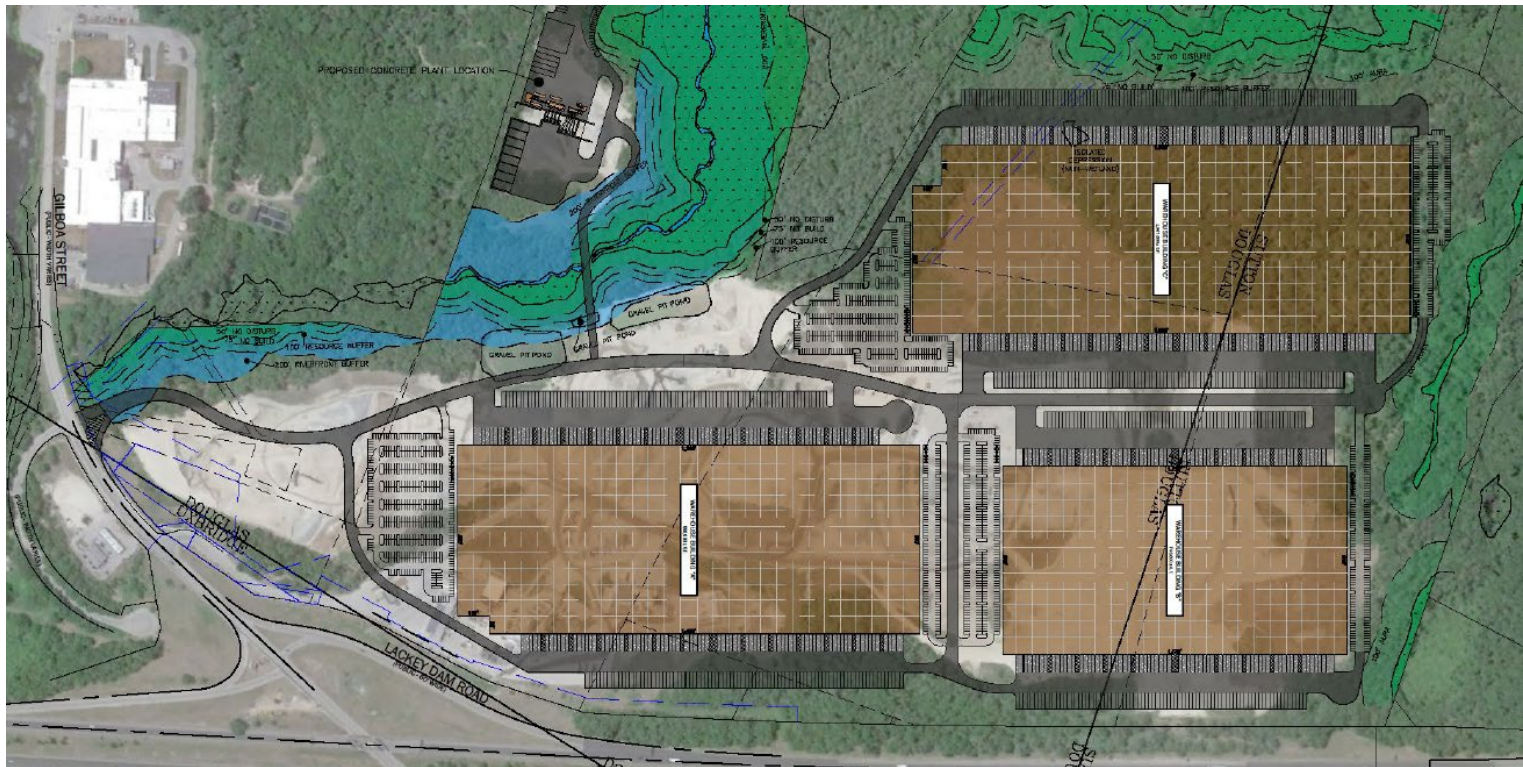




Environmental Notification Form

CRG Cubes @ Pyne



Submitted to:

Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Submitted by:

CRG Services Management LLC
300 Barr Harbor Dr
Conshohocken, PA 19428

Prepared by:

Epsilon Associates, Inc.
3 Mill & Main Place, Suite 250
Maynard, MA 01754

In Association with:

Beals Associates, Inc.
Vanasse & Associates Inc.

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Environmental Notification Form

Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Massachusetts Environmental Policy Act (MEPA) Office

Environmental Notification Form

For Office Use Only

EEA#: _____

MEPA Analyst: _____

The information requested on this form must be completed in order to submit a document electronically for review under the Massachusetts Environmental Policy Act, 301 CMR 11.00.

Project Name: **CRG Cubes @ Pyne**

Street Address: **150 Gilboa Street**

Municipality: **Sutton, Douglas**

Watershed: **Blackstone**

Universal Transverse Mercator
Coordinates: **276348.48 Easting,
4663370.66 Northing, UTM Zone: 19T**

Latitude: **42.090563**

Longitude: **-71.704265**

Estimated commencement date: **2024**

Estimated completion date: **2026**

Project Type: **Warehouse**

Status of project design: **10%complete**

Proponent: **CRG Services Management LLC**

Street Address: **300 Barr Harbor Drive**

Municipality: **Conshohocken**

State: **PA**

Zip Code: **19428**

Name of Contact Person: **David Hewett**

Firm/Agency: **Epsilon Associates, Inc**

Street Address: **3 Mill & Main Place, Suite 250**

Municipality: **Maynard**

State: **MA**

Zip Code: **01754**

Phone: **(978) 897-7100**

Fax: **(978) 897-0099**

E-mail: **dhewett@epsilonassociates.com**

Does this project meet or exceed a mandatory EIR threshold (see 301 CMR 11.03)?

☒ Yes ☐ No **See list below.**

If this is an Expanded Environmental Notification Form (ENF) (see 301 CMR 11.05(7)) or a Notice of Project Change (NPC), are you requesting:

a Single EIR? (see 301 CMR 11.06(8))

☐ Yes ☒ No

a Rollover EIR? (see 301 CMR 11.06(13))

☐ Yes ☒ No

a Special Review Procedure? (see 301CMR 11.09)

☐ Yes ☒ No

a Waiver of mandatory EIR? (see 301 CMR 11.11)

☐ Yes ☒ No

a Phase I Waiver? (see 301 CMR 11.11)

☒ Yes ☐ No

(Note: Greenhouse Gas Emissions analysis must be included in the Expanded ENF.)

Which MEPA review threshold(s) does the project meet or exceed (see 301 CMR 11.03)?

301 CMR 11.03(1)(a)(1) alteration of 50 or more acres of land

301 CMR 11.03(1)(a)(2) creation of 10 or more acres of impervious area

301 CMR 11.03(6)(a)(6) Generation of 3,000 or more New adt on roadways providing access to a single location

301 CMR 11.03(6)(a)(7) construction of 1,000 or more New parking spaces at a single location

301 CMR 11.03(6)(b)(13) generation of 2,000 or more New adt on roadways providing access to a single location

301 CMR 11.03(6)(b)(14) generation 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.

301 CMR 11.03(6)(b)(15) construction of 300 or more New parking spaces at a single location

Which State Agency Permits will the project require?

Massachusetts Department of Transportation State Highway Access Permit

Identify any financial assistance or land transfer from an Agency of the Commonwealth, including the Agency name and the amount of funding or land area in acres: **None**

Summary of Project Size & Environmental Impacts	Existing	Change	Total
LAND			
Total site acreage	255.47		
New acres of land altered		60.5	
Acres of impervious area	10.8	115.56	126.36
Square feet of new bordering vegetated wetlands alteration		0	
Square feet of new other wetland alteration		43,995 ¹	
Acres of new non-water dependent use of tidelands or waterways		0	
STRUCTURES			
Gross square footage	21,161	2,794,503	2,815,664
Number of housing units	0	0	0
Maximum height (feet)	73.3	+3.34	76.64
TRANSPORTATION			
Vehicle trips per day	462	4,630	5,092
Parking spaces	13	1,495	1,508
WASTEWATER			
Water Use (Gallons per day)	50,330	30,954	81,284
Water withdrawal (GPD)	0	0	0
Wastewater generation/treatment (GPD)	300	28,140	28,440
Length of water mains (miles)	0	0	0
Length of sewer mains (miles)	0	0	0
Has this project been filed with MEPA before? ☐ Yes (EEA #_____) ☒ No			
Has any project on this site been filed with MEPA before? ☐ Yes (EEA #_____) ☒ No			
¹ Riverfront area (RFA)			

GENERAL PROJECT INFORMATION – all proponents must fill out this section

PROJECT DESCRIPTION:

Describe the existing conditions and land uses on the project site:

The Project Site (referred to herein as “Site”) includes approximately 255.5-acres of land located west of Route 146 straddling the Douglas-Sutton border. The Site is bound to the north by Whitins Road (Sutton), to the west by Hough Road (Sutton) and North Street (Douglas), and to the south by Gilboa Street (Douglas). The majority of the Site is currently used as a gravel excavation/processing pit, contractor storage yards. Approximately 36.37-acres is currently occupied by a concrete manufacturing facility, Dauphinais Concrete Inc. and Pyne Sand & Gravel. Approximately 155-acres of the Site is undeveloped with approximately 89.41 acres altered. A site locus map is provided as Figure 1 in Attachment A.

As part of the Project, Dauphinais Concrete operations will be moved approximately 1,700 feet to the west, to a previously disturbed area just south of Gilboa Brook, a perennial stream (Figure 4). The Proponent is requesting a Phase I Waiver for this relocation. Please see Attachment 6.

The western portion of the Site includes Bordering Vegetated Wetlands (BVW) and Riverfront Area (RFA). The perennial Gilboa Brook and an intermittent stream run through the southwestern portion of the Site. Environmental constraints are shown on Figure 3 in Attachment A.

Describe the proposed project and its programmatic and physical elements:

The Project includes construction of three warehouses totaling 2,813,380-sf with 516 loading docks total (See Figures 5 and 6 in Attachment A). These warehouses are intended to be high-cube facilities, meaning that they are primarily intended for the storage of manufactured goods (more so than raw materials) prior to distribution to retail locations or other warehouses.

- Building A is proposed to be 996,980 sf (approximately 987,010 GFA industrial, 9,970 GFA office) with 164 loading docks, 174 trailer spaces and 534 employee parking spaces.
- Building B is proposed to be 748,800sf (741,312 GFA industrial, 7,488 GFA office) with 132 loading docks, 150 trailer spaces, and 405 employee parking spaces.
- Building C is proposed to be 1,067,600 sf (approximately 1,056,824 GFA industrial), 10,676 GFA office) with 174 loading docks, 202 trailer spaces and 572 employee parking spaces.

Trailer parking spaces will be located across from the loading docks at each building. The access drive will enter into the site from Lackey Dam Road. Each building will have a full perimeter road with connection points to the other buildings centrally located on the Site. Portions of the perimeter road located between Buildings B and C will impact the buffer zone to wetland resources. A proposed site plan is shown on Figure 5 in Attachment A. The Project will maintain approximately 121.51 acres of undeveloped land.

Prior to construction, the Proponent will relocate the Dauphinais Concrete operations approximately 1,700 feet west from its current location to an already disturbed area south of Gilboa Brook. The access drive to the new plant location necessarily must cross over Gilboa Brook. The Proponent

intends to install a concrete precast arch structure over the brook to avoid the need for any wetland filling. The stream crossing will be designed to meet the Massachusetts Department of Environmental Protection's (MassDEP) stream crossing standards.

IMPACTS

The sections below describe Project impacts and includes a breakdown of impacts associated with Phase I (relocation of Dauphinais Concrete) and construction of the Project.

Transportation

The Project is expected to generate approximately +4,630 new vehicle trips per day, including approximately 648 truck trips. Existing operations within the site (Dauphinais Concrete and Pyne Sand & Gravel) currently generate 462 trips per day, of which 342-trips are truck trips. Relocation of the concrete operation will not change existing trip generation.

Stormwater

The stormwater management system will comply with MassDEP stormwater management regulations. Please see the Stormwater section below and the attached narrative for additional information.

Greenhouse Gas/Air Quality

A complete GHG and air quality analysis within EJ populations will be provided in the DEIR. The estimate of GHG emissions from the GHG Estimator Tool is 6,617 metric tons/year of CO₂.

Climate Resiliency

The Project has been designed to improve the on-site stormwater management system. The Project will include tree plantings to help reduce the heat island effect. A majority of the Site is located outside of a FEMA Floodplain, with only a corner of the eastern portion of the Site classified as Zone X (0.2% chance of flood) by FEMA.

Wetland Resources

The Project will result in approximately 1.01-acres of impact to Riverfront Area (RFA) of which approximately 0.41 acres is associated with construction of the warehouses and 0.6 acres is associated with the Phase I relocation of the concrete facility. Pavement will be placed within the RFA with approximately 0.28 acres of pavement associated with warehouse construction and approximately 0.48 acres of pavement associated with Phase I.

Historic and Archaeological Resources

The Project will potentially impact archaeological sites 19-WR-311 and 19-WR-304. Based upon previous disturbance at the Project Site, however, no adverse effects to archaeological sites are anticipated.

Environmental Justice

The Project is not located within or within one mile of any EJ communities. The Project Site is located within 5-miles of just one EJ population located in southern Grafton characterized as Minority. See Figures 9 and 10 in Attachment A. Given the distance from the site and because it is unlikely to experience any significant traffic from the Project, this EJ population is not likely to be affected by the Project.

NOTE: The project description should summarize both the project's direct and indirect impacts (including construction period impacts) in terms of their magnitude, geographic extent, duration and frequency, and reversibility, as applicable. It should also discuss the infrastructure requirements of the project and the capacity of the municipal and/or regional infrastructure to sustain these requirements into the future.

Describe the on-site project alternatives (and alternative off-site locations, if applicable), considered by the proponent, including at least one feasible alternative that is allowed under current zoning, and the reasons(s) that they were not selected as the preferred alternative:

Access Alternatives

The sections below outline different Access Alternatives the Proponent considered.

Sutton Access to Whitins Road

The Sutton Access would involve constructing an access road from the Site to Whitins Road in Sutton (See Figure 7 in Attachment A). To construct the access road in Sutton, the Project would result in significantly greater impacts to wetland resources, including Bordering Vegetated Wetlands and Isolated Vegetated Wetlands. For these reasons, this alternative access was dismissed.

Roundabout Access on Lackey Dam Road

The Proponent considered installing a roundabout access to the Site from Lackey Dam Road. The roundabout would improve traffic flow to/from the Site and along adjacent roadways; however, the location of the proposed roundabout would have required significant changes to the surrounding grade and was deemed infeasible.

STOP/Traffic Light Access on Lackey Dam Road

The Preferred Access Alternative involves the installation of a traffic light or STOP-control at the intersection of the Access Drive with Lackey Dam Road. The Signal Warrants analysis is currently being conducted, and it may find that a signal would improve safety and ease of access to the site for employees and trucks by facilitating left-turn movements. If a signal is installed, access from the Access Drive will be under STOP control and the Access Drive layout may be modified to accommodate queuing for both left and right turns. This is the Preferred Access Drive Alternative because it will result in the least environmental impact, creating an ideal alignment with Old Lackey Dam Road.

No Build Alternative

The No-Build Alternative would maintain the Site in its current state as a gravel pit. This Alternative was dismissed as it does not meet the Project's goals or objectives.

Preferred Alternative

The Preferred Alternative (the "Project") includes construction of three warehouses totaling 2,813,380 sf and including 552 trailer spaces, 1,508 employee spaces, and 491 loading docks (See Figure 5 in Attachment A). The Project will improve existing conditions on the site by removing the open gravel pits and revegetate portions of the site that were previously disturbed.

Reduced Build Alternative

The Reduced Build Alternative would involve constructing one approximately 996,980 sf warehouse in the general location of the Building A in the Preferred Alternative (See Figure 8 in Attachment A).

The warehouse would include 534 employee parking spaces, 162 loading docks, and 176 trailer spaces. The warehouse would be entirely located in Douglas (no portion of the warehouses in Sutton); thus, only Douglas would receive tax benefits. This Alternative would result in similar wetland impacts as the Preferred Alternative due to the location of the access drive and relocation of the concrete facility. Due to the costs associated with acquiring the land and relocating the concrete facility, this Alternative was deemed not economically feasible. Additionally, this Alternative is not preferred by the Town of Sutton as they would not receive any economic benefit from the Project.

Alternatives Summary Table

Alternative	Gross Area (sf)	Parking	Total Vehicle Trips (adt)	Truck Trips (adt)	Impervious Area
No-Build	21,161	13	462	342	12.1
Preferred Alternative	2,815,664	1,508	5,092	648	113.7
Reduced Build	2,200,000	534	1,806	230	42.8

NOTE: The purpose of the alternatives analysis is to consider what effect changing the parameters and/or siting of a project, or components thereof, 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. Examples of alternative projects include alternative site locations, alternative site uses, and alternative site configurations.

Summarize the mitigation measures proposed to offset the impacts of the preferred alternative:

Mitigation and Project Benefits

The sections below outline mitigation measures the Project is implementing and benefits the Project will provide.

Transportation

The Project will implement a Transportation Demand Management (TDM) program designed to reduce single occupancy vehicles. A full Transportation Impact Assessment and list of TDM measures will be provided in the DEIR. The Proponent is also coordinating with MassDOT to reconstruct the Lackey Dam Road/Route 146 northbound and southbound ramps and the Northeast Main Street/Davis Street intersections.

Stormwater/Climate Resiliency

The stormwater management system has been designed to meet or exceed the MassDEP Stormwater Management Standards.

