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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
EXPANDED ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME	: Unified Parkway Industrial Development
PROJECT MUNICIPALITY	: Millbury and Sutton
PROJECT WATERSHED	: Blackstone
EEA NUMBER	: 16593
PROJECT PROPONENT	: UGPG RE Sutton LLC
DATE NOTICED IN MONITOR	: August 24, 2022

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I have reviewed the Expanded Environmental Notification Form (EENF) and hereby determine that this project **requires** a mandatory Environmental Impact Report (EIR). The project has requested that a Special Review Procedure (SRP) be established to allow for phased review of the project. I hereby grant the request to establish the SRP, which shall be issued within 30 days of issuance of this Certificate unless extended with consent of the Proponent. Issuance of the SRP is contingent on provision of supplemental greenhouse gas (GHG) analysis for review by the Department of Energy Resources (DOER) as described below. Upon issuance of the SRP, Phase 1 may proceed to permitting, and future phases will be reviewed in accordance with the terms of the SRP. Final mitigation commitments for Phase 1, as described herein, shall be incorporated into Section 61 findings for the Full Build project.

Project Description

The EENF describes a redevelopment project (the Full Build), located in the Town of Sutton and Millbury. The Full Build consists of the redevelopment of an approximately 448-acre

site, containing former gravel pits, into a warehouse and distribution center totaling up to 2.4 million gross-square-feet (gsf) (further discussed below). Phase 1, the focus of the EENF, consists of the construction of the first warehouse building, totaling approximately 343,200 square feet (sf) with 208 surface parking spaces (118 spaces for vehicle parking and 90 for trailer parking) and associated infrastructure, including a stormwater management system, water mains, and sewer mains. Phase 1 of the project will include the partial construction of a new internal access drive, referred to in the EENF as the "Unified Parkway." Only the section of Unified Parkway from Boston Road to the site access drive for Phase 1 will be constructed as part of this first phase.[1]

Project Site

The project site consists of approximately 448 acres of land bounded by Providence Road (Route 122A) and Providence Street to the north, Buttonwood Avenue to the east, Boston Road to the south, and Dudley Road to the west. The site is located predominantly in the Town of Sutton, with a portion of the site located in the Town of Millbury. As noted above, the site contains former gravel pits no longer in operation and multiple dirt roads associated with this former use. Portions of the project site are undeveloped and/or re-vegetated, most notably in the southeast corner and western edge of the site. Surrounding land uses are predominantly residential, with commercial uses along Providence Road and Boston Road. Located centrally within, but separate from, the project site is a Zone I Wellhead Protection Area (as designated by the Massachusetts Department of Environmental Protection (MassDEP)) associated with a public well owned and operated by the Wilkinsonville Water District (Water District). The project site contains mapped Zone II Wellhead Protection Area associated with this well. The Branch River lies northeast of the site; wetland resources on site include Bordering Vegetated Wetland (BVW) and Bank. The EENF indicates the Phase 1 site is not mapped within a Federal Emergency Management Agency (FEMA) floodplain; however, other portions of the site are.

The project site does not contain *Estimated and Priority Habitat of Rare Species* as delineated by the Natural Heritage and Endangered Species Program (NHESP) in the 15th Edition of the Massachusetts Natural Heritage Atlas or an Area of Critical Environmental Concern (ACEC). The project site contains historic resources listed in the Massachusetts Historical Commission's (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth, further discussed below. Several waterbodies within one-half mile of the project site are listed as impaired, specifically: Woodbury Pond, Girard Pond, Aldrich Pond, Marble Pond, and the Blackstone River. A Limited Removal Action (LRA) was performed at the site in September 2015, in accordance with the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000), to address a release of fuel oil to soil from a former underground storage tank (UST). The EENF states a Release Tracking Number (RTN) was not assigned to this release as fuel oil concentrations in soil were reduced below the applicable Reportable Concentrations within 120-days of identification of the release condition. Comments from MassDEP describe RTNs associated with disposal sites and/or release notifications located within or near the project site, further discussed below.

[1] The EENF indicated that the entirety of Unified Parkway will be constructed prior to construction beginning on Phase 1; however, the Proponent subsequently clarified that only the portion needed to serve the Phase 1 building will be constructed during this first phase, as described in an email sent from Lauren DeVoe (VHB) to Eva Vaughan (MEPA Office) on September 29, 2022.

The project site is not located within an Environmental Justice (EJ) population but is located within one mile of two EJ populations characterized by Income and Minority criteria, respectively. Additional EJ populations characterized by Minority; Income; Minority and Income; and Minority, Income, and English Isolation criteria are located within five miles of the project site. As described below, the EENF included a review of potential impacts of Phase 1 and benefits to EJ populations within one mile of the project site and described public involvement efforts undertaken to date. Additional outreach and analysis of impacts will be required as part of MEPA reviews of future phases, and are anticipated to extend over a five mile radius around the projects site.

Special Review Procedure

The Proponent has requested that an SRP be established to allow for phased review of the project. To that end, the EENF provided detailed analysis of Phase 1 only with a request that review of future phases proceed under the terms of the SRP. The Full Build project is anticipated to include up to 2.4 million gross sf of warehouse/distribution uses spread across three buildings, including the Phase 1 building, resulting in over 50 acres of land alteration, the generation of over 3,000 New average daily trips (adt), the creation of over 1,000 parking spaces, and over 100,000 gpd of water usage and wastewater generation (inclusive of Phase 1), although these impact estimates may change as the project is refined. The EENF states that the Phase 1 project is needed immediately to meet the Proponent's operational needs and to consolidate the Proponent's warehouse operations from across several locations; upon establishment of this central headquarters, the Proponent intends to expand operations and continue to develop the remainder of the project site. As described in the EENF, the Phase 1 portion of the project is at an advanced stage of design and has received all necessary local approvals, whereas the future development on the remaining lots comprising the project site (Lots 1 and 2) is either not imminent (Lot 2) or is unknown (Lot 1). Further, the EENF indicates that the consolidation of the Proponent's existing operations will result in an over 90 percent reduction in tractor-trailer miles traveled between the Proponent's other facilities (including the current headquarters in Sutton) and the Phase 1 project.

The Full Build will require a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT) due to the anticipated traffic impacts of the Full Build project on the Worcester Turnpike (Route 146), a state jurisdictional roadway. However, as confirmed in comments from MassDOT, the Phase 1 warehouse will have limited trip generation and will not require any traffic mitigation; thus, no Access Permit (nor any other Agency Action) is required for Phase 1 MassDOT therefore does not object to phased review of the project through an SRP, and agrees that Phase 1 may proceed to local permitting upon issuance of the SRP.

Based on the information in the SRP request and consultation with Agencies, I concur that a project specific procedure, as provided for in Section 11.09 of the MEPA regulations, is warranted for review of this project. The SRP will support advancement of the Phase 1 project while facilitating additional consideration of alternatives and measures to avoid, minimize, and mitigate environmental impacts for future phases at a later time. The development of Phase 1 will proceed in such a way that it is severable from the remainder of the project, in particular, through construction of any required infrastructure (such as Unified Parkway) only to the extent

required to support the Phase 1 warehouse. Phase 1 design shall not preclude the consideration of design alternatives for any future phase. Prior to commencement of any future phase of development, including any extension of Unified Parkway beyond the Phase 1 project, the Proponent will submit a Project Commencement Notice (PCN) in accordance with the forthcoming SRP to describe the potential impacts of the future phase(s) and provide updated reporting of the cumulative impacts of the Full-Build project. I will then retain discretion to require further review in the form of an EIR. As further discussed below, in light of outstanding issues pertaining to GHG emissions that remain after review of Phase 1, the SRP shall be issued within 30 days of this Certificate unless extended with consent of the Proponent, and shall be contingent on the provision of supplemental GHG information to DOER for review. Final mitigation measures for Phase 1 shall be incorporated into Section 61 Findings for the Full Build project, and shall be described in the final review document required for the future phase(s). No work on Phase 1 shall proceed until the SRP is issued. In the event the GHG information is not provided in sufficient time to allow for issuance of the SRP within 30 days of the issuance of this Certificate, the Proponent should submit a Notice of Project Change (NPC) for the Full Build project (inclusive of Phase 1) such that a scope for an EIR can be issued. In this instance, no work on Phase 1 should occur until MEPA review of the Full Build project has been completed.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the Phase 1 project include the alteration of 38.3 acres of land (including 7.9 acres of new alteration); the creation of approximately 20 acres of impervious surface; the generation of 480 New unadjusted adt (including 76 truck trips); 587 gallons per day (gpd) of water usage; the generation of 525 gpd of wastewater; and Greenhouse Gas (GHG) emissions and other air pollutants associated with the burning of fossil fuels for on-site energy use and transportation. Cumulative impacts of the Full Build project are currently estimated to include over 50 acres of land alteration, the generation of over 3,000 New adt, the creation of over 1,000 parking spaces, and over 100,000 gpd of water usage and wastewater generation (inclusive of Phase 1), although these impact estimates may change as the project is refined. More detailed information on future phases will be provided as part of future filings under the SRP.

Measures to avoid, minimize, and mitigate environmental impacts of Phase 1 include the use of a previously disturbed site; creation of a stormwater management system that has been designed to provide at least 80% removal of Total Suspended Solids (TSS) through the use of Best Management Practices (BMPs), including deep-sump hooded catch basins, forebays, and surface infiltration basins; removal of invasive species within the Phase 1 portion of the project site and restoration of degraded Buffer Zone to wetland resources; instillation of electric vehicle (EV) charging spaces and EV-ready spaces; use of sediment and erosion controls during construction; and contributions to science, technology, engineering, and mathematics (STEM) community education and transportation services for Sutton Senior Center.

Permitting and Jurisdiction

The project is undergoing MEPA review and is subject to preparation of a mandatory EIR because the project requires an Agency Action, and exceeds, at minimum, the MEPA review threshold at 11.03(1)(a)(2): the creation of ten or more acres of impervious surface, and is expected to additionally exceed the MEPA review thresholds at 11.03(1)(a)(1) and

11.03(6)(a)(6): the direct alteration of 50 or more acres of land, and the generation of 3,000 or more New adt on roadways providing access to a single location (respectively) at Full Build.

Phase 1 alone will result in the creation of ten or more acres of impervious area (20 acres), and also exceeds the ENF threshold at 301 CMR 11.03(1)(b)(2): creation of five or more acres of impervious area. As noted above, the Full Build project, but not Phase 1, requires a Vehicular Access Permit from MassDOT. The project is subject to the MEPA GHG Emissions Policy and Protocol.

Phase 1 received Site Plan Review and Approval, and Special Permits, from the Sutton Planning Board. The Sutton Conservation Commission issued an Order of Conditions for Unified Parkway on January 25, 2022 that was not appealed, and a separate Order of Conditions for Phase 1 and a portion of the Full Build Project was issued on July 8, 2022, which also was not appealed. Future phases may require an Order of Conditions from the Millbury Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions from MassDEP) as well as Site Plan Review and Special Permits from the Millbury Planning Board. The project requires a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the Environmental Protection Agency (EPA).

Because the Proponent is not seeking Financial Assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that are within the subject matter of required or potentially required State Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations.

Review of the EENF

The EENF provided a project description, an alternatives analysis, existing and proposed conditions plans, an estimate of environmental impacts, a transportation study, proposed mitigation measures, a draft SRP, and a GHG analysis for Phase 1. It identified measures to avoid, minimize and mitigate environmental and public health impacts. Consistent with the MEPA Interim Protocol on Climate Change Adaptation and Resiliency, the EENF contained an output report from the MA Climate Resilience Design Standards Tool prepared by the Resilient Massachusetts Action Team (RMAT) (the "MA Resilience Design Tool"),[2] together with information on climate resilience strategies to be undertaken by the project during Phase 1. It also included a description of measures taken to enhance public involvement by EJ populations and a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations in accordance with 301 CMR 11.07(6)(n)(1).

The Proponent provided additional information to the MEPA Office regarding GHG emissions on September 19, 2022, and regarding the stormwater system design, water quality measures, Zone I and II Wellhead Protection Areas, and for the proposed extent of Unified Parkway during the Phase 1 project on September 28 and 29, 2022. For purposes of clarity, all supplemental materials provided by the Proponent are included in references to the "EENF," unless otherwise indicated.

[2] https://resilientma.org/rmat_home/designstandards/

Comments from DOER note that the Phase 1 building has near-negligible stationary emissions mitigation when considering the required emissions reduction measures under the Stretch Code. As noted below, supplemental GHG analysis should be provided for review by DOER prior to issuance of the SRP. Comments from MassDEP express concern with the project's potential to impact water quality resources; as noted above, the Proponent provided clarification regarding water quality measures, and additional analysis is anticipated to be provided as part of future phases. Comments from MassDOT note that Phase 1 is anticipated to result in limited trip generation and associated traffic impacts.

Comments from several residents express concerns with the project's potential to impact water quality and traffic (more significantly, the potential for the Full Build project to impact traffic) and describe existing impacts from blasting that has occurred on site. Comments from several other residents express support for the project and note the benefits the project will bring to the community through job creation, financial contributions, and redevelopment of the site. The Proponent is directed to respond to comments related to the Full Build as part of future filings.

Alternatives Analysis

The EENF describes a No-Build Alternative, Build (As of Right) Alternative, and the Preferred Alternative for Phase 1. The EENF included a table comparing environmental impacts across the three alternatives, copied below:

Impact Category	No Build Alternative	Build Alternative	Preferred Alternative
Total Site Area (acres)	38	38	38
New Land Alteration (acres)	0	7.9	7.9
New Impervious Area (acres)	0	20.8	20.05
Water Usage (gpd)	0	35,376	587
Wastewater Generation (gpd)	0	32,160	525
New adt (unadjusted)	0	3,486	480
New Parking Spaces	0	1,737	208

The ENF describes the project goals as developing a warehouse facility in close proximity to the Proponent's existing main manufacturing plant and headquarters (located at 223 Worcester Providence Turnpike in Sutton) in order to meet growing business demands and reduce operational inefficiencies, while also redeveloping an underutilized and previously altered area in Sutton to drive job creation and increase tax revenue. In addition to the No-Build and Build (As of Right) Alternatives, the EENF states alternative locations were taken into consideration and analyzed by the Proponent but were deemed unable to meet the needs of the Proponent, either due to financial infeasibility or as they did not meet the requirements of the Proponent's operations.

As described in the EENF, the No-Build Alternative would leave in place previously disturbed land from an underutilized gravel pit no longer in operation, but would not result in new environmental impacts. The EENF states that the No Build Alternative would not meet project goals, and would increase the Proponent's transportation impacts elsewhere in the State by limiting the Proponent's ability to access a warehouse facility in close proximity to their headquarters in Sutton. The EENF states the No-Build Alternative would also eliminate the Proponent's ability to provide public benefits from the development of the Phase 1 Project including increased tax revenue and creation of new jobs. The EENF states, for these reasons, the No Build Alternative was no considered viable.

The Build (As of Right) Alternative represents an alternative use for the Phase 1 area allowed by right under the Sutton Zoning Bylaw, which would consist of an approximately 428,800 sf commercial office building supported by over 1,700 parking spaces, to meet the minimum parking requirements under the local zoning bylaw for office uses. The EENF indicates the Build Alternative would not meet the project goal of fulfilling the Proponent's immediate business needs of increasing warehousing space and operational efficiency, and (as shown in the table above) would result in significantly more water usage, wastewater generation, and traffic impacts, as compared to the Preferred Alternative, and so it was dismissed. The EENF indicates the Preferred Alternative (described herein) was selected as it meets project goals, results in fewer environmental impacts as compared to the Preferred Alternative, and will enhance and improve efficiencies in the Proponent's operations while providing benefits to the Town of Sutton through job creation, increased tax revenue and other community benefits (further described below).

Environmental Justice

As noted above, while the project site is not located within an EJ population, it is located within one mile of two EJ populations characterized by Income and (separately) Minority criteria. Additional EJ populations characterized by Minority; Income; Minority and Income; and Minority, Income, and English Isolation criteria are located within five miles of the project site. Within the census tracts containing the above EJ populations within 5 miles of the project site, Spanish is identified as spoken by 5% or more of residents who also identify as not speaking English very well; there are no languages spoken by 5% or more of residents who also identify as not speaking English very well within 1 mile of the project site. While the EJ analysis included in the EENF focuses on populations within 1 mile of the project site due to the impacts associated with Phase 1, to promote public involvement during MEPA review of the EENF, the Proponent offered Spanish interpretation services during the remote consultation session (held on September 9, 2022); however, no requests for interpretation were received.

Effective January 1, 2022, all new projects in "Designated Geographic Areas" ("DGA," as defined in 301 CMR 11.02, as amended) around EJ populations are subject to new requirements imposed by Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* (the "Climate Roadmap Act") and amended MEPA regulations at 301 CMR 11.00.[3] Two related MEPA protocols – the MEPA Public Involvement Protocol for Environmental Justice Populations (the "MEPA EJ Public Involvement Protocol") and MEPA Interim Protocol for Analysis of project Impacts on Environmental Justice Populations (the "MEPA Interim Protocol for Analysis of EJ Impacts") – are also in effect for new projects filed on or after January 1, 2022.[4] Under the new regulations and protocols, all

projects located in a DGA around one or more EJ populations must take steps to enhance public involvement opportunities for EJ populations, and must submit analysis of impacts to such EJ populations in the form of an EIR.

The EENF indicates that the DGA for the Full Build project is expected to be 5 miles due to impacts from truck trips (i.e., greater than 150 New adt of diesel vehicle traffic); however, the EENF focuses on impacts within 1 mile of the project site as Phase 1 is expected to result in only 76 truck trips on an average weekday. The EENF described public involvement activities conducted prior to filing, including a neighborhood meeting that was held on May 25, 2022 to provide an overview and update for any member of the public. The EENF states the Proponent is committed to hosting more open gatherings as development progresses so that members of the public have the opportunity to learn and comment on each phase of development. In addition, the Proponent has created a project specific website to communicate project updates at key milestones.[3] The Proponent provided Advance Notification under Part II of the MEPA EJ Public Involvement Protocol through the distribution of an EJ Screening Form, which was provided in both English and Spanish, to a list of community-based organizations (CBOs) and tribes/indigenous organizations provided by the MEPA Office (the "EJ Reference List"). The EENF states the Proponent will continue to meet with key stakeholders and community groups in an effort to ensure an inclusive process and to effectively reach EJ populations. The Proponent will continue to use the EJ Reference List to disseminate information during future MEPA review that will follow the procedures set forth in the SRP.

