryLaurinda T. Bedingfield
Commissioner

December 30, 1994

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JAN 4 1995

MEPA

Trudy Coxe, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: Agawam - Proposed Retail Development - ENF
(EOEA #10221)

ATTN: Jan Reitsma, Assistant Secretary
MEPA Unit

Dear Secretary Coxe:

The Massachusetts Highway Department (MHD) has reviewed the Environmental Notification Form (ENF) for the Proposed Retail Development project in Agawam. The project entails the construction of 483,000 square feet of retail space on a 92.5-acre parcel located in the southwest quadrant of the new Route 57/Mill Street interchange that is being constructed as part of the relocation of that state highway (EOEA #0915). The project is expected to generate 18,910 vehicle-trips per weekday and is categorically included for the preparation of an EIR.

As mentioned above, the MHD is currently relocating Route 57 in the vicinity of the project site. This new four-lane median-divided state highway has been laid out as a limited access facility along its entire length and is scheduled to open in 1996. As designed, the configuration of the new Route 57/Mill Street interchange consists of a slip ramp from westbound Route 57 to northbound Mill Street and a loop ramp onto eastbound Route 57 from southbound Mill Street.

As shown on the plan included with the ENF, direct access to the site from eastbound Route 57 is proposed via a new off-ramp in the southwest quadrant of the new Route 57/Mill Street interchange at a location of the layout that has been restricted to "No Access." Because this proposed access concept was not developed in consultation with the MHD or the Federal Highway Administration (FHWA), we do not support it at this time. If the proponent wishes to pursue this proposed access concept further, immediate discussions should take place with appropriate units of

the MHD and FHWA prior to the preparation of the DEIR. As part of these discussions, the proponent should be prepared to submit detailed environmental and traffic analyses (using a 20-year analysis horizon) to the MHD in support of a petition to alter the new Route 57 layout and interchange design. These analyses must thoroughly evaluate the feasibility and desirability of the proposed access concept and should clearly demonstrate its superiority over the currently-planned interchange configuration in the context of the overall purpose and function of this state highway relocation project.

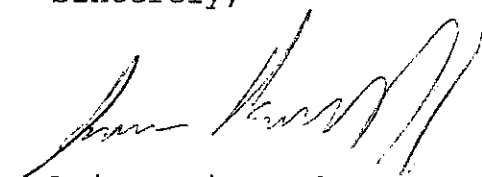
In the event that the proposed access concept is reviewed and approved by MHD and FHWA, the DEIR should then be prepared in conformance with the EOE/EOTC Guidelines for EIR/EIS Traffic Impact Assessment and should identify appropriate mitigation measures for areas where the project will have an impact on traffic operations. The proponent should provide a clear commitment to implement these mitigation measures and should describe the timing of their implementation based on the phases of the project, if any. At a minimum, the traffic study should analyze the following state highway locations: the new Route 57/South Westfield Street interchange, the new Route 57/Garden Street interchange, the new Route 57/Mill Street interchange, the existing Route 57/Suffield Street interchange, and the Route 159 (Main Street)/Springfield Street/Suffield Street intersection.

Trip generation for this project should be estimated using ITE Land Use Code (LUC) #820 (Shopping Center) for retail portions of the project and the appropriate LUC for specific non-retail tenants, such as movie theaters or restaurants. The DEIR should also provide a detailed and thorough discussion of the methodology that is used to develop the trip distribution and assignment networks for project-generated traffic. Since the relocated Route 57 is not currently open to traffic, the analyses of the new interchanges should be based on the traffic volume projections as developed by the MHD in support of this state highway project. Any model that is applied should fully consider qualitative travel-time characteristics and the proximity of the site to regional population centers, employment centers, and alternative shopping opportunities.

Conceptual plans for proposed roadway improvements should be of sufficient detail to verify the feasibility of constructing such improvements. The drawings should clearly show proposed lane widths and offsets, layout lines and jurisdictions, and the land uses (including access drives) adjacent to areas where improvements are proposed. The most recent "as-built" construction plans for Route 57 should be the basis for the preparation of any conceptual traffic mitigation plans at locations along that state highway. In particular, the DEIR should state whether additional right-of-way is necessary to implement the proposed improvements and should identify the party responsible for such takings.

If you have any questions regarding these comments, please call me at (617) 973-7858, or Douglas Landry, Chief Planner, Public/Private Development Unit at (617) 973-7340.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luisa Paiewonsky', written in a cursive style.

Luisa Paiewonsky, Manager
Public/Private Development Unit

cc: R. Dindio, Chief Engineer
C. Sterling, State Traffic Engineer
J. Hoey, DHD, District 2
P. Trombly, Director, Environmental Programs
G. Snoonian, PPDU
Planning Board, Town of Agawam
Pioneer Valley Planning Commission