The Site is not located within a floodplain and is not anticipated to exacerbate current climate conditions.

Land Alteration/Wetland Resources

The Project will restore some areas of the site that were previously disturbed by the gravel, sand, and concrete operations to its natural state. Total square footage of restored area is still being determined but the Project is committed to restoring previously disturbed RFA within the Project Site that is not utilized by the Project.

Sustainable Design

The Project will be designed to meet current code standards for warehouses as described in the 2023 Code Update. Both Douglas and Sutton are required to meet Stretch Code.

Environmental Justice

The Project is not expected to negatively impact surrounding EJ populations as the nearest EJ population is located almost 5-miles from the Site and is not within or adjacent to a major roadways.

If the project is proposed to be constructed in phases, please describe each phase:

Other than relocation of the concrete facility, the Project will be constructed in a single phase to facilitate earthwork and create a balanced cut/fill condition. To achieve balanced conditions, all three building pads will need to be prepared simultaneously.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN:

Is the project within or adjacent to an Area of Critical Environmental Concern?

☐ Yes (Specify _____)
☒ No

If yes, does the ACEC have an approved Resource Management Plan? ____ Yes ____ No;

If yes, describe how the project complies with this plan. _____

Will there be stormwater runoff or discharge to the designated ACEC? ____ Yes ____ No;

If yes, describe and assess the potential impacts of such stormwater runoff/discharge to the designated ACEC.

RARE SPECIES:

Does the project site include Estimated and/or Priority Habitat of State-Listed Rare Species? (see http://www.mass.gov/dfwele/dfw/nhsp/regulatory_review/priority_habitat/priority_habitat_home.htm)

☐ Yes (Specify _____) ☒ No

HISTORICAL /ARCHAEOLOGICAL RESOURCES:

Does the project site include any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

☒ Yes (Specify 19-WR-311 and 19-WR-304) ☐ No

If yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources? ☒ Yes (Specify Portions of the mapped units of 19-WR-311 and 19-WR-304 will be affected) ☐ No

WATER RESOURCES:

Is there an Outstanding Resource Water (ORW) on or within a half-mile radius of the project site?

____ Yes X No;

if yes, identify the ORW and its location. _____

(NOTE: Outstanding Resource Waters include Class A public water supplies, their tributaries, and bordering

wetlands; active and inactive reservoirs approved by MassDEP; certain waters within Areas of Critical Environmental Concern, and certified vernal pools. Outstanding resource waters are listed in the Surface Water Quality Standards, 314 CMR 4.00.)

Are there any impaired water bodies on or within a half-mile radius of the project site? X Yes ____ No;

if yes, identify the water body and pollutant(s) causing the impairment: **Mumford River (Category 5: impaired – TMDL required)**

Is the project within a medium or high stress basin, as established by the Massachusetts Water Resources Commission? ___Yes X No

STORMWATER MANAGEMENT:

Generally describe the project's stormwater impacts and measures that the project will take to comply with the standards found in MassDEP's Stormwater Management Regulations:

The site is currently used as a gravel excavation/processing pit, contractor storage yards, and a concrete manufacturing facility. The perimeter of the property consists of wooded and grassed areas where excavation is not occurring as well as wetland and Riverfront Areas to the north and west. While there are several sedimentation ponds for the gravel extraction operation onsite, the remainder of the uses feature virtually no formal stormwater management facilities. Despite the absence of these facilities, existing runoff from the property to adjacent areas is minimal mainly due to the presence of sand and gravel soils with high rates of infiltrative capacity.

Based on historic and ongoing geotechnical observations, depth to groundwater is expected to be in excess of ten feet from the finished grade of the project. Additional testing will be performed during the final design of the stormwater management facilities to ensure that soils are suitable for the measures proposed and that there will be adequate groundwater separation to meet or exceed Massachusetts Department of Environmental Protection standards.

Given the nature of the soils onsite, the project team is committed to developing stormwater management systems with high infiltrative capacity to retain as much of the runoff generated by the project as possible. Based on the team's experience with nearby facilities, it is anticipated that storms exceeding the 25-year design interval can be fully recharged. Since the site will be classified as a Land Use with Higher Potential Pollution Loading (LUHPPL) the stormwater management system will need to provide additional pretreatment prior to any discharge into infiltrative systems. This treatment will be provided in the form of Low Impact Development systems (water quality swales, designed stormwater streams, etc.) as well as proprietary hydrodynamic separators.

Runoff generated from rooftops will be considered clean since the rooftops will be a rubber membrane system. This runoff will be directed to infiltration systems directly without pretreatment. The goal will be to recharge as much of this clean runoff as possible across all storm events. Runoff from vehicular parking and truck aprons will be collected in a series of catch basins and conveyed via subsurface pipe networks to pretreatment systems consisting of either sediment forebays, water quality swales/stormwater streams, or hydrodynamic separators prior to discharge to the infiltration systems.

Infiltrative systems will be a mix of open-air infiltration basins as well as subsurface infiltration systems that will be comprised of chamber systems. The chamber systems will be located under pavement and/or truck apron areas. As noted above, all infiltration systems, whether open air or subsurface, will receive a minimum of 44% Total Suspended Solid (TSS) removal based on one-inch of runoff prior to discharge to the infiltration systems. This pretreatment will be in the form of sediment forebays (for open air basin), water quality swales and hydrodynamic separators. Biofiltration and rain gardens will be used for vehicular parking areas where possible to allow stormwater treatment to remain visible at the surface. This will aid in long term maintenance.

All applicable Massachusetts Stormwater Standards will be met or exceed for this project. A summary of the Standards and how they will be met is presented below.

Standard 1 – No new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.

The proposed project will result in a series of stormwater management facilities that will be designed to recharge the maximum volume of stormwater allowable. The systems will be designed with overflow structures that will be stabilized with riprap aprons sized to convey the necessary flow velocities without causing scour or erosion to surfaces. All runoff entering the infiltration systems will be either pre-treated per the LUHPPL requirements or will be considered clean rooftop runoff. The infiltrative systems will be designed per the criteria in the Stormwater Handbook. Since there will be no untreated stormwater runoff from impervious areas leaving the site, this standard will be met by the final design.

Standard 2 – Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates.

The project will be designed and analyzed using rainfall data published in the NOAA 14 data for precipitation events. The systems will be analyzed for 2-, 10- and 100-year events and will be sized to ensure that the peak rates of runoff will be met or reduced from the current rates. In areas close to wetland resource areas, the post-development design will attempt to closely match the pre-development rates (and volumes) to ensure the hydrologic conditions of the natural resources areas are as unchanged as possible. This design will meet or exceed the stormwater standard.

Standard 3 – Loss of annual recharge to groundwater shall be eliminated or minimized through the use of infiltration measures including environmentally sensitive site design, low impact development techniques, stormwater best management practices, and good operation and maintenance. At a minimum, the annual recharge from the post-development site shall approximate the annual recharge from pre-development conditions based on soil type. This Standard is met when the stormwater management system is designed to infiltrate the required recharge volume as determined in accordance with the Massachusetts Stormwater Handbook.

The introduction of large areas of impervious surfaces will require the design and construction of large infiltration systems across the site to promote recharge. The project design will feature a variety of infiltration systems across the site in both an open-air configuration as well as subsurface chamber configurations.

Given the current use of the site as an active sand and gravel extraction industry and the prior and ongoing geotechnical investigations, the subsurface soils are very well suited for groundwater recharge. The groundwater table is also quite deep in this area which will further promote the ability to recharge large volumes of clean runoff. The goal for the project will be to exceed the Massachusetts Stormwater Handbook requirements by at least a factor of 2.0, meaning that the project will recharge at least twice the required volume of runoff. Based on these goals, the project will exceed the stormwater standard.

Standard 4 – Stormwater management systems shall be designed to remove 80% of the average annual post-construction load of Total Suspended Solids (TSS). This Standard is met when:

- a. Suitable practices for source control and pollution prevention are identified in a long-term pollution prevention plan, and thereafter are implemented and maintained;*
- b. Structural stormwater best management practices are sized to capture the required water quality volume determined in accordance with the Massachusetts Stormwater Handbook; and*
- c. Pretreatment is provided in accordance with the Massachusetts Stormwater Handbook.*

The project will include a wide variety of stormwater quality treatment devices which will provide not only primary treatment of runoff, but also pre-treatment of runoff from surfaces that are designated as LUHPPL areas. An additional goal of the project is to provide as many areas of Low Impact Development water quality treatment as possible to promote ease of long-term maintenance.

Project documentation will include calculations and design details to support a minimum of 44% TSS removal for areas that require pretreatment prior to discharge to the infiltrative practices. Treatment train calculations to document that the final design also meets 80% TSS removal for the overall project site will also be included.

It is anticipated that this stormwater standard will be exceeded.

Standard 5 – For land uses with higher potential pollutant loads, source control and pollution prevention shall be implemented in accordance with the Massachusetts Stormwater Handbook to eliminate or reduce the discharge of stormwater runoff from such land uses to the maximum extent practicable. If through source control and/or pollution prevention all land uses with higher potential pollutant loads cannot be completely protected from exposure to rain, snow, snow melt, and stormwater runoff, the proponent shall use the specific structural stormwater BMPs determined by the Department to be suitable for such uses as provided in the Massachusetts Stormwater Handbook. Stormwater discharges from land uses with higher potential pollutant loads shall also comply with the requirements of the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26-53 and the regulations promulgated thereunder at 314 CMR 3.00, 314 CMR 4.00 and 314 CMR 5.00.

The project is considered a Land Use with Higher Potential Pollution Load due to the proposed land use and therefore must meet a higher standard for water quality enhancement. The discharges from the areas defined to be LUHPPL uses will be separated from the “clean” rooftop runoff. This will allow the discharge pipes from the LUHPPL sources to be plugged in the event of any spill or situation where discharge to a recharge system needs to be prevented.

All runoff from LUHPPL areas will be pretreated prior to recharge. Pretreatment will come in the form of hydrodynamic separators, lined biofiltration systems, or sediment forebays. The proposed design will meet all requirements of the stormwater standard.

Standard 6 – Stormwater discharges within the Zone II or Interim Wellhead Protection Area of a public water supply, and stormwater discharges near or to any other critical area, require the use of the specific source control and pollution prevention measures and the specific structural stormwater best management practices determined by the Department to be suitable for managing discharges to such areas, as provided in the Massachusetts Stormwater Handbook. A discharge is near a critical area if there is a strong likelihood of a significant impact occurring to said area, taking into account site-specific factors. Stormwater discharges to Outstanding Resource Waters and Special Resource Waters shall be removed and set back from the receiving water or wetland and receive the highest and best practical method of treatment. A “storm water discharge” as defined in 314 CMR 3.04(2)(a)1 or (b) to an Outstanding Resource Water or Special Resource Water shall comply with 314 CMR 3.00 and 314 CMR 4.00. Stormwater discharges to a Zone I or Zone A are prohibited unless essential to the operation of a public water supply.

The project site will not discharge to any Critical Areas. This stormwater standard will not apply to the proposed project.

Standard 7 – A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6. Existing stormwater discharges shall comply with Standard 1 only to the maximum extent practicable. A redevelopment project shall also comply with all other requirements of the Stormwater Management Standards and improve existing conditions.

The project is not considered a redevelopment since the amount of impervious area will exceed the existing condition. This stormwater standard will not apply.

Standard 8 – A plan to control construction-related impacts including erosion, sedimentation and other pollutant sources during construction and land disturbance activities (construction period erosion, sedimentation, and pollution prevention plan) shall be developed and implemented.

The project documentation will include a full construction period erosion and sedimentation control plan and written narrative. The plan will be developed to provide flexibility for the contractor in the event of unforeseen conditions related to weather or soils. In addition, since the project will impact over an acre of land, an NPDES Construction General Permit will be required. In order to request coverage under the current CGP, a full Stormwater Pollution Prevention Plan (SWPPP) will be prepared in accordance with current USEPA standards.

It should also be noted that the proponent will require post construction registration under the NPDES Multi-Sector General Permit program prior to occupancy of the project.

This stormwater standard will be met.

Standard 9 – A long-term operation and maintenance plan shall be developed and implemented to ensure that stormwater management systems function as designed.

The project documentation will include a complete Stormwater Operation and Maintenance Manual for the site. This manual will meet all MA DEP checklist requirements. This standard will be met.

Standard 10 – All illicit discharges to the stormwater management system are prohibited.

The project will provide a completely new stormwater management system and utility systems throughout the site. This will provide assurances that any unknown discharge points will be eliminated. The project documentation will include a signed illicit discharge statement in accordance with the stormwater standard. This standard will be met.

MASSACHUSETTS CONTINGENCY PLAN:

Has the project site been, or is it currently being, regulated under M.G.L.c.21E or the Massachusetts Contingency Plan? Yes ___ No X; if yes, please describe the current status of the site (including Release Tracking Number (RTN), cleanup phase, and Response Action Outcome classification): _____

Is there an Activity and Use Limitation (AUL) on any portion of the project site? Yes ___ No X; if yes, describe which portion of the site and how the project will be consistent with the AUL: _____.

Are you aware of any Reportable Conditions at the property that have not yet been assigned an RTN? Yes X No ___; if yes, please describe: _____

RTN 2-20945 for a minor diesel spill. Impacted soil was removed. This RTN is closed and the contaminant resolved.

SOLID AND HAZARDOUS WASTE:

If the project will generate solid waste during demolition or construction, describe alternatives considered for re-use, recycling, and disposal of, e.g., asphalt, brick, concrete, gypsum, metal, wood:

The Project will divert construction waste from local landfills by recycling waste material generated on the Site as feasible. The disposable contract between the Proponent and Construction Manager will include specific requirements so that construction procedures require the necessary segregation, reprocessing, reuse, and recycling of materials when possible. For those materials that cannot be recycled, solid waste will be transported in covered trucks to an approved solid waste facility per MassDEP Regulations for Solid Waste Facilities, 310 CMR 16.00.

(NOTE: Asphalt pavement, brick, concrete and metal are banned from disposal at Massachusetts landfills and waste combustion facilities and wood is banned from disposal at Massachusetts landfills. See 310 CMR 19.017 for the complete list of banned materials.)

Will your project disturb asbestos containing materials? Yes ___ No X; if yes, please consult state asbestos requirements at <http://mass.gov/MassDEP/air/asbhom01.htm>

Describe anti-idling and other measures to limit emissions from construction equipment: _____

DESIGNATED WILD AND SCENIC RIVER:

Is this project site located wholly or partially within a defined river corridor of a federally designated Wild and Scenic River or a state designated Scenic River? Yes ___ No X;
if yes, specify name of river and designation:

If yes, does the project have the potential to impact any of the “outstandingly remarkable” resources of a federally Wild and Scenic River or the stated purpose of a state designated Scenic River? Yes ___ No ___; if yes, specify name of river and designation: _____;

if yes, will the project will result in any impacts to any of the designated “outstandingly remarkable” resources of the Wild and Scenic River or the stated purposes of a Scenic River.

Yes ___ No ___;

if yes, describe the potential impacts to one or more of the “outstandingly remarkable” resources or stated purposes and mitigation measures proposed.

ATTACHMENTS:

1. List of all attachments to this document.
2. U.S.G.S. map (good quality color copy, 8-½ x 11 inches or larger, at a scale of 1:24,000) indicating the project location and boundaries.
3. Plan, at an appropriate scale, of existing conditions on the project site and its immediate environs, showing all known structures, roadways and parking lots, railroad rights-of-way, wetlands and water bodies, wooded areas, farmland, steep slopes, public open spaces, and major utilities.
4. Plan, at an appropriate scale, depicting environmental constraints on or adjacent to the project site such as Priority and/or Estimated Habitat of state-listed rare species, Areas of Critical Environmental Concern, Chapter 91 jurisdictional areas, Article 97 lands, wetland resource area delineations, water supply protection areas, and historic resources and/or districts.
5. Plan, at an appropriate scale, of proposed conditions upon completion of project (if construction of the project is proposed to be phased, there should be a site plan showing conditions upon the completion of each phase).
6. List of all agencies and persons to whom the proponent circulated the ENF, in accordance with 301 CMR 11.16(2).
7. List of municipal and federal permits and reviews required by the project, as applicable.
8. Printout of output report from RMA Climate Resilience Design Standards Tool, available [here](#).
9. Printout from the EEA [EJ Maps Viewer](#) showing the project location relative to Environmental Justice (EJ) Populations located in whole or in part within a 1-mile and 5-mile radius of the project site.