The EENF contained a baseline assessment of any existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations in accordance with 301 CMR 11.07(6)(n)(1) and the MEPA Interim Protocol for Analysis of EJ Impacts. According to the EENF, the data surveyed show some indication of an existing "unfair or inequitable" burden impacting the identified EJ populations. Specifically, the EENF notes that the DPH EJ Tool identifies the Town of Northbridge as a municipality in which the identified EJ populations within the 1-mile DGA are located as exhibiting "vulnerable health EJ criteria"; this term is defined in the DPH EJ Tool to include any one of four environmentally related health indicators that are measured to be 110% above statewide rates based on a five-year rolling average, in this case, Low Birth Weight. The EENF notes that, despite the Town of Northbridge exhibiting vulnerable health EJ criteria, no census tract within 5 miles of the project site exhibits any vulnerable health EJ criteria for any parameter. In addition, the EENF indicates that the following sources of potential pollution exist within the identified EJ populations within 1 mile of the project site, based on the mapping layers available in the DPH EJ Tool:

- Major air and waste facilities: 5
- "Tier II" Toxics Release Inventory Site: 3
- MassDEP sites with AULs: 3
- MassDEP public water suppliers: 1
- Underground storage tanks: 2

[3] The project website can be accessed here: https://unified2parkwayproject.wordpress.com/

The EENF asserts that Phase 1 will not result in disproportionate adverse effects, or increase the risks of climate change, on the EJ populations by materially exacerbating any existing environmental burdens. The project will provide a robust stormwater management system to address impacts associated with the increased impervious surface on site, employ water quality measures, and enable a significant reduction in mobile source emission in the project area through consolidation of the Proponent's existing warehouse operations. Phase 1 will add a modest number (76) of truck trips, and the EENF indicates that none of the roadways affected by project-generated traffic extend through the identified EJ populations within the 1-mile DGA. As discussed in the Climate Change section below, the project has been designed to include sustainable building design measures and the stormwater management system has been designed such that post-development peak rates of runoff are below pre-development conditions.

The EENF states that potential long-term environmental or public health impacts to EJ populations are primarily limited to transportation impacts associated with the Full Build. The EENF states that measures to reduce vehicular traffic and associated air emissions will be comprehensively evaluated through review of the Full Build, such as site access and roadway improvements, implementation of a Transportation Demand Management (TDM) program, and EV-parking. The EENF states that the Phase 1 project will protect water resources by properly managing any adverse effects of increased stormwater runoff and promoting groundwater recharge to protect surface and groundwater drinking supplies. The EENF described a variety of public benefits associated with the Full Build project; specific to Phase 1, the Proponent will contribute $100,000 toward Boston Road/Providence Road (local roadway) intersection improvements, $100,000 towards STEM education, and $60,000 to the Council of Aging for a new transportation vehicle for the Sutton Senior Center.

Land Alteration / Stormwater

As described in the EENF, the 38.3-acre Phase 1 project site is comprised of areas that were part of the gravel removal operation. The project will result in the creation of approximately 20 acres of impervious surface and require the alteration of 7.9 acres of land. On-site elevations range from approximately 560 feet in the western portion of the project site to approximately 358 feet adjacent to Providence Road (which bounds the site to the east). Comments from residents note that the high elevations along Boston Road (in the south of the project site, adjacent to the Phase 1 project area) and associated vegetation act as visual and noise barrier to site operations; I encourage the Proponent to retain these functions of the project site to the maximum extent feasible.

As described in the EENF, a vast majority of Phase 1 has been designed to drain to deep-sump, hooded catch basins. The remaining perimeter areas, which consist mostly of landscaped pervious areas, will drain to temporary swales and basins for management of stormwater runoff until the construction of future phases when the runoff will be directed to permanent stormwater BMPs. Comments from the Sutton Planning Board note that, as part of the local approval process, the Proponent committed to the use proprietary stormwater units that will provide an increased level of filtration in addition to the use of bio-swales. The EENF states catch basins will capture and convey stormwater runoff, via an underground pipe system, to a proposed underground infiltration basin or one of two surface infiltration basins. Pretreatment of stormwater runoff will be provided by a combination of the deep-sump, hooded catch basins, forebays and isolator rows prior to discharge into the proposed infiltration basins; rooftop runoff

has been designed to flow to the basins as well. The EENF states the stormwater management system has been designed such that post-development peak rates of runoff are below pre-development conditions for the current 2-, 10-, 25- and 100-year storm events, further discussed below. While the Phase 1 project is not considered to be a Land Use with Higher Potential Pollutant Loads (LUHPPL), the stormwater system has been designed to provide a minimum 44% TSS removal prior to stormwater entering infiltration basins; and at least 80% removal of TSS prior to infiltration. The EENF states that the stormwater improvements will increase the volume of water directed toward the Zone 1 WPA, at the Water District's request, and as such will provide an environmental benefit to the surrounding communities by increasing the amount of recharge of groundwater sources.

Comments from MassDEP state that it does not consider redirection of water from the increased impervious surfaces to the area around the well as an environmental benefit, as water from the impervious surfaces may carry contaminants such as oil, vehicle fluids, and salt, and will be warmer after contact with the impervious surfaces. MassDEP indicates that the amount of recharge will not change as a result of Phase 1, water that currently recharges through natural processes, that would otherwise potentially runoff outside of the wellhead area following the construction of impervious surface, will just be redirected toward the drinking water source instead. Comments submitted by abutters also note concern with the project's potential impacts to public drinking water. In response to MassDEP requests for clarification, the EENF states that except for a small portion of the driveway entrance at Unified Parkway, the entire Phase 1 component is outside of the Zone II WPA and no part of the project is located within the Zone I WPA. The Proponent has committed to installing four monitoring wells in locations across the site as determined by the Water District so they can monitor water quality long term, which will be installed on October 25 and 26, 2022. As noted, the redirection of stormwater to the Zone I WPA is at the request of the Water District, and has been approved by a local Order of Conditions that was not appealed. I encourage the Proponent to continue to consult with MassDEP and local officials to determine whether any design changes are warranted in light of potential water quality impacts.

The Proponent has filed an Operations and Maintenance (O&M) Plan with the Town of Sutton that identifies areas where de-icing and fertilizer use is restricted in order to mitigate any runoff to the Zone II, and ultimately Zone I, WPA. The stormwater system has also been designed to include emergency shutoff valves that would be used in the event of a hazardous material spill. When closed, runoff and or hazardous material within the drainage catch basins, manholes or pipes would be contained, isolated and not allowed to discharge to the infiltration areas which are tributary to Zone II area. The liquid within the drainage system would then be removed as direct by the public safety officials (e.g., MassDEP, Sutton Fire Department, Sutton Board of Health, etc.) following their response to the spill. Comments from MassDEP note that per- and polyfluoroalkylated substances (PFAS) have been detected below the current Massachusetts Drinking Water standards in the Hatchery Road Well (the Water District's well, located interior to the project site). The project should be designed so as to not affect the ability of the Wilkinsonville Water District to install treatment for PFAS if necessary in the future.

Water / Wastewater

As noted above, the EENF indicates the Phase 1 project will generate 587 gpd of water usage and 525 gpd of wastewater. The project will construct 0.20 miles of water main to connect to an existing main in Boston Road and construct 0.01 miles of sewer main to connect to an existing sewer main in Providence Road. Wastewater generation, and in part, water demand was calculated based on the number of employees associated with the Phase 1 building on a daily basis (35). The EENF states that, in order to reduce water usage, the Phase 1 project will incorporate low-flow toilets as well as a drip irrigation system for on-site landscaping and plantings. Comments from MassDEP note that the water usage estimation appears to be low given the project includes irrigation, and as the EENF indicates the Phase 1 warehouse will include the use of water-cooled chillers. MassDEP notes that the Water District has a Water Management Act (WMA) permitted withdrawal rate of 0.29 million gallons per day (gpd), and only has the capacity to support Phase 1 of the project at this rate. Any additional build out of the project will require additional capacity by the Wilkinsonville Water District and every effort by the Proponent to support its efforts would be necessary (as stated by MassDEP), and should be provided. Full analysis of water capacity should be provided as part of future filings.

Traffic/Transportation

The project proposes construct 208 parking spaces and generate 480 New unadjusted adt, 76 of which are truck trips. The EENF included a Transportation Impact Assessment (TIA) for the Phase 1 project that evaluated the existing traffic conditions in the project area, the project's anticipated traffic impacts, and proposed mitigation measures. As described in the TIA, the Phase 1 project is expected to have a minimal effect on the surrounding roadway network and will not trigger traffic improvements on roadways and at intersections under the control of MassDOT. As noted above, the Proponent has committed to a $100,00 contribution toward Boston Road/Providence Road (local roadway) intersection improvements. The Full Build project is anticipated to require a Vehicular Access Permit from MassDOT; however, as stated in comments from MassDOT no Access Permit is required for Phase 1 given the limited trip generation and associated traffic impacts that are anticipated. However, the EENF included a transportation study prepared in general conformance with the current MassDOT/EOEEA *Transportation Impact Assessment (TIA) Guidelines*. I refer the Proponent to comments from MassDOT, which include a preliminary scope for the TIA that will be required in MEPA filings for future phases of the project.

Trip Generation

The EENF states that the trip generation for the proposed project was based on standard Institute of Transportation Engineers (ITE) trip rates published in ITE's *Trip Generation Manual*, 10th Edition. Trip generation was calculated using the ITE Land Use Code (LUC) 154: High Cube and Short-Term Storage Warehouses. Accordingly, the Phase 1 project is expected to generate a total of 480 average weekday vehicle trips, with 45 trips during the morning peak hour and 58 during the evening peak hour. This daily trip generation is anticipated to include 76 average weekday truck trips, including 4 during the morning peak hour and 7 during the evening peak hour.

Study Area

As described in the EENF, the TIA evaluated intersections based on the traffic characteristics of the proposed uses and the surrounding transportation network. Comments from MassDOT note that, given the limited trip generation and associated traffic impacts anticipated to result from the development of the Phase 1 warehouse, the proposed study is appropriate for the analysis of Phase 1 project impacts; however, the Proponent will be required to expand the scope of analysis for future phases of the Full Build project. The study area for the Phase 1 project includes the following intersections:

- Route 146 at Boston Road
- Boston Road at Dudley Road/Pleasant Valley Road
- Boston Road at Galaxy Pass
- Providence Road (Route 122A) at Boston Road
- Boston Road at Unified Parkway (Build conditions only)
- Providence Road (Route 122A) at Unified Parkway (Build conditions only)

Capacity Analysis

The TIA includes analysis of area intersections under 2022 Existing Conditions, 2029 No-Build Conditions, and 2029 Future Build Conditions. As noted in the EENF and in comments from MassDOT, no intersection within the study area is anticipated to experience a decline in overall Level of Service (LOS) as a result of the project.

Safety

The TIA includes a summary of crash rates derived from the MassDOT crash portal for the five-year period between 2015 and 2019. The intersection of Boston Road and Route 146 represents a crash cluster, with 1.03 crashes per million vehicles as compared to the District 3 average of 0.89 crashes per million vehicles at signalized intersections. Comments from MassDOT state that this intersection has additionally been identified as an 2017-2019 HSIP-eligible crash cluster by MassDOT and one of the "Top 200" crash clusters in the same period. The EENF states the Proponent is currently in the process of coordinating with the MassDOT Safety Section staff as well as Town staff to schedule a Road Safety Audit (RSA) for the intersection. The EENF states the RSA is expected to be completed prior to the filing of the TIA for the Full Build project.

Site Access Improvements

As noted above, while Unified Parkway is proposed to connect from Boston Road to Providence Road as part of the Full Build project, only the section of Unified Parkway from Boston Road to the site access drive for Phase 1 will be constructed as part of this first phase. Unified Parkway is anticipated to intersect with Boston Road under STOP-sign control for the purpose of analysis under Phase 1.

Parking

As described above, the project proposes to construct 208 surface parking spaces, consisting of 118 spaces for vehicle parking and 90 for trailer parking. Comments from MassDEP note that the number of vehicle parking spaces appears high as compared to the number of employees (35). I encourage the Proponent to minimize the creation of parking spaces (and in turn, impervious surface creation).

Transportation Demand Management (TDM)

The EENF states the Proponent will implement a comprehensive TDM program to reduce mobile source GHG emissions relative to the baseline, including installing ten EV charging stations with the remainder of parking spaces being EV-ready. Additional details regarding the TDM program were not included in the EENF. As noted above, Phase 1 will allow the Proponent to consolidate operations resulting in a significant reduction in tractor-trailer miles traveled.

Climate Change

Governor Baker's Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth was issued on September 16, 2016. The Order recognizes the serious threat presented by climate change and direct Executive Branch agencies to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts. The urgent need to address climate change was again recognized by Governor Baker and the Massachusetts Legislature with the recent passage of St. 2021, c. 8, An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy, which sets a goal of Net Zero emissions by 2050. I note that the MEPA statute directs all Agencies to consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise, when issuing permits, licenses and other administrative approvals and decisions. M.G.L. c. 30, § 61.

Adaptation and Resiliency

Effective October 1, 2021, all MEPA projects are required to submit an output report from the MA Resilience Design Tool to assess the climate risks of the project. Based on the output report attached to the ENF, the Phase 1 project has a "High" exposure rating based on the project's location for the following climate parameters: extreme precipitation (urban flooding), extreme precipitation (riverine flooding), and extreme heat. Based on the 50-year useful life identified for the Phase 1 project and the self-assessed criticality of the building, the MA Resilience Design Tool recommends a planning horizon of 2070 and a return period associated with a 10-year (10% chance) storm event when designing the building to be resilient to extreme precipitation. This recommendation appears to be based on a "Low" criticality rating for the building (generated from inputs provided by the Proponent) associated with a 11- to 50-year planning horizon. For projects of "Medium" or "High" criticality, the recommended design storm is the 25-year (4% chance) storm and 50-year (2% chance) storm, respectively.[4]

[4] See https://eea-nescaum-dataservices-assets-prd.s3.amazonaws.com/cms/GUIDELINES/V1.2_SECTION_4.pdf at p. 27.

As described in the EENF, the stormwater system for Phase 1 is required to provide approximately 36,024 cubic feet (cf) of stormwater recharge volume based on the amount of impervious surfaced proposed; the stormwater system as currently proposed will provide approximately 316,853 CF of recharge volume.[5] As noted above, the stormwater management system has been designed so that post-development peak rates of runoff are below pre-development conditions for the current 2-, 10-, 25- and 100-year storm events; these were based on the National Oceanic and Atmospheric Administration (NOAA) Atlas 14 precipitation data, which reflects modern precipitation rates, but does not account for the increased frequently and volume of storms anticipated with climate change. Regarding the project's vulnerability to extreme heat, the EENF notes that the Phase 1 project design will include measures to adapt to high heat conditions, including a high-performance building envelope that will reduce cooling loads in the summer, installing high performance HVAC equipment, and new landscaping and light-colored hardscape materials to reduce the urban heat island effect. I encourage the Proponent to continue to consider design elements that will minimize impacts associated with more frequent and intense storms and extreme heat waves. The Proponent should maximize opportunities to incorporate Low Impact Development (LID) stormwater management techniques into project design.

Greenhouse Gas (GHG) Emissions

The EENF included a GHG analysis based on the MEPA GHG Policy and Protocol (GHG Policy) and proposed mitigation measures to reduce GHG emissions. The project's stationary and mobile sources of GHG emissions were evaluated.

Stationary Sources

The stationary source GHG analysis included in the EENF for Phase 1 evaluated CO_2 emissions for two alternatives: a Base Case and Preferred Case (Mitigation Alternative). The Base Case was designed to meet the 9th Edition of the Massachusetts Building Code, which references the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013-Appendix G with Massachusetts Amendments including C402.1.5 (envelope), C405.3 and C405.4 (lighting), C405.10 (electric vehicle (EV) charging), and C406 (three additional efficiency measures). The EENF indicates that the Section C406 requirement will incorporate more efficient HVAC performance (Section C406.2); digital controls (Section C406.4); and enhanced envelope performance (Section C406.8). I note the Town has adopted the Massachusetts Stretch Energy Code (SC). Therefore, the project will be required to meet the applicable version of the SC in effect at the time of construction. The SC increases the energy efficiency code requirements for new construction (both residential and commercial) and for major residential renovations or additions in municipalities that adopt it. The current SC requires a reduction in energy use of 10 percent compared to that achieved by complying with the baseline energy provisions of the State Building Code. The project will be required to meet the applicable version of the Stretch Energy Code in effect at the time of construction. The project is committing to 80% solar photovoltaic (PV) rooftop readiness, which is a significant increase over the 40% required by code; DOER commends the Proponent for this commitment.

[5] Recharge volume refers to the amount of rainfall captured on-site, in this case post-development, and directed through the soil to the groundwater table.

The Phase 1 project's overall stationary source CO_2 emissions were estimated at 1,174 tons per year (tpy) in the Base Case. According to the EENF, the energy efficiency measures included in the Preferred Case will reduce GHG emissions to 1,055 tpy, a reduction of 119 tpy (10.1 percent); however, the Base Case does not appear to be inclusive of emissions reductions associated with SC requirements.[6] According to comments from DOER, when considering the required emissions reduction measures under the SC, the Phase 1 building has near-negligible emissions mitigation and is essentially a "code" building. Comments from DOER state that mitigation can be improved by a factor of more than x3 with hybrid electrification, and note that approach is commonly used by other warehouse buildings reviewed by DOER. The Proponent evaluated a hybrid electrification scenario, which was determined to be infeasible based on cost. However, comments from DOER note that the scenario evaluated by the Proponent consists of a near fully-redundant electric and gas approach (electric sized to 67% peak, gas sized to 100% peak). Comments from DOER state that the Proponent should instead evaluate a traditional hybrid electric and gas approach (electric at 20% peak, gas at 100% peak), and note that a "right-sized" hybrid electrification approach could cost 65% less than the scenario described in the EENF. As a "right-sized" hybrid electrification approach (electric at 20% peak, gas at 100% peak) appears to be a "feasible" measure to reduce GHG emissions impacts, the Proponent should conduct supplemental analysis of this scenario for further consideration and should provide it to DOER for further review. In the event the Proponent elects to make further design refinements to achieve greater GHG emissions reductions, it should update its GHG commitments as part of that filing. Alternatively, the Proponent may commit to implement the scenario identified in DOER's comment letter as the traditional hybrid electric and gas approach (electric at 20% peak and gas at 100% peak) in-lieu of providing the additional analysis for the Phase 1 project. In this instance, the Proponent should consult with DOER prior to filing the information to determine the appropriate information to document this commitment.

Mobile Source

The EENF analyzed the project's mobile-source CO_2 emissions using the EPA's MOVES emissions model and data from the traffic study. The MOVES model calculates emissions factors for vehicles expressed in a volume per distance travelled. Total emissions of vehicles are estimated by applying Vehicle Miles Travelled (VMT) data to vehicles in the study area and emissions from idling trucks at the facility. The analysis calculated GHG emissions under 2022 Existing, 2028 No-Build, and 2028 Build scenario. In 2022, study area GHG emissions from mobile sources were estimated as 7,844 tpy. In 2029, study area emissions from mobile sources were estimated as 8,017 tpy under No-Build conditions (an increase of 173 tpy from existing conditions), and as 8,207 tpy under Build conditions (an increase of 363 tpy as compared to 2022 Existing Conditions and an increase of 190 tpy as compared to 2029 No-Build conditions). As noted above, Phase 1 is expected to result in an estimated 90 percent reduction in tractor-tailer miles travelled regionally by consolidating the Proponent's operations near their exiting headquarters in Sutton. The EENF states that, currently, the tractor-trailers are estimated to travel 1,079,234 miles per year between facilities, but that this number is expected to reduce to 87,204 miles per year with the construction of Phase 1. While this reduction pertains to emission on a

[6] The GHG analysis included in the EENF identified 1,058 tpy of GHG emission associated with the Preferred Case; however, the Proponent committed to the use of heat pump water heating in an email sent by Mark Arnoldy (VHB) to Eva Vaughan (MEPA Office) on September 19, 2022, which is estimated to reduce the stationary emissions associated with the Preferred Case to 1,055 tpy.

regional level and not for the project, the EENF notes that the estimated reduction in GHG emissions for the Proponent's regional operations would exceed the total estimated stationary and mobile source emissions expected from Phase 1. As noted above, the project will also implement TDM measures to reduce single-occupancy vehicle (SOV) trips. The implementation of the TDM program is expected to result in a further decrease of 4 tpy.

