



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

Maura T. Healey
GOVERNOR

Kimberley Driscoll
LIEUTENANT GOVERNOR

Rebecca L. Tepper
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1081
<http://www.mass.gov/eea>

June 14, 2024

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

PROJECT NAME : Downtown Complete Streets Corridor and Intersection
Improvements on Main Street (Route 9)
PROJECT MUNICIPALITY : Northampton
PROJECT WATERSHED : Connecticut
EEA NUMBER : 16817
PROJECT PROPONENT : City of Northampton
DATE NOTICED IN MONITOR : May 8, 2024

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 Final Environmental Impact Report (FEIR) and hereby determine that it adequately and properly complies with MEPA and its implementing regulations. As noted in my Certificate on the Expanded Environmental Notification Form (EENF) and Proposed EIR (EENF/Proposed EIR) issued on April 29, 2024, the Proposed EIR was published for review as a FEIR pursuant to Section 11.06(14)(a) of the MEPA regulations. It was subject to a 30-day public comment period, during which time no additional comments were received.

Project Description

As described in the FEIR, the project is proposed by the City of Northampton (City), and consists of the reconstruction and modification of a 0.4-mile length of Main Street (Route 9), from approximately 130 feet west of the intersection of Elm and West Streets to the intersection of Market and Hawley Streets. The project involves intersection and side street improvements at ten (10) locations along the project corridor. According to the FEIR, the Massachusetts Department of Transportation (MassDOT) has identified Main Street as one of the region's top crash clusters for people walking and biking and it has been a Top 25 High Crash Segment in the Pioneer Valley. The FEIR describes the purpose of the project as improving safety and accessibility, while enhancing the vibrancy of Main Street. It is being partially funded through MassDOT's Complete Streets program.¹ The entire street will be made fully compliant with the Americans with Disabilities Act (ADA). Specifically, the project involves narrowing the roadway; defining travel lanes; widening sidewalks; adding separated bike lanes;

¹ <https://www.mass.gov/complete-streets-funding-program>

installing street furniture, planting trees, installing new curbing, pavement, pavement markings, crosswalks, and signage; adjusting crossings and signalized intersections to be more bicycle and pedestrian friendly; and improving the functioning of intersections and the roadway. As part of the construction, aging and deteriorating water, sewer, and drainage lines, will be replaced with modern and more resilient utilities.

Project Site

The 8.12-acre project site consists of a 0.4-mile section of Main Street in the City's central downtown area, with additional work on abutting portions of side streets that intersect with Main Street within the corridor. The roadway is fully developed, with 7.96 acres of the 8.12-acre site currently consisting of impervious surface. Land uses are generally characterized by dense commercial and institutional services, with mixed use development, industrial, transportation, and parking uses as well. West of the King Street/Pleasant Street intersection, the curb-to-curb pavement on Main Street ranges in width from 60 feet to approximately 102 feet and is ambiguously used as either two or four, unlined travel lanes. East of the King Street/Pleasant Street intersection, the pavement narrows to between 54 and 65 feet wide with one clear lane for vehicle travel in each direction. Main Street is functionally classified as an Other Numbered Highway but is not a state highway within the project limits. As described in the FEIR, Main Street is also a center of transit activity with connections both locally and regionally, with service from the Pioneer Valley Transit Authority (PVTa) and Franklin Regional Transit Authority (FRTA), Amtrak, and other transportation service providers. Multiple subsurface utility lines are present within the roadway corridor including gas, telecommunications, sewer, water, and storm drainage. Sewer, water, and drainage lines particularly are aging beyond useful life with much of the infrastructure over 100 years old. The City will use the corridor reconstruction as an opportunity to replace these three types of utilities.

There are no streams, wetlands, associated buffer zones, lands subject to flooding, or Riverfront Areas as regulated by the Massachusetts Wetlands Protection Act (MGL Ch 131 S 40) within the project site. As described in the FEIR, the project limits end over 1,400 feet from the boundary of the extensive floodplain associated with the Connecticut River and lie an approximately equal distance to the Mill River Diversion floodplain to the west. According to the FEIR, the downtown project limits are elevated above surrounding land areas. 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 Mill River and Connecticut River, both within a half-mile of the project site, are listed as impaired waterbodies. Two (2) state-listed disposal sites of varying regulated status under the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) have been identified in the vicinity of the project corridor, assigned Release Tracking Numbers (RTNs) 1-0010539 and 1-0018592.