LAND SECTION – all proponents must fill out this section

I. Thresholds / Permits

- A. Does the project meet or exceed any review thresholds related to **land** (see 301 CMR 11.03(1))
 X Yes No; if yes, specify each threshold:

301 CMR 11.03(1)(a)(1) alteration of 50 or more acres of land

301 CMR 11.3(1)(a)(2) creation of 10 or more acres of impervious area

II. Impacts and Permits

- A. Describe, in acres, the current and proposed character of the project site, as follows:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Footprint of buildings	0.49	64.15	64.64
Internal roadways	6.50	8.22	14.72
Parking and other paved areas	3.81	43.19	47
Other altered areas	89.41	-81.81	7.6
Undeveloped areas	155.26	-33.75	121.51
Total: Project Site Acreage	255.47	0	255.47

- B. Has any part of the project site been in active agricultural use in the last five years?
 Yes X No; if yes, how many acres of land in agricultural use (with prime state or locally important agricultural soils) will be converted to nonagricultural use?
- C. Is any part of the project site currently or proposed to be in active forestry use?
 Yes X No; if yes, please describe current and proposed forestry activities and indicate whether any part of the site is the subject of a forest management plan approved by the Department of Conservation and Recreation:
- D. Does any part of the project involve conversion of land held for natural resources purposes in accordance with Article 97 of the Amendments to the Constitution of the Commonwealth to any purpose not in accordance with Article 97? Yes X No; if yes, describe:
- E. Is any part of the project site currently subject to a conservation restriction, preservation restriction, agricultural preservation restriction or watershed preservation restriction? Yes X No; if yes, does the project involve the release or modification of such restriction? Yes No; if yes, describe:
- F. Does the project require approval of a new urban redevelopment project or a fundamental change in an existing urban redevelopment project under M.G.L.c.121A? Yes X No; if yes, describe:
- G. Does the project require approval of a new urban renewal plan or a major modification of an existing urban renewal plan under M.G.L.c.121B? Yes No X ; if yes, describe:

III. Consistency

- A. Identify the current municipal comprehensive land use plan
Title: **Town of Sutton Master Plan** Date **2012**
There is no municipal comprehensive plan for the Town of Douglas.
- B. Describe the project's consistency with that plan with regard to:
1) economic development
The Town of Sutton aims to promote employment opportunities for Sutton residents to create a balanced local economy by working with owners of underutilized commercial properties to ensure mutually beneficial future redevelopment. The Project will provide employment opportunities for residents of Sutton and surrounding communities in the short term (construction jobs) and long-term permanent jobs.

- 2) adequacy of infrastructure
The Town's goals include improving the safety of bridges and roads, and improving traffic flow and safety at high traffic and congestion areas. Water and wastewater infrastructure is of adequate capacity. The Project will help achieve this by reconstructing the Lackey Dam Road/Route 146 northbound and southbound ramps.
 - 3) open space impacts
The Town's goal is to provide a maintained system of open space for the enjoyment of residents and visitors. A majority of the Site will be maintained as open space with only 60 acres of impervious/developed area of the 255-acre parcel (greater than 75% open space remaining).
 - 4) compatibility with adjacent land uses
The Town is looking to optimize commercial areas and intends to complete a corridor study of Route 146 to promote economic growth and housing. The Project will utilize the proximity to Route 146 and increase commercial businesses in the area.
- C. Identify the current Regional Policy Plan of the applicable Regional Planning Agency (RPA)
RPA: [Central Massachusetts Regional Planning Commission](#)
- Title: [Blackstone Valley Prioritization Project \(BVPP\)](#) Date 2012
- D. Describe the project's consistency with that plan with regard to:
- 1) economic development
The BVPP indicates "most development historically occurred along the region's key transportation corridors and in village/town centers." The BVPP looks to "maintain those patterns" of growth by "reducing the need for new infrastructure extension," and "focusing on redevelopment and infill." The Project will develop an already disturbed site along the Route 146 corridor and promote job growth.
 - 2) adequacy of infrastructure
The BVPP seeks to "protect previous infrastructure investments" and is working to develop a "comprehensive, long-range water infrastructure finance plan" by taking into consideration water supply and capacity.
 - 3) open space impacts
The BVPP outlines strategies for improving and maintaining open space to protect natural resources, wildlife, and water resources. According to the BVPP, "development decisions should consider opportunities to match targeted growth with preservation of vulnerable open spaces and habitat." The Project will help maintain open space by developing an existing disturbed site and installing a stormwater management system.

RARE SPECIES SECTION

I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to **rare species or habitat** (see 301 CMR 11.03(2))? ___ Yes **X** No; if yes, specify, in quantitative terms:

(NOTE: If you are uncertain, it is recommended that you consult with the Natural Heritage and Endangered Species Program (NHESP) prior to submitting the ENF.)

- B. Does the project require any state permits related to **rare species or habitat**? ___ Yes **X** No
- C. Does the project site fall within mapped rare species habitat (Priority or Estimated Habitat?) in the current Massachusetts Natural Heritage Atlas (attach relevant page)? ___ Yes **X** No.
- D. If you answered "No" to all questions A, B and C, proceed to the **Wetlands, Waterways, and Tidelands Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Rare Species section below.

II. Impacts and Permits

- A. Does the project site fall within Priority or Estimated Habitat in the current Massachusetts Natural Heritage Atlas (attach relevant page)? ___ Yes ___ No. If yes,
1. Have you consulted with the Division of Fisheries and Wildlife Natural Heritage and Endangered Species Program (NHESP)? ___ Yes ___ No; if yes, have you received a determination as to whether the project will result in the "take" of a rare species? ___ Yes ___ No; if yes, attach the letter of determination to this submission.
 2. Will the project "take" an endangered, threatened, and/or species of special concern in accordance with M.G.L. c.131A (see also 321 CMR 10.04)? ___ Yes ___ No; if yes, provide a summary of proposed measures to minimize and mitigate rare species impacts
 3. Which rare species are known to occur within the Priority or Estimated Habitat?
 4. Has the site been surveyed for rare species in accordance with the Massachusetts Endangered Species Act? ___ Yes ___ No
 5. If your project is within Estimated Habitat, have you filed a Notice of Intent or received an Order of Conditions for this project? ___ Yes ___ No; if yes, did you send a copy of the Notice of Intent to the Natural Heritage and Endangered Species Program, in accordance with the Wetlands Protection Act regulations? ___ Yes ___ No
- B. Will the project "take" an endangered, threatened, and/or species of special concern in accordance with M.G.L. c.131A (see also 321 CMR 10.04)? ___ Yes ___ No; if yes, provide a summary of proposed measures to minimize and mitigate impacts to significant habitat:

WETLANDS, WATERWAYS, AND TIDELANDS SECTION

I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to **wetlands, waterways, and tidelands** (see 301 CMR 11.03(3))? ___ Yes **X** No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits (or a local Order of Conditions) related to **wetlands, waterways, or tidelands**? **X** Yes ___ No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Water Supply Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Wetlands, Waterways, and Tidelands Section below.

II. Wetlands Impacts and Permits

- A. Does the project require a new or amended Order of Conditions under the Wetlands Protection Act (M.G.L. c.131A)? **X** Yes ___ No; if yes, has a Notice of Intent been filed? ___ Yes **X** No; if yes, list the date and MassDEP file number: _____; if yes, has a local Order of Conditions been issued? ___ Yes ___ No; Was the Order of Conditions appealed? ___ Yes ___ No. Will the project require a Variance from the Wetlands regulations? ___ Yes ___ No.
- B. Describe any proposed permanent or temporary impacts to wetland resource areas located on the project site:

Perennial stream crossing for the relocated concrete plant will utilize concrete arch culverts or equivalent structures to avoid any direct impact to the stream bed. The footings for the structure will be placed behind the limits of the bank to avoid direct impacts. The crossing will be designed to meet the Massachusetts Stream Crossing Standards. The Project will result in a total of 1.01 acres of impact to riverfront area (RFA) (including grading impacts). Approximately 0.41 acres of RFA impact is associated with construction of the warehouses and 0.6 acres is associated with Phase I (relocation of the concrete facility).

All other direct impacts to resource areas are expected to be avoided. Buffer zone encroachments will be limited to the extent practicable and will utilize retaining walls and steep slopes where possible to further minimize buffer zone disturbances.

- C. Estimate the extent and type of impact that the project will have on wetland resources, and indicate whether the impacts are temporary or permanent:

<u>Coastal Wetlands</u>	<u>Area (square feet) or Length (linear feet)</u>	<u>Temporary or Permanent Impact?</u>
Land Under the Ocean	<u>0</u>	<u>N/A</u>
Designated Port Areas	<u>0</u>	<u>N/A</u>
Coastal Beaches	<u>0</u>	<u>N/A</u>
Coastal Dunes	<u>0</u>	<u>N/A</u>
Barrier Beaches	<u>0</u>	<u>N/A</u>
Coastal Banks	<u>0</u>	<u>N/A</u>
Rocky Intertidal Shores	<u>0</u>	<u>N/A</u>
Salt Marshes	<u>0</u>	<u>N/A</u>
Land Under Salt Ponds	<u>0</u>	<u>N/A</u>

Land Containing Shellfish	<u>0</u>	<u>N/A</u>
Fish Runs	<u>0</u>	<u>N/A</u>
Land Subject to Coastal Storm Flowage	<u>0</u>	<u>N/A</u>

Inland Wetlands

Bank (If)	<u>0</u>	<u>N/A</u>
Bordering Vegetated Wetlands	<u>0</u>	<u>N/A</u>
Isolated Vegetated Wetlands	<u>0</u>	<u>N/A</u>
Land under Water	<u>0</u>	<u>N/A</u>
Isolated Land Subject to Flooding	<u>0</u>	<u>N/A</u>
Bordering Land Subject to Flooding	<u>0</u>	<u>N/A</u>
Riverfront Area	<u>1.01 acres¹</u>	<u>Permanent</u>

¹ Approximately 0.41 acres of impact to the 200-ft RFA for construction of the warehouses.
Approximately 0.6 acres of 200-ft RFA impact for relocation of the concrete facility (Phase I).

D. Is any part of the project:

1. proposed as a **limited project**? ___ Yes X No; if yes, what is the area (in sf)? ___
2. the construction or alteration of a **dam**? ___ Yes X No; if yes, describe: ___
3. fill or structure in a **velocity zone** or **regulatory floodway**? ___ Yes X No
4. dredging or disposal of dredged material? ___ Yes X No; if yes, describe the volume of dredged material and the proposed disposal site: ___
5. a discharge to an **Outstanding Resource Water (ORW)** or an **Area of Critical Environmental Concern (ACEC)**? ___ Yes X No
6. subject to a wetlands restriction order? ___ Yes X No; if yes, identify the area (in sf): ___
7. located in buffer zones? X Yes ___ No; if yes, how much (in sf) ±62,000 sf

E. Will the project:

1. be subject to a local wetlands ordinance or bylaw? X Yes ___ No
2. alter any federally-protected wetlands not regulated under state law? ___ Yes X No; if yes, what is the area (sf)? ___

III. Waterways and Tidelands Impacts and Permits

A. Does the project site contain waterways or tidelands (including filled former tidelands) that are subject to the Waterways Act, M.G.L.c.91? ___ Yes X No; if yes, is there a current Chapter 91 License or Permit affecting the project site? ___ Yes ___ No; if yes, list the date and license or permit number and provide a copy of the historic map used to determine extent of filled tidelands: ___

B. Does the project require a new or modified license or permit under M.G.L.c.91? ___ Yes X No; if yes, how many acres of the project site subject to M.G.L.c.91 will be for non-water-dependent use? Current ___ Change ___ Total ___
If yes, how many square feet of solid fill or pile-supported structures (in sf)? ___

C. For non-water-dependent use projects, indicate the following:

Area of filled tidelands on the site: 0

Area of filled tidelands covered by buildings: 0

For portions of site on filled tidelands, list ground floor uses and area of each use:

0

Does the project include new non-water-dependent uses located over flowed tidelands? Yes

___ No X

Height of building on filled tidelands N/A

Also show the following on a site plan: Mean High Water, Mean Low Water, Water-dependent Use Zone, location of uses within buildings on tidelands, and interior and exterior areas and facilities dedicated for public use, and historic high and historic low water marks.

- D. Is the project located on landlocked tidelands? ___ Yes X No; if yes, describe the project's impact on the public's right to access, use and enjoy jurisdictional tidelands and describe measures the project will implement to avoid, minimize or mitigate any adverse impact:
- E. Is the project located in an area where low groundwater levels have been identified by a municipality or by a state or federal agency as a threat to building foundations? ___ Yes X No; if yes, describe the project's impact on groundwater levels and describe measures the project will implement to avoid, minimize or mitigate any adverse impact:
- F. Is the project non-water-dependent **and** located on landlocked tidelands **or** waterways or tidelands subject to the Waterways Act **and** subject to a mandatory EIR? ___ Yes X No; *(NOTE: If yes, then the project will be subject to Public Benefit Review and Determination.)*
- G. Does the project include dredging? ___ Yes X No; if yes, answer the following questions:
What type of dredging? Improvement ___ Maintenance ___ Both ___
What is the proposed dredge volume, in cubic yards (cys) ___
What is the proposed dredge footprint ___ length (ft) ___ width (ft) ___ depth (ft);
Will dredging impact the following resource areas?
Intertidal Yes ___ No ___; if yes, ___ sq ft
Outstanding Resource Waters Yes ___ No ___; if yes, ___ sq ft
Other resource area (i.e. shellfish beds, eel grass beds) Yes ___ No ___; if yes ___ sq ft
If yes to any of the above, have you evaluated appropriate and practicable steps to: 1) avoidance; 2) if avoidance is not possible, minimization; 3) if either avoidance or minimize is not possible, mitigation?
If no to any of the above, what information or documentation was used to support this determination?
Provide a comprehensive analysis of practicable alternatives for improvement dredging in accordance with 314 CMR 9.07(1)(b). Physical and chemical data of the sediment shall be included in the comprehensive analysis.
Sediment Characterization
Existing gradation analysis results? ___ Yes ___ No; if yes, provide results.
Existing chemical results for parameters listed in 314 CMR 9.07(2)(b)6? ___ Yes ___ No; if yes, provide results.
Do you have sufficient information to evaluate feasibility of the following management options for dredged sediment? If yes, check the appropriate option.

Beach Nourishment ___
Unconfined Ocean Disposal ___
Confined Disposal:
Confined Aquatic Disposal (CAD) ___
Confined Disposal Facility (CDF) ___
Landfill Reuse in accordance with COMM-97-001 ___
Shoreline Placement ___
Upland Material Reuse ___
In-State landfill disposal ___
Out-of-state landfill disposal ___
(NOTE: This information is required for a 401 Water Quality Certification.)

IV. Consistency:

- A. Does the project have effects on the coastal resources or uses, and/or is the project located within the Coastal Zone? ____ Yes ☒ No; if yes, describe these effects and the projects consistency with the policies of the Office of Coastal Zone Management:
- B. Is the project located within an area subject to a Municipal Harbor Plan? ____ Yes ☒ No; if yes, identify the Municipal Harbor Plan and describe the project's consistency with that plan:

WATER SUPPLY SECTION

I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to **water supply** (see 301 CMR 11.03(4))? ___ Yes ___ X No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to **water supply**? ___ Yes ___ X No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Wastewater Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Water Supply Section below.

II. Impacts and Permits

- A. Describe, in gallons per day (gpd), the volume and source of water use for existing and proposed activities at the project site:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Municipal or regional water supply	_____	_____	_____
Withdrawal from groundwater	_____	_____	_____
Withdrawal from surface water	_____	_____	_____
Interbasin transfer	_____	_____	_____

(NOTE: Interbasin Transfer approval will be required if the basin and community where the proposed water supply source is located is different from the basin and community where the wastewater from the source will be discharged.)

- B. If the source is a municipal or regional supply, has the municipality or region indicated that there is adequate capacity in the system to accommodate the project? ___ Yes ___ No
- C. If the project involves a new or expanded withdrawal from a groundwater or surface water source, has a pumping test been conducted? ___ Yes ___ No; if yes, attach a map of the drilling sites and a summary of the alternatives considered and the results.

- D. What is the currently permitted withdrawal at the proposed water supply source (in gallons per day)? _____ Will the project require an increase in that withdrawal? ___ Yes ___ No; if yes, then how much of an increase (gpd)? _____
- E. Does the project site currently contain a water supply well, a drinking water treatment facility, water main, or other water supply facility, or will the project involve construction of a new facility? ___ Yes ___ No. If yes, describe existing and proposed water supply facilities at the project site:

	<u>Permitted Flow</u>	<u>Existing Avg Daily Flow</u>	<u>Project Flow</u>	<u>Total</u>
Capacity of water supply well(s) (gpd)	_____	_____	_____	_____
Capacity of water treatment plant (gpd)	_____	_____	_____	_____

- F. If the project involves a new interbasin transfer of water, which basins are involved, what is the direction of the transfer, and is the interbasin transfer existing or proposed?

G. Does the project involve:

1. new water service by the Massachusetts Water Resources Authority or other agency of the Commonwealth to a municipality or water district? ☐ Yes ☐ No
2. a Watershed Protection Act variance? ☐ Yes ☐ No; if yes, how many acres of alteration?
3. a non-bridged stream crossing 1,000 or less feet upstream of a public surface drinking water supply for purpose of forest harvesting activities? ☐ Yes ☐ No

III. Consistency

Describe the project's consistency with water conservation plans or other plans to enhance water resources, quality, facilities and services:

WASTEWATER SECTION

I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to **wastewater** (see 301 CMR 11.03(5))? ____ Yes X No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to **wastewater**? ____ Yes X No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Transportation -- Traffic Generation Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Wastewater Section below.