Hazardous Waste

The EENF states there are no RNTs, cleanup, or Response Action Outcome classifications associated with the project site; thus, no soil or groundwater contamination is anticipated to be found during site excavation activities. However, comments from MassDEP identify 12 RTNs located within or near the project area; of these, 11 are described as having the potential to impact the project: RTN 2-0018327, 2-0012481, 2-0017245, 2-008730, 2-0010801, 2-0017039, 2-0010227, 2-001-575, 2-0011076, 2-0011136, and 2-0020150 (multiple RTNs can be associated with a single site). The EENF states that if soil contamination is discovered, the Proponent will take all necessary steps to identify any hazardous materials and use proper handling procedures for their removal. As stated in comments from MassDEP, the Proponent is advised that excavating, removing and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c. 21E (and, potentially c.21C) and OSHA and may require the submittal of a Release Abatement Plan or to be conducted as a Phase IV Remedial Action. If oil and/or hazardous materials are identified during the implementation of the Phase 1 project, notification to MassDEP may be required pursuant to M.G.L. c. 21E and the MCP. As stated by MassDEP, a Licensed Site Professional (LSP) should be retained to determine if submittals to MassDEP are required to conduct the work or if notification is required.

Archaeological Resources

As described in the EENF, MHC's Inventory lists archaeological sites associated with 19-WR-892, 19-WR-893, and 19- WR-893, that may be located partially or wholly within, or proximate to, the Full Build project site. Site 19-WR-894 is located outside of the Phase 1 project site in an area identified for future construction. The archaeological sites listed proximate to the Phase 1 project site (19-WR-893 and 19-WR-892), on the opposite site of Boston Road, are located in an area of the Phase 1 site that is previously disturbed. The EENF states that the site is extensively previously disturbed by the historic gravel pit operations, and that the Proponent has made efforts to locate the Phase 1 project within these areas. The EENF further stats that, if it is determined that the Phase 1 project will result in adverse effect to historic properties, consultation with the MHC will continue to identify ways to avoid, minimize, or mitigate these adverse effects.

Construction Period

As described in the EENF, Phase 1 project construction is expected to commence in October 2022 and conclude in December 2023. Construction on future phases is expected to start sometime in 2024 or as dictated by tenant specific needs. The EENF states that each future phase is anticipated to take approximately one year from the start of construction (i.e., site preparation, earthwork, etc.) to occupancy with another eight to 10 months for tenant fit-out. The EENF states that a Construction Management Plan (CMP) will be developed with input from the Town of

Sutton and other appropriate agencies. Additionally, in accordance with EPA NPDES requirements, a construction phase Storm Water Pollution Prevention Plan (SWPPP) will be developed to prevent impacts on nearby resource areas from the construction as well as the operation of the Phase 1 project. During construction of the Phase 1 Project, erosion control measures will be installed, inspected, and maintained throughout the duration of construction to protect the wetland resource areas adjacent to the Phase 1 work area. The EENF describes additional measures to mitigate air quality and noise impacts associated with Phase 1 project construction. Comments from the Sutton Planning Board note that, as part of the local permitting process, the use of manufacturer-approved silencing equipment on construction equipment as well as the use of quite building erection systems to minimize noise impacts to nearby residents.

All construction activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits.

Conclusion

The EENF has adequately described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on review of the EENF and comments received on it, and in consultation with Agencies, I hereby grant the request to establish an SRP for this project. The SRP shall be issued within 30 days unless extended with consent of the Proponent, and shall be contingent on provision of supplemental GHG analysis to DOER. As noted above, no work on Phase 1 may proceed until the SRP is issued or, if the SRP is not issued due to failure to provide the GHG analysis, until the Full Build project (inclusive of Phase 1) completes MEPA review.

September 30, 2022
Date

Bethany A. Card

Comments received:

09/08/2022	Marie DeCosta
09/13/2022	Janice Berthiaume
09/17/2022	Jack Sheehan
09/19/2022	James Nault
09/21/2022	Enrico Meucci
09/21/2022	Jim LeClaire
09/21/2022	Rob Liddy
09/22/2022	Eric DaSilva
09/22/2022	James LaPlante
09/22/2022	Paul, Stephanie, Courtney, and Stephen Granger
09/23/2022	Andrea Mattei
09/23/2022	Massachusetts Department of Transportation (MassDOT)
09/23/2022	Town of Sutton Planning Board & Department
09/26/2022	Karen Cadrin
09/26/2022	Massachusetts Department of Environmental Protection (MassDEP), Central Regional Office (CERO)
09/29/2022	Massachusetts Department of Energy Resources (DOER)

BAC/ELV/elv

From: Marie DeCosta
To: Vaughan, Eva (EEA)
Subject: Unified Parkway Industrial Development - SUTTON-MTG 9/9 @ 11:00 am-Resident Concerns
Date: Wednesday, September 7, 2022 2:46:52 PM

Hello Ms. Vaughan,

My name is Marie DeCosta and I live at 26 Heritage Rd., Sutton, MA. I am as well as my neighbors are concerned about the Environmental impacts that could occur in the future development of the Unified Parkway project. We are concerned of our water wells running dry, quality of our drinking water, as well as damage to our homes and septic systems which have already occurred from blasting at the site. Here is a link to a petition we created mentioning our concerns: https://www.change.org/SaveOurSutton

Sincerely,
Marie DeCosta
508-479-2614

SOS Save “ Our ” Sutton

Marie DeCosta started this petition

https://www.change.org/SaveOurSutton

For all Sutton Residents and surrounding communities concerned about blasting and future development at the UN1F1ED² Global Packaging Group site.

There has been blasting since March 7th, 2022 at the UN1F1ED² construction site on Providence Road formally owned by Aggregate Industries and Worcester Sand and Gravel. We as concerned citizens would like the Town of Sutton to protect our quiet neighborhoods and our homes and hold UN1F1ED² accountable.

Please sign this petition to urge the Sutton Town officials to protect our neighborhood.

Our main concerns with the blasting is the damage caused to our homes and what it’s doing to our private water wells and septic systems. Also, what it could do to our drinking water in the future as there is a large aquifer underneath our neighborhoods close to the UN1F1ED² construction site.

Years ago, the Town of Sutton had denied blasting permits to Aggregate Industries and Worcester Sand and Gravel, the former businesses/owners so why all of a sudden is it ok for UN1F1ED² to blast?

Neighbors have experienced their houses shake, windows, dishes and glasses rattling in cabinets. A few neighbors have already experienced damage to their homes such as cracks in their walls and ceiling, cracks in driveways, nail pops and pictures falling off walls, etc. one resident mentioned his water well partially collapsed.

What about Veterans with PTSD? Residents with Autism and Asperger’s?

The Fire Department and Select Board members mentioned to submit a Blasting damage request form which needs to be submitted within 30 days of the damage. What if there is damage long after the blasting say to our water quality?

We respectfully request that the following items be acted upon by our FRIENDLY Neighbor, UN1F1ED² Global Packaging Group. (UGPG)

Water Quality We request that UN1F1ED² is to provide Water Quality analysis from our homes, not from an upstream aquifer. The analysis will be performed by UN1F1ED² Independent third-party Laboratory and conducted quarterly through the life of the project and continuing for at least Three years following completion. These tests will include but not be limited to the following Inorganic and organic chemicals, Radionuclides, Biologicals, Turbidity, and all other standards as defined in 310 CMR 22.00 AND 310 CMR 22.02.

As the shock wave from the blasts rip through the aquifer stirring up silt, when our pumps kick on they are pumping sand “The enemy of any pump system” we request that UN1F1ED² set up a fund to replace the pumps of those in the immediately affected area.
Radon Testing be performed as new blasting could cause fissures releasing Radon into our homes.

Traffic Study We request that UGPG perform an up to date traffic study to include not only the main arteries but all side roads in the area. (Dudley, Colonial, Buttonwood, Stone School, Pleasant Valley, Marble, Harback, Old Boston, Bashaw) as the Traffic Study was not representative of real time traffic nor did it take into consideration the affect it would have on side streets that will be used to avoid the congestion on Boston Rd.

We also request that all future incremental development of the parcel formerly known as Aggregate Industries now UGPG be held at a Public Meeting with a formal invitation of all abutters as well as neighboring communities affected.
Noise Pollution In order to protect the community and wildlife from the damaging effects of noise pollution, we are requesting if it’s possible to install Sound Barriers/Noise Walls to block the noise of construction now and noisy back-up beepers on Industrial vehicles and tractor trailer trucks in the future.
Air Pollution Use a blasting mat to suppress the dust. The blasting is causing a cloud of dust that is traveling into our neighborhoods. Exposure to drill and blast respirable dust could lead to silicosis and other respiratory diseases.

Authored by James LaPlante and Marie DeCosta

127 have signed.

Reasons for signing

Paul Eklund

May 27, 2022

The future truck traffic in this area is going to be a horror show and the noise and light pollution this will bring to the neighborhood will be an assault on our peaceful country living.

Milford Berry

May 25, 2022

I live in the area & I. Concerned with the blasting in our local area

Patricia Perry

May 20, 2022

My daughters wall and ceiling have cracked!

Hannah P

May 19, 2022

My foundation and chimney are cracking.

Phyllis Nault

May 9, 2022

Phyllis Nault….I sighed because our ceilings are cracking, the chimney has cracked along with our fireplace front.

John Cudmore

May 9, 2022

If I have issues with my well I am coming for unified!

Marie DeCosta

May 9, 2022

I’m signing because I’m concerned about our water quality, private water well and septic system cracking from the blasts. Also, damage to our home. I’m not against the development I just want Unified to be held accountable.

PETITION UPDATES

We request that UN1F1ED² provide Water Quality analysis from our homes, not from an upstream aquifer

Marie DeCosta
Sutton, MA, United States

MAY 12, 2022 —
Posted on Facebook by James LaPlante on Apr 8th:

So this picture is of a member of the blasting crew in our neighborhood of Heritage Rd. taking seismic readings in a neighbors lawn. I spoke with him briefly regarding today's round of home shaking, picture falling, window rattling blasting.

I then left to the store stopped at the Sunoco on 146 and the cashier said it shook the building there.

Why is this an issue? As a U.S. Marine stationed at Camp Lejeune I was subjected to a drinking water aquifer contaminated with Benzene from a leaking fuel depot.

We must demand that the UGPG do aquifer monitoring or we'll end up like Charlton with poisoned drinking water!

Sutton neighbors sound off on blasting at United construction site

Maureen Sullivan
The Millbury-Sutton Chronicle

SUTTON -- You can barely hear the traffic on routes 146 and 122A from Dudley and Heritage roads.

However, once each weekday since late March, there has been a noise -- blasting from the Allied Packaging Group construction site off 122A (Providence Road).

And now, neighbors near the site are making their own noise about shaking houses, cracked ceilings, sediment in the water -- not to mention potential trouble with increased traffic and other issues.

"Since March 7th there has been ongoing blasting at the Unified construction site on Providence Road, formerly owned by Aggregate Industries," wrote Marie DeCosta of Heritage Road via email. "I have experienced as well as my neighbors these horrible blasts. You hear a big boom, then the entire house shakes, windows, dishes and glasses rattle in our cabinets. It’s so unnerving! A few neighbors have already experienced damage to their homes such as cracks in their walls and ceiling, cracks in driveways, nail pops and pictures falling off walls, etc."

DeCosta and other neighbors packed a Planning Board public hearing April 25 to voice their concerns and find out what the town can do to help alleviate their concerns.

"I'm very, very nervous about our wells," said Heritage Road resident Jim Nault at the public hearing. "Our ceilings are cracking."

James Laplante of Heritage Road wants the town to be "more proactive" about monitoring water quality; many neighbors access an aquifer (via wells) that's very close to the construction site.

Darryl Cunningham of Colonial Road said his well has caved in as a result of the blasting.

"Our homes shake. We are very, very concerned," said Tracey Connors, also of Heritage Road. She asked whether there could be a meeting about the blasting, as well as traffic on Boston Road.

Planning Board Chairman Michael Gagan said the blasting is not within the board's jurisdiction and that the blasting has been done according to code.

Town Planner Jen Hager said that meetings could be scheduled with the town manager and the applicant could set up a neighborhood meeting.

Hager added that complaints have been filed with the building and fire departments and those complaints have been logged.

The board voted to continue the public hearing to its next meeting May 23 at 7:15 p.m.

On May 2, Town Manager James Smith emailed the following statement: "We have had some discussions with residents surrounding that area. At this time we don't want to interfere with the Planning Board special permit process. Any comments regarding the site should be forwarded to the Planning Board.

"However, we have heard complaints regarding the blasting. We have been in contact with the leadership of Unified and discussed these complaints. They are concerned and working on this issue.

"The blasting is monitored by the Fire Department and recorded. None of these blasts have come close to the state limit with most blasts coming well below half the state limit; however, it is still a quality-of-life issue that we need to pay attention to and do what we can to mitigate the impact."

About the project

Last fall, Unified Global Packaging Group acquired more than 440 acres in Sutton and Millbury; the site is off Buttonwood Avenue, Boston Road, Dudley Road and Providence Road.

Unified is in the process of developing the site into a three-building warehouse and distribution center.

According to its project update, the initial phase includes construction of a private roadway between Boston and Providence roads, as well as blasting to level part of the site.

"Because of these historic uses, most of the interior of the property is previously disturbed with steep changes in topography and elevations that create safety and siting issues for the planned improvements. These are the portions of the property where the blasting activities are occurring," according to its project update.

Unified said they had meetings with the Wilkinsonville Water District and the Fire Department and all permits had been obtained.

The rocks being blasted will be used for on-site fill, according to the update.

Unified said that the first phase of blasting will continue once per weekday (Monday through Friday), at approximately noon or 3 p.m. through June. After that, blasting will be suspended while plans for Phase 1 are refined.

The Sutton Fire Department has been notifying residents via Facebook on whether there will be blasting that day.

During the Planning Board meeting April 25 members of the project team discussed plans for buildings 2 and 3.

Building 2 is slated to be 652,000 square feet, while Building 3 will be 343,000 square feet. Information on this project may be found on the town website.

From: Jan
To: Vaughan, Eva (EEA)
Subject: UNIFIED PROJECT IN SUTTON MA
Date: Tuesday, September 13, 2022 11:38:28 AM
Attachments: UNIFIED.docx

Dear Ms.Vaughan,

I was not able to attend the Unified ZOOM meeting because I was at work. I have attached a letter with questions about the project that need to be addressed before Unified's Project is approved.
Thank you for your work on this matter!
Janice Berthiaume

I am writing this letter as a concerned citizen and long-time resident of Sutton. I grew up in Sutton, went to the Sutton Public Schools, raised my children here, and am now spending my retirement years here.

The recent developments in the Unified Project being conducted on Providence Road, have led me to question the future of Sutton for generations to come.

It seems to me, and other residents that I have spoken with, that decisions about the town have been made without, perhaps, the proper procedures having taken place.

I am submitting a list of questions that need to be answered as soon as possible.

- The former owner (Aggregate) of the property in question was not allowed to conduct any more blasting at that site. So, how did Unified get permits for blasting, and who gave them those permits?

- Was there an environmental impact study done before blasting occurred? If so, where is that study and how can we gain access to it? The effect on ecological systems and surface area drainage need to be considered. And what about the wild animals like deer, turkeys, fox, coyotes, etc that we used to see in our backyards? They have disappeared since the project began.

- Were there any traffic studies done to demonstrate the increased traffic flow on our scenic roadways, and side streets that will be effected? What impact will this traffic have on the surrounding environment and ecological systems?

- Were any studies done regarding the noise pollution levels of the blasting, and the heavy equipment being used on the site? And the continued noise from the buildings and traffic that will result? We are no longer able to enjoy the peace and quiet of our backyards since the construction began. The noise is significant every day from 7:00AM until 5:00 PM.

- Were any studies conducted on air pollution quality with so many particulates being dispersed into the air from the blasting? Many people are concerned with the increased dust on their properties, as well as in the air we breathe. Some residents have experienced increased allergic reactions and worsening asthma and other respiratory issues.

- Has damage from vibrations of the blasting been documented, so that property owners may be reimbursed for said damages? How can we prove that the damage was caused by the blasting? This damage includes, but is not limited to the following: cracks in walls, ceilings, foundations, chimneys, and fireplaces; damage to the aquifer resulting in problems with well water; possible damage to septic systems due to vibrations, and interference with the drainage levels; the future structural integrity of any homes, businesses, etc.

- Were any considerations given to the significant change to our landscape the project is creating that alters the characteristics of our small town?

  What about the impact this will have on our property values now and in the future?

- We all know that increased taxes from businesses will help our town financially, but couldn't said businesses be developed in other areas away from residential areas? Perhaps directly off of major roads such as Route 146?

- Better communication about the project must be made to residents. The notifications about blasting appeared on social media hours after blasting. Can that be remedied?

- If residents are notified in writing about the Town Meeting and Board meetings, could those letters be sent by way of genuine certified mail, that isn't just left carelessly in a mailbox?

- Could new business be discussed at Board Meetings without that being part of the original agendas? Not being allowed to talk about citizen concerns is NOT the way to run meetings.

- Could there be a joint meeting of several Boards together to discuss the concerns of residents about the Unified Project? Each board seems to put the responsibilities on the other boards. Can they get together about this?

Many other questions need to be addressed as well, but I will submit these questions first.

Please respond to our concerns as soon as possible. Thank you.

Janice Berthiaume

22 Heritage Rd

Sutton MA 01590

janberthiaume@aol.com

View Comment

Comment Details

EEA #/MEPA ID	First Name	Address Line 1	Organization
16593	Jack		--
Comments Submit Date	**Last Name**	**Address Line 2**	**Affiliation Description**
9-17-2022	Sheehan	--	Individual
Certificate Action Date	**Phone**	**State**	**Status**
9-23-2022		MASSACHUSETTS	Opened
Reviewer	**Email**	**Zip Code**	
Eva Murray (857)408-6381, eva.murray@mass.gov	jacksheehan26@gmail.com		

Comment Title or Subject

Topic: Unified Industrial Parkway

Comments

To Whom It May Concern,

In the interest of disclosure, I am a sitting member of the Sutton Sewer Commission. The observations and comments herein are my own and not those of the Sutton Sewer Commission.