The entire project area is located within either the National Register of Historic Places (NRHP) Northampton Downtown Historic District or the Local Historic District (LHD) Elm Street Historic District. The site contains 73 structures listed in the Massachusetts Historical Commission's (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth. According to the FEIR, the project does not involve any demolition or destruction of any listed or inventoried historic resources. The project site contains Article 97 Land² associated with abutting land uses. The proposed activities

² Article 97 refers to Article 97 of the amendments to the state constitution, which require a 2/3 vote of the General Court to authorize any change in use or disposition of land or interest in land that was acquired for the purposes set forth in Article 97, such as park and conservation land.

will not extend into these parcels with the exception of tree protection measures and temporary easements near the courthouse fence. As stated in the FEIR, the project will not require a land transfer, change of use, or other actions necessitating Article 97 parcel disposition or involvement of the Public Lands Preservation Act (PLPA).

The project site is located within three (3) Environmental Justice (EJ) populations characterized by Minority (2) and Minority and Income (1) criteria. Two (2) additional EJ populations are located within one mile of the project site, also characterized by Minority (1) and Minority and Income (1) criteria. An additional 10 EJ populations are located within 5 miles of the project site, characterized by Minority (4), Income (4), and Minority and Income (2) criteria. As described below, the FEIR identified the “Designated Geographic Area” (DGA) for the project as 1 mile around EJ populations, included a review of potential impacts and benefits to the EJ populations within this DGA, and described public involvement efforts undertaken to date.

Environmental Impacts and Mitigation

Anticipated project impacts include the alteration of 8.12 acres of land, all of which has been previously developed. The project will involve cutting 26 public shade trees, 10 of which are 14 or more inches in diameter at breast height (dbh).

The project will remove 0.29 acres of impervious surface, for a remaining total of 7.67 acres of impervious surface within the project site, as well as 57 parking spaces, for a remaining total of 73 parking spaces within the site. Additional measures to avoid, minimize, and mitigate environmental impacts include the planting of 65 new trees; the creation of green space; stormwater management system improvements, including the construction of rain gardens and use of permeable pavers; and use of erosion and sedimentation controls and construction-period best management practices (BMPs).

Jurisdiction and Permitting

This project is subject to MEPA review and preparation of an ENF pursuant to 301 CMR 11.03(6)(b)(2)(b) because it requires Agency Action and will involve the construction, widening, or maintenance of a roadway or its right-of-way that will cut five or more living public shade trees with a dbh of 14 or more inches (10 trees). The project is required to prepare an EIR under 301 CMR 11.06(7)(b) of the MEPA regulations because it is located within one mile of one or more EJ populations. The project will receive Financial Assistance from MassDOT.

The project requires a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA); National Environmental Policy Act (NEPA) Programmatic Categorical Exclusion (CE), issued by the Federal Highway Administration (FHWA); U.S. Department of Transportation Act Section 4(f) De minimis Determination from the FHWA; and Endangered Species Act Section 7 Consultation with the U.S. Fish and Wildlife Service (USFWS). The project will require review by MHC acting as the State Historic Preservation Officer (SHPO) pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800).

Because the project will receive Financial Assistance through MassDOT, MEPA jurisdiction is broad in scope and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment as defined in MEPA regulations.

Review of the FEIR

The FEIR provided a description of existing and proposed conditions, an alternatives analysis, estimates of project-related impacts, site plans, copies of correspondence with USFWS, a functional design report (which includes a traffic analysis), planting plan, stormwater memo, and draft Section 61 Findings. It identified measures to avoid, minimize, and mitigate environmental impacts. The FEIR included a description of measures taken to enhance public involvement by EJ populations and 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). It also contains an assessment of the public health impacts of the project and information related to impacts on EJ populations in accordance with 301 CMR 11.07(6)(n)(2) and 301 CMR 11.06(13). 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”),³ together with information on climate resilience strategies to be undertaken by the project.