II. Impacts and Permits

- A. Describe the volume (in gallons per day) and type of disposal of wastewater generation for existing and proposed activities at the project site (calculate according to 310 CMR 15.00 for septic systems or 314 CMR 7.00 for sewer systems):

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Discharge of sanitary wastewater	_____	_____	_____
Discharge of industrial wastewater	_____	_____	_____
TOTAL	_____	_____	_____

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Discharge to groundwater	_____	_____	_____
Discharge to outstanding resource water	_____	_____	_____
Discharge to surface water	_____	_____	_____
Discharge to municipal or regional wastewater facility	_____	_____	_____
TOTAL	_____	_____	_____

- B. Is the existing collection system at or near its capacity? ____ Yes ____ No; if yes, then describe the measures to be undertaken to accommodate the project's wastewater flows:
- C. Is the existing wastewater disposal facility at or near its permitted capacity? ____ Yes ____ No; if yes, then describe the measures to be undertaken to accommodate the project's wastewater flows:
- D. Does the project site currently contain a wastewater treatment facility, sewer main, or other wastewater disposal facility, or will the project involve construction of a new facility? ____ Yes ____ No; if yes, describe as follows:

	<u>Permitted</u>	<u>Existing Avg Daily Flow</u>	<u>Project Flow</u>	<u>Total</u>
Wastewater treatment plant capacity (in gallons per day)	_____	_____	_____	_____

- E. If the project requires an interbasin transfer of wastewater, which basins are involved, what is the direction of the transfer, and is the interbasin transfer existing or new?
(NOTE: Interbasin Transfer approval may be needed if the basin and community where wastewater will be discharged is different from the basin and community where the source of water supply is located.)

F. Does the project involve new sewer service by the Massachusetts Water Resources Authority (MWRA) or other Agency of the Commonwealth to a municipality or sewer district? ____ Yes ____ No

G. Is there an existing facility, or is a new facility proposed at the project site for the storage, treatment, processing, combustion or disposal of sewage sludge, sludge ash, grit, screenings, wastewater reuse (gray water) or other sewage residual materials? ____ Yes ____ No; if yes, what is the capacity (tons per day):

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Storage	_____	_____	_____
Treatment	_____	_____	_____
Processing	_____	_____	_____
Combustion	_____	_____	_____
Disposal	_____	_____	_____

H. Describe the water conservation measures to be undertaken by the project, and other wastewater mitigation, such as infiltration and inflow removal.

III. Consistency

A. Describe measures that the proponent will take to comply with applicable state, regional, and local plans and policies related to wastewater management:

B. If the project requires a sewer extension permit, is that extension included in a comprehensive wastewater management plan? ____ Yes ____ No; if yes, indicate the EEA number for the plan and whether the project site is within a sewer service area recommended or approved in that plan:

TRANSPORTATION SECTION (TRAFFIC GENERATION)

I. Thresholds / Permit

- A. Will the project meet or exceed any review thresholds related to **traffic generation** (see 301 CMR 11.03(6))? X Yes No; if yes, specify, in quantitative terms:

301 CMR 11.03(6)(a)(6) Generation of 3,000 or more New adt on roadways providing access to a single location.

301 CMR 11.03(6)(a)(7) construction of 1,000 or more New parking spaces at a single location.

301 CMR 11.03(6)(b)(14) generation 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.

301 CMR 11.03(6)(b)(15) construction of 300 or more New parking spaces at a single location.

- B. Does the project require any state permits related to **state-controlled roadways**? X Yes No; if yes, specify which permit:

Massachusetts Department of Transportation State Highway Access Permit

- C. If you answered "No" to both questions A and B, proceed to the **Roadways and Other Transportation Facilities Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Traffic Generation Section below.

II. Traffic Impacts and Permits

- A. Describe existing and proposed vehicular traffic generated by activities at the project site:

	Existing	Change	Total
Number of parking spaces	13	+1,495	1,508
Number of vehicle trips per day	462 ^a	+4,630	5,092 ^b
ITE Land Use Code(s):	^a Based on empirical data from Dauphinais Concrete and Pyne Sand & Stone regarding daily employee and truck trips. ^b Based on ITE LUC 155, <i>High-Cube Fulfillment Center Warehouse – Non-Sort</i> ; 2,813,380 sf.		

- B. What is the estimated average daily traffic on roadways serving the site?

Roadway	Existing	Change	Total
1. Lackey Dam Road/Gilboa Street	12,200	+4,630	16,830

- C. If applicable, describe proposed mitigation measures on state-controlled roadways that the project proponent will implement:

The Project proponent will coordinate with MassDOT to design and reconstruct the Lackey Dam Road/Route 146 northbound ramps, Lackey Dam Road/Route 146 southbound ramps and Northeast Main Street/Davis Street intersections as mitigation for the Project. In an effort to: i) accommodate the additional traffic on the roadway network resulting from the construction of the Project; ii) enhance safety for vehicles, pedestrians and bicyclists; and iii) reduce motorist delays and vehicle queuing at the intersections; the following improvements may be reviewed for advancement as a part of the Project:

- Geometric improvement that could include the addition of travel lanes;
- The design and reconstruction of the intersections under alternate traffic control strategies (traffic signals, modern roundabout, etc.);
- Intersection specific safety improvements to include signage, pavement markings and sight line improvements; and
- The widening and/or restriping of MassDOT owned roadways to provide multimodal accommodations consistent with a Complete Streets design approach.

The identified improvements will be completed subject to receipt of all necessary rights, permits and approvals, and in conjunction with the appropriate parties to the extent that the improvements involve others.

- D. How will the project implement and/or promote the use of transit, pedestrian and bicycle facilities and services to provide access to and from the project site?

The following Transportation Demand Management (TDM) measures will be implemented as a part of the project to encourage the use of alternative modes of transportation to single-occupant vehicles (SOVs), the success of which will be measured as a part of an annual Traffic Monitoring and Reporting Program that will be implemented in conjunction with the Project. The property manager will serve as the Transportation Coordinator (TC) for the TDM program and will serve as the point of contact for tenants. The TDM program will include the following measures that will also be defined in tenant leases:

- The TC will facilitate a rideshare matching program for employees to encourage carpooling;
- A “welcome packet” will be provided to employees detailing the contact information for the transportation coordinator and information to enroll in the employee rideshare program;
- Specific amenities will be provided to discourage off-site trips, including providing a break-room equipped with a microwave and refrigerator; offering direct deposit of paychecks; allowing telecommuting or flexible work schedules; and other such measures to reduce overall traffic volumes and travel during peak-traffic-volume periods;
- Pedestrian accommodations will be incorporated within the Project site to link the employee parking areas to the warehouse buildings; and
- Secure bicycle parking will be provided at an appropriate location within the Project site.

- C. Is there a Transportation Management Association (TMA) that provides transportation demand management (TDM) services in the area of the project site? ____ Yes X No; if yes, describe if and how will the project will participate in the TMA:

- D. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation facilities? ____ Yes X No; if yes, generally describe:

- E. If the project will penetrate approach airspace of a nearby airport, has the proponent filed a Massachusetts Aeronautics Commission Airspace Review Form (780 CMR 111.7) and a Notice of Proposed Construction or Alteration with the Federal Aviation Administration (FAA) (CFR Title 14 Part 77.13, forms 7460-1 and 7460-2)?

N/A

III. Consistency

Describe measures that the proponent will take to comply with municipal, regional, state, and federal plans and policies related to traffic, transit, pedestrian and bicycle transportation facilities and services:

The Project has been designed to be consistent with municipal, regional, state and federal plans and policies related to traffic, transit, pedestrian and bicycle transportation facilities and services. A comprehensive TDM program is an integral part of the Project and will be facilitated by a transportation coordinator as a means to reduce the overall traffic and parking demands of the Project. Secure bicycle parking will be provided within the Project site to encourage bicycle commuting. All work to be completed by the Proponent to support the Project will comply with local requirements and will be designed following Complete Streets design standards to accommodate all roadway users.

TRANSPORTATION SECTION (ROADWAYS AND OTHER TRANSPORTATION FACILITIES)

I. Thresholds

- A. Will the project meet or exceed any review thresholds related to **roadways or other transportation facilities** (see 301 CMR 11.03(6))? ____ Yes X No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to **roadways or other transportation facilities**? ____ Yes X No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Energy Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Roadways Section below.

II. Transportation Facility Impacts

- A. Describe existing and proposed transportation facilities in the immediate vicinity of the project site:
- B. Will the project involve any
1. Alteration of bank or terrain (in linear feet)? _____
 2. Cutting of living public shade trees (number)? _____
 3. Elimination of stone wall (in linear feet)? _____

III. Consistency -- Describe the project's consistency with other federal, state, regional, and local plans and policies related to traffic, transit, pedestrian and bicycle transportation facilities and services, including consistency with the applicable regional transportation plan and the Transportation Improvements Plan (TIP), the State Bicycle Plan, and the State Pedestrian Plan:

ENERGY SECTION

I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to **energy** (see 301 CMR 11.03(7))? ____ Yes **X** No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to **energy**? ____ Yes **X** No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Air Quality Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Energy Section below.

II. Impacts and Permits

- A. Describe existing and proposed energy generation and transmission facilities at the project site:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Capacity of electric generating facility (megawatts)	_____	_____	_____
Length of fuel line (in miles)	_____	_____	_____
Length of transmission lines (in miles)	_____	_____	_____
Capacity of transmission lines (in kilovolts)	_____	_____	_____

- B. If the project involves construction or expansion of an electric generating facility, what are:
1. the facility's current and proposed fuel source(s)?
 2. the facility's current and proposed cooling source(s)?
- C. If the project involves construction of an electrical transmission line, will it be located on a new, unused, or abandoned right of way? ____ Yes ____ No; if yes, please describe:
- D. Describe the project's other impacts on energy facilities and services:

III. Consistency

Describe the project's consistency with state, municipal, regional, and federal plans and policies for enhancing energy facilities and services:

AIR QUALITY SECTION

I. Thresholds

- A. Will the project meet or exceed any review thresholds related to **air quality** (see 301 CMR 11.03(8))? ____ Yes X No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to **air quality**? ____ Yes X No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Solid and Hazardous Waste Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Air Quality Section below.

II. Impacts and Permits

- A. Does the project involve construction or modification of a major stationary source (see 310 CMR 7.00, Appendix A)? ____ Yes ____ No; if yes, describe existing and proposed emissions (in tons per day) of:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Particulate matter	_____	_____	_____
Carbon monoxide	_____	_____	_____
Sulfur dioxide	_____	_____	_____
Volatile organic compounds	_____	_____	_____
Oxides of nitrogen	_____	_____	_____
Lead	_____	_____	_____
Any hazardous air pollutant	_____	_____	_____
Carbon dioxide	_____	_____	_____

- B. Describe the project's other impacts on air resources and air quality, including noise impacts:

III. Consistency

- A. Describe the project's consistency with the State Implementation Plan:
- B. Describe measures that the proponent will take to comply with other federal, state, regional, and local plans and policies related to air resources and air quality:

SOLID AND HAZARDOUS WASTE SECTION

I. Thresholds / Permits

- A. Will the project meet or exceed any review thresholds related to **solid or hazardous waste** (see 301 CMR 11.03(9))? ___ Yes X No; if yes, specify, in quantitative terms:
- B. Does the project require any state permits related to **solid and hazardous waste**? ___ Yes X ___ No; if yes, specify which permit:
- C. If you answered "No" to both questions A and B, proceed to the **Historical and Archaeological Resources Section**. If you answered "Yes" to either question A or question B, fill out the remainder of the Solid and Hazardous Waste Section below.

II. Impacts and Permits

- A. Is there any current or proposed facility at the project site for the storage, treatment, processing, combustion or disposal of solid waste? ___ Yes ___ No; if yes, what is the volume (in tons per day) of the capacity:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Storage	_____	_____	_____
Treatment, processing	_____	_____	_____
Combustion	_____	_____	_____
Disposal	_____	_____	_____

- B. Is there any current or proposed facility at the project site for the storage, recycling, treatment or disposal of hazardous waste? ___ Yes ___ No; if yes, what is the volume (in tons or gallons per day) of the capacity:

	<u>Existing</u>	<u>Change</u>	<u>Total</u>
Storage	_____	_____	_____
Recycling	_____	_____	_____
Treatment	_____	_____	_____
Disposal	_____	_____	_____

- C. If the project will generate solid waste (for example, during demolition or construction), describe alternatives considered for re-use, recycling, and disposal:
- D. If the project involves demolition, do any buildings to be demolished contain asbestos?
___ Yes ___ No
- E. Describe the project's other solid and hazardous waste impacts (including indirect impacts):

III. Consistency

Describe measures that the proponent will take to comply with the State Solid Waste Master Plan:

HISTORICAL AND ARCHAEOLOGICAL RESOURCES SECTION

I. Thresholds / Impacts

- A. Have you consulted with the Massachusetts Historical Commission? ____ Yes X No; if yes, attach correspondence. For project sites involving lands under water, have you consulted with the Massachusetts Board of Underwater Archaeological Resources? ____ Yes ____ No; if yes, attach correspondence
- B. Is any part of the project site a historic structure, or a structure within a historic district, in either case listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth? ____ Yes X No; if yes, does the project involve the demolition of all or any exterior part of such historic structure? ____ Yes ____ No; if yes, please describe:
- C. Is any part of the project site an archaeological site listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth? X Yes ____ No; if yes, does the project involve the destruction of all or any part of such archaeological site? X Yes ____ No; if yes, please describe:

Portions of the mapped units of 19-WR-311 and 19-WR-304 are within the Project Site and will be affected by ground disturbing activities.

- D. If you answered "No" to all parts of both questions A, B and C, proceed to the **Attachments and Certifications** Sections. If you answered "Yes" to any part of either question A or question B, fill out the remainder of the Historical and Archaeological Resources Section below.

II. Impacts

Describe and assess the project's impacts, direct and indirect, on listed or inventoried historical and archaeological resources:

Portions of the mapped units of 19-WR-311 and 19-WR-304 will be impacted by ground disturbing activities as part of the proposed Project. One site is categorized as a flake scatter, while the other is categorized as a campsite, habitation site and flake scatter. The Project Site historically contained a large gravel pit starting in the 1970s creating significant ground disturbance over a large area. Additionally, part of the property boundary is state route 146 creating ground disturbance via its construction. While intact soil deposits may remain, given the prior disturbance, adverse effects to archaeological resources are not anticipated. No archaeological investigation is proposed as part of the Project.

III. Consistency

Describe measures that the proponent will take to comply with federal, state, regional, and local plans and policies related to preserving historical and archaeological resources:

This ENF shall serve as project notification to the Massachusetts Historical Commission (MHC) under State Register Review (950 CMR 71.00: M.G.L. c. 9, §§ 26-27C as amended by St. 1988, c. 254. Affects to historic and archaeological resources will be addressed as required through consultation with the MHC. If additional archaeological investigation is required by MHC, it will be conducted under a state archaeological permit.

CLIMATE CHANGE ADAPTATION AND RESILIENCY SECTION

This section of the Environmental Notification Form (ENF) solicits information and disclosures related to climate change adaptation and resiliency, in accordance with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency (the “MEPA Interim Protocol”), effective October 1, 2021. The Interim Protocol builds on the analysis and recommendations of the 2018 Massachusetts Integrated State Hazard Mitigation and Climate Adaptation Plan (SHMCAP), and incorporates the efforts of the Resilient Massachusetts Action Team (RMAT), the inter-agency steering committee responsible for implementation, monitoring, and maintenance of the SHMCAP, including the “Climate Resilience Design Standards and Guidelines” project. The RMAT team recently released the RMAT Climate Resilience Design Standards Tool, which is available [here](#).

The MEPA Interim Protocol is intended to gather project-level data in a standardized manner that will both inform the MEPA review process and assist the RMAT team in evaluating the accuracy and effectiveness of the RMAT Climate Resilience Design Standards Tool. Once this testing process is completed, the MEPA Office anticipates developing a formal Climate Change Adaptation and Resiliency Policy through a public stakeholder process. Questions about the RMAT Climate Resilience Design Standards Tool can be directed to rmat@mass.gov.

All Proponents must complete the following section, referencing as appropriate the results of the output report generated by the RMAT Climate Resilience Design Standards Tool and attached to the ENF. In completing this section, Proponents are encouraged, but not required at this time, to utilize the recommended design standards and associated Tier 1/2/3 methodologies outlined in the RMAT Climate Resilience Design Standards Tool to analyze the project design. However, Proponents are requested to respond to a [user feedback survey](#) on the RMAT website or to provide feedback to rmat@mass.gov, which will be used by the RMAT team to further refine the tool. Proponents are also encouraged to consult general guidance and best practices as described in the [RMAT Climate Resilience Design Guidelines](#).

Climate Change Adaptation and Resiliency Strategies

- I. Has the project taken measures to adapt to climate change for all of the climate parameters analyzed in the RMAT Climate Resilience Design Standards Tool (sea level rise/storm surge, extreme precipitation (urban or riverine flooding), extreme heat)? X Yes No

Note: Climate adaptation and resiliency strategies include actions that seek to reduce vulnerability to anticipated climate risks and improve resiliency for future climate conditions. Examples of climate adaptation and resiliency strategies include flood barriers, increased stormwater infiltration, living shorelines, elevated infrastructure, increased tree canopy, etc. Projects should address any planning priorities identified by the affected municipality through the Municipal Vulnerability Preparedness (MVP) program or other planning efforts, and should consider a flexible adaptive pathways approach, an adaptation best practice that encourages design strategies that adapt over time to respond to changing climate conditions. General guidance and best practices for designing for climate risk are described in the [RMAT Climate Resilience Design Guidelines](#).

- A. If no, explain why.
- B. If yes, describe the measures the project will take, including identifying the planning horizon and climate data used in designing project components. If applicable, specify the return period and design storm used (e.g., 100-year, 24-hour storm).

Based on the Project’s location the RMAT Tool (Attachment 4) indicates the Site has a high exposure for extreme precipitation urban and riverine flooding and a moderate exposure for extreme heat. The RMAT Tool recommends the Projects stormwater management system be designed to accommodate the 10-year 10% storm. To adapt to more frequent and intense

storms, the Proponent will take measures to minimize stormwater runoff and protect the Project's mechanical equipment, as necessary. The Project is evaluating the stormwater design for the 2 through 100-year storm events. The stormwater management system will reduce the existing peak rates and volumes of stormwater runoff from the Project Site to the greatest extent practicable and is aiming for exceeding MassDEP's groundwater recharge requirements.