The project proponent seeks to establish a Special Review Procedure for the redevelopment of 448 acres in Sutton. If I understand the process, the SRP will allow Phase 1 of the project to go ahead with review of the Full Build Project to be completed at a later date. I feel that a process that would delay review is not in the best environmental interest of the town, the region or the Commonwealth.

I first inquired about the need for MEPA review in October 2021 and was correctly advised that if no state permits or agency actions were required then MEPA review would not be required. At that time site work was ongoing and intensive. Negotiations with the town of Sutton regarding tax relief and community enhancements were underway or completed.

Necessary local approvals were being sought. The project was for all intents and purposes underway and 2.4 million square feet of warehouse and distribution space in three buildings were planned. All the while site work continued including a great deal of blasting. It should be noted that most of the site was home to several gravel operations. As such even in its dormant commercial condition, the site offers a tremendous area of groundwater aquifer recharge. Alteration of the site would certainly change this.

This activity does not lend itself to the contention that things are not imminent or unknown.

The Phase 1 environmental benefit of a reduction in truck miles traveled is modest when considered with the construction of a large commercial building. Stating that there are infrastructure improvements such as .01 miles of sewer and .20 miles of water mains appear insignificant as well.

The submitted EENF notes a review threshold met for the creation of more than 10 acres of impervious surface but not until it was anticipated that a highway access permit might be needed was a filing with MEPA necessary. I believe this should have been anticipated long ago and would have the review process much further along. It would also appear that the filing misstates the amount of land to be directly altered. The additional buildings after Phase 1 and their parking will certainly exceed 50 acres and I believe that is another review threshold.

The project should be reviewed in its entirety in a timely fashion. The SRP allows the project to go forward with the complete review being presented later on and without a date certain. The size of the Full Build Project has regional impacts that may be best considered in an Area Wide Review.

The assembled parcels which make up the site also contain a significant amount of contiguous land zoned residential. There is no mention of any plans for this part of the site and its potential development should have bearing on the review.

There is note of the need to make broad assumptions in further review owing to tenant-specific needs. I believe that such broad assumptions can be made to present a picture specific enough to complete environmental review. A Notice of Project Change could modify the review parameters.

The Draft letter at the end of the EENF notes a Community Advisory Committee as unwarranted without any discussion. Full consideration of the creation of a CAC is necessary.

I am not opposed to the construction of Unified's first building if, going forward, immediate and complete review of the Full Build Project is required.

Sincerely,

Jack Sheehan

Attachments

Update Status

Status

Opened

SUBMIT

Share Comment

From: James Nault
To: Vaughan, Eva (EEA)
Subject: Unified Distribution Center
Date: Monday, September 19, 2022 3:15:54 PM

I am a resident of Heritage Rd. In Sutton Ma abutting The Unified Project. We, as residents, have many many problems with Unified. My home as an example has many cracks from their blasting. Previous owners of this land where denied blasting because of our water supply as we all have wells. Because the town was promised 13 million the blasting permit was approved by the planning department consisting of 5 people.
My husband was on the earth removal board for many years. Blasting was never approved on that site. Last year Aggregate Co was denied a blasting permit so they pulled out of the purchase of the land. Now because The Kraft Group which owns Unified the permit gets approved. There was no regard to us as residence for this project. Our wells are in danger, our health from environment air quality filled with debris is a danger. I myself spent seven days in the hospital because I could not breathe. I could go on forever for the harm this company has caused. This neighborhood is in danger, our health is unknown and we need help to stop this crooked company for destroying our health and our homes. Thank you as a resident in our home for 53 years.

Phyllis and James Nault
25 Heritage Road
Sutton, Ma 01590
508 865-9085

From: Rick Meucci
To: Vaughan, Eva (EEA)
Subject: comments on Unified Sutton Project
Date: Wednesday, September 21, 2022 2:00:32 PM

Dear Ms. Vaughan,

I live in Sutton MA and am writing in support of Unified"s Sutton Warehouse. This area of our town has not been used for many years. The new project will increase our tax base which will help pay for additional town needs. The increased financial resources will contribute to STEM education in our high school and a new vehicle for our fire department.

Sincerely,

Enrico R Meucci
16 Cedar Hill RD
Sutton, MA

From: jim_leclaire@outlook.com
To: Vaughan, Eva (EEA)
Subject: Unified Parkway Industrial Development
Date: Wednesday, September 21, 2022 12:43:55 PM

To the MEPA Office:

As a resident I am hoping your office will support Unified to help this project come to fruition. Unified started out almost 30 years ago as a locally owned business called Atlas Box & Crating. They have been good neighbors over that time. They have grown their business while remaining in Sutton. With this project, Unified will be investing in our town. These investments will help other businesses grow and increase property values. Getting their first building operational will start that investment right away. I do not see a lot of businesses making this kind of commitment to our town. Yes, there will be some impacts, but knowing Unified's history, they will make sure to do the right thing.

Best regards,
Jim LeClaire
38 Wildflower Drive
Sutton, MA 01590

From: rob@lidcoelectric.com
To: Vaughan, Eva (EEA)
Subject: Comments on Unified Sutton Project
Date: Wednesday, September 21, 2022 10:37:01 AM

Good Morning Ms. Vaughan,

I am a Sutton resident and writing in support of Unified's Sutton Warehouse Project.

I have been driving by the abandoned gravel pits for MANY YEAR's and I have always believed that the property was underutilized and could make a very significantly and positive contribution to our town if it could be developed.

Since I have lived in town, Atlas/ Unified has been a 1st class operation and a true asset to our town. With an established track record of being generous to the town and having very well maintained properties, the town of Sutton can rest assured that Unified's development of the abandoned sand pits will be a very positive step forward.

It is now time to look to the future and make sure our town has what it needs. The project will increase our tax base and bring financial resources to our schools and municipal services. They will contribute towards STEM education in our high school, a new vehicle for our fire department and training services. I am glad to see these community benefits coming to Sutton. I know development brings change, but these changes will bring good things for our town and residents.

Please do not hesitate to call or email if you have any questions or concerns.

Thank you.

Rob Liddy, PE (registerd professional engineer #45439)
20 Cedar Hill Road
Sutton, MA 01520
C:508-868-9943
Rob@lidcoelectric.com

From: eric dasilva
To: Vaughan, Eva (EEA)
Subject: Unified Sutton Project feedback
Date: Thursday, September 22, 2022 10:00:47 AM

Dear Ms. Vaughan:

I am a Sutton resident and I am writing in support of Unified's Sutton Warehouse Project. This area of our town has been underutilized for many years as old gravel pits. It is time to look toward the future and ensure the town has what it needs to progress. This project will increase our tax base and bring financial resources to our schools and municipal services. They will contribute towards STEM education in our high school, provide a new vehicle for our fire department and training services.

I am glad to see these community benefits coming to Sutton. Development brings change and these changes will bring good things for our town and residents.

Thanks,

Eric daSilva

3 Benoni Drive

Sutton

From: James Laplante
To: Vaughan, Eva (EEA)
Subject: Unified Project Public Comments
Date: Thursday, September 22, 2022 8:09:35 PM
Attachments: Sutton ConCom.pdf
Sutton 7 Shiny gifts.pdf

Eva,
The following email will contain the public comments that represent the concerns of the neighborhood residents of both Dudley, and Heritage Rd.'s.
First and foremost is the Aquifer,
We have approached the Town through the Boards and Committees throughout this process and at no time have they ever addressed our concerns regarding the Aquifer that serves the private wells of our homes (Which is the same as the Wilkinsonville Water District.) .
I have asked at 3 separate meetings for the study utilized for their claims on the Aquifer flow and at no time was a study referenced or provided. The flow direction of the resource is detrimental to the possible contamination of the private wells that serve our neighborhood as we have already experienced the effects of the blasting has had on our resource.
One resident had a partial cave in, others have had to replace pumps , and the increase of sediment has affected multiple water bearing appliances throughout the neighborhood.
I just recently learned of a reported UST (Underground Storage Tank) that was compromised in the area that was never disclosed during any of the UGPG Project until this past week's Site Walk. My concerns on this is as follows
1) When was the tank installed
2) What were the contents
3) when was it discovered to be defective
4) Was the tank removed, filled, or crushed
5) Did anyone (Private, Public) perform soil and/ or water quality analyses
6) If analyses were performed they should have been shared
Next I will reference the ongoing onsite refueling operation of Construction equipment.
1) What safeguards are in place to prevent the leaking of fuels, hydraulic fluid, and oil while construction is ongoing.
All you need to do is reference the Charlton Ma. Exxon/Mobil Aquifer contamination or one closer to my heart would be the Camp Lejeune water contamination for which I served and trained on or near that base from 1985-1989.
I would like to call your attention to the attached document " Sutton ConCom" on 12/17/18 the Sutton Conservation Committee denied the then Worcester Sand and Gravel a permit for blasting with the special condition of establishing a groundwater monitoring well but yet Unified has been given a Carte Blanche permit to perform the very same activity. I would also recommend that you watch the Sutton Planning Boards By-Law meeting of 9/12/22 where they adopted all the criteria I have expressed to them over the life of this project (Closing the barn doors after the horses are out) They are in complete damage control right now and we are the ones who will pay for it.
More on the blasting front maybe a quick Q & A with the Town Administrator/ manager along with Selectman Limanek and you will discover the Site Visit during blasting operations when they experienced a wall of dust that came from the site traveling East to West up the steep grade that blanketed the area (Silicosis comes to mind) and yet they still refuse to put any protective measures in place for the residents (See Attached Sutton 7 shiny gifts)

Now we will move on to the sound and traffic study....
The traffic study is a non stamped, unrepresentative study taken during the height of the China Virus with the compensation of a fudge factor that does not truly represent the actual significant impact this project will truly have on the area due to the progressive growth that will surely follow in the Galaxy Pass Plaza as well as other areas. The study also does not take into account the amount of traffic that will impact the secondary roads when the impatient Trucker or Unified employee does not want to wait at a traffic light so they will obviously take these roads to expedite their travel.
The Sound Study and its lack of transparency is another item. at no point in the study released was a single data point present in the document. All information is either pass or fail, it does not show whether it is closer or farther than threshold numbers and these numbers have been requested at multiple town meetings.
I want to Thank you for your time on and I hope that your agency along with the EPA, and DEP can see the reasons for our concerns and maybe help the maligned, and concerned residents of our neighborhood.
Respectfully Submitted,

James T. LaPlante Jr.
26 Heritage Rd
Sutton Ma. 01590

Sutton Planning Board
Minutes
December 17, 2018

Approved _____

Present: R. Largess Jr., W. Baker, W. Whittier, M. Sanderson,
Staff: Jen Hager, Planning Director

General Business

Minutes:
Motion: To approve the minutes of 12/3/18, M. Sanderson
2nd: W. Baker
Vote: W. Whittier abstained as he wasn't present at this meeting

Filings:
The Board received a request to withdraw the application for a retreat lot at 6 Burnap Road and to file an alternate application for a retreat lot with frontage at 100 Armsby Road.
Motion: To allow the withdrawal of the retreat lot application at 6 Burnap Road, W. Whittier
2nd: M. Sanderson
Vote: 4-0-0
The Board acknowledged the legal filing of the 100 Armsby Road application.

Form A Plans: None.

Correspondence/Other:
CMRPC Legislative Breakfast: Walter Baker gave a summary of the legislative breakfast he attended with Council on Aging Director Michelle Edelstein and several COA members. The topic was planning for healthy aging. Representatives of State agencies related to aging, a representative from AARP, as well as the Sturbridge Senior Center Director sat on the panel. Striking statistics included that the population of Massachusetts now consists of more individuals 60+ than under 20. Massachusetts is in the top 3 "Age Friendly" states along with New York and Colorado. Additionally 1 in 9 Americans over the age of 65 have some level/form of dementia. The discussion highlighted the need to consider aging seriously in provision of housing as well as design of businesses and sites open to the aging public.

The Board reviewed an email from Jack Sheehan with concerns that a Request for Determination of Applicability (RDA) might be allowed versus an Advance Notice of Resource Area Delineation (ANRAD) to pin down the limits of the wetlands on the previously approved retreat lot at 23 Jones Road. He noted an RDA does not require notification to abutters and the information abutters can provide could change the wetland line determination. J. Hager stated she had spoken with site engineers and Mr. Sheehan and told both that the term ANRAD was used in the approval because this was the term Mr. Sheehan used when expressing his concern in the hearing. She added that the Board's only concern is that the wetland line is properly located and confirmed by the Town, and that the Board was not likely to levy a violation fine if an RDA was used instead of an ANRAD as they both accomplish the same thing. The Chairman agreed the Board wants to ensure that the wetland line location is accurate in accordance with professional standards, he noted abutter's comments may be emotionally influenced.

However, as he has no objection to more transparency or notification of those who may be effected, and as the term ANRAD was used in the Board's decision, the Board will request the Conservation Commission require and ANRAD

Public Hearing – Earth Removal Permit – Aggregate Industries

Steve Landry Operations Manager for Aggregate Industries was present.

J. Hager reminded the Board the hearing had been continued as Mr. Williams of Dudley Road stated he had not been notified. J. Hager confirmed that although she couldn't find his name on the night of the hearing, Mr. Williams was on the certified abutters list, so she was not sure why he hadn't received his notification. In any case she provided the Board with a copy of the letter and information she provided to Mr. Williams. Additionally, in an abundance of caution, the department sent notice of the continued public hearing back out to all 150+ abutters. Mr. Williams sent a message thanking the Board for looking into the situation and stating he had no further concerns. Additionally per Mr. Williams' comments, the plan has been revised to show two parcels owned by Aggregate on Dudley Road separate from the earth removal parcels.

Motion: To grant a one year earth removal permit for the Aggregate Industries holdings off Providence and Boston Roads per the application with the following conditions. M. Sanderson

General Conditions:

1. Failure to comply with all Conditions of this Permit, and all sections of the Town of Sutton Earth Removal bylaw, which are a part of this permit, and are attached herewith may result in a Cease and Desist Order and/or fines.
2. Approval of all other applicable local, state and federal agencies, with a copy of said decisions/permits provided to the Planning Board.
3. No Drilling or Blasting allowed in any area of the pit.

Special Conditions:

1. If excavation resumes anywhere East of the Western edge of the power line easement near Boston Road, a monitoring well must be established to verify compliance with required separation to ground water.

2nd: W. Baker

Vote: 3-0-1, W. Whittier abstained as he was not present on the original night of the hearing and has not had a chance to watch the tape.

Motion: To close the public hearing, M. Sanderson

2nd: W. Baker

Vote: 3-0-1, W. Whittier abstained

Earth Removal Permit Renewal – Worcester Sand & Gravel

Chuck Scott of CMS Engineering was present to review the current earth removal plan for Worcester Sand & Gravel. Active earth removal has resumed in the pit. The planned finish elevation is approximately 375'. The nearest monitoring well to current excavation is about 100' from excavation. This well shows there is well over 10' separation from groundwater to proposed finish elevation. It was noted last years' permit required a well be installed within 50' of excavation if it resumed. J. Hager asked Mr. Scott if he felt this was necessary.

He showed the way groundwater drops across the site from East the West and said he did not feel a closer well was necessary because based on historic and well documented ground water readings. Groundwater directly under the excavation, while likely a little higher, is still going to be far enough down to more than maintain the required separation.

Mr. Scott added that the building debris photographed by the Planning Director near a utility shed on the property will absolutely be cleaned up shortly if it hasn't been already.

Motion: To grant a one year renewal of the earth removal permit for Worcester Sand & Gravel for property off Hatchery Drive with the following conditions: W. Baker

General Conditions

1. Failure to comply with all Conditions of this Permit, and all sections of the Town of Sutton Earth Removal bylaw, which are a part of this permit, and are attached herewith, will result in a Cease and Desist Order, and fines.
2. Approval/Permitting/Special Requirements of all other applicable local, state and federal agencies, with a copy of said decisions/permits provided to the Planning Board.
3. No Drilling or Blasting allowed in any area of the pit.

Special Conditions:

1. Clean up of building debris, etc. around the shed area of the site needs to be accomplished by 1/31/19 (weather dependent).
2. Bond for calendar year 2019 must be received prior to 12/31/18

2nd: W. Whittier

R. Nunnemacher of 24 Singletary Ave. asked why the Wilkinsonville Water District had not been notified of the meeting considering their vested interest in what is occurring directly adjacent to their well head. Mr. Scott stated this is a one year renewal and notification to abutters is not required. There was brief discussion about the location of the Zone 2 for the wells and whether earth removal is allowed in this zone. The Planning Director will make sure the District is aware of the operations and any concerns are addressed.

Vote: 4-0-0

Earth Removal Permit Renewal – Pyne Sand & Stone (Bedoian)

John Federico of Guerriere & Halnon was present to review the renewal application. He noted their active excavation area will not change from last year's application. They continue to work approximately 5 acres closest to Route 146 originally granted in 2017 as well as a portion of the area approved in 2015 located farther to the Southwest. Their finish elevation is projected to be at 380' which is significantly higher than the ground water readings. W. Whittier asked if they expect to continue operations over the winter. Mr. Federico stated they will likely continue all year as demand is not slowing.

In response to a question, Mr. Federico stated current earth removal is approximately 60' from the Route 146 ROW line and trees have been maintained in this area effectively buffering the highway.

Mr. Nunnemacher asked for a color copy of all active excavation pits in Sutton.

Motion: To grant a one year renewal of the earth removal permit for Pyne Sand & Stone on land of Bedoian off Hough Road (access off Lackey Dam Road) with the following conditions: W. Whittier

General Conditions

1. Failure to comply with all Conditions of this Permit, and all sections of the Town of Sutton Earth Removal bylaw, which are a part of this permit, and are attached herewith, will result in a Cease and Desist Order, and fines.
2. Approval/Permitting/Special Requirements of all other applicable local, state and federal agencies, with a copy of said decisions/permits provided to the Planning Board.
3. No Drilling or Blasting allowed in any area of the pit.

Special Conditions:

1. Maintain appropriate dust control measures to prevent blowing onto Route 146 and/or adjacent properties.

2nd: W. Baker
Vote: 4-0-0

- W. Whittier announced that this evening will be his last night on the Board. He stated he will be resigning so he can focus fully with his family on the changing landscape of his farming business. He thanked the Board for their support and for what he has learned as a member. The Board and staff expressed their sadness at the loss, but wished Mr. Whittier, his family, and business all the best.

Motion: To Adjourn, W. Whittier
2nd: W. Baker
Vote: 4-0-0

Adjourned 8:00 PM

Unified thanks town for TIF with more than $7M in improvements, gifts

Lisa Redmond, Special to the Millbury-Sutton Chronicle

1:12
1:11

SUTTON – Unified Global Packaging Group has offered to give the town more than $7 million in "off-site improvements" in appreciation for the Select Board and Town Meeting approving nearly $18 million in tax breaks in a 15-year Tax Increment Financing package with the town.