Alternatives Analysis

The FEIR evaluated a No-Build Alternative, three alternative configurations for layout of the roadway and amenities (Alternative 1A, 1B, and 2), and the Preferred Alternative, which were informed by an extensive planning and community outreach process over the last 20 years. The FEIR states that the project team consistently sought feedback and garnered support from residents, business owners, visitors, and stakeholders to enhance the responsiveness and relevance of the Main Street design for current and future users. Several comments submitted on the EENF/Proposed EIR expressed dissatisfaction with the public outreach that has occurred to-date, which is further discussed in the Environmental Justice section below. Alternatives were evaluated based on 15 criteria developed through the public outreach process, with five criteria established for each of the project’s three main goals: providing safety and access for all; promoting a vibrant and attractive downtown; and creating a functional, enduring, and sustainable streetscape.

The No-Build Alternative would not involve any changes to the existing roadway, and in turn would not generate new environmental impacts. The FEIR indicates that this Alternative was dismissed as it would not address critical safety needs in a high crash location, improve poor visibility, address confusion over travel lanes, provide additional accessibility, nor provide dedicated space for bicycles. Further, the FEIR notes that, while it would not result in the removal of public shade trees, it also would not provide the additional space, beneficial soils, and new plantings proposed as part of the project, and the health of the existing trees would continue to decline due to the existing, inadequate conditions (specifically, undersized and compacted tree wells).

Alternative 1A would consist of four vehicle travel lanes with a mix of expanded and reduced sidewalks, angled parking, and a mix of separated and shared bike lanes. The FEIR states that this Alternative was developed in direct response to suggestions by community members at previous meetings. I note comments from members of the public submitted on the EENF/Proposed EIR expressed concern with the reduction from four travel lanes to three (two travel lanes and one turning lane) under the Preferred Alternative. This Alternative would retain two lanes in each direction. Twenty (20) public

³ https://resilientma.org/rmat_home/designstandards/

shade trees would be removed, as opposed to the 26 proposed for removal under the Preferred Alternative. According to the FEIR, while Alternative 1A provides benefits such as formalized lanes and safety enhancements, it would not satisfy project goals as it would require narrowed sidewalks, potential conflicts at intersections, and a loss of parking spaces (26%). As such, it was dismissed. There would be limited space for furnishings, plantings, or green infrastructure features, and the roadway layout under this Alternative would eliminate space for separate bike lanes between Masonic and State Street and Pleasant and Strong Street. Left turns at non-signalized intersections become more dangerous for all modes, lacking dedicated turn lanes and potentially causing traffic build-up. For these reasons, Alternative 1A was dismissed.

Alternative 1B (which the FEIR describes as a variation of 1A) would also maintain four travel lanes, with angled parking, and curb extensions. The key difference in this Alternative as compared to Alternative 1A is the absence of dedicated space for cyclists, as bike lanes would be eliminated from the project design to provide wider sidewalks. All existing trees would be preserved except for one that would be removed. Even with the elimination of bike lanes, existing sidewalks would need to be narrowed to less than 5 feet in multiple locations. According to the FEIR, while this Alternative would provide some benefits, including up to three dedicated commercial loading zones, expanded sidewalks and certain locations, and an enhanced bus stop, it would not provide dedicated turn lanes, and left turns at intersections within the project corridor would become more dangerous for all modes. The FEIR states that an estimated 21% of existing parking would be lost to accommodate design changes; multiple threat scenarios at unsignalized intersections remains or increases for crossing pedestrians, and the lack of dedicated and separated bicycle facilities raises safety concerns. The FEIR notes that it is also unlikely Alternative 1B would gain MassDOT approval for federal aid assistance due to the absence of dedicated bicycle facilities; as such, it was not considered feasible.