To adapt to more days with temperatures over 90 degrees, the Project design will provide new landscaping to reduce the heat island effect, use reflective roof materials, and include operable windows where possible.

To minimize the Project's susceptibility to drought conditions, the landscape design is anticipated to incorporate native and adaptive plant materials and high efficiency irrigation systems. Aeration fixtures and appliances will be chosen for water conservation qualities, thereby conserving potable water supplies.

C. Is the project contributing to regional adaptation strategies? ___ Yes X No; If yes, describe.

II. Has the Proponent considered alternative locations for the project in light of climate change risks? ___ Yes X No

A. If no, explain why.

The Project Site is not particularly susceptible to climate change risks, and is well suited for its intended use, being appropriately zoned and proximate to the regional highway network.

B. If yes, describe alternatives considered.

III. Is the project located in Land Subject to Coastal Storm Flowage (LSCSF) or Bordering Land Subject to Flooding (BLSF) as defined in the Wetlands Protection Act? ___ Yes X No

If yes, describe how/whether proposed changes to the site's topography (including the addition of fill) will result in changes to floodwater flow paths and/or velocities that could impact adjacent properties or the functioning of the floodplain. General guidance on providing this analysis can be found in the CZM/MassDEP Coastal Wetlands Manual, available [here](#).

ENVIRONMENTAL JUSTICE SECTION

I. Identifying Characteristics of EJ Populations

- A. If an Environmental Justice (EJ) population has been identified as located in whole or in part within 5 miles of the project site, describe the characteristics of each EJ populations as identified in the EJ Maps Viewer (i.e., the census block group identification number and EJ characteristics of "Minority," "Minority and Income," etc.). Provide a breakdown of those EJ populations within 1 mile of the project site, and those within 5 miles of the site.

The Project is not located within one mile of any EJ populations (See Figure 9 in Attachment A).

The Project is located within five miles of one EJ populations characterized by Minority (located over 4.95 miles from the Site. See Figure 10 in Attachment A). It is Block Group 2, Census Tract 7381, in Grafton (Worcester County).

- B. Identify all languages identified in the "Languages Spoken in Massachusetts" tab of the EJ Maps Viewer as spoken by 5 percent or more of the EJ population who also identify as not speaking English "very well." The languages should be identified for each census tract located in whole or in part within 1 mile and 5 miles of the project site, regardless of whether such census tract contains any designated EJ populations.

There are no languages identified as spoken by 5% or more of the EJ populations within the DGA.

- C. If the list of languages identified under Section I.B. has been modified with approval of the EEA EJ Director, provide a list of approved languages that the project will use to provide public involvement opportunities during the course of MEPA review. If the list has been expanded by the Proponent (without input from the EEA EJ Director), provide a list of the additional languages that will be used to provide public involvement opportunities during the course of MEPA review as required by Part II of the MEPA Public Involvement Protocol for Environmental Justice Populations ("MEPA EJ Public Involvement Protocol"). If the project is exempt from Part II of the protocol, please specify.

II. Potential Effects on EJ Populations

- A. If an EJ population has been identified using the EJ Maps Viewer within 1 mile of the project site, describe the likely effects of the project (both adverse and beneficial) on the identified EJ population(s).

NA – No EJ populations within one-mile of the Site.

- B. If an EJ population has been identified using the EJ Maps Viewer within 5 miles of the project site, will the project: (i) meet or exceed MEPA review thresholds under 301 CMR 11.03(8)(a)-(b) X Yes X No; or (ii) generate 150 or more new average daily trips (adt) of diesel vehicle traffic, excluding public transit trips, over a duration of 1 year or more. X Yes No
- C. If you answered "Yes" to either question in Section II.B., describe the likely effects of the project (both adverse and beneficial) on the identified EJ population(s).

The Project will result in an increase in truck trips in the area surrounding the Site, however, the Site is optimally located in proximity to State Route 146. There are no EJ block groups located along the anticipated routes of travel within the DGA. The only EJ block group within the DGA is located over 4.95 miles from the Site is not along Route 146 and is not anticipated to be impacted by the Project. Increased truck traffic associated with this Project is not expected to disproportionately impact EJ versus non-EJ communities. Appropriate mitigation will be implemented through the MEPA process.

III. Public Involvement Activities

- A. Provide a description of activities conducted prior to filing to promote public involvement by EJ populations, in accordance with Part II of the MEPA EJ Public Involvement Protocol. In particular:
1. If advance notification was provided under Part II.A., attach a copy of the Environmental Justice Screening Form and provide list of CBOs/tribes contacted (with dates). Copies of email correspondence can be attached in lieu of a separate list.

The EJ Screening Form (Attachment 5) was distributed in advance to the list of Tribes and Community Based Organizations (CBOs) provided by the MEPA Office.

2. State how CBOs and tribes were informed of ways to request a community meeting, and if any meeting was requested. If public meetings were held, describe any issues of concern that were raised at such meetings, and any steps taken (including modifications to the project design) to address such concerns.

EJ Screen

CBOs and Tribes were notified of the Project via the EJ Screening form which included information on who to contact to request a meeting or additional information. The EJ Screening Form.

Local Citizenry Outreach

The Proponent gathered a list of local organizations, churches, and apartment complexes in the area which may be interested in the proposed Project. The Proponent is currently conducting outreach to these communities to notify them of the MEPA process and how comments can be submitted on the Project.

3. If the project is exempt from Part II of the protocol, please specify.
- B. Provide below (or attach) a distribution list (if different from the list in Section III.A. above) of CBOs and tribes, or other individuals or entities the Proponent intends to maintain for the notice of the MEPA Site Visit and circulation of other materials and notices during the course of MEPA review.

The EJ Distribution list is included in Attachment 2.

- C. Describe (or submit as a separate document) the Proponent's plan to maintain the same level of community engagement throughout the MEPA review process, as conducted prior to filing.

The Proponent will continue to circulate notices of the proposed Project to the EJ Reference List and additional organizations identified by the Proponent that may be interested in or impacted by the Project. Public participation will be encouraged throughout the MEPA process. The public will also have the opportunity to participate during the local permitting processes. The Proponent will be available throughout permitting and building construction to meet with stakeholders, CBOs, Tribes, and other members of the community and answer any questions they may have.

CERTIFICATIONS:

1. The Public Notice of Environmental Review has been/will be published in the following newspapers in accordance with 301 CMR 11.15(1):

(Name) Millbury-Sutton Chronicle (Date) 2/22/2023

2. This form has been circulated to Agencies and Persons in accordance with 301 CMR 11.16(2).

Signatures:

2.14.23	<i>Fred Ferraro</i>	2.14.23	<i>D. E. Hewett</i>
Date	Signature of Responsible Officer or Proponent	Date	Signature of person preparing ENF (if different from above)

<u>Fred Ferraro</u>	<u>David Hewett</u>
Name (print or type)	Name (print or type)

<u>CRG Real Estate Solutions</u>	<u>Epsilon Associates</u>
Firm/Agency	Firm/Agency

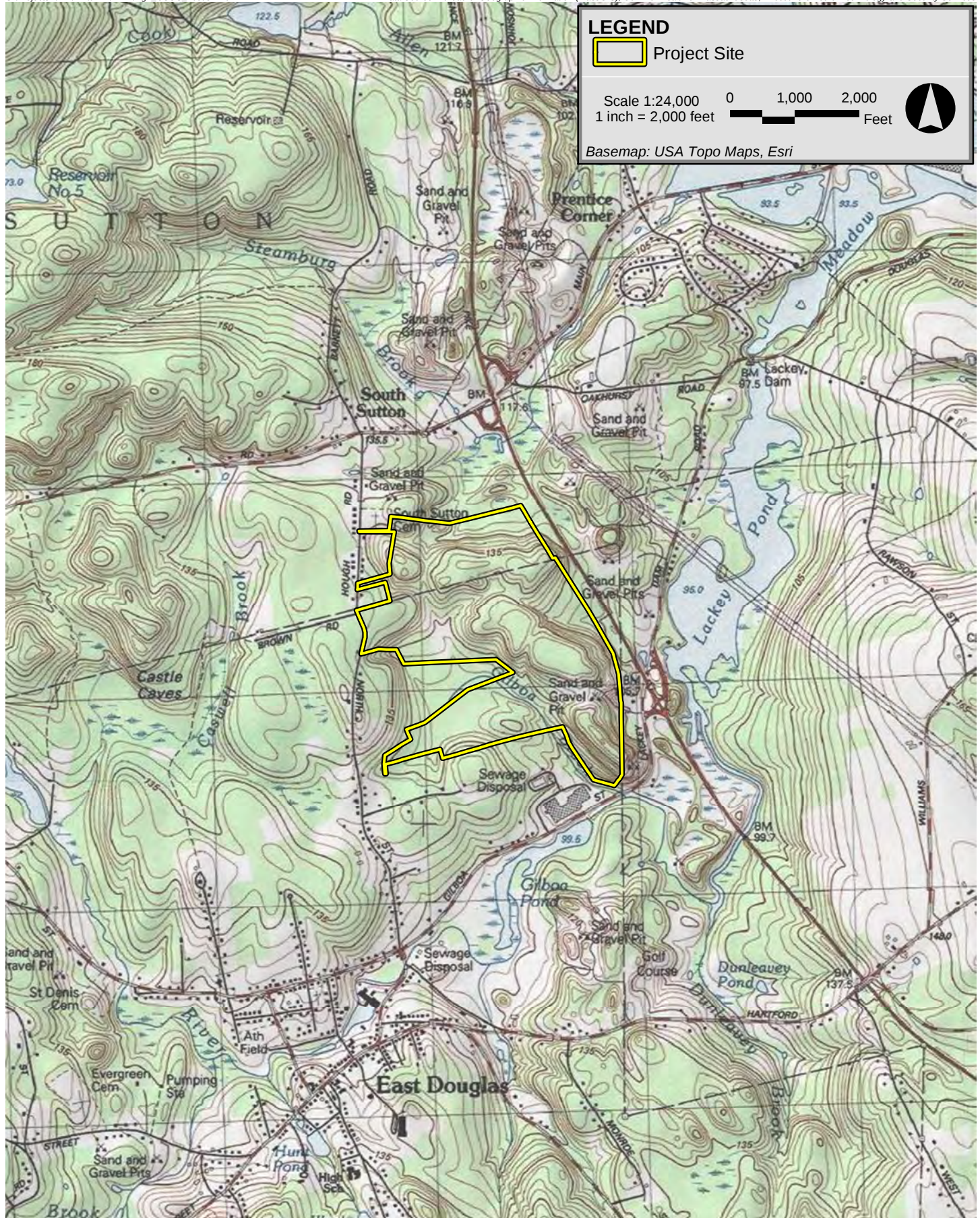
<u>300 Bar Harbor</u>	<u>3 Mill and Main Place, Suite 250</u>
Street	Street

<u>Conshohocken, PA 19428</u>	<u>Maynard, MA 01754</u>
Municipality/State/Zip	Municipality/State/Zip

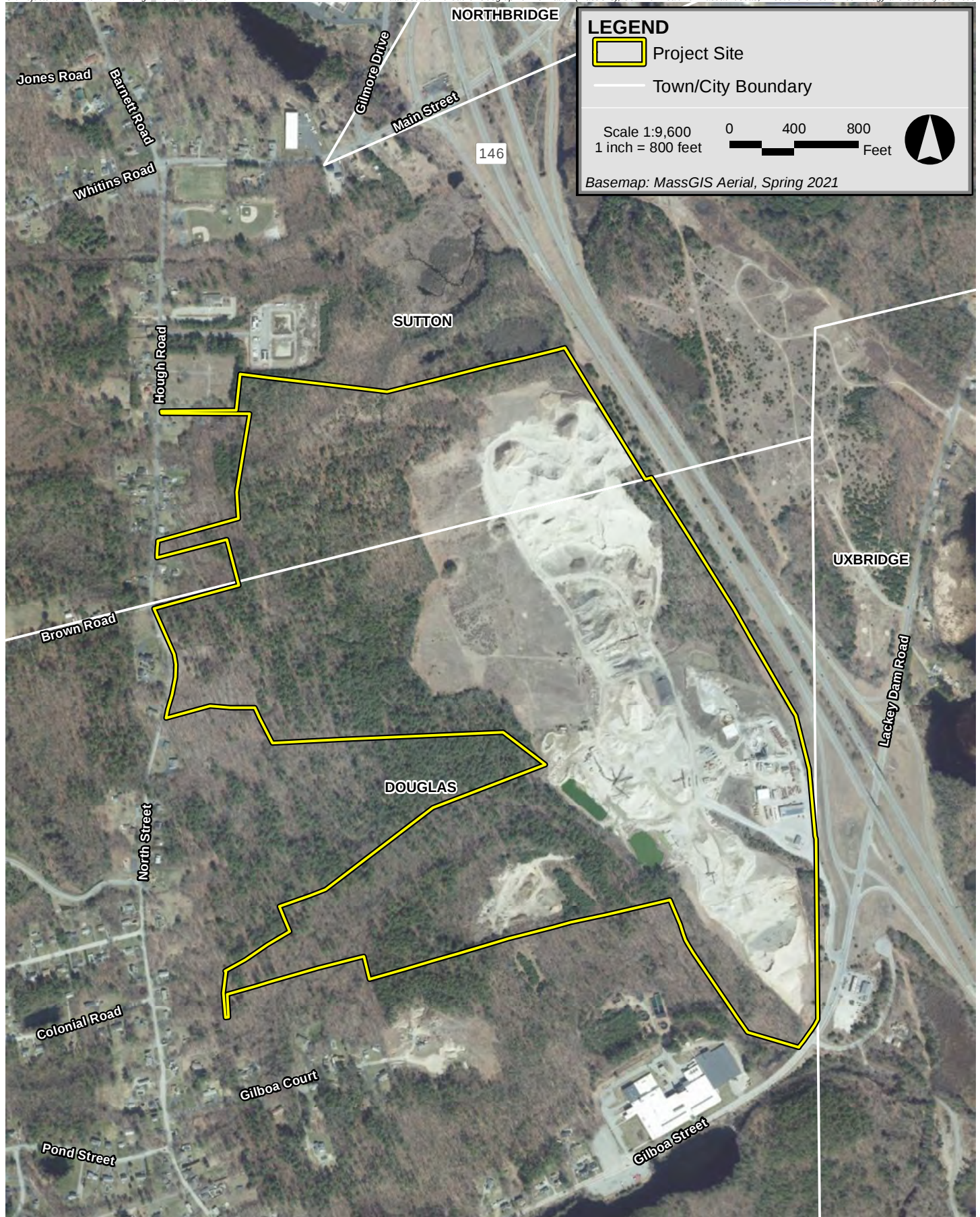
<u>908-966-1401</u>	<u>(978) 897-7100</u>
Phone	Phone