The Select Board met with representatives of Unified Global Packaging (formerly Atlas Box) at a special meeting on Nov. 29 to sign the TIF package and a Community Partnership Agreement in which Unified proposes more than $7 million for improvements such as:

-- $5 million contribution toward new athletic fields and park which would be gifted to the town

-- $900,000 to replace a Sutton Fire Department truck and provide enhanced training for firefighters

-- $80,000 to the Building Department to hire a third-party consultant to review plans and provide inspections

-- $100,000 to help fund the Sutton Public Schools' STEM (Science, Technology, Engineering and Math) education

-- A new vehicle to transport patrons of the Senior Center

-- Sewer upgrades

-- Make much needed improvements to the intersection of Boston and Providence roads depending on the results of a traffic study and whatever improvements the Planning Board imposes.

"This is our thanks to the board and the community," Unified President and CEO Art Mahassell told the board.

Select Board member David Hall described a formal Community Partnership Agreement is "a little bit unusual," but he is excited because it "codifies your intentions" and inks the partnership between Unified and Sutton.

However, Hall noted that there are some "severability clauses" in the agreement that may halt some off-site improvements if the project doesn't go as planned. For example, if there is no tenant for Building 1, then the athletic fields won't be built.

Planning & Economic Development Director Jennifer Hager explained that any substantial modifications or changes to the CPA would need to be brought before the Select Board.

TIF SCHEDULE & CALCULATIONS - RE

TIF Year	Exemption Percentage	Estimated TIF Savings to Company	Estimated Base Tax to Sutton	Estimated Additional Tax to Sutton	Estimated Excise Tax to Sutton	Estimated Total Taxes to Sutton
1	100%	1,702,512	245,200	0	30,000	275,200
2	100%	1,702,512	245,200	0	30,000	275,200
3	95%	1,617,386	245,200	85,126	30,000	360,326
4	90%	1,532,261	245,200	170,251	30,000	445,451
5	85%	1,447,135	245,200	255,377	30,000	530,577
6	80%	1,362,010	245,200	340,502	30,000	615,702
7	75%	1,276,884	245,200	425,628	30,000	700,828
8	70%	1,191,758	245,200	510,754	30,000	785,954
9	65%	1,106,633	245,200	595,879	30,000	871,079
10	60%	1,021,507	245,200	681,005	30,000	956,205
11	55%	936,382	245,200	766,130	30,000	1,041,330
12	50%	851,256	245,200	851,256	30,000	1,126,456
13	45%	766,130	245,200	936,382	30,000	1,211,582
14	40%	681,005	245,200	1,021,507	30,000	1,296,707
15	35%	595,879	245,200	1,106,633	30,000	1,381,833
TOTALS	70%	**17,791,250**	3,678,000	**7,746,430**	**450,000**	**11,874,430**
16+	0%	0	245,200	1,702,512	30,000	1,977,712

The TIF schedule for the development proposed by United Global Packaging Group. *[Submitted Photo]*

At the Sept. 9 Select Board meeting, Town Manager James Smith explained the 15-year TIF would exempt Unified from paying 100% of real estate and personal property taxes in the first year, then decreasing the tax break over the years to 35% in year 15.

As the TIF decreases, the town will realize a portion of the $1.7 million in taxes Unified will pay for its buildings and $5.2 million to $350,000 on personal property, such as equipment.

The TIF agreement is activated once an occupancy permit is issued.

Sutton will continue to receive real estate taxes on "base land valuation" estimated at $245,200 per year. The town will all receive all excise taxes with no exemption estimates at $30,000 per year.

From: Paul Granger
To: Vaughan, Eva (EEA)
Subject: UNIFIED PROJECT IN SUTTON, MA
Date: Thursday, September 22, 2022 6:08:23 PM

Good Evening Ms Vaughan

We have lived in Sutton at 51 Highland View Dr since 1993. I strongly recommend the UNIFIED project to proceed for many reasons. Atlas Box has been a great local company for many years in our area of town. The town has few businesses to help homeowners with taxes. The land the project is located on has been an eye sore from use by multiple concrete production companies over the years and is currently underutilized. Please allow this project to proceed in an expeditious time frame. The completed project will help all in town with additional tax income and the land will be better utilized and beautified.

Thank You for your time

Paul Granger
Stephanie Granger
Courtney Granger
Stephen Granger

From:	Andrea Mattei
To:	Vaughan, Eva (EEA)
Cc:	Gomes, Jeffrey R. (DOT)
Subject:	Un1F1fied2 Global Project 16953 Sutton and Millbury, MA Comments following Site Inspection September 20, 2022
Date:	Friday, September 23, 2022 4:37:05 PM

First and foremost, thank you and thanks to the representatives of Un1f1ed2 Global, their counsel, engineers, consultants, MDOT, MEPA, and the Town of Sutton for an informative site inspection on Tuesday.

Please consider the following questions:

(1) Do the current plans to mitigate environmental and use impact require re-structuring of the topography, that may benefit pollution containment, noise reduction, and site beautification?

The current stage of earth movement and grading clearly demonstrates the enormous benefit of retaining the high elevation areas along Boston Road, and the trees and other vegetation that shield construction (and future as-built use) from roadways and adjacent properties.
What options may be available to preserve those natural blockers? Why would we not want to try?

(2) From the discussion, the intent of the applicant is to consolidate more than 90% of its current activities, and therefore close to all of its future growth, at this location.

What information has the applicant provided now to inform the anticipated growth stream for this location? With that future business plan in mind, what protections on behalf of the residents of Sutton can be activated now to manage this future growth? For example, if the near term projection is 75 truck trips or 400 vehicle trips per day presently, at full maximization of operations, how quickly will those numbers double? Triple? What steps for emissions, noise, light, and traffic flow will be required now and at that time as this location rapidly grows? This location distills through consolidation the emissions pollution, noise and traffic previously diffused among the applicant's other locations and is the planned epicenter for future operations of this type.

(3) Please detail the requirements MEPA will mandate to maintain the life quality of residential abutters, and broadly residents of Sutton, to mitigate the impact and contain the increased emissions pollution, noise, traffic congestion and water and resource disturbance? How will these requirements be monitored and enforced at

construction and completion through future use? What agency (or Town of Sutton agency) bears the primary enforcement responsibility and is and will be accountable?

Andrea Mattei

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO

massDOT
Massachusetts Department of Transportation

September 23, 2022

Bethany A. Card, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Sutton – Unified Parkway Industrial Development
(EEA #16593)

ATTN: MEPA Unit
Eva Vaughn

Dear Secretary Card:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Expanded Environmental Notification Form filed for the Unified Parkway Industrial Development located 103 Providence Road in Sutton as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

cc: Jonathan Gulliver, Administrator, Highway Division
Carrie Lavallee, P.E., Chief Engineer, Highway Division
Barry Lorion, P.E. District 3 Highway Director
James Danila, P.E., State Traffic Engineer
Central Massachusetts Regional Planning Commission
Planning Board, Town of Sutton

Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO

massDOT
Massachusetts Department of Transportation

MEMORANDUM

TO: David J. Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E., Manager
Public/Private Development Unit

DATE: September 23, 2022

RE: Sutton – Unified Parkway Industrial Development
(EEA #16593)

The Public/Private Development Unit (PPDU) has reviewed the Expanded Environmental Notification Form (EENF) submitted for the Unified Parkway Industrial Development (the "Project") located at 103 Providence Road in Sutton as submitted by Vanasse Hangen Brustlin, Inc. on behalf of UGPG RE Sutton LLC (the "Proponent"). The Proponent has submitted a request for a Special Review Procedure (SRP) to allow for phased review of the Project.

The Project site represents 448 acres of former gravel storage space over three parcels in common ownership. For Phase 1 of the Project, the Proponent proposes to develop an approximate area of 38 acres within the larger site in order to construct a single 343,200 square foot (sf) warehouse and distribution building with associated site infrastructure, including utilities and 20 acres of impervious area to support a total of 90 surface parking spaces and 118 spaces scaled for use by tractor-trailers. Phase 2, which is currently undergoing local permit review, is anticipated to include up to 2 million square feet of additional warehouse and distribution space with up to 2,050 additional parking spaces and 630 additional tractor-trailer spaces.

Access to the Phase 1 Project site will be provided by the proposed private way Unified Parkway, with two driveways to the north and south of the Phase 1 project site connecting to passenger vehicle parking and truck loading and parking areas. Unified Parkway connects Providence Road (Route 122A) to Boston Road and will additionally provide access to the Phase 2 buildout of the Project site. Unified Parkway is anticipated to intersect with Boston Road under STOP-sign control for the purpose of analysis under Phase 1.

The Phase 1 Project requires an Environmental Impact Report (EIR) due to impacts on land per 301 CMR 11.03(1). The Phase 1 Project, however, will not require any MEPA review due to impacts on transportation, and it also does not require any agency action including access permits from MassDOT. The Proponent requests a Special Review

Procedure (SRP) to allow for phased review of the larger proposed development of which the Phase 1 Project is a small component.

The EENF includes a transportation study that is generally consistent with the *EEA/MassDOT Transportation Impact Assessment (TIA) Guidelines*. The TIA includes an analysis of the surrounding study area that addresses intersection operations, safety, and bicycle, pedestrian, and transit modes.

Study Area

Based on the anticipated Project trip generation and field reconnaissance, the Proponent includes the following intersections in the study area for traffic analysis:

- Route 146 at Boston Road
- Boston Road at Dudley Road/Pleasant Valley Road
- Boston Road at Galaxy Pass
- Providence Road (Route 122A) at Boston Road
- Boston Road at Unified Parkway (Build conditions only)
- Providence Road (Route 122A) at Unified Parkway (Build conditions only)

The TIA includes a network analysis which provides the anticipated distribution of Project-generated trips within this study area based on Census-estimated regional population densities, existing traffic patterns, and roadway conditions. The Proponent estimates that Project-generated trips will be distributed such that 63% of site-generated inbound and outbound passenger vehicle trips will travel via Route 146 northbound and southbound, with 31% northbound arriving trips exiting Route 146 and traveling to the site via Pleasant Valley Road. These trips and the 7% of trips traveling via Boston Road from the southwest will arrive and depart via Boston Road south of the proposed Unified Parkway. An additional 30% of trips will arrive via Route 122A, with 12% traveling via Route 122A north of the Project site and turning into and out of Unified Parkway on Route 122A and 18% traveling via Route 122A south of the Project site and split between Unified Parkway on Boston Road and Route 122. The Proponent proposes to route all truck trips via the Unified Parkway/Boston Road intersection to Route 146, with 70% of all truck trips arriving and departing via Route 146 north of the of Boston Road intersection and 30% departing via Route 146 south and arriving via Pleasant Valley Road.

Given the limited trip generation and associated traffic impacts anticipated to result from the development of the Phase 1 warehouse, MassDOT finds the proposed study area appropriate for the analysis of Project impacts with the understanding that the Proponent will be required to expand the scope of analysis for future Phases of the overall Project.

The EENF additionally includes traffic impacts anticipated to result from future development within the Project study area, including private and public developments in Millbury, Grafton, Uxbridge, and Douglas.

Trip Generation

The TIA utilizes Land Use Code (LUC) 154: High Cube and Short-Term Storage Warehouse as provided in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual (11th Ed.)* to estimate total trip generation associated with Project development. Based on the Project description provided in the EENF, which outlines Phase 1 as a warehouse development attendant to the Proponent's existing industrial operations in Sutton rather than a development for lease to an as-yet unknown warehouse tenant. This definition and associated trip generation is acceptable to estimate traffic impacts associated with Phase 1 Project development.

With this approach, the Proponent estimates that the Project will generate a total of 480 average weekday vehicle trips, with 45 trips during the morning peak hour and 58 during the evening peak hour. This daily trip generation is anticipated to include 76 average weekday truck trips, including 4 during the morning peak hour and 7 during the evening peak hour.

Traffic Operations

The TIA includes an analysis of peak hour traffic operations at study area intersections under current conditions, a 2029 No-Build Scenario, and a 2029 Build Scenario. No intersection within the study area is anticipated to experience a decline in overall Level of Service (LOS) in the 2029 Build Scenario as compared to the 2029 No-Build Scenario.

Safety

The TIA includes a summary of crash rates derived from the MassDOT crash portal for the five-year period between 2015 and 2019. The intersection of Boston Road and Route 146 represents a crash cluster, with 1.03 crashes per million vehicles as compared to the District 3 average of 0.89 crashes per million vehicles at signalized intersections. This intersection has additionally been identified as an 2017-2019 HSIP-eligible crash cluster by MassDOT and one of the "Top 200" crash clusters in the same period.

Phase I Project Conclusion

In light of the limited traffic impacts likely to result from Phase 1 Project development, MassDOT offers no objection to the Proponent's requests for an SRP and to proceed to permitting for the Phase 1 Project.

Project Scope

Although the Phase 1 Project does not require additional review for impacts on transportation, the full Project triggers an Environmental Impact Report (EIR) due to impacts on land per 301 CMR 11.03(1) and transportation per 301 CMR 11.06. Additionally, the Project will require an EIR per 301 CMR 11.06(7)(b) as a project within the Designated Geographic Area surrounding an Environmental Justice Population. The Project requires a Vehicular Access Permit from MassDOT as Project-generated trips are anticipated to impact the Worcester Turnpike (Route 146), a state jurisdictional roadway.

In the EENF section titled "Transportation," the Proponent estimates that Building 2 (to be developed in a future Project phase) will operate as a High Cube and Short-term Storage Warehouse under LUC 154 but does not provide an approximate trip generation associated with Building 1A, the larger warehouse development for commercial lease. Taken together, the Proponent anticipates that overall Project development will exceed the thresholds for review of an EIR due to impacts on transportation and will therefore require the preparation of a Transportation Impact Analysis (TIA) in accordance with the EEA/MassDOT *TIA Guidelines*. MassDOT accordingly offers the following commentary as a preliminary scope for the Project's TIA.

The TIA should include an expanded study area for the Project in order to incorporate additional intersections impacted by the additional site trip generation. MassDOT anticipates Route 146 at Dudley Road and Route 146 at Central Turnpike as two intersections likely to receive an increase of greater than 100 vehicles per hour or 5% of existing roadway volume, thereby requiring their inclusion in the Project study area.

The Proponent should conduct a Road Safety Audit (RSA) in coordination with MassDOT District 3 at the Boston Road/Route 146 intersection since it is identified as a crash cluster, which could be exacerbated by Project trip generation. Future phases of the overall Project build-out should commit to safety improvements at this location to accommodate site-generated vehicle trips and truck trips.

Additionally, the Project EIR should identify feasible mitigation to address observed delays at the Route 146/Boston Road intersection (as well as any other area intersection anticipated to operate at LOS E or F under Future Build conditions). While Phase 1 is not anticipated to significantly exacerbate delays at this intersection, the Route 146/Boston Road interchange already operates at LOS E under present and future No-Build and Build scenarios and will likely degrade further as a result of overall Project development.

The Proponent should identify mitigation to improve multi-modal access to the Project site, incorporating transit, pedestrian, and bicycle travel support. At a minimum, the Project will be required to include a detailed Transportation Demand Management (TDM) program with the goal of reducing single-occupancy vehicle trips to the Project site. Additionally, the EIR should describe transit service within the Project study area as well as document gaps and

desire lines in the limited surrounding bicycle and pedestrian infrastructure in order to identify opportunities for the Project to support multi-modal travel to the Project site.

The Proponent will be required to implement a Transportation Monitoring Program (TMP) to begin six months after the issuance of a Certificate of Occupancy for the Project and to run for five years, with annual reporting to MassDOT and the Town of Sutton. In accordance with MassDOT/EEA standards, the TMP must include:

- Obtaining traffic-volume information over a continuous seven-day, weeklong period on the shared driveway serving the Project site;
- Performing manual turning movement and vehicle classification counts at the Unified Industrial intersection with Route 122A and Boston Road during the weekday morning (7:00 to 9:00 AM) and weekday evening (4:00 to 6:00 PM) peak periods;
- Evaluating motor vehicle crash data at the intersection of Unified Industrial with Boston Road and Route 122A, and;
- Updates regarding the effectiveness of the TDM program.

As this Project includes multiple proposed phases, with Phase 1 representing the least impactful of proposed site development, MassDOT recommends the Proponent prepare a comprehensive mitigation schedule to appropriately scale safety, access, and traffic operations to each Project phase's impacts and describe mitigation activities to be completed prior to the occupancy of each Project phase.

The Proponent should continue consultation with MassDOT during the preparation of future phases of the Project. If you have any questions regarding these comments, please contact *Curtis.B.Wiemann@dot.state.ma.us*.

Sutton Town Hall
4 Uxbridge Road
Sutton, Massachusetts 01590
Telephone: (508) 865-8729

TOWN OF SUTTON
PLANNING BOARD & DEPARTMENT

September 23, 2022

Eva Vaughan, Environmental Analyst
Massachusetts Environmental Policy Act (MEPA) Office
100 Cambridge Street, 9th Floor
Boston, MA 02114

Regarding: **EEA NO. 16593**

Dear Ms. Vaughn:

Consistent with the comments I provided at the site walk on 9/20/22, the Planning Department has two primary concerns with inconsistencies between what was contained in the MEPA filing and what was approved by the Sutton Planning Board as noted below. For your information I have attached one of the four approvals issued by the Planning Board that contains all conditions of approval required by the Board.

Stormwater: Plans approved by the Planning Board include proprietary stormwater units that provide an increased level of filtration in addition to the use of bio-swales to ensure run-off that infiltrates back into the Zone 2 for the Wilkinsonville Hatchery Road public water supply well head and adjacent Cold Spring Brook is as clean as possible. The narrative in the MEPA filing does not mention these units/measures. The Town wants to be sure a commitment to the use of these increased protection measures is acknowledged by the applicant and reinforced by MEPA during the MEPA process.

Noise: Conditions of approval required by the Planning Board, and not appealed by the applicant, include the use of manufacturer approved silencing equipment on construction equipment as well as the use of quiet building and erection systems to minimize sound transmitted to nearby residences. The narrative in the MEPA filing does not mention the intent to use these mitigation measures. Again, the Town wants to be sure a commitment to the use of these mitigation measures is acknowledged by the applicant and reinforced by MEPA during the MEPA process.

Thank you in advance for your consideration of our comments. If you have any questions, please feel free to contact the Planning Office at (508) 865-8729.

Sincerely,

Jennifer S. Hager,
Planning & Economic Development Director

cc: Applicant
Town Manager & Select Board
Building Department

Sutton Town Hall
4 Uxbridge Road
Sutton, Massachusetts 01590
Telephone: (508) 865-8729
Fax: (508) 865-8721

TOWN OF SUTTON
PLANNING BOARD & DEPARTMENT

SITE PLAN APPROVAL AND USE SPECIAL PERMIT

August 4, 2022

Town Clerk, Town of Sutton
At a meeting held on July 25, 2022, the Sutton Planning Board, in accordance with the Sutton Zoning Bylaws Section III.A.F.6, IV.C. and VII.A.2, voted to approve the **Site Plan and Use Special Permit** applications. The applications were submitted by UGPG RE SUTTON LLC of Sutton, MA for property located at 40 & 42 Unified Parkway (formerly known as 39, 39R, 47, 49R, 51, and 63 Buttonwood Avenue; 7, 11, 14, 26, 34 and 39R Hatchery Drive; and 53, 71, and 105 Providence Road) – WDRD B64357 P317; B65304 P312; B63692 P50; B66277 P112. The applicant proposes development of two warehouse and distribution buildings; one at 42 Unified Parkway (lot #2) measuring 652,530 sf and the other at 40 Unified Parkway (lot #3) measuring 343,120 sf.