Alternative 2 would involve four marked vehicle travel lanes, parallel parking, separated bike lanes, and sidewalks ranging from 4.5 feet to 35 feet in width. Curb extensions would be constructed to reduce crossing lengths. As described in the FEIR, Alternative 2 aims to balance competing priorities by providing designated vehicle lanes, expanded pedestrian space, and separated bike lanes. It would require the removal of 14 public shade trees. Similar to Alternative 1B, while Alternative 2 would provide some benefits, including up to three dedicated commercial loading zones, expanded sidewalks and certain locations, and separated bike lanes between Masonic Street and King/Pleasant street, there are multiple trade-offs which would not satisfy project goals. Existing sidewalks would be narrowed to less than 5 feet in multiple locations to accommodate desired roadway elements, left turns at intersections within the project corridor would become more dangerous for all modes, and an estimated 37% of existing parking would be lost to accommodate all parallel parking (to provide adequate width for other roadway elements). The presence of multiple threat scenarios at unsignalized intersections remains or increases for crossing pedestrians. The separated bicycle lanes are discontinued at each signalized intersection for an inconsistent experience. As it would not address the existing safety concerns for bicycle and pedestrian traffic, this Alternative was dismissed.

The Preferred Alternative (Alternative 3, described herein) consists of three marked vehicle travel lanes (including a dedicated left-turn lane); parallel parking on the north side and largely angled parking with some parallel on the southwest of Crafts Avenue; separated, raised bike lanes, and sidewalks ranging from 6 feet to 35 feet in width; and curb extensions to narrow crossings to an average of 38 feet. As noted above, it requires the removal of 26 public shade trees, the most of any alternative evaluated. An estimated 44% of existing parking is lost to accommodate the increased visibility, bike lanes, turn lanes, and public space. As stated in the FEIR, the Preferred Alternative was selected as it

addresses safety concerns and provides space for various amenities, although it will involve trade-offs in parking and traffic flow.

As noted above, comments previously submitted on the project expressed concern with the proposed loss of public shade trees, and several express a preference to maintain four travel lanes as opposed to the creation of dedicated bike lanes. While acknowledging the loss of mature tree canopy and associated benefits, the project includes the planting of 65 new trees and the creation of several new green spaces to mitigate urban heat island effects. I also acknowledge that, based on the traffic assessment included in the functional design report, the level of service (LOS) of certain turning movements at intersections along the project corridor are expected to worsen due to the project design (while the LOS for other turning movements will improve). As stated in the FEIR, the vehicle-dominated roadway design through the City's downtown, coupled with a lack of accommodations for people walking and biking through the corridor, creates unsafe conditions for all roadway users. These conditions are reflected by the inclusion of the entire project area in the 2008-2017 Highway Safety Improvement Program (HSIP) bicycle and pedestrian crash clusters. These crash clusters indicate that the study area intersections fall within the top 5% of high crash locations in Massachusetts. The basis of design for this project is to address these existing safety issues, and to improve comfort for people walking, riding bicycles, and taking transit, and increased use of these modes of travel. As the project proceeds to permitting, I encourage the City to make efforts to preserve mature tree canopy in good condition wherever possible.

Environmental Justice

As noted above, the project site is located within three (3) Environmental Justice (EJ) populations characterized by Minority (2) and Minority and Income (1) criteria. Two (2) additional EJ populations are located within one mile of the project site, also characterized by Minority (1) and Minority and Income (1) criteria. An additional 10 EJ populations are located within 5 miles of the project site, characterized by Minority (4), Income (4), and Minority and Income (2) criteria. The FEIR identified the DGA for the project as 1 mile around EJ populations. There are no languages spoken by 5% or more of residents who also identify as not speaking English very well (Limited English Proficiency (LEP) populations) within the DGA; however, review of the Massachusetts Department of Elementary and Secondary Education (DESE) information identifies that approximately 10% of the population speaks Spanish in the project zip code. As noted, the Proponent provides written and oral translation services in Spanish.