Attachment 1

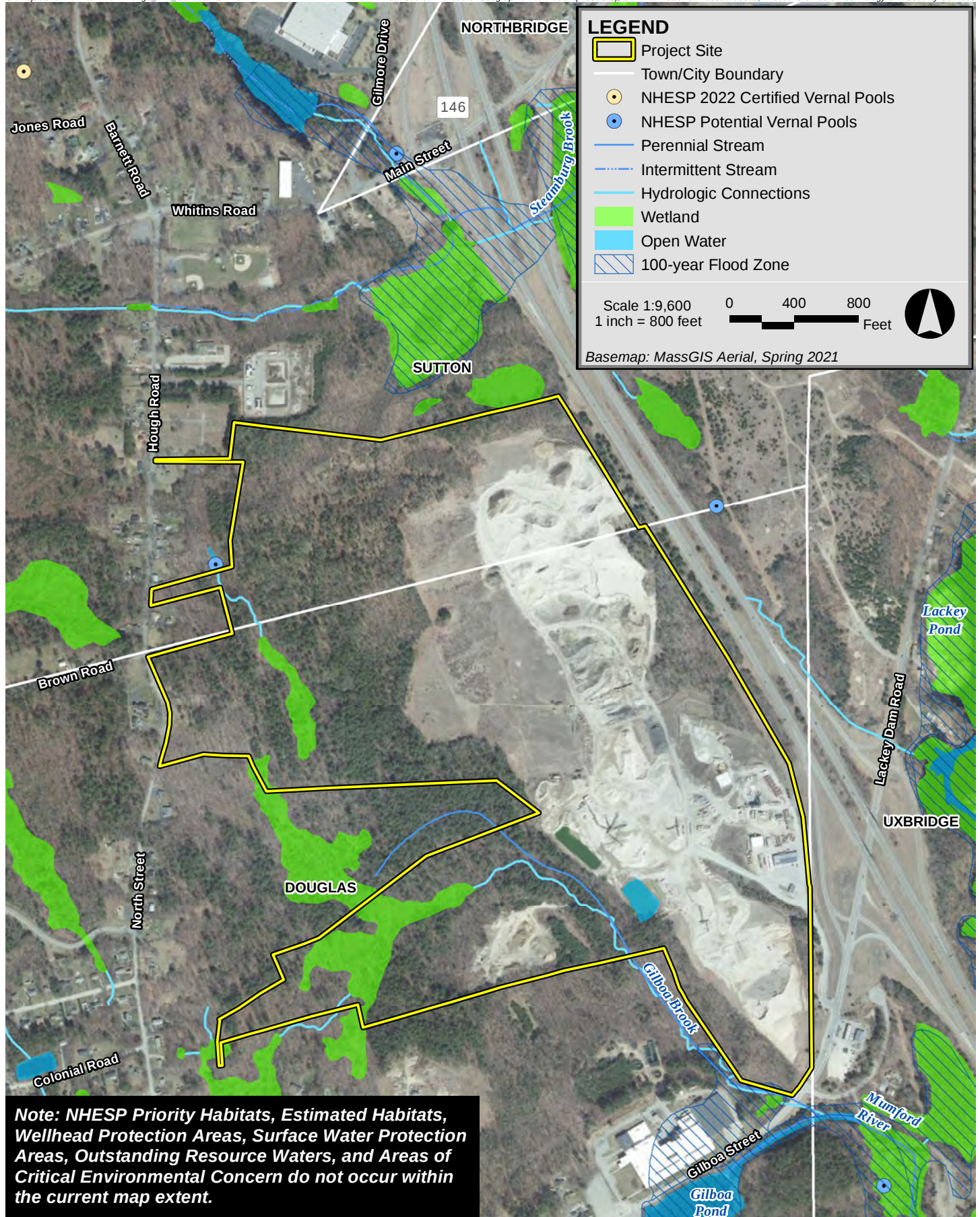
Figures



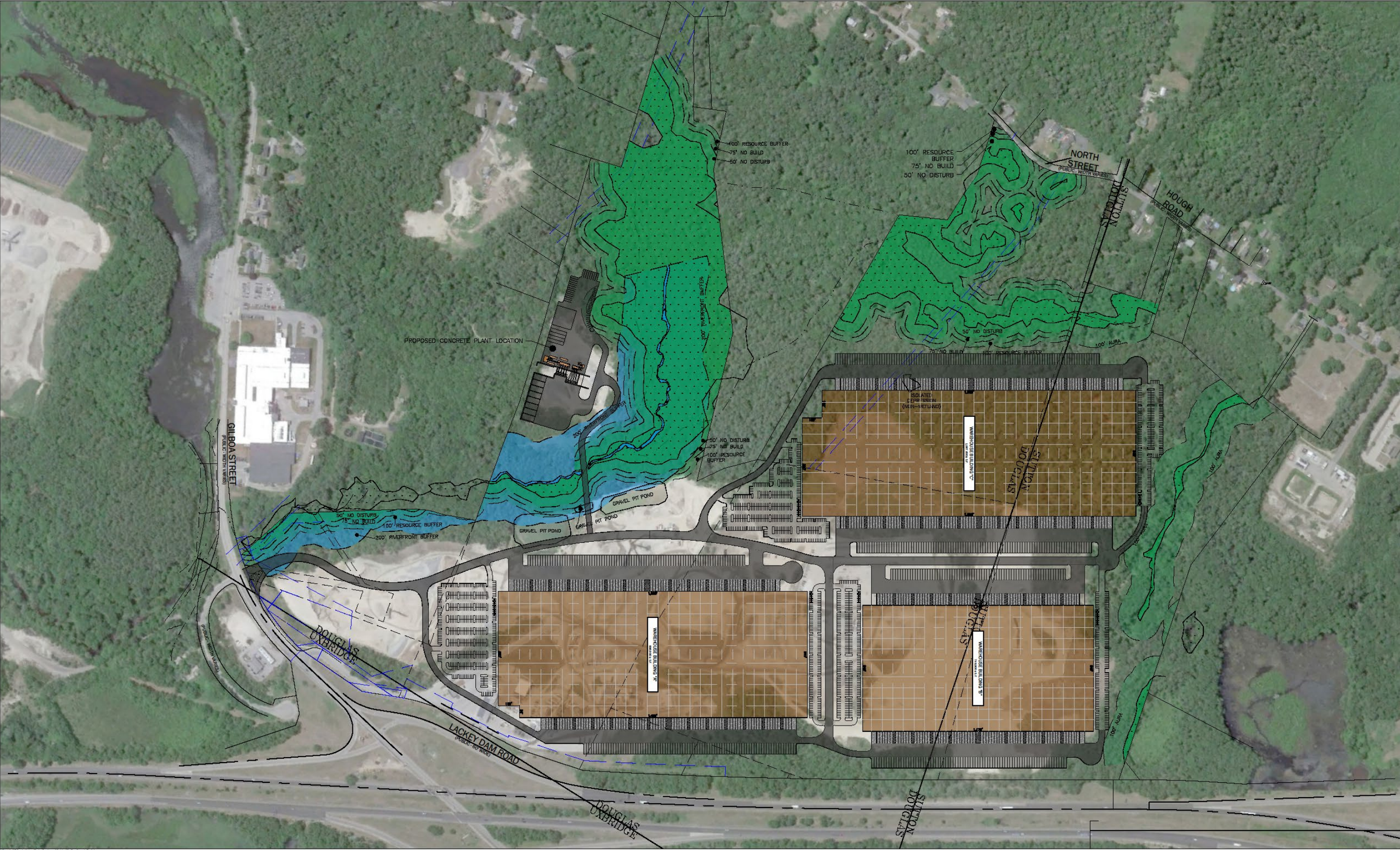
Beals CRG Warehouse Route 146 Douglas and Sutton, Massachusetts



Beals CRG Warehouse Route 146 Douglas and Sutton, Massachusetts



Beals CRG Warehouse Route 146 Douglas and Sutton, Massachusetts



1 Lackey Dam Road
Douglas, Massachusetts

BEALS ASSOCIATES INC.
2 PARK PLAZA SUITE 200 BOSTON, MA 02116
PHONE: 617-242-1120
PLANNING • ENGINEERING • PERMITTING • MANAGEMENT

0 100 200 400 SCALE: 1"=200'

Conceptual Concrete Plant
(Site Plan)

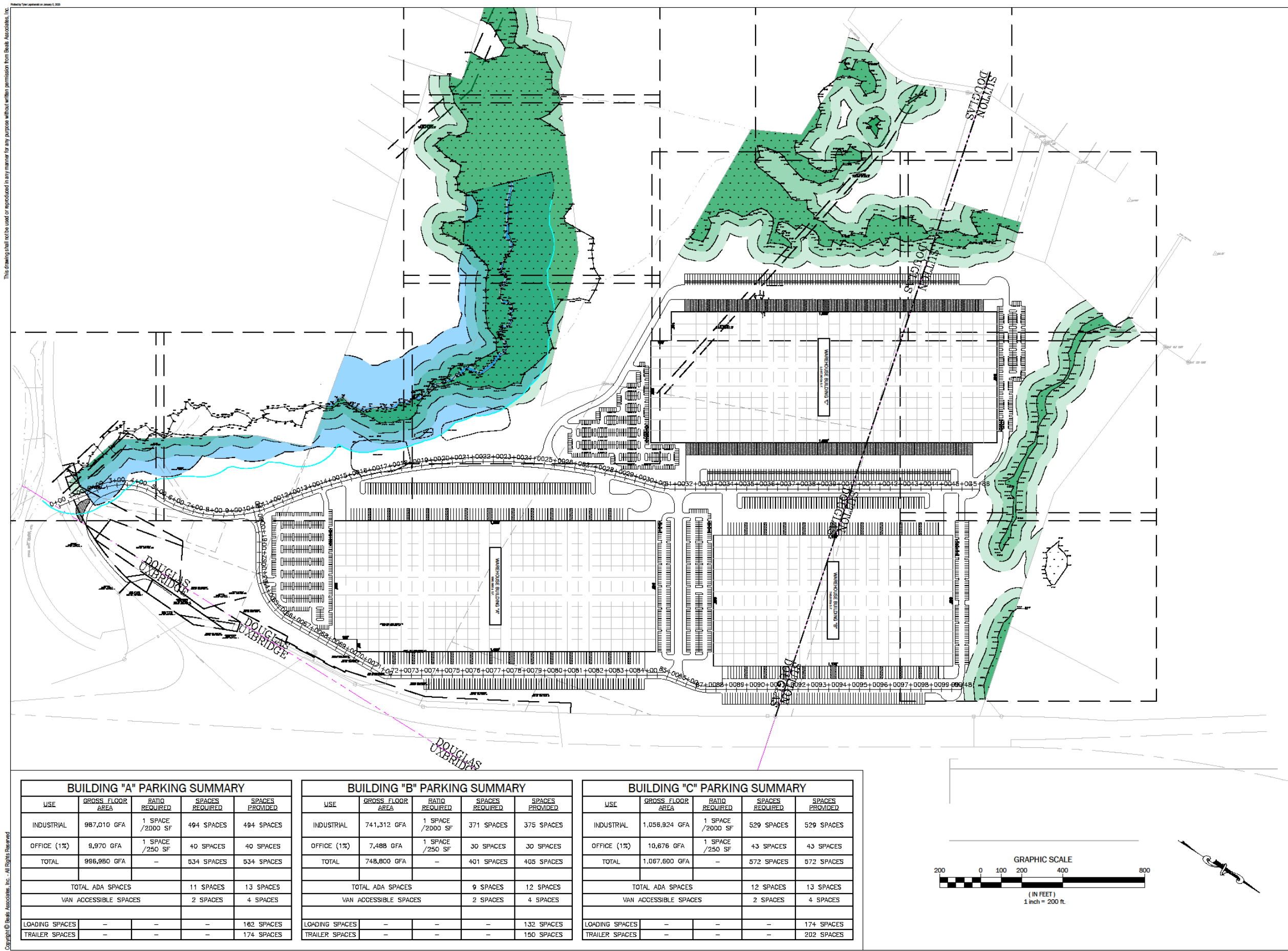
January, 2023

CRG Cubes @ Pyne Douglas, MA

Figure 4
Site Plans with Phase 1 Concrete Facility Relocation

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BEALS ASSOCIATES, INC.
2 PARK PLAZA SUITE 200 WESTON, MA 02156
PHONE: 617-262-1120
FAX: 617-262-1120
PLANNING ENGINEERING PERMITTING MANAGEMENT

Project Pyne
1 Lackey Dam Road
Douglas, MA

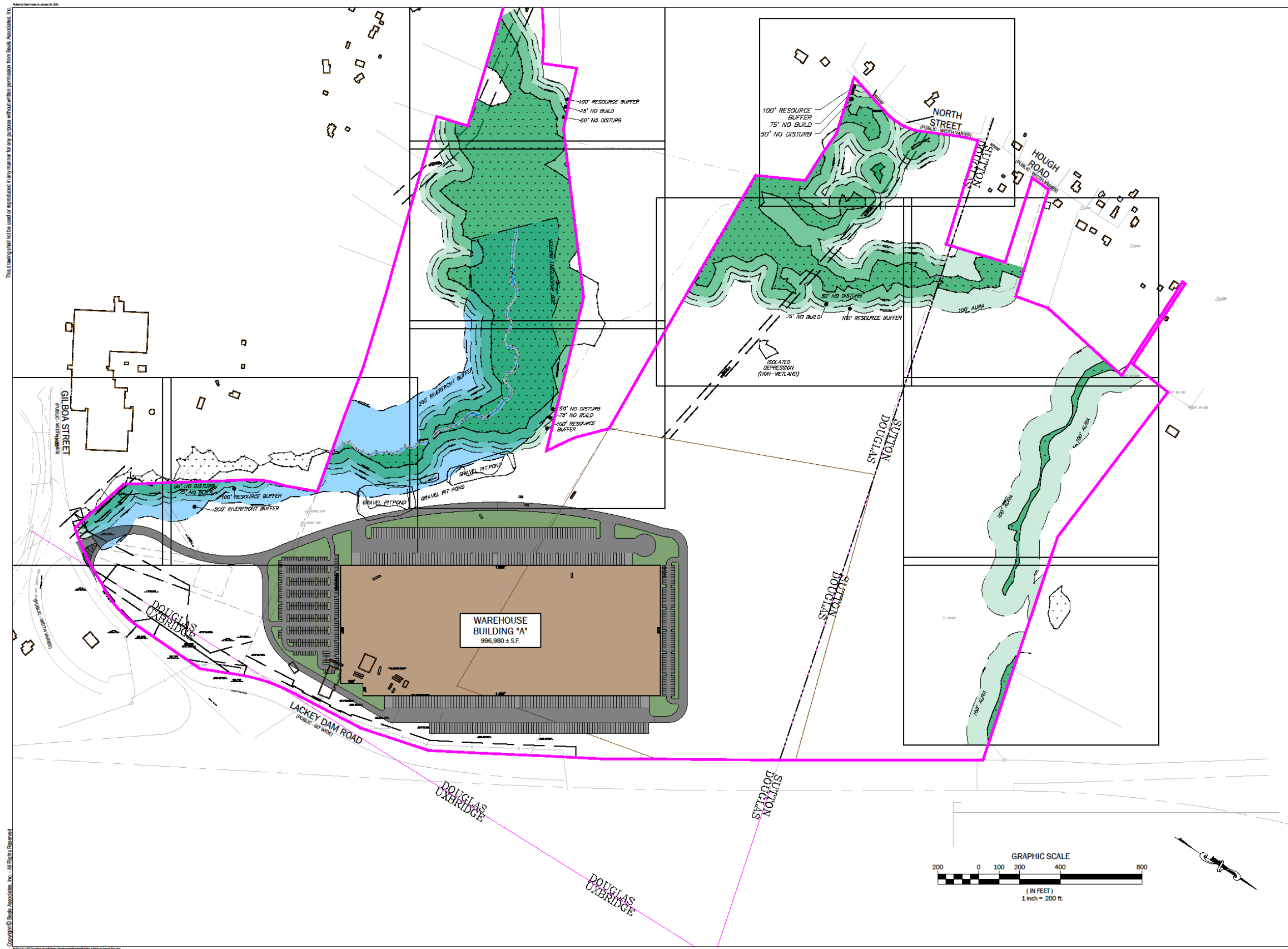
Not for Construction
Permit Documents

Designed by: TML | Checked by: TFM
Proj. No.: C-1267 | Issue Date: 12/15/22
Drawing Scale: 1"=200'

Sheet Title
OVERALL SITE LAYOUT

Sheet Number

C200



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BEALE ASSOCIATES, INC.
 2 PARK PLAZA, SUITE 200 WESTON, MA 02156
 PHONE: 617-262-1122 FAX: 617-262-1123
 PLANNING • ENGINEERING • PERMITTING • MANAGEMENT

INTEGRATED
 SOLUTIONS

Project Pyne
 1 Lackey Dam Road
 Douglas, MA

No.	Revision	Date

Not for Construction
Permit Documents

Designed by: DPH | Checked by: DPH
 Proj. No.: C-1267 | Issue Date: 1/24/23
 Drawing Scale: 1"=200'
 Sheet Title