Public hearings concerning the application and associated project were held on the following evening(s): April 25, 2022, May 23, 2022, June 27, 2022, July 11, 2022 and July 25, 2022.

The Planning Board conducted deliberations on the following evening: July 25, 2022.

Hearing Attendance/Absence:

4/25/22	M. Gagan, W. Talcott, R. Largess, Jr., S. Paul (late – certificate of viewing), W. Baker (absent – certificate of viewing), E. McCallum (associate)
5/23/22	M. Gagan, W. Talcott, R. Largess, Jr., S. Paul, W. Baker, E. McCallum (associate)
6/27/22	M. Gagan, W. Talcott, R. Largess, Jr., S. Paul, W. Baker, E. McCallum (associate)
7/11/22	M. Gagan, W. Talcott, R. Largess, Jr., (absent – certificate of viewing), S. Paul, W. Baker, E. McCallum (associate)
7/25/22	M. Gagan, W. Talcott, R. Largess, Jr., S. Paul, W. Baker, E. McCallum (associate)

Eligible to vote: M. Gagan, W. Talcott, R. Largess, Jr., S. Paul, W. Baker, E. McCallum (associate)

The following individuals raised questions and/or expressed concerns with the Application: various per the public record

The following individuals spoke in favor of the application: various per the public record

The following members voted in favor of granting the approval: M. Gagan, W. Talcott, R. Largess, Jr., S. Paul, W. Baker, E. McCallum (associate)

The following members voted in opposition to the approval: none

The Board granted the following waivers after findings in open meeting:

- IV.C.4 - To allow an alternate scale for the site plans noting the plans provided clearly show all required detail
- IV.B.2 - To allow some loading spaces to be 13' instead of 14'
- IV.B.3 Table 4 - To allow reduction in the amount of required parking while demonstrating through the land bank exhibit that the full amount of required parking can be provided if it is needed in the future
- IV.B.4.e - To allow driveways of 36' instead of 30' for safe truck turning movements
- IV.B.5.c #3 - To eliminate interior landscape islands within the truck parking areas with the addition of a tree for every 100' of truck parking perimeter to be located adjacent to truck parking with any extra trees to be located at park entrances at Boston and Providence Roads. See Condition #5 below.
- IV.B.1 - To allow driveways within the side setbacks off the common driveway between lots 2 & 3

Approval was based on the following plans and record documents (list attached):

Unified[2] Industrial Development – Unified Parkway
Proposed site plans (prepared by John A. Kucich, P.E., Bohler Engineering) 7/6/22

Cover sheet	C-101
General notes sheet	C-102
Zoning compliance plan	C-301
Overall layout plan	C-302
Layout plan (a - d)	C-303-306
Overall grading and drainage plan	C-401
Grading and drainage plan (a - d)	C-402-405
Drainage schedule	C-406
Overall utility plan	C-501
Utility plan (a - e)	C-502-506
Overall soil erosion and sediment control plan	C-601
Soil erosion and sediment control plan (a - e)	C-602-606
Erosion and sediment control notes and details	C-607
Overall landscape plan	C-701
Landscape plan (a - d)	C-702-705
Landscape notes and details	C-706
Proposed photometric light plan (a - c)	C-707-709
Detail sheets	C-901-905

Existing conditions plan of land (prepared by WSP USA, Inc.) 3/28/22 - 9 sheets
Unified building 2 partial floor plans and elevation plans (prepared by Gregory J. O'Connor Associates, Inc.) 3/21/22 - 11 sheets
Unified building 3 partial floor plans and elevation plans (prepared by Gregory J. O'Connor Associates, Inc.) 3/21/22 - 7 sheets
Unified building 2 & 3 renderings (prepared by Gregory J. O'Connor Associates, Inc.) 3/21/22 - 1 sheet
Unified pump house plans and elevations (prepared by Gregory J. O'Connor Associates, Inc.) 3/15/22 - 1 sheet

Findings:

1. The appropriateness of the specific site as a location for the use: The project is consistent with the spirit of the Bylaw and in conformity with the Master Plan for the Town of Sutton and the areas designation as an industrial area. The Town has identified this area of Sutton, including this area of Sutton, including the project lots as a prime location for the development of business and industry in order to increase the Town's tax base and drive job creation. While the use will be a change as the site has been dormant, the intent of the OLI Zoning was to encourage development of this type. This is where the Master Plan intended this type of development to be located.
2. The adequacy of public sewerage and water systems: The Project Lots will be adequately served by Unified Parkway in terms of frontage and utilities. Sutton Sewer Department & Wilkinsonville Water District have verified they have adequate capacity for the proposed use.
3. The effect of the developed use upon the neighborhood: The Project will maintain undisturbed, natural vegetated areas separating the Project Lots from abutting properties, essentially creating a natural buffer area in excess of applicable setback and buffer zone requirements. The site was previously a sand and gravel pit for well over 50 years. This use is consistent with, but an improvement on the historic use of the property. Effects of this use have been confirmed via the Towns consulting engineers to be compliant with State and local regulations. The Board will also impose conditions to help minimize impacts.
4. Whether there will be undue nuisance or serious hazard to vehicles or pedestrians: The project has been designed in a manner to provide safe site circulation for employees and loading and delivery vehicles servicing the buildings. Through the Towns consulting engineers these studies and proposed measures have been found to be consistent with proven industry standards and compliant with State and local regulations.
5. Whether adequate and appropriate facilities will be provided to ensure the proper operation of the proposed use, structure, or condition. Appropriate facilities will be provided to ensure proper operation of the warehouse buildings and related improvements, including utilities, drainage basins, grading, landscaped areas, lighting and other features. The Towns staff and consulting engineers have found these provisions to be compliant with State and local regulations and adequate for the proper operation of this use.

Approval of the requested permits is subject to the following conditions:
General Conditions:

1. Within a month of the appeal period concluding, the applicant shall provide a final set of plans with waivers granted and conditions of approval on the plan set for the Board's endorsement as the record set of plans upon which construction shall be based.
2. Unless a specific exception is approved by the Planning Director or Building Commissioner, construction shall be limited to Monday through Friday, 7:00 a.m. to 7:00 p.m. and Saturdays, 7:00 a.m. to 12:00 p.m., and shall exclude Sundays and the following holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, after 12 PM on Christmas Eve, and Christmas. From November 15th to April 1st. equipment may be started at 6:30 a.m. but no construction may commence until 7:00 a.m. unless a specific exception is granted as noted above.
3. During any construction, the Applicant shall maintain all feasible and reasonable means of dust control and shall collect all trash and debris daily.
4. The Applicant shall implement measures to ensure that noise during construction activities does not exceed acceptable levels, as set forth by Federal and State regulatory agencies. The Applicant shall cease any excessively loud noise during construction activities when directed by a duly appointed agent of the Board. No excessively loud activities are permitted prior to 7:00 AM or after 7:00 PM.

5. Prior to plan endorsement, the Applicant shall add one shade tree for every 100' in length of the perimeter of the parking areas dedicated to truck trailer parking. If the planting of such trees is not feasible or permitted around any portion of such perimeter, then the Applicant may add the remaining amount of required trees under this condition elsewhere on the site including at the industrial park entrances on Boston and/or Providence Roads.
6. The Board reserves the right to review landscaping for the purpose of requiring the addition of plants or screening materials which may be reasonably necessary to complete the intended aesthetics and screening.
7. The Board reserves the right to review lighting and require adjustments if they find it to be a danger or nuisance.
8. Materials intended for production and partially or fully assembled products shall not be stored outside except for temporary or occasional storage that is part of routine and customary loading and unloading operations of a warehouse and distribution center. Scrap being donated to the public may be located outside in a well-constructed and maintained enclosure similar to the existing one at 223 Worcester Providence Turnpike. If the applicant needs to establish a permanent outdoor storage area, they must seek approval of an amended site plan showing the location, size, and screening methods.
9. All construction equipment utilized to construct the Project shall be outfitted with manufacturer approved silencing equipment including mufflers and skirts.
10. The Applicant shall employ quiet building equipment and erection systems to minimize sound transmitted to nearby residences.
11. The Board reserves the right to review and assess noise complaints related to onsite operations. If the applicant/operator fails to cure or remedy a complaint the Board deems to be valid within a reasonable time as determined by the Board, the Board reserves the right to require the applicant and/or operator to provide adequate mitigation.
12. The Applicant shall provide post occupancy traffic monitoring studies for the Project. The monitoring shall be annual reviews of the traffic counts and conditions at the intersections identified in the Traffic Impact Evaluation from VHB dated March 30, 2022, as further modified and supplemented by the Applicant's Response to Comments dated June 8, 2022 and VHB's Response to Traffic Comments dated July 1, 2022 (collectively the "TIAS"), at 9, 18, and 30 months after initial occupancy of each building and again after full occupancy if this hasn't occurred before 30 months. The schedule of such monitoring may be adjusted with approval of the Board to coincide with any schedule for monitoring studies imposed by state permitting requirements for the Project (e.g. MEPA and MassDOT). In the event the monitoring study demonstrates an increase in peak hour traffic volumes that is directly and predominately identified as being generated from this Project (as opposed to other significant developments in the area or background traffic growth) of a material nature (defined as more than 20% for trailer truck above the estimated peak hour site related traffic volumes as set forth in TIAS), Sutton may retain a qualified traffic engineer firm having an office in the Commonwealth of Massachusetts to conduct a peer review of owner's monitoring report and, if determined to be necessary, require additional traffic impact mitigation measures to be implemented by the Applicant or, where appropriate, by one or more of the identified communities with reimbursement from the Applicant. Where necessary, the Applicant agrees to make applications to appropriate agencies and boards to obtain necessary approvals, and/or to cooperate with such applications, if such permits or permissions are necessary to construct or implement the recommendations of the peer reviewer. The Board and the Applicant acknowledge that some recommendations may exceed the Board's authority to permit or impose as a condition, such as signalization or other infrastructure improvements. Notwithstanding, the Applicant agrees to pursue such measures, if recommended, with reasonable diligence and subject to the limitations set forth herein.

13. The Applicant shall submit to the town a copy of the Road Safety Audit (RSA) for the intersection of Route 146 and Boston Road that they will prepare for MassDOT. The report will identify short-term and long term safety improvements at the intersection. The timing of the RSA report preparation is subject to the MassDOT timeline for the RSA process to be completed.
14. If the employee parking spaces provided at either site do not provide adequate parking capacity for the operation of the warehouse with distribution use at such site, the Applicant or operator of such site agrees to assess the parking capacity and make any necessary changes to the site to increase parking capacity to adequately meet employee demand. Such improvements may include restriping portions of trailer parking areas to be used for employee parking spaces as approved in advance by the Planning Board or, if necessary, constructing portions of the land banked parking shown on the approved site plans for such site.
15. Per comment #4 of the 4/25/22 memo from Donald Provencher on behalf of Wilkinsonville Water District, only liquid brine, sand, or sand treated with liquid brine shall be stored or used within the Zone II areas and next to jurisdictional wetlands. Other forms of deicing agents may be applied outside these resource areas. All deicing materials shall be stored in containment to prevent precipitation and/or runoff to come into contact with these materials. No crystalized sodium chloride, crystalized calcium chloride or other crystalized salt shall be allowed to be stored or applied within drainage areas tributary to or through stormwater basins located within the Zone II and deicing practices within these areas shall be limited to liquid salt brine, sand, or sand treated with liquid brine. These areas are to be depicted on the Alternative Deicing Restriction Areas plan updated before site plan endorsement.
16. Per comment #5 of the 4/25/22 memo from Donald Provencher on behalf of Wilkinsonville Water District, application of fertilizer shall be prohibited within the Zone II areas and next to jurisdictional wetlands as well as within drainage areas tributary to or through stormwater basins located within the Zone II. These areas are to be depicted on the Fertilizer Use Restriction Areas plan to be updated before site plan endorsement.

Prior to Commencement of Construction:

17. The Applicant shall prepare and submit for the Board's approval a construction traffic management plan which, at a minimum, shall address construction truck routes, contractor parking, staging areas, hours of operation, determination of need for police details during each identified construction phase.
18. All required approvals and/or permits shall be received from applicable permitting authorities. Notwithstanding the foregoing, the Applicant may continue any construction related to Unified Parkway and related roadway improvements. Site preparation and grading for Buildings 2 & 3 and related stormwater basins may proceed with receipt of all local approvals subject to all other applicable conditions.
19. A pre-construction meeting shall be held with the Planning Director and other Town staff as appropriate, the Town's consulting engineer, the applicant and/or his representative, the applicant's engineer, and the applicant's construction supervisor for this site. Minutes shall be drafted by the Town's consulting engineer and provided to all parties in attendance within 48 hours for approval prior to construction start to ensure all parties are in agreement.
20. The applicant will provide a minimum of one week's notice to review staked limits of clearing with a Planning Board representative.

Prior to Issuance of Building or Sign Permits:

21. Prior to issuance of permits for signage within the Town of Sutton the applicant shall submit any signage not shown on the Site Plan to the Planning Board. The Board shall review and act on the signage for compliance with the Sign Bylaw criteria.

Prior to Issuance of Occupancy Permits:

22. The Applicant shall submit an application to the Board to modify its definitive subdivision plan for Unified Parkway as well as a scenic road alteration application in order to seek approval of the redesigned Unified Parkway and Boston Road intersection proposed in conceptual form to the Board during the public hearing on this application. The application shall include a plan to construct a 5' wide sidewalk from Unified Parkway west adjacent to Boston Road along the Applicant's entire frontage separated from the roadway by a minimum 4' wide grass strip, to the extent feasible. Subject to and in accordance with the Board's approval of such applications, the Applicant shall construct said improvements, including an east bound, left turn lane from Boston Road into Unified Parkway, at their expense.
23. Prior to issuance of a certificate of occupancy, security systems and all necessary amplifiers shall be installed as required by the Police and Fire Chiefs.
24. Prior to issuance of a certificate of occupancy on any building, the Applicant shall submit to the Planning Board and receive approval for an As-Built Plan and written certification from the Project's engineer that the site and all infrastructure to serve this area of the site has been constructed substantially in accordance with the Site Plan. Additionally, the Applicant shall provide an As-Built plan to the Town of Sutton Assessors in accordance with the requirements in their email dated 4/23/22.
25. Prior to issuance of occupancy on any structure a knox box with building access keys and/or codes, a building layout plan and emergency contact shall be installed to the satisfaction of the Fire Department.
26. All exterior doors and roof access shall be marked on the interior and exterior with reflective, sequential numbering that is reflected on the building layout plans in the knox box.
27. The Fire Departments shall be given the opportunity to tour the building to orient themselves with the new structure.
28. The building occupant shall detail the method and location of snow removal from trucks.
29. The permit holder shall record such instruments, including a plan of the common driveway, as are necessary to establish easements providing for use of the common driveway and a restriction burdening all lots served by the common driveway that said common driveway shall remain private in perpetuity, no parking will be allowed on the common drive and all roadway maintenance, snowplowing and rubbish collection shall be the land owners' responsibility. The Plan and instruments shall be in a form approved by the Planning Board, and shall be recorded, with proof of such recording provided to the Planning Board.

Site Maintenance:

30. The Applicant shall ensure proper maintenance of plantings on the site, including immediate replacement of dead or diseased plantings unless it is winter or summer, in which case in the following planting season.
31. The Applicant shall make minor clarifications to the O & M plan as requested by the Planning Director prior to site plan endorsement. Thereafter the applicant shall comply with the final O&M plan for the site drainage systems. Inspection and maintenance shall be performed in accordance with the recommended schedule and a written report shall be prepared by the inspector, including any required correction actions to be taken, such report to be submitted to the Planning Board within fourteen (14) business days of owner's receipt of the report. Any required correction actions shall be promptly implemented by the owner at its expense.
32. The industrial wastewater (i.e., floor drain wastewater) holding tanks and ancillary components shall be designed, certified, operated and maintained in accordance with MassDEP WP56: Industrial Wastewater Holding Tank Compliance Certification and 314 CMR 18.00: Industrial Wastewater Holding Tank and Container Construction, Operation, and Record Keeping Requirements unless it is

demonstrated by the applicant that other regulations apply. The Applicant or holding tank operator shall provide the Town of Sutton with copies of records associated with the holding tanks within fourteen (14) days of the Town's request.

Michael Gagan, Chair

cc:	Town Manager	Building Commissioner	Board of Health	Conservation
	Board of Assessors	Fire Department	Police Department	Select Board
	Highway Department	Wilkinsonville Water	Sewer Department	Applicants
	Parties in Interest			

NOTE: This permit must be utilized within two (2) years or it will expire and no longer be valid.

Filed in the Town Clerk's office August 4, 2022

Laura J. Caruso, Town Clerk

This decision is subject to appeal in accordance with M.G.L. c. 40A § 17 within 20 days after this decision if filed with the Town Clerk.

I, Hereby certify that twenty-one days have lapsed since the filing of the above reference decision in the Town Clerk's office on _____ and that no appeal has been filed.

_____
Laura J. Caruso, Town Clerk

From: Karen Cadrin
To: mkarasik@vhg.com; idevoe@vhb.com; Vaughan, Eva (EEA)
Subject: Heavy Equipment & Trailer Truck Traffic - Sutton,,
Date: Sunday, September 25, 2022 3:08:31 PM

Hi,

I am a long time Sutton resident who recently moved within Sutton to Central Turnpike. Even though I have lived here for over 30 years, I didn't realize (until I moved here) the horrendous volume of heavy equipment, trailer trucks vs. commuter local traffic on Central Turnpike. There has been an uptick in Unified truck traffic on this road, adding to an already congested country road. I understand that this is a main thoroughfare; however it is 99% residential and thickly settled. The speed limit is 35 or 40 mph depending on what section of Central Turnpike is traveled. Trucks and other traffic typically exceed the posted limits easily by 15 - 20 mph with vehicles and trailer trucks flying up and down the road.

I am located on the corner of Ray Lane and Central Turnpike. This intersection has a blind rise that traffic flies over and down. I've come close to getting T-boned numerous times, and always have traffic riding my bumper creating unsafe and stressful entering and exiting.

I'm not sure if this is the right forum to address the amount and volume of heavy equipment and trailer traffic usage this road gets. It is not Route 146 but at times feels busier than the state highway. I would ask that the speed limit on this road be reduced to 30 mph (from 35) and 35 (from 40) accordingly and that a traffic study be undertaken to review volume of heavy equipment and trailer truck traffic to curtail and manage this problem (ie. no pass through heavy equipment traffic over XX pounds, axles over xx).

I am voicing this concern, however, If you speak with any Central Turnpike residents, or roads connecting off of Central Turnpike this is a constant complaint. Living on this street does not feel like country living - it is quickly resembling a major highway congested with trucks with loaded down cargo and heavy equipment with the unfortunate by-product of constant noise and permeating smell of diesel fuel.