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 the Chapter 8 of the Acts of 2021: *An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy* (the "Climate Roadmap Map") and amended MEPA regulations at 301 CMR 11.00. 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. 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 Proponent provided Advance Notification under Part II of the MEPA EJ Public Involvement Protocol through the preparation of an EJ Screening Form, which was provided in both English and Spanish, and was distributed to a list of community-based organizations (CBOs) and tribes/indigenous organizations (the “EJ Reference List”) provided by the MEPA Office. The EJ Screening Form included contact information to request information about the project and/or translation services. The FEIR states that no requests for community meetings were received from the recipients of the EJ Screening Form or other residents following the circulation of the form; however, the City did arrange multiple community events on January 23, 2024, prior to starting the MEPA review process. The FEIR notes that a number of attendees at these events described personal experiences with mobility impairment and emphasized many of the existing safety issues the project intends to address. Various outreach strategies were used to promote the project and increase accessibility of these meetings, including offering both an afternoon and evening session (the latter of which was held as a hybrid meeting with a virtual option), distributing flyers in both English and Spanish, noticing the meeting in the Daily Hampshire Gazette and on City social media sites, and providing activities for children to promote the attendance of families.

Several comments previously submitted on the EENF/Proposed EIR indicated that the public outreach conducted for the project was insufficient. As described in the FEIR, to facilitate inclusive planning and decision-making, the City of Northampton has undertaken outreach to include residents, stakeholders, and community advocates, and incorporated input into the project design. This was done through multiple community surveys, subcommittees, a series of public sessions, and other events held over the past several years. In August 2020, reduced vehicle travel lanes and expanded pedestrian areas and restaurant space were implemented along Main Street in an effort to provide economic relief to restaurant owners during the Covid-19 pandemic. Previous comments submitted on the project noted that the significant traffic impacts that were experienced during this period. Additional surveys and a series of public sessions were conducted following the demonstration to gather more feedback and answer questions on the project. The City has also developed a website that is kept updated with project information;⁴ MassDOT also held a 25% Design Public Hearing virtual meeting on April 26, 2023 for the project. Outreach efforts for this meeting included coordination on accessibility and notice to many of the CBOs and agencies that were later identified by the City for the EJ Screening Form distribution. Responses to comments following the hearing, along with responses to a list of frequently asked questions were developed and released on the website in September 2023 (these are also included in the FEIR).

The FEIR contained a baseline assessment of 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 FEIR, the data surveyed show some indication of an existing “unfair or inequitable” burden impacting the identified EJ populations. Specifically, the FEIR identifies one census tract (25015821602) as exhibiting “vulnerable health EJ criteria” for elevated blood lead levels; 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.⁵ The FEIR additionally indicates that the following sources of potential pollution exist within the identified EJ populations, based on the mapping layers available in the DPH EJ Tool:

⁴ The project website is available here: <https://storymaps.arcgis.com/stories/4b996c75da2f4aaca58a1f0310424c77>

⁵ See <https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html>. Four vulnerable health EJ criteria are tracked in the DPH EJ Viewer.

- Major air and waste facilities: 6
- M.G.L. c. 21E sites: 1
- “Tier II” Toxics Release Inventory Site: 9
- MassDEP sites with AULs: 8
- Underground storage tanks: 10
- EPA facilities: 5
- Road infrastructure: 4
- MBTA bus and rapid transit: 2
- Other transportation infrastructure: 1
- Regional transit agencies: 2

As noted below, the output report from the MA Resilience Design Tool attached to the FEIR indicates that the project has a “High” exposure rating based on the project’s location for the following climate parameters: extreme precipitation (urban flooding) and extreme heat. The project also received a “High” ecosystem services score. As noted above, the project includes the cutting of 26 public shade trees. To mitigate these impacts, the project proposes to plant 65 new trees, and create new vegetated open spaces. The project will also remove 0.29 acres of impervious surface, and improve stormwater infrastructure within the project area. These measures are anticipated to mitigate impacts to the urban heat island effect, and improve urban flooding within the project site.

The FEIR asserts that, long-term, the project will not result in disproportionate adverse effects on EJ populations by materially exacerbating any existing environmental burdens. The FEIR indicates that project impacts will primarily be limited to the construction period, and that these impacts will be mitigated through implementation of construction BMPs. As stated in the FEIR, the construction phase and future public use of the proposed outdoor living spaces and sidewalk amenities may impact people experiencing homelessness. The City has established a Community Resilience Hub in advance of the reconstruction to reach all community members who face chronic and acute stress. The FEIR acknowledges that there will be several years where shade is reduced and heat impacts will be exacerbated due to the removal of mature tree canopy; however, the FEIR asserts that canopy cover will rebound and improve significantly as a result of the project. As stated in the FEIR, the project's focus on creating designated bicycle lanes, enhancing outdoor seating and dining spaces, and improving amenities and service at public transportation stops will contribute to increased recreation, improved public health, and reduced emissions and pollution through the promotion of sustainable modes of transportation.