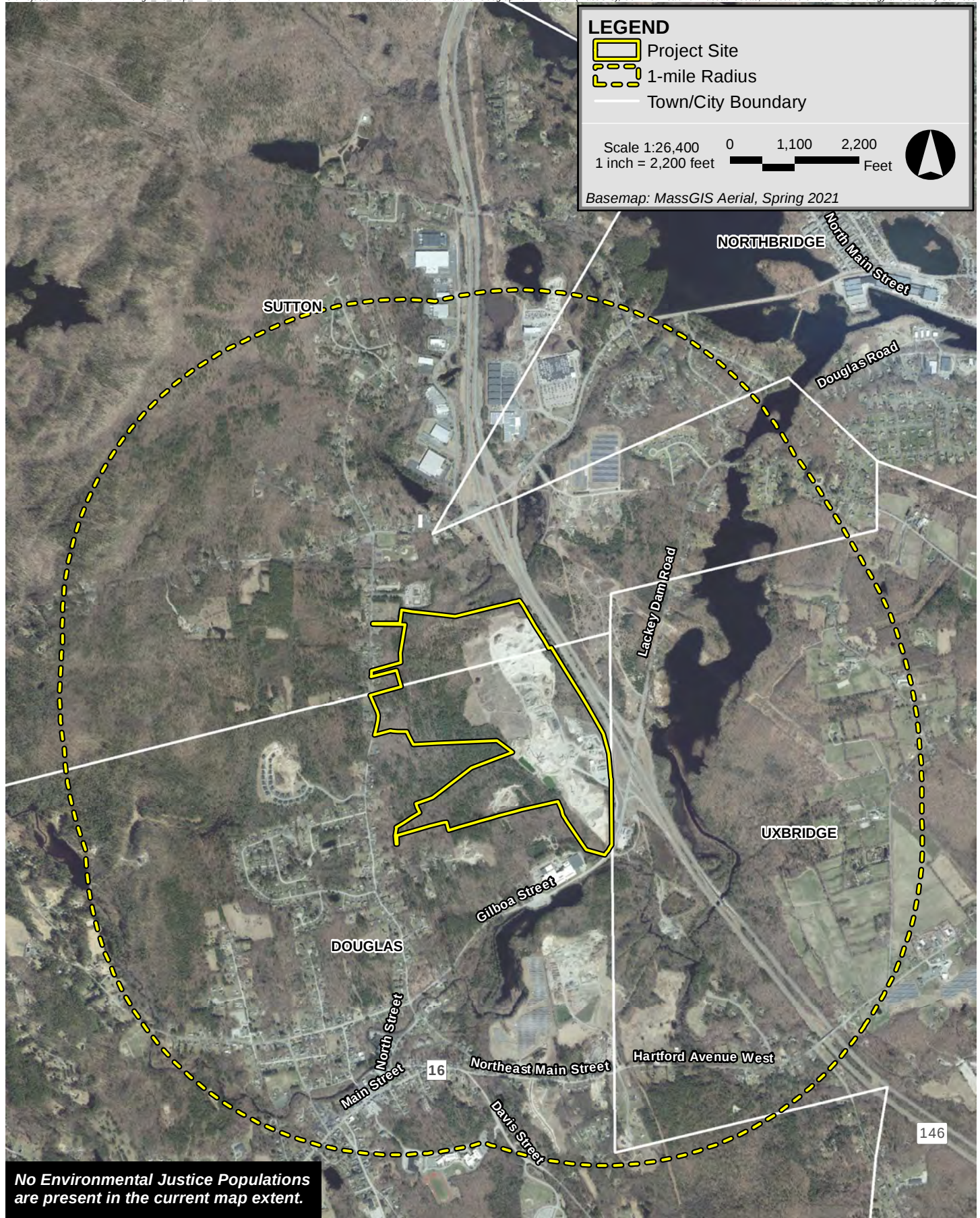
**BUILDING A
 REDUCED IMPACT
 PLAN**

Sheet Number

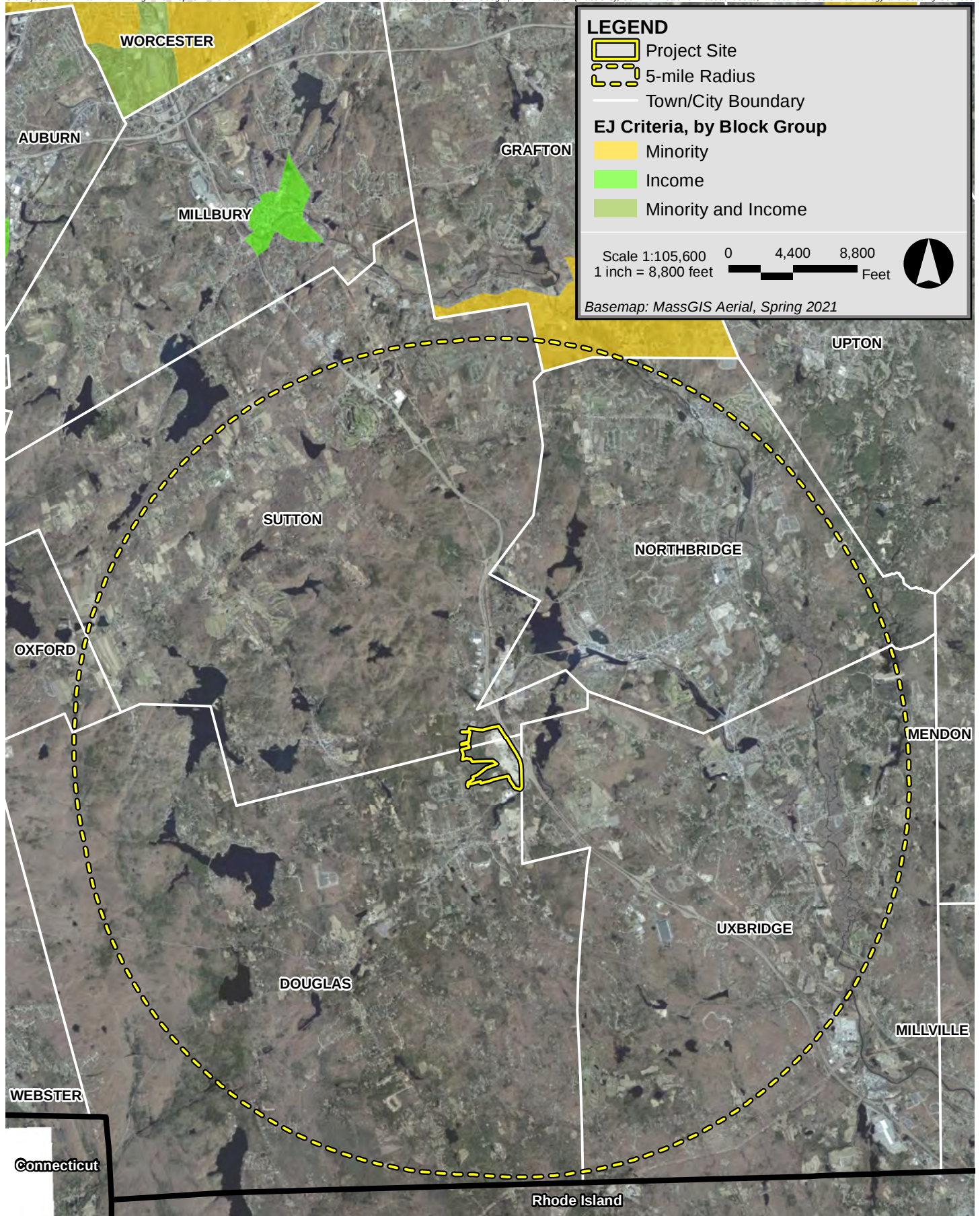
EX1.0

CRG Cubes @ Pyne Douglas, MA

Figure 8
 Reduced Build Alternative



Beals CRG Warehouse Route 146 Douglas and Sutton, Massachusetts



Beals CRG Warehouse Route 146 Douglas and Sutton, Massachusetts

Attachment 2-1

MEPA Circulation List

ATTACHMENT 2 CIRCULATION LIST

Rebecca Tepper
Executive Office of Energy and
Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114
MEPA@mass.gov

Department of Environmental Protection
Attn: Commissioner's Office/
MEPA Coordinator
One Winter Street
Boston, MA 02108
helena.boccadoro@mass.gov

Department of Environmental Protection
Central Regional Office
Attn: MEPA Coordinator
8 New Bond Street
Worcester, MA 01887
andrea.briggs@mass.gov

Massachusetts Department of Transportation
Public/Private Development Unit
10 Park Plaza, Suite 4150
Boston, MA 02116
MassDOTPPDU@dot.state.ma.us

Massachusetts Department of Transportation
District #3
Attn: MEPA Coordinator
499 Plantation Parkway
Worcester, MA 01605
jeffrey.r.gnomes@dot.state.ma.us

Massachusetts Historical Commission
The MA Archives Building
220 Morrissey Boulevard
Boston, MA 02125

Department of Conservation and Recreation
Attn: MEPA Coordinator
251 Causeway St. Suite 600
Boston, MA 02114
andy.blackman@mass.gov

MEPA Office
Attn: EEA EJ Director
100 Cambridge Street, Suite 900
Boston, MA 02144
MEPA-EJ@mass.gov

Natural Heritage and Endangered Species
Program (NHESP)
Division of Fisheries & Wildlife
1 Rabbit Hill Road
Westborough, MA 01581
Melany.cheeseman@mass.gov
Emily.holt@mass.gov

Energy Facilities Siting Board
Attn: MEPA Coordinator
100 Cambridge Street, 10th floor
Boston, MA 02114
Andrew.greene@mass.gov
Geneen.bartley@mass.gov

Department of Energy Resources
Attn: MEPA Coordinators
100 Cambridge Street, 10th floor
Boston, MA 02114
Paul.ormond@mass.gov

Central Massachusetts Regional Planning
Commission (CMRPC)
1 Mercantile St, Suite 520
Worcester, MA 01608
mepafiling@cmrpc.org

Douglas Planning Board
29 Depot Street
Douglas, MA 01516
mbenoit@douglas-ma.gov
jcouture@douglas-ma.gov

Douglas Conservation Commission
29 Depot Street
Douglas, MA 01516
szisk@douglas-ma.gov

Douglas Select Board
29 Depot Street
Douglas, MA 01516
kmorse@douglas-ma.gov

Douglas Board of Health
29 Depot Street
Douglas, MA 01516
jkessler@douglas-ma.gov

Sutton Planning Board
4 Uxbridge Road
Sutton, MA 01590
j.hager@town.sutton.ma.us

Sutton Conservation Commission
4 Uxbridge Road
Sutton, MA 01590
w.bien@town.sutton.ma.us

Sutton Select Board
4 Uxbridge Road
Sutton, MA 01590
d.jacques@town.sutton.ma.us

Sutton Board of Health
4 Uxbridge Road
Sutton, MA 01590
j.bater@town.sutton.ma.us

Sutton Town Manager
4 Uxbridge Road
Sutton, MA 01590
j.smith@town.sutton.ma.us

Attachment 2-2

EJ Distribution List

Statewide Environmental Justice Community Based Organizations					
First Name	Last Name	Title	Phone	Email	Affiliation
Julia	Blatt	Executive Director	(617) 714-4272	danielledolan@massriversalliance.org juliablatt@massriversalliance.org	Mass Rivers Alliance
Elvis	Mendez	Associate Director	508-505-6748	elvis@n2nma.org	Neighbor to Neighbor
Ben	Hellerstein	MA State Director	617-747-4368	ben@environmentmassachusetts.org	Environment Massachusetts
Claire	B.W. Muller	Movement Building Director	508 308-9261	claire@uumassaction.org	Unitarian Universalist Mass Action Network
Cindy	Luppi	New England Director	617-338-8131 x208	cluppi@cleanwater.org	Clean Water Action
Deb	Pasternak	Director, MA Chapter	617-423-5775	deb.pasternak@sierraclub.org	Sierra Club MA
Heather	Clish	Director of Conservation & Recreation Policy	(617) 523-0655	hclish@outdoors.org	Appalachian Mountain Club
Heidi	Ricci	Director of Policy	Not Provided	hricci@massaudubon.org	Mass Audubon
Kelly	Boling	MA & RI State Director	(617) 367-6200	kelly.boling@tpl.org	The Trust for Public Land
Kerry	Bowie	Board President	Not Provided	kerry@msaadapartners.com	Browning the GreenSpace
Nancy	Goodman	Vice President for Policy	Not Provided	ngoodman@environmentalleague.org	Environmental League of MA
Rob	Moir	Executive Director	Not Provided	rob@oceanriver.org	Ocean River Institute
Robb	Johnson	Executive Director	(978) 443-2233	robb@massland.org	Mass Land Trust Coalition
Staci	Rubin	Senior Attorney	617 350-0990	srubin@clf.org	Conservation Law Foundation
Sylvia	Broude	Executive Director	617 292-4821	sylvia@communityactionworks.org	Community Action Works

Indigenous Organizations					
First Name	Last Name	Title	Phone	Email	Affiliation
Alma	Gordon	President	Not Provided	tribalcouncil@chappaquiddickwampanoag.org	Chappaquiddick Tribe of the Wampanoag Nation
Cheryll	Toney Holley	Chair	774-317-9138	crwritings@aol.com	Nipmuc Nation (Hassanamisco Nipmucs)
John	Peters, Jr.	Executive Director	617-573-1292	john.peters@mass.gov	Massachusetts Commission on Indian Affairs (MCIA)
Kenneth	White	Council Chairman	508-347-7829	acw1213@verizon.net	Chaubunagungamaug Nipmuck Indian Council
Melissa	Ferretti	Chair	(508) 304-5023	melissa@herringpondtribe.org	Herring Pond Wampanoag Tribe
Patricia	D. Rocker	Council Chair	Not Provided	rockerpatriciad@verizon.net	Chappaquiddick Tribe of the Wampanoag Nation, Whale Clan
Raquel	Halsey	Executive Director	(617) 232-0343	rhalsey@naicob.org	North American Indian Center of Boston
Cora	Pierce	Not Provided	Not Provided	Coradot@yahoo.com	Pocasset Wampanoag Tribe
Elizabeth	Soloman	Not Provided	Not Provided	Solomon.Elizabeth@gmail.com	Massachusetts Tribe at Ponkapoag

Federally Recognized Tribes					
First	Last	Title	Phone	Email	Affiliation
Bettina	Washington	Tribal Historic Preservation Officer	508-560-9014	thpo@wampanoagtribe-nsn.gov	Wampanoag Tribe of Gay Head (Aquinnah)
Brian	Weeden	Chair	774-413-0520	Brian.Weeden@mwtribe-nsn.gov	Mashpee Wampanoag Tribe

Attachment 3

Anticipated List of Permits

ATTACHMENT 3 ANTICIPATED LIST OF PERMITS

This is a preliminary list of permits and approvals the Project will require. Other local permits that are not listed may be required. The Proponent will work with the Towns to ensure the necessary permits are acquired.

Agency	Permit / Approval
Local	
Douglas Conservation Commission	Order of Resource Area Delineation Order of Conditions
Douglas Planning Board	Site Plan Approval
Douglas Building Department	Building Permit
Sutton Planning Board	Site Plan Approval Special Permit
Sutton Conservation Commission	Order of Resource Area Delineation Order of Conditions
Sutton Building Department	Building Permit
State	
Executive Office of Energy and Environmental Affairs	Massachusetts Environmental Policy Act
Massachusetts Department of Transportation	Highway Access Permit
Federal	
Environmental Protection Agency	National Pollutant and Discharge Elimination System (NPDES) Construction General Permit (CGP) Multi-Sector General Permit – Sector P – Land Transportation and Warehousing

Attachment 4

RMAT Report

Climate Resilience Design Standards Tool Project Report

CRG Cubes @ Pyne

Date Created: 12/21/2022 12:42:05 PM

Created By: clyons

Date Report Generated: 1/16/2023 1:20:18 PM

Tool Version: Version 1.2

Project Contact Information: Christina Lyons (cl Lyons@epsilonassociates.com)

Project Summary

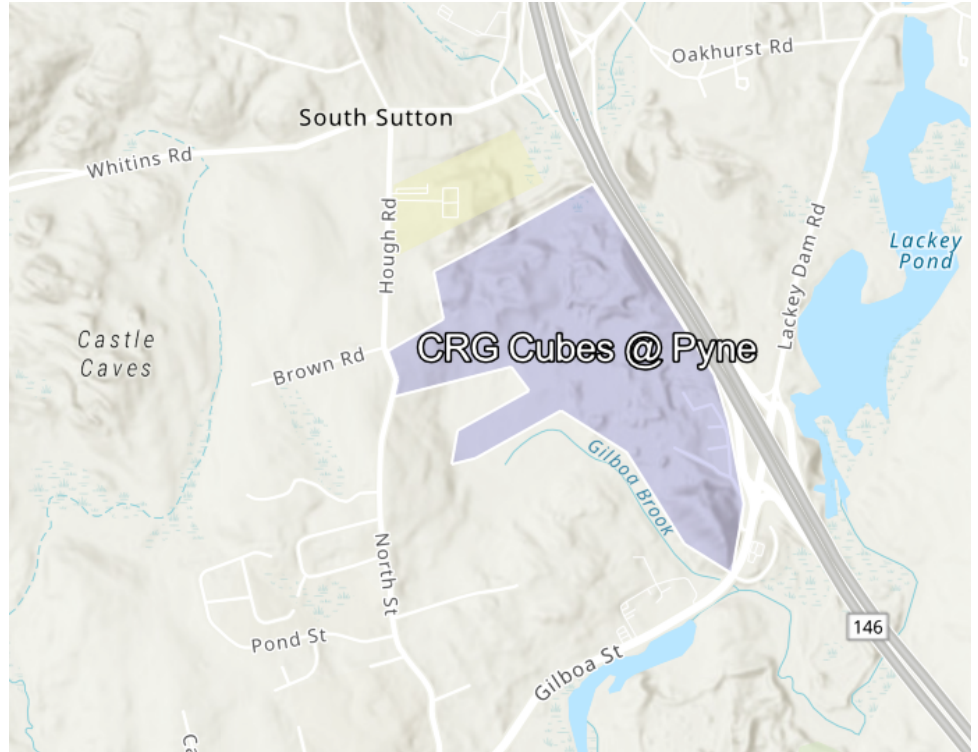
[Link to Project](#)

Estimated Capital Cost: \$500000000.00

End of Useful Life Year: 2049

Project within mapped Environmental Justice neighborhood: No

Ecosystem Service	Scores
Benefits	
Project Score	Low
Exposure	Scores
Sea Level Rise/Storm Surge	Not Exposed
Extreme Precipitation - Urban Flooding	High Exposure
Extreme Precipitation - Riverine Flooding	High Exposure
Extreme Heat	Moderate Exposure



Asset Preliminary Climate Risk Rating

Number of Assets: 1

Summary

Asset Risk	Sea Level Rise/Storm Surge	Extreme Precipitation - Urban Flooding	Extreme Precipitation - Riverine Flooding	Extreme Heat
Building A, B, C	Low Risk	High Risk	High Risk	Moderate Risk

Climate Resilience Design Standards Summary

	Target Planning Horizon	Intermediate Planning Horizon	Percentile	Return Period	Tier
Sea Level Rise/Storm Surge					
Building A, B, C					
Extreme Precipitation					
Building A, B, C	2050			10-yr (10%)	Tier 2
Extreme Heat					
Building A, B, C	2050		50th		Tier 2

Scoring Rationale - Project Exposure Score

The purpose of the Exposure Score output is to provide a preliminary assessment of whether the overall project site and subsequent assets are exposed to impacts of natural hazard events and/or future impacts of climate change. For each climate parameter, the Tool will calculate one of the following exposure ratings: Not Exposed, Low Exposure, Moderate Exposure, or High Exposure. The rationale behind the exposure rating is provided below.