Please feel free to reach out to me to discuss.

Thank you and best.

Karen Cadrin
468 Central Turnpike
Sutton
508-612-2869

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Paramount Realty Group
212 Worcester Street, Ste. E
North Grafton, MA 01536
508-612-2869

kcadrin10@gmail.com

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Central Regional Office • 8 New Bond Street, Worcester MA 01606 • 508-792-7650

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Bethany A. Card
Secretary

Martin Suuberg
Commissioner

September 26, 2022

Secretary Bethany A. Card
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Attention: MEPA Unit – Eva Vaughan

Re: Expanded Environmental Notification Form (EENF)
Unified Parkway Industrial Development
Sutton-Millbury
EEA #16593

Dear Secretary Card,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the EENF for the Unified Parkway Industrial Development (the "Project"). UGPG RE Sutton LLC (the "Proponent") is proposing to construct a warehouse and distribution building on 448 acres at 40 and 42 Unified Parkway and 105 Providence Road in Sutton. A portion of the site is in Millbury. The property consists of former gravel pits and vegetated undeveloped areas including large wetland systems.

The Proponent intends to construct the Project in phases. Phase 1 consists of construction of a 343,200-square-foot warehouse and distribution building with up to 90 automobile parking spaces and 118 trailer parking spaces on approximately 38 acres of the Project Site (the "Phase 1 Project Site"). Phase 2 includes the future development on the remaining lots on the Project Site, which are either not imminent (Lot 2) or unknown (Lot 1).

The Project is under MEPA review because it meets or exceeds the following review thresholds:

- 301 CMR 11.03 (1)(a)2 - Creation of ten or more acres of impervious area;

- Future phases are expected to meet or exceed mandatory Environmental Impact Review thresholds for Land and Transportation.

The Project requires the following State Agency Permits:

- Massachusetts Department of Transportation Vehicular Access Permit (for future phases);
- MassDEP - Superseding Order of Conditions (if Millbury Order of Conditions is appealed).

The Proponent is requesting a Special Review Procedure to allow the Phase 1 Project to proceed through MEPA review and permitting prior to advancing the future phases, even though Phase 1 considered alone exceeds an EIR threshold for creation of impervious area. MassDEP offers the following comments:

Water Supply

The Hatchery Road Well for the Wilkinsonville Water District is in the middle of the Project site on land owned by the Water District. The Wilkinsonville Water District serves a population of 2,662, with the Hatchery Well providing 25 percent of the water. The EENF provides minimal information about potential impacts to this well. For this reason, Mass DEP does not agree with the Proponent's statements that the Project with provide environmental benefits to the public water supply. MassDEP believes construction around the well has the potential to adversely affect drinking water quality. Although it appears that the building in Phase 1 may be outside of the Zone I for the well, MassDEP requests a description of the exact location of the building as well as confirmation of the District's ownership or control of the Zone I, including deed references. MassDEP also requests more detailed information about the layout of the proposed roadway in relation to both the Zone I and the Zone II and whether that construction is proposed as part of Phase 1 of the Project.

MassDEP does not consider redirection of water from the increased impervious surfaces to the area around the well as an environmental benefit. Water from the impervious surfaces may carry contaminants such as oil, vehicle fluids, and salt. That water will also be warmer after contact with the impervious surfaces. The amount of recharge will not change as a result; of the project; it will just be redirected toward the drinking water source.

The EENF estimates water demand for Phase 1 as 587 gallons per day (gpd) and wastewater generation as 525 gpd (35 employees at 15 gpd per employee). MassDEP questions the number of auto parking spaces (90) for 35 employees. The water use is higher than the wastewater to account for drip irrigation. The water supply lines will connect through a new 12-inch water main to an existing 12-inch water main on Boston Road at its intersection with Unified Parkway. Water will be provided via two lines, one for potable and one for fire protection. The Proponent should clarify whether a separate pumphouse will be required.

Per- and polyfluoroalkylated substances (PFAS) have been detected in the Hatchery Road Well below the current Massachusetts Drinking Water standards. The United States Environmental Protection Agency has published notice of its development of a national drinking

water for certain PFAS compounds, which may be more stringent than the current Massachusetts standard. The Proponent should clarify whether the Project may affect the ability of the Wilkinsonville Water District to install treatment for PFAS if necessary in the future.

The Proponent must provide a potable water use breakdown for Phase 1. The estimate of 587 gpd appears low. It is not clear that 32 gpd of water for all landscaping and drip irrigation on a 38-acre site will be sufficient. In addition, the EENF indicates that the warehouse will have water cooled chillers. This water usage does not appear to be accounted for in the EENF. In addition, 587 gpd through a 12-inch water line is very low and thus may cause a water age issue. The full build-out estimates 35,376 gpd for drinking water (Table 2-2).

The Wilkinsonville Water District has a Water Management Act permitted withdrawal of 0.29 mgd from all sources combined. It is important to note that the Wilkinsonville Water District has sufficient capacity to support only Phase I of the Project. Any additional build out of the Project will require additional capacity by the Wilkinsonville Water District and every effort by the Proponent to support its efforts would be necessary.

Bureau of Waste Site Cleanup (BWSC)

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications located within and near the proposed Project area. The following sites and related Release Tracking Numbers (RTNs) were found.

- **RTNs 2-0018327 & 2-0012481– 86 Providence St, Millbury, MA – Permanent Solution with no Conditions**
  These RTNs are related to a sudden release of approximately 1,400 gallons of liquid phenol from an aboveground storage tank at a specialty fabric manufacturing facility. The released phenol impacted soil and groundwater at and downgradient of the subject site. Following installation and 18 months of operation of a groundwater interreceptor and recovery system, post-remedial soil sampling indicated that background conditions had been achieved and post-remedial groundwater monitoring indicated that concentrations of phenol in groundwater were below applicable MCP Method 1 Groundwater Standards. A Permanent Solution with no Conditions was submitted to the Department in December 2014. These disposal sites abut or are on the Project site and may have the potential to impact the Project.
- **RTN 2-0017245 – Route 122A Bridge over Blackstone River, Millbury – Utility Release Abatement Measure**
  This RTN was issued due to the presence of arsenic and benzene in soil at concentrations greater than their respective MCP Reportable Concentrations. The Massachusetts Highway Department notified MassDEP of the release condition on September 12, 2008, at which time they indicated their intention to conduct a Utility Release Abatement Measure (URAM). On January 20, 2009, the Department received a URAM Status Report, which indicated that approximately 800 tons of soil had been excavated and shipped off-site. The Department does not have any additional information related to the status of this RTN. This disposal site abuts or is on the Project site and may have the potential to impact the Project.

- **RTN 2-0015295 – 100 Worcester-Providence Turnpike, Millbury - Class A-1 Response Action Outcome Statement**
  This RTN is related to a release of approximately 10 gallons of diesel fuel to the pavement and a downgradient catch basin. The release was the result of a customer overfill at a diesel fuel dispenser located at a retail gasoline station and convenience store. Response actions included deployment and recovery of absorbent materials and removal of diesel fuel impacted water in the catch basin. No soil or groundwater sampling was conducted as part of the assessment activities conducted at this disposal site as the Licensed Site Professional (LSP) of record opined that soil and groundwater were not impacted by the release. A Class A-1 Response Action Outcome (RAO) Statement was submitted to the Department in August 2004.
- **RTN 2-008730 – 40 Hatchery Road, Sutton - Class A-1 Response Action Outcome Statement**
  This RTN is related to a sudden release of approximately 23 gallons in non-PCB mineral oil dielectric fluid (MODF) from a pole-mounted transformer. The released MODF impacted soils in the area surrounding the pole. Approximately 33 cubic yards (yds^3) of impacted soil were excavated and disposed of off-site. There were reportedly no impacts to groundwater a s a result of the release. A Class A-1 RAO was submitted to the department for this disposal site in August 2004. This disposal site abuts or is on the Project site and may have the potential to impact the Project.
- **RTN 2-0010801 – 1 Blackstone Road, Sutton, MA – Class A-2 Response Action Outcome Statement**
  This RTN is related to a historic release of petroleum hydrocarbons from a former gasoline underground storage tank (UST) system. At the time of release discovery, the 10-acre subject site was improved with a large building housing offices and a meat processing facility as well as a vehicle maintenance garage. The release was discovered during the removal of the former USTs. Response actions included excavation and off-site disposal of approximately 407 tons of impacted soil, implementation of a chemical oxidation injection program, use of oxygen release compound socks in select site monitoring wells, and performance of a monitored natural attenuation program. Residual soil and groundwater contamination remained present at the site following the completion of site assessment and remediation activities; however, a Method 1 Risk Characterization supported the conclusion that the disposal site did not pose a significant risk of harm to human health, safety, public welfare, or the environment. A Class A-2 RAO Statement was submitted to the Department in May 2011. This disposal site abuts or is on the Project site and may have the potential to impact the Project.
- **RTN 2-0017039 – 1 Blackstone Street, Sutton – Class A-2 Response Action Outcome Statement**
  This RTN is related to a release of approximately 30 gallons of non-PCB MODF from a pole-mounted transformer. Release MODF impacted soil surrounding the release location. Approximately 16 cubic yards of impacted soil were excavated and disposed of off-site. Groundwater was not encountered during the response actions and was not characterized but presumed to not be impacted by the Licensed Site Professional of record. A Method 1 Rick Characterization and Class A-2 RAO Statement were submitted to the Department in October 2008, which indicated that residual soil impacts remained on-site but a condition of No significant Risk had been achieved. This disposal site abuts or is on the Project site and may have the potential to impact the Project.

- **RTNs 2-0010227 & 2-001-575 – 33 Providence Road & 10 Old Providence Road, Sutton – Class A-3 Response Action Outcome Statement/Activity and Use Limitation**
  These RTNS are related to historical releases at a former apple orchard between the mid-1960s and 1970s. Pesticides were released to the environment during mixing of pesticides in spray equipment and/or because of the cleaning of the equipment. Soil at this Disposal Site is impacted by residual lead and organic pesticide constituents. Concentrations of contaminants in groundwater were below applicable MCP Method 1 Groundwater Standards. In May 1999, a Class A-3 RAO Statement supported by a Method 3 Risk Characterization were submitted to the Department. A Notice of Activity and Use Limitation (AUL) was also recorded for these parcels. The AUL restricts residential use of the property as well as removal and relocation of surface soil at the property without prior evaluation and approval by a LSP. These disposal sites abut or are on the Project site and may have the potential to impact the Project.
- **RTN 2-0011076 – 9 Harback Road, Sutton – Class A-2 Response Action Outcome Statement**
  This RTN is related to a release of approximately 250 gallons of #2 fuel oil from a vent pipe associated with a former UST located at an industrial facility. The released oil impacted the ground surface and some volume migrated downgradient to an unnamed brook and ultimately to Marble Pond. Soil impacts were observed to include the presence of fuel oil constituents as well as lead and chromium (unrelated to the oil release and issued a separate RTN by the Department). Release response actions included recovery of fuel oil and impacted snow/ice/water, deployment and retrieval of absorbent materials and absorbent booms, and limited impacted soil excavation activities (approximately 19 tons). The fuel oil UST associated with the release was also excavated and removed from the site. A Method 1 Risk Characterization and Class A-2 RAO Statement were submitted to the Department for this release in August 1996. This disposal site abuts or is on the Project site and may have the potential to impact the Project.
- **RTN 2-0011136 – 9 Harback Road, Sutton – Temporary Solution Statement**
  This RTN is related to the discovery of weathered fuel oil impacts to soil during the removal of a former underground storage tank at an industrial facility in February 1996. Investigations identified elevated concentrations of lead in shallow soil at imminent hazard levels and chlorinated volatile organic compounds (CVOCs) in groundwater above drinking water standards and within 500 feet of private drinking water supply wells. MassDEP issued RTN 2-0012143 in April 1998 due to the drinking water standard exceedances in groundwater, and that RTN was linked to 2-0011136. In October 2005, MassDEP issued another RTN (2-0015941) due to the detection of cadmium and tetrachloroethylene in two nearby private wells. That RTN was also linked to 2-0011136. Historical response actions have included and off-site disposal of petroleum and lead impacted soils and performance of a monitored natural attenuation (MNA) program at the site. Residual concentrations of petroleum constituents and metals remain in soil at the site, and residual concentrations of CVOCs remain present in groundwater. A Class C-2 RAO Statement (Temporary Solution) was submitted to the Department for this RTN in January 2010, and MNA is ongoing. This disposal site abuts or is on the Project site and may have the potential to impact the Project.

- **RTN 2-0020150 – 9 Harback Road, Sutton – Immediate Response Action**
  This RTN is related to the detection of chlorinated VOCs in private drinking water wells. In November 2016, a bedrock drinking water well installed at the property located at 31 Dudley Road in Sutton, and subsequent testing indicated the presence of trichloroethylene (TCE) testing of a water sample collected from the newly installed well. The property owner provided the results of these laboratory analyses to the Sutton Health Department who, in turn, provided the results to MassDEP. MassDEP concluded that the disposal site associated with RTN 2-001116 and located at 9 Harback Road was the likely source of the contamination in the private well, and the Department issued RTN 2-20150. Immediate Response Action (IRA) activities performed under RTN 2-20150 have included sampling of additional nearby private water supply wells, installing a point-of-entry treatment (POET) system at 37 Dudley Road, maintaining new or existing POET systems located at the 31, 35 and 37 Dudley Road, and supplying bottled water to the 24 and 27 Dudley Road properties. IRA activities were discontinued by the potentially responsible party in January 2020. This disposal site abuts or is on the Project site and may have the potential to impact the Project.

The Proponent is advised that excavating, removing and/or disposing of contaminated soil, pumping of contaminated groundwater, or working in contaminated media must be done under the provisions of MGL c. 21E (and, potentially c.21C) and OSHA and may require the submittal of a Release Abatement Plan or to be conducted as a Phase IV Remedial Action. Excavating contaminated soil or pumping contaminated groundwater could be considered response actions under the MCP. Conducting response actions without MassDEP approval may result in a penalty.

If oil and/or hazardous materials are identified during the implementation of this Project, notification to MassDEP may be required pursuant to M.G.L. c. 21E and the MCP. A Licensed Site Professional (LSP) should be retained to determine if submittals to MassDEP are required to conduct the work or if notification is required. The BWSC may be contacted for guidance if questions arise regarding contaminated material.

If dewatering activities are to occur at a site with contaminated groundwater, or in proximity to contaminated groundwater where dewatering can draw in the contamination, a plan must be in place to properly manage the groundwater and ensure site conditions are not exacerbated by these activities.

Parties constructing and/or renovating buildings in contaminated areas should consider whether vapors of oil and/or hazardous materials (OHM) in subsurface soils and/or groundwater could impact the quality of the indoor air of the buildings. All relevant site data, such as contaminant concentrations in soil and groundwater, depth to groundwater, and concentrations of OHM in soil gas should be evaluated to determine the potential for indoor air impacts to existing or proposed building structures. Particular attention should be paid to the vapor intrusion pathway for sites with elevated levels of chlorinated volatile organic compounds such as tetrachloroethylene (PCE) and trichloroethylene (TCE). MassDEP has additional information about the vapor intrusion pathway on its website at https://www.mass.gov/lists/site-cleanup-fact-sheets.

Construction activities conducted at a disposal site shall not prevent or impede the implementation of likely assessment or remedial response actions at the site. Construction of structures at a contaminated site may be conducted as a Release Abatement Measure if assessment and remedial activities prescribed at 310 CMR 40.0442(3) are completed within or adjacent to the footprint of the proposed structure prior to or concurrent with the construction activities. If encountered, contaminated soils should be excavated to construct clean utility corridors for all new utility installations.

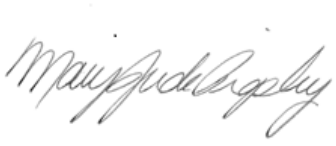
Wetlands

A Notice of Intent (File # 303-957) was filed with the Sutton Conservation Commission (the "Commission") and MassDEP for construction of the roadway and stormwater management in the Buffer Zone to a Bordering Vegetated Wetland. An Order of Conditions (OOC) was issued by the Commission on January 27, 2022 approving the proposed Project. There was no appeal to MassDEP of the OOC. A Notice of Intent (File # 303-966) was filed with the Commission and MassDEP for construction of two commercial/industrial buildings, parking and stormwater management in the Buffer Zone to a Bordering Vegetated Wetland. An OOC (File # 303-966) was issued by the Commission on July 8, 2022 approving the proposed Project. There was no appeal to MassDEP of the OOC.

The EENF is not clear as to whether a Notice of Intent will be filed with the Millbury Conservation Commission for the Project. At various places in the document, it states that a filing may be required and at others, that no additional wetlands filings are necessary. This issue should be resolved before beginning Phase 2 of the Project.

MassDEP appreciates the opportunity to comment on the Project. If you have any questions regarding these comments, please do not hesitate to contact JoAnne Kasper-Dunne, Central Regional Office MEPA Coordinator, at (508) 767-2716.

Very truly yours,



Mary Jude Pigsley
Regional Director

cc: Commissioner's Office, MassDEP

COMMONWEALTH OF MASSACHUSETTS
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Beth Card
Secretary

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29 September 2022

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

RE: Unified Parkway Industrial Development, Sutton and Millbury, MA, EEA #16593

cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resource
Patrick Woodcock, Commissioner, Department of Energy Resources

Dear Secretary Card:

We've reviewed the Expanded Environmental Notification Form (EENF) and subsequent correspondence for the proposed project. The project includes a 343,200-sf warehouse/distribution center (heated only). About 11,000-sf (3%) of this area is expected to have office use (heated and cooled).

Executive Summary

The building has near-negligible emissions mitigation and is essentially a "code" building.

Mitigation can be improved by a factor of more than **x3** with hybrid electrification. This approach is commonly used by other warehouse buildings reviewed by DOER. As proposed, this warehouse project represents a **significant outlier** compared to other warehouse projects. At a minimum, hybrid electrification should be used to address the insufficient mitigation. Ventilation energy recovery and reduced air-infiltration should also be evaluated.