Public Shade Trees

As noted above, there are 41 public shade trees of varying size and condition within the project limits, including 17 with a dbh greater than 14 inches. This does not include adjacent trees beyond project limits in private lawns, Pulaski Park, or in the full yard of the Hampshire County Historic Courthouse, which abut the roadway. The Northampton Tree Warden conducted a visual assessment of trees within the project area in early 2021. As described in the FEIR, many of the existing trees on Main Street show dying crowns, dying limbs, trunk splitting, and issues with root growth or girdling. The trees are planted in constrained pits (approximately estimated at 380 cubic feet in volume on average) with poor, compacted soils; over half of those inventoried are in fair to poor condition. A map of the project corridor that identifies the location, condition, and dbh of each tree was included in the FEIR. As described in the EENF/Proposed, approximately 26 public shade trees need to be removed in order to accommodate the proposed corridor and roadway reconstruction and ultimately the ability to provide

increased tree cover in more beneficial planting spaces. Of the 26 public shade trees proposed to be cut, 10 have a dbh greater than 14 inches, seven of which are in poor condition. Their current locations cannot be retained under the redesign due to the constraints associated with existing infrastructure abutting the roadway. Cutting and removal of shade trees and any existing vegetation in planting areas is proposed to occur in phases with construction to delay the loss of existing shade trees until absolutely necessary.

Several comments previously submitted by residents expressed concern with the proposed removal of the trees. As stated in the FEIR, the removals will allow newly planted trees to be more appropriately spaced for long-term growth. The redesign also includes understory plantings and significantly increased greenspace. The project will add a total of 65 trees following construction, with replacements for the 26 trees proposed to be removed, and 39 additional new trees (all 2-to-2.5-inches dbh). The majority of species proposed to be planted, both trees and understory vegetation, are proposed to be native; other species have been selected due to their adaptiveness to urban conditions and climate change impacts. A list of all species proposed to be planted are identified in the planting plans included in the FEIR. Existing trees to be preserved within the project corridor will be evaluated by an arborist to determine the best treatment for preservation during the remainder of construction. As stated in the FEIR, there will be several years where shading is reduced and heat impacts will be exacerbated due to the removal of mature tree canopy. However, the replacement of mature public shade trees with more numerous healthier, resilient trees and additional plantings aims to provide long-term environmental benefits. The trees to be planted are expected to be more resilient than the existing trees due to the improvements in soil conditions/volume and spacing (the average soil volume currently available to each tree will nearly triple), and the selection of more adaptive species. As noted in the FEIR, planting larger caliper trees as opposed to saplings is not recommended as they tend to be less successful transplants than younger, smaller trees.

Transportation

As noted above, the project includes the reduction of the existing four travel lanes (with no turning lanes) to three lanes (one in each direction, with an additional turning lane), and the reduction in parking spaces from 130 to 73 (eliminating 57 spaces). Main Street is part of the National Highway System (NHS) serving strategic transport facilities such as rail and truck terminals, airports, and ports. As stated in the FEIR, the existing Main Street corridor primarily serves to accommodate vehicular traffic, leaving limited space for comfortable and accessible pedestrian and bicycle facilities. Several comments from members of the public previously submitted on the EENF/Proposed EIR expressed a desire to retain the existing design of the roadway, concerns regarding congestion following the completion of the project, and a lack of desire for bicycle infrastructure.