Sea Level Rise/Storm Surge

This project received a "Not Exposed" because of the following:

- Not located within the predicted mean high water shoreline by 2030
- No historic coastal flooding at project site
- Not located within the Massachusetts Coast Flood Risk Model (MC-FRM)

Extreme Precipitation - Urban Flooding

This project received a "High Exposure" because of the following:

- Increased impervious area
- Maximum annual daily rainfall exceeds 10 inches within the overall project's useful life
- No historic flooding at project site
- Existing impervious area of the project site is less than 10%

Extreme Precipitation - Riverine Flooding

This project received a "High Exposure" because of the following:

- Part of the project is within a mapped FEMA floodplain, outside of the Massachusetts Coast Flood Risk Model (MC-FRM)
- Part of the project is within 500ft of a waterbody and less than 20ft above the waterbody
- No historic riverine flooding at project site
- Project is not likely susceptible to riverine erosion

Extreme Heat

This project received a "Moderate Exposure" because of the following:

- Increased impervious area
- Existing impervious area of the project site is less than 10%
- 10 to 30 day increase in days over 90 deg. F within project's useful life
- Located within 100 ft of existing water body
- No tree removal

Scoring Rationale - Asset Preliminary Climate Risk Rating

A Preliminary Climate Risk Rating is determined for each infrastructure and building asset by considering the overall project Exposure Score and responses to Step 4 questions provided by the user in the Tool. Natural Resource assets do not receive a risk rating. The following factors are what influenced the risk ratings for each asset.

Asset - Building A, B, C

Primary asset criticality factors influencing risk ratings for this asset:

- Asset can be inaccessible/inoperable more than a week after natural hazard event without consequences
- Less than 1,000 people would be directly affected by the loss/inoperability of the asset
- Inoperability of the asset would not be expected to result in injuries
- Cost to replace is between \$10 million and \$30 million
- There are no hazardous materials in the asset

Project Climate Resilience Design Standards Output

Climate Resilience Design Standards and Guidance are recommended for each asset and climate parameter. The Design Standards for each climate parameter include the following: recommended planning horizon (target and/or intermediate), recommended return period (Sea Level Rise/Storm Surge and Precipitation) or percentile (Heat), and a list of applicable design criteria that are likely to be affected by climate change. Some design criteria have numerical values associated with the recommended return period and planning horizon, while others have tiered methodologies with step-by-step instructions on how to estimate design values given the other recommended design standards.

Asset: Building A, B, C

Building/Facility

Sea Level Rise/Storm Surge

Low Risk

Applicable Design Criteria

Projected Tidal Datums: NOT APPLICABLE

Projected Water Surface Elevation: NOT APPLICABLE

Projected Wave Action Water Elevation: NOT APPLICABLE

Projected Wave Heights: NOT APPLICABLE

Projected Duration of Flooding: NOT APPLICABLE

Projected Design Flood Velocity: NOT APPLICABLE

Projected Scour & Erosion: NOT APPLICABLE

Extreme Precipitation

High Risk

Target Planning Horizon: 2050

Return Period: 10-yr (10%)

LIMITATIONS: The recommended Standards for Total Precipitation Depth & Peak Intensity are determined by the user drawn polygon and relationships as defined in the Supporting Documents. The projected Total Precipitation Depth values provided through the Tool are based on the climate projections developed by Cornell University as part of EEA's Massachusetts Climate and Hydrologic Risk Project, GIS-based data as of 10/15/21. For additional information on the methodology of these precipitation outputs, see Supporting Documents.

While Total Precipitation Depth & Peak Intensity for 24-hour Design Storms are useful to inform planning and design, it is recommended to also consider additional longer- and shorter-duration precipitation events and intensities in accordance with best practices. Longer-duration, lower-intensity storms allow time for infiltration and reduce the load on infrastructure over the duration of the storm. Shorter-duration, higher-intensity storms often have higher runoff volumes because the water does not have enough time to infiltrate infrastructure systems (e.g., catch basins) and may overflow or back up during such storms, resulting in flooding. In the Northeast, short-duration high intensity rain events are becoming more frequent, and there is often little early warning for these events, making it difficult to plan operationally. While the Tool does not provide recommended design standards for these scenarios, users should still consider both short- and long-duration precipitation events and how they may impact the asset.

The projected values, standards, and guidance provided within this Tool may be used to inform plans and designs, but they do not provide guarantees for future conditions or resilience. The projected values are not to be considered final or appropriate for construction documents without supporting engineering analyses. The guidance provided within this Tool is intended to be general and users are encouraged to do their own due diligence

Applicable Design Criteria

Tiered Methodology: Tier 2

Projected Total Precipitation Depth & Peak Intensity for 24-hr Design Storms: APPLICABLE

Asset Name	Recommended Planning Horizon	Recommended Return Period (Design Storm)	Projected 24-hr Total Precipitation Depth (inches)	Step-by-Step Methodology for Peak Intensity
Building A, B, C	2050	10-Year (10%)	6.3	Downloadable Methodology PDF

Projected Riverine Peak Discharge & Peak Flood Elevation: APPLICABLE

[Methodology to Estimate Projected Values](#) : Tier 2

Target Planning Horizon: 2050
Percentile: 50th Percentile

Applicable Design Criteria

Tiered Methodology: Tier 2

Projected Annual/Summer/Winter Average Temperatures: APPLICABLE
[Methodology to Estimate Projected Values](#) : Tier 2

Projected Heat Index: APPLICABLE
[Methodology to Estimate Projected Values](#) : Tier 2

Projected Growing Degree Days: NOT APPLICABLE

Projected Days Per Year With Max Temp > 95°F, >90°F, <32°F: APPLICABLE
[Methodology to Estimate Projected Values](#) : Tier 2

Projected Number of Heat Waves Per Year & Average Heat Wave Duration: APPLICABLE
[Methodology to Estimate Projected Values](#) : Tier 2

Projected Cooling Degree Days & Heating Degree Days (base = 65°F): APPLICABLE
[Methodology to Estimate Projected Values](#) : Tier 2

Project Inputs

Core Project Information

Name:	CRG Cubes @ Pyne
Given the expected useful life of the project, through what year do you estimate the project to last (i.e. before a major reconstruction/renovation)?	2049
Location of Project:	Douglas, Sutton, Uxbridge
Estimated Capital Cost:	\$500,000,000
Who is the Submitting Entity?	Private Other Epsilon Associates on behalf of Other Private company Christina Lyons (clyons@epsilonassociates.com)
Is this project being submitted as part of a state grant application?	No
Which grant program?	
What stage are you in your project lifecycle?	Design
Is climate resiliency a core objective of this project?	No
Is this project being submitted as part of the state capital planning process?	No
Is this project being submitted as part of a regulatory review process or permitting?	No
Brief Project Description:	The Project involves construction of three warehouses totaling approximately 2.8 million square feet. Parking for employees and trailers will be provided.
Project Submission Comments:	

Project Ecosystem Service Benefits

Factors Influencing Output

- ✓ Project improves water quality

Factors to Improve Output

- ✓ Incorporate nature-based solutions that may provide flood protection
- ✓ Incorporate nature-based solutions that may reduce storm damage
- ✓ Protect public water supply by reducing the risk of contamination, pollution, and/or runoff of surface and groundwater sources used for human consumption
- ✓ Incorporate strategies that reduce carbon emissions
- ✓ Incorporate green infrastructure or nature-based solutions that recharge groundwater
- ✓ Incorporate green infrastructure to filter stormwater
- ✓ Incorporate nature-based solutions that sequester carbon carbon
- ✓ Increase biodiversity, protect critical habitat for species, manage invasive populations, and/or provide connectivity to other habitats
- ✓ Preserve, enhance, and/or restore coastal shellfish habitats
- ✓ Incorporate vegetation that provides pollinator habitat
- ✓ Identify opportunities to remediate existing sources of pollution
- ✓ Provide opportunities for passive and/or active recreation through open space
- ✓ Increase plants, trees, and/or other vegetation to provide oxygen production
- ✓ Mitigate atmospheric greenhouse gas concentrations and other toxic air pollutants through nature-based solutions
- ✓ Identify opportunities to prevent pollutants from impacting ecosystems
- ✓ Incorporate education and/or protect cultural resources as part of your project

Is the primary purpose of this project ecological restoration?

No

Project Benefits

Provides flood protection through nature-based solutions	No
Reduces storm damage	No
Recharges groundwater	No
Protects public water supply	No
Filters stormwater using green infrastructure	No
Improves water quality	Yes
Promotes decarbonization	No
Enables carbon sequestration	No
Provides oxygen production	No
Improves air quality	No
Prevents pollution	No
Remediates existing sources of pollution	No
Protects fisheries, wildlife, and plant habitat	No
Protects land containing shellfish	No
Provides pollinator habitat	No
Provides recreation	No
Provides cultural resources/education	No

Project Climate Exposure

Is the primary purpose of this project ecological restoration?	No
--	----

Does the project site have a history of coastal flooding?	No
Does the project site have a history of flooding during extreme precipitation events (unrelated to water/sewer damages)?	No
Does the project site have a history of riverine flooding?	Unsure
Does the project result in a net increase in impervious area of the site?	Yes
Are existing trees being removed as part of the proposed project?	Unsure

Project Assets

Asset: Building A, B, C

Asset Type: Typically Occupied

Asset Sub-Type: Non-residential building (office, commercial, retail)

Construction Type: New Construction

Construction Year: 2024

Useful Life: 25

Identify the length of time the asset can be inaccessible/inoperable without significant consequences.

Building may be inaccessible/inoperable more than a week after natural hazard event without consequences

Identify the geographic area directly affected by permanent loss or significant inoperability of the building/facility.

Impacts limited to site only

Identify the population directly served that would be affected by the permanent loss of use or inoperability of the building/facility.

Less than 1,000 people

Identify if the building/facility provides services to populations that reside within Environmental Justice neighborhoods or climate vulnerable populations.

The building/facility does not provide services to populations that reside within Environmental Justice neighborhoods or climate vulnerable populations.

If the building/facility became inoperable for longer than acceptable in Question 1, how, if at all, would it be expected to impact people's health and safety?

Inoperability of the building/facility would not be expected to result in injuries

If there are hazardous materials in your building/facility, what are the extent of impacts related to spills/releases of these materials?

There are no hazardous materials in the building/facility

If the building/facility became inoperable for longer than acceptable in Question 1, what are the impacts on other facilities, assets, and/or infrastructure?

Minor – Inoperability will not likely affect other facilities, assets, or buildings

If this building/facility was damaged beyond repair, how much would it approximately cost to replace?

Between \$10 million and \$30 million

Is this a recreational facility which can be vacated during a natural hazard event?

No

If the building/facility became inoperable for longer than acceptable in Question 1, what are the public and/or social services impacts?

Many alternative programs and/or services are available to support the community

If the building/facility became inoperable for longer than acceptable in Question 1, what are the environmental impacts related to natural resources?

No impact on surrounding natural resources is expected

If the building/facility became inoperable for longer than acceptable in Question 1, what are the impacts to government services (i.e. the building is not able to serve or operate its intended users or function)?

Loss of building is not expected to reduce the ability to maintain government services.

If the building/facility became inoperable for longer than acceptable in Question 1, what are the impacts to loss of confidence in government (i.e. the building is not able to serve or operate its intended users or function)?

No Impact

Report Comments

N/A

Attachment 5

Environmental Justice

PROPOSED PROJECT: CRG CUBES @ PYNE, DOUGLAS & SUTTON – FACT SHEET

Proponent: CRG Services Management LLC.

Project Summary

CRG Services Management LLC proposes to build three warehouses on an approximately 255-acre site spanning from Douglas to Sutton (the “Project”). The Project Site (150 Gilboa Street, Douglas, MA) is located immediately west of Route-146, north of Gilboa Street (Douglas), east of North Street (Douglas) and Hough Road (Sutton), and south of Whitins Road (Sutton). The Project will be accessed via a new driveway off Gilboa Street with full a full perimeter road providing access around all buildings. The three warehouses will total approximately 2,815,000 sf and include approximately 515 loading docks and approximately 480 trailer and approximately 1,510 employee parking spaces.

The Project will also include the relocation of Dauphinais Concrete to a site approximately 1,700 feet west of its current location.

Project Benefits

The Project will provide additional jobs to residents in surrounding towns as well as significant new tax revenue for both Douglas and Sutton. Approximately 70% of the site will remain open with portions revegetated.

Ways to Participate and Learn More

Massachusetts Environmental Policy Act (MEPA)

- The Proponent plans on filing an Environmental Notification Form (“ENF”) for this project in early February 2023. This will initiate the State’s comprehensive environmental review of the Project. Once the ENF is filed, it will be noticed in the [Environmental Monitor](#) for review and comment. The ENF will include a description of the project and potential impacts. Copies of the ENF can be requested from Epsilon Associates:

Email: dhewett@epsilonassociates.com

Phone: 978-897-7100

- You are encouraged to submit comments on the ENF to MEPA via the [MEPA Public Comment Portal](#).
- Learn more about the MEPA process at:

If you would like to learn more about the Project or request a meeting with the Proponent, please contact Dave Hewett via the above email or phone.

Attachment 6

Phase I Waiver Request

ATTACHMENT 6 PHASE I WAIVER REQUEST

This section discusses how the proposed advance action of relocating the Dauphinais Concrete Inc. meets the standards in the MEPA Regulations for all waivers and specifically those for Phase I Waivers.

6.1 Standards for All Waivers

The MEPA Regulations at 301 CMR 11.11(1) include two standards that Waivers of all types must meet. The proposed relocation of the concrete plant meets these two standards. Specifically, the regulations state:

The Secretary may waive any provision or requirement in 301 CMR 11.00 not specifically required by MEPA and may impose appropriate and relevant conditions or restrictions, provided that the Secretary finds that strict compliance with the provision or requirement would:

(a) result in an undue hardship for the Proponent, unless based on delay in compliance by the Proponent; and

(b) not serve to avoid or minimize Damage to the Environment.

Each of these standards is addressed below.

6.1.1 *Delaying the Relocation of Dauphinais Concrete Would Result in an Undue Hardship for the Proponent*

As discussed in the ENF, the Project Site is currently occupied by Dauphinais Concrete Inc. As part the Proponent's agreement to purchase the site, the Proponent must relocate the concrete plant prior to construction of the warehouse. If the Proponent must wait until the completion of the MEPA process to undertake the relocation, it will add a significant amount of time to the Project's overall schedule. Given current economic conditions, delay will almost certainly result in increased development costs. Furthermore, the Proponent seeks to capitalize on market conditions and bring the warehouse online during a time of high demand. Further delay makes marketing the product more difficult and risks "missing the cycle" and causing long-term harm to the Project's operational revenue.

6.1.2 *Delaying the Relocation of Dauphinais Concrete Would Not Serve to Avoid or Minimize Damage to the Environment*

Undertaking the relocation of Dauphinais Concrete Inc earlier, via a Phase I Waiver, is not expected to change the design of the relocated facility or the proposed warehouse development. It will not result in any increase in impacts from construction or operation of either the concrete plant or the warehouse.

6.2 Standards for Phase I Waivers

In addition to the Standards for All Waivers, the MEPA Regulations present four additional standards specific to Phase I Waivers. The proposed relocation of Dauphinais Concrete meets these four standards. Specifically, the regulations state:

- (a) the potential environmental impacts of phase one, taken alone, are insignificant;*
- (b) ample and unconstrained infrastructure facilities and services exist to support phase one;*
- (c) the Project is severable, such that phase one does not require the implementation of any other future phase of the Project or restrict the means by which potential environmental impacts from any other phase of the Project may be avoided, minimized or mitigated; and*
- (d) the Agency Action on phase one will contain terms such as a condition or restriction in a Permit, contract or other relevant document approving or allowing the Agency Action, or other evidence satisfactory to the Secretary, so as to ensure due compliance with MEPA and 301 CMR 11.00 prior to Commencement of any other phase of the Project.*

Each of these standards is addressed below.

6.2.1 *The Environmental Impacts of Relocating Dauphinais Concrete are Insignificant*

As stated in the ENF, the proposed relocation of Dauphinais Concrete will result in relatively minor permanent impacts to riverfront area (RFA). Impacts to RFA are associated with construction of a precast concrete arch over Gilboa Brook for access to the new location of the concrete facility. Currently access over Gilboa Brook is provided via a 24-inch culvert and dirt road passing over the brook. Construction of the precast arch will improve conditions and meet Massachusetts Stream Crossing Standards.

The proposed relocation site is previously disturbed and mostly cleared of existing vegetation. Relocation of Dauphinais Concrete will not result in significant amounts of new tree clearing.

Operations of the concrete plant are not expected to be changed as a result of the relocation and impact areas such as air emissions and water use are expected to be unchanged from existing operations.

6.2.2 *There is Ample and Unconstrained Infrastructure and Services to Support Phase I*

Phase I is supported by a separate roadway that connects to Lackey Dam Road. Utilities will be extended across the new concrete plant site from the existing property using the proposed stream crossing roadway. There is adequate and separate infrastructure on the current property to support Dauphinais Concrete upon relocation. New utility mains will be installed, and the service connections transferred to the new mains when the future development is under construction.

6.2.3 *The Relocation of Dauphinais Concrete is Severable, i.e., it Does not Require that the Project be Built*

Relocation of the concrete plant is entirely severable from the construction of the warehouses. Its relocation does not require the warehouse project to move forward, nor will it affect the ultimate layout or design of the warehouse project; therefore, it will not in any way limit or restrict the potential means of mitigation for the warehouse project.

6.2.4 *The Proponent will Fully Comply with MEPA*

The Proponent is submitting this Phase I Waiver Request with an ENF and anticipates preparing a Draft and Final EIR for the Project. MEPA will necessarily need to be completed prior to the issuance of a MassDOT Access Permit for the Project. The Proponent looks forward to the review of the Project and intends to collaborate with the MEPA Office and other participating agencies to design and construct the Project with all practicable means to minimize damage to the environment.