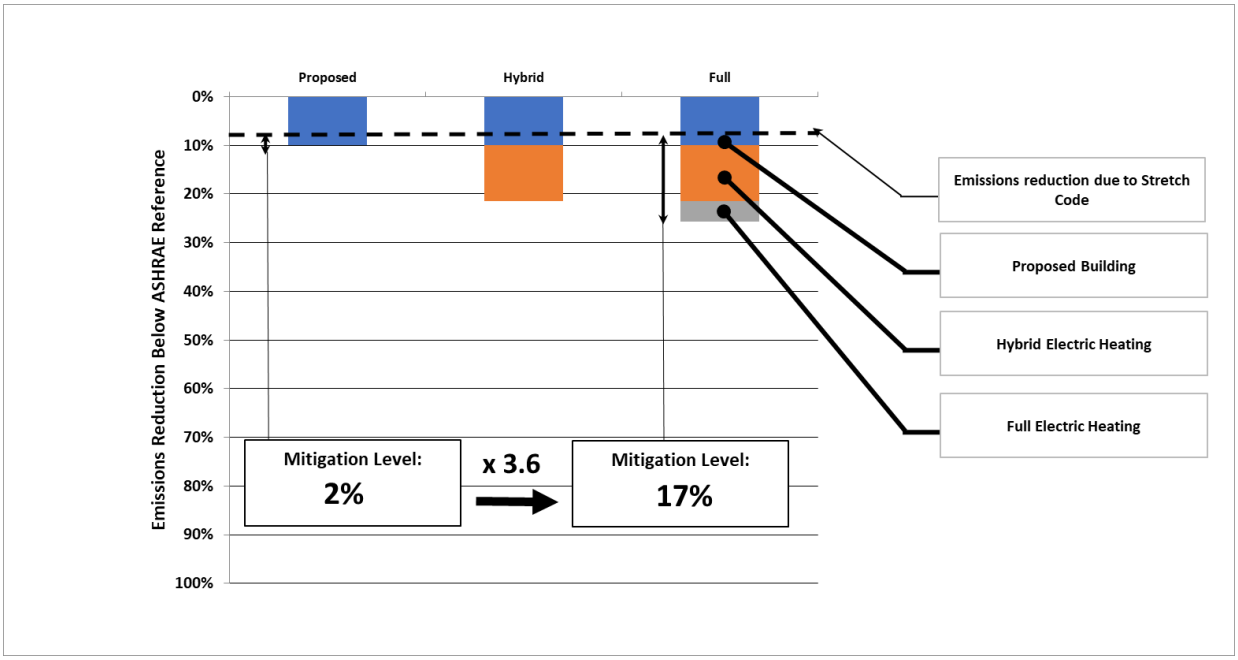
The proponent states that hybrid electrification is not feasible based on cost. However, this decision is based on a near fully-redundant electric and gas approach (electric sized to 67% peak, gas sized to 100% peak). Instead, the proponent should evaluate a traditional hybrid electric and

gas approach (electric at 20% peak, gas at 100% peak). A "right-sized" hybrid electrification approach could cost **65% less** than described in the submission.

Mitigation Level

The illustration below compares what is currently proposed to other alternatives which can greatly improve project mitigation. In summary:

- Mitigation Level[1] as proposed is **just 2%** meaning that the project is essentially a code building, with very little mitigation as noted above (left column).
- Building as proposed, swapping for all gas to a right-sized hybrid electric/gas heating system, would improve ML to 13% (middle column).
- Building as proposed, swapping gas for full electric heating system, would improve ML to 17% (right column).



The "middle" option, hybrid gas/electric, provides a cost-effective balance that achieves most of the mitigation at much less cost than full mitigation. This approach is recommended.

Other strategies to evaluate and consider include improving building envelope improvements (air infiltration) and ventilation energy recovery. The following sections presents more detail about electrification and other mitigation strategies.

[1] Mitigation Level is the GHG reduction in percent above and beyond what is required by building code, including Stretch Code if applicable. A Mitigation Level of 0% means the project has no mitigation.

Thermal Energy Demand Intensity (TEDI)

General

The combination of quality envelope, heat recovery (during ventilation and during concurrent heating and cooling), and management of solar gains can result in significant reduction in heating (and cooling) thermal energy demand intensity (TEDI, units of kBtu/sf-yr). Heating TEDI is the heating energy required to offset enclosure losses and to heat fresh ventilation air. Cooling TEDI is the cooling energy required to be removed to offset heat energy entry into the enclosure and to remove heat energy from fresh ventilation air.

Thermal energy demand reduction should always be a "first strategy" in building design as reduced heating and cooling demand translates to:

- Simplified space heating electrification;
- Reduction, and possible elimination, of perimeter heating and other systems;
- Improved resiliency;
- Reduced peak demands;
- Improved occupant comfort;
- Reduced maintenance.

Specific TEDI reduction strategies are:

- High-performance window and walls;
- Thermally broken window and wall components to eliminate thermal bridges;
- Low air-infiltration;
- Ventilation energy recovery;
- Energy recovery during concurrent heating and cooling;
- Solar gain management via external shading and/or low solar heat gain coefficient (SHGC)

Heating and cooling TEDI can be calculated using the same energy modeling tools as currently used to estimate energy use. We recommend reporting both heating and cooling TEDIs for the all scenarios.

Reporting TEDIs

We recommend providing a summary of both heating and cooling TEDI information for all scenarios, with the warehouse and office spaces broken out separately. This information can be used to assess envelope (air infiltration), energy recovery, and solar gain management improvements.

Vertical Envelope Performance

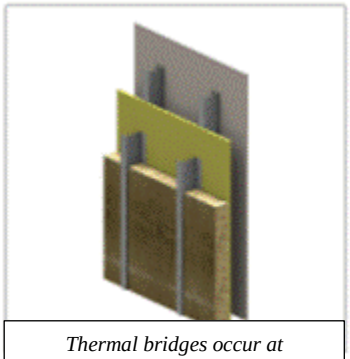
It appears that the project is committing to U-0.046 (R-21 c.i. equivalent), though this should be confirmed. Code minimum is U-0.055 (R-18 c.i. equivalent).

Horizontal Envelope Performance

In large footprint buildings, roof insulation can have a significant impact on energy use. It appears that the project is committing to U=0.027 (R-37 c.i. equivalent), though this should be confirmed. Code minimum is U-0.032 (R-31.3 c.i. equivalent).

Thermal bridges

Thermal bridges are elements that interrupt areas of uniform thermal resistance in the building envelope. Thermal bridges occur at commonly used girt systems used to attach wall coverings, curtain wall connections, door to wall intersections, parapets, penetrations, window to wall intersections, wall to wall intersections, and in many other locations.



Thermal bridges occur at commonly used "z-girts" used to connect wall covers. Thermal bridges also occur at balconies, parapets, window to wall intersections, and many other locations

Thermal breaks should be thoroughly incorporated into the design to ensure that the intended wall, window, and roof performance is being delivered. The thermal bridge accounting method described in the Building Envelope Thermal Bridging Guide[2] can be used. This design guide now has a web-based database[3]

All window and wall thermal values should reflect the thermal values after accounting for thermal bridges. Unfortunately, many projects do not typically account for thermal bridges other than wall studs and delivered envelope performance is likely lower, potentially significantly lower, than intended by design.

The project should confirm that reported envelope performance values include the effect of thermal bridges.

Air Infiltration

Low air infiltration, confirmed with whole-building testing in the field, is essential to ensure high levels of energy efficiency, low heating and cooling TEDI, and greenhouse gas mitigation. Even small amounts of air leakage can reverse all other envelope progress.

The project is proposing code-level required air infiltration of 0.4 cfm at 75 Pa. We recommend evaluating lower air infiltration (0.25 cfm at 75 Pa) and committing to confirm air leakage rates with field testing.

[2] Building Envelope Thermal Bridging Guide, Version 1.2, 2018, BC Hydro available here https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/power-smart/business/programs/building-envelope-thermal-bridging-guide-version-1.2.pdf

[3] https://thermalenvelope.ca/

Energy Recovery

Energy recovery is a key strategy to reduce heating and cooling TEDI and emissions. There are two categories of energy recovery, as described below:

- *Ventilation energy recovery:* Ventilation energy recovery includes systems that recover energy in a building's ventilation system.

- *Concurrent heating and cooling energy recovery:* Sometimes buildings experience a need for concurrent space heating and space cooling (heating and cooling at the same time, usually in different parts of the building or building systems). If a building has an appreciable amount of concurrent heating and cooling, an effective TEDI and emission reduction strategy is utilizing energy recovery which uses heat generated from space cooling and compression processes to be usefully reused for space heating.

The project evaluated, but is not proposing, ventilation energy recovery for one of the full electrification scenarios. We recommend an additional evaluation of ventilation energy recovery as part of the hybrid electrification scenario.

In terms of concurrent energy recovery, electric air source VRF systems are available which can recovery concurrent heating and cooling. This kind of system is recommended for the office portion of the building which is committing to air source systems.

Solar Gain Management

Solar gains can be managed with a combination of external shading and/or improved solar heat gain coefficient (SHGC) vision glass. For the office portion of the project, we recommend evaluations and design of external shading and/or improved SHGC to manage cooling TEDI. No information was provided in the submission regarding SHGC or external shading strategies for the office portion of the building.

Efficient Electric Space Heating

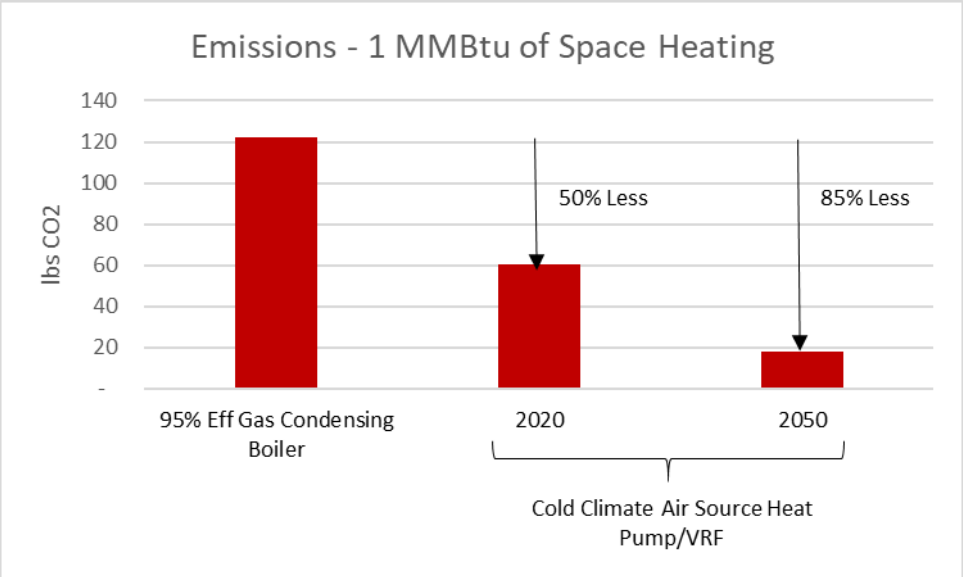
Efficient electrification and renewable thermal space and water heating entails the swapping of fossil fuels (natural gas, oil, and propane) or electric resistance systems with one or more of the following:

- Cold-climate air source heat pumps and variable refrigerant flow (VRF) for space heating;
- Air source heat pumps for water heating;
- Ground source heat pumps;
- Solar thermal.

Electrification of space and water heating is a key mitigation strategy with significant short- and long-term implications on GHG emissions. Massachusetts grid emissions rates continue to decline with the implementation of clean energy policies that increase renewable electricity sources. The implication is that efficient electric space and water heating with cold climate air source heat pump

and VRF equipment have lower emissions than other fossil-fuel based heating options, including best-in-class (95% efficient) condensing natural gas equipment.

Currently, efficient electric heating has approximately **50% lower emissions** in Massachusetts than condensing natural gas heating. By 2050, efficient electric heating is expected to have approximately **85% lower emissions** in Massachusetts than condensing natural gas heating. See illustration below.



We are pleased to see that the project is proposing efficient electrification (with air source heat pumps) for the office portion of the project (about 2% of the proposed building). Unfortunately, no electrification is proposed for the non-office areas (about 98% of the proposed building). Electrification, either hybrid or full, for non-office areas would have a major positive impact on mitigation for this project as noted above.

The submission information states that electrification was not chosen due to cost. However, a right-sized, cost-effective hybrid elec/gas system was not evaluated. Instead, a much more expensive, near fully-redundant, elec/gas system was evaluated. While a fully redundant system would be very expensive, a right-sized hybrid system offers a much more cost-effective approach that improves GHG emissions mitigation for this project.

Hybrid systems typically consist of a combination of gas heating systems, sized to provide 100% of the space heating load, and electric heat pump systems, sized to provide 20-25% of the space heating load. The electric heat pump systems are used as the primary space heating system while the gas system is used as the secondary space heating system, used only to supplement when the capacity of the electric heat pump system is exceeded. Because heating loads are typically only a fraction of the peak heating load most of the time, it's possible that the electric heat pump system is the only system necessary 80 to 90% of the time.

In the submission, the system described as the "hybrid" elec/gas system has heat pump equipment sized to almost **70%** of the peak heating load, or, about **x3 larger** than a typical hybrid system would use. The proponent dismisses this system on the basis of cost ($9.96/sf).

To assess a traditional, right-sized hybrid system, DOER pro-rated the component cost values supplied in the detailed cost estimate. DOER assumed electric heat pumps for 20% of the peak heating and gas for 100% of the peak heating load. Based on this, DOER estimates that a right-sized hybrid system would cost about $3.42/sf, not $9.96/sf. This is about 65% less than the cost of the near fully-redundant system evaluated in the submission.

This right-sized hybrid approach, which results in significant mitigation, is in the same cost ballpark as the proposed all-gas system ($3.42/sf compared to $1.78/sf) but yields almost no mitigation.

In summary:

Approach	Configuration	Unit Cost ($/sf)
Proposed - all gas	600-ton (equiv) gas heating	$1.78
Near fully-redundant elec/gas system in submission (described as hybrid)	**400-ton** electric heat pump (primary) plus 600-ton (equiv) gas (secondary)	$9.97
Right-sized hybrid	**120-ton** electric heat pump (primary) plus 600-ton (equiv) gas (secondary)	$3.42

Based on this, hybrid electrification (using a right-sized approach) is recommended.

Efficient Electrification – Service Water Heating

Similar to above, due to Massachusetts electric grid emissions, even swapping from best in class condensing gas to air source heat pump service water heating results in significant emissions reduction. We are pleased to see the project propose air source heat pump water heating.

Operating Costs

Note that both right-sized hybrid and full electrification **cost less to operate** than code (between 1 to 3% reduction). The proposed (all-gas) approach also costs less to operate. It is the case that gas, all else being equal, results in more operational savings (7% reduction) then the same building electrified. However, an all-gas approach results in insufficient mitigation (shown in red).

One approach to achieve lower operating costs and sufficient level of GHG emissions mitigation is to reduce thermal energy demand intensity (TEDI) via envelope and energy recovery strategies. As noted above, lower-TEDI strategies have not been fully evaluated.

	Code Building	Proposed all gas	As proposed, hybrid elec	As proposed, full elec	Low TEDI, hybrid elec
Total cost to operate	$494,928	$462,627	$482,348	$488,638	Unevaluated – target low TEDI scenarios to address both Mitigation Level and operating cost
Operating cost improvement	-	$32,300	$12,580	$6,289	
% Improvement compared to code	-	7%	3%	1%	
Mitigation Level	-	2%	13%	17%	

Life Cycle Cost Assessment

The submission contains a simple payback analysis for various strategies evaluated which show relatively long "paybacks". These payback values, however, are not based on a right-sized hybrid system, which should be updated.

In addition, the simple payback assessment should be replaced with a more complete life cycle cost assessment that incorporates all costs and benefits. At a minimum, this assessment needs to include:

- Cost of gas utility construction or upgrades.
- Electric utility upgrade costs. In the electric scenario, these costs would be at the time of construction. In the gas scenario, these costs would be in the future, during building service, and thus should include potential retrofit premiums. Electric upgrade costs may be able to be mitigated or avoided by deploying low-TEDI strategies which is one reason why these strategies are so important.
- Replacement costs at end of life;
    - For a gas scenario, added electric upgrades and building structure upgrades for conversion from all gas to electric heating at the end of life. In the submission cost details, electric and structural infrastructure enhancements account for about 20% of the cost of electrification. These costs may need to be increased due to retrofitting during period when building is in service, rather than during initial construction.
- For lower-TEDI scenarios, HVAC equipment and utility service upgrades should reflect smaller equipment needs.

Solar PV

The project is committing to 80% solar PV readiness, which is a significant increase over code required 40%. We commend the project for this commitment.

Electric Vehicle (EV) Ready Parking Spaces

EV charging stations are critical for the continual transition towards electric mobility. The project is committing to 10 EV charging stations with all remaining spaces to be EV-ready. We commend the project for this commitment.

Codes and Baseline

Energy code for this project is 2013 ASHRAE Appendix G with 10% energy reduction on site energy basis. There are many Massachusetts amendments including: C402.1.5 (envelope), C405.3 and C405.4 (lighting), C405.10 (EV charging), and C406 (three additional efficiency measures).

The following C406 measures are proposed to be included:

- C406.2 – Option 1 - More efficient HVAC performance
- C406.4 – Option 3 – Digital controls
- C406.8 – Option 7 – Enhanced envelope performance

Recommendations

In general, the building has insufficient mitigation and, at a minimum, should incorporate hybrid electrification. Additional low-TEDI strategies are also recommended to be evaluated. Specific recommendations for the next submission are as follows:

1. Incorporate hybrid, or full, electrification to address the insufficient mitigation. Electrification is "state of practice" for other similar building that we have reviewed. Hybrid electrification would improve Mitigation Level from 2% to 13%.

   Once right-sized, hybrid electrification appears much more cost effective than reported in the submission with costs on par with the proposed all gas system. All gas was reported at $1.78/sf while right-sized hybrid would be about $3.42/sf. This is much less than the reported hybrid cost of $9.96/sf.

2. Develop additional scenarios to evaluate low TEDI strategies, including right-sized hybrid with:

   a. low air infiltration (0.25 cfm/sf at 75 Pa)
   b. ventilation air energy recovery of at least 50%
   c. Both (a) and (b)

3. Confirm vertical and horizontal envelope commitments, noted above.

4. For all scenarios, commit to on-site air infiltration testing.

5. For the office space, commit to air source VRF systems that are equipped with heat recovery.

6. Ensure that the building design and construction properly account for thermal bridges. Thermal breaks should be incorporated to ensure that the proposed wall, roof, and window performance is being delivered. Thermal bridge accounting as described in the Building Envelope Thermal Bridging Guide can be used.

It would also be useful to perform the following:

1. Report the following for all scenarios, separated for the office and warehouse spaces:

    i. Heating and cooling thermal energy demand intensity TEDI (kBtu/sf-yr)
    ii. Heating and cooling peak loads for each month (MBH)
    iii. Peak energy use for each month, broken down by energy type (gas/elec) (MBH)
    iv. Total annual heating and cooling (MMbtu/yr)
    v. Total annual energy use, broken down by energy type (MMbtu/yr)

2. Revise life cycle costs to including following:

    - All costs of gas utility construction and upgrades.

    - Electric utility upgrade costs at time of construction, or, in the future, in the case of the gas scenario (which could be a high-cost retrofit). For lower-TEDI scenarios, reduced electric upgrade costs as appropriate.

    - Replacement costs at end of life;

        - For a gas scenario, added electric and structural upgrades for conversion to electric heating with possible additional premium due to retrofitting during period when building is in service.

    - For lower-TEDI scenarios, HVAC equipment should be downsized to reflect smaller equipment needs.

3. For the office space, report the solar heat gain coefficients (SHGCs) used for the baseline and proposed scenarios and possible external shading strategies. Cross reference with the cooling TEDI and peak load information above to evaluate whether additional improvements are warranted.

Sincerely,

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