The Mass Central Rail Trail crosses over Main Street on the east side of downtown and the New Haven and Northampton Canal Greenway circles the south side of downtown. This well-established trail network brings people near downtown where there is little to no dedicated space for people on bicycles on Main Street. As noted above, the entire project area is included in the 2008-2017 HSIP bicycle and pedestrian crash clusters; these crash clusters indicate that the study area intersections fall within the top 5% of high crash locations in Massachusetts. The main goal of the project, as stated in the FEIR, is to address a critical safety need in reducing a high crash location, improving poor visibility, addressing confusion over travel lanes, providing additional accessibility, and providing dedicated space for people on bicycles.

Based on the traffic assessment included in the functional design report, the LOS of certain turning movements at intersections along the project corridor are expected to worsen due to the project design; LOS for other turning movements are also expected to improve. Proposed signal programming at intersections will also be used to make vehicle travel through the corridor more efficient and synchronized. Temporary travel disruption is anticipated during construction phases, but management and phasing plans intend to minimize the issues. A through-lane in each direction will be maintained for the entire construction period.

The FEIR states that parking has been evaluated extensively due to the concerns of reducing available spaces. Measures to address parking concerns implemented by the City include reduced pricing for meters on side streets, premium pricing, and increase turnover rates on Main Street. Parking outside of the project area but within the downtown core provides over 400 additional on-street parking spaces with over 1000 spaces in nearby garages and municipal lots. Smart signage identifies real-time availability and capacity in the lots. While the overall number of street parking spaces will decrease, the number of ADA accessible spots within the project corridor will increase from 5 to 7 and be spaced along the corridor as evenly as feasible.

As stated in the FEIR, the basis of design for this project is improved safety and comfort for people walking, riding bicycles, and taking transit, and increased use of these modes of travel. The project will make the entirety of the project corridor ADA-compliant. In addition to providing consistent sidewalks, shorter street crossings, protected bike lanes, and bicycle parking, the project includes enhancements to bus stops along Main Street. Specifically, the project proposes to improve amenities such as shelters, lighting, passenger information, and outdoor seating. The design improves the space for bus queuing and ensures space for accessibility to avoid egress from the roadway. As stated in the FEIR, the Commonwealth, the City, and the region all have goals to reduce greenhouse gas (GHG) emissions, and redesigning the street to encourage walking, biking, and transit by making it safe and comfortable will contribute to reducing emissions. Comments from the Pioneer Valley Planning Commission (PVPC) submitted on the EENF/Proposed EIR noted that the project is the highest ranked Complete Streets project in the region.

Hazardous Waste

As noted above, two (2) state-listed disposal sites of varying regulated status under the MCP have been identified in the vicinity of the project corridor, assigned RTNs 1-0010539 and 1-0018592. As described in the FEIR, all of the sites identified have Response Action Outcome Statements (RAOs) in Classes that are considered closed with permanent solutions. The 21-31 Main Street at Merrick Lane site does have an established Activity and Use Limitation (AUL) for disturbance of soil below 4 feet, but for an area that is beyond the project limits. A MassDOT Hazardous Materials Review determined that only RTN 1-0010539 at 21-31 Main St/Merrick Lane has a potential project impact due to migrating groundwater. The project is mitigating any potential groundwater contamination by utilizing an impermeable liner for the one proposed rain garden in this area. The project will also include funds for disposal of contaminated soil in the case that excavation results in the disturbance of contaminated soil.

*Climate Change**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 FEIR the project has a “High” exposure rating based on the project’s location for the following climate parameters: extreme precipitation (urban flooding) and extreme heat. It received a “High” ecosystem benefits score. Based on the 50-year useful life identified for the roadway, and the self-assessed criticality of this asset, the MA Resilience Design Tool recommends a planning horizon of 2070 and a return period associated with a 50-year (2% chance) storm when designing for the extreme precipitation parameter. It also recommends planning for the 90th percentile for applicable extreme heat parameters.

The project corridor crosses a “Hot Spot,” which is an area with the 5 percent highest Land Surface Temperature (LST) Index values within each Regional Planning Agency (RPA) region.⁶ The project will involve the cutting of 26 shade trees, including mature trees, which may contribute to the urban heat island effect. As discussed above, the FEIR notes that seven of the ten public shade trees with a dbh greater than 14 inches are in poor condition. The project proposes to plant 65 new trees and improve the growing conditions for these trees as part of the project. Once mature, the proposed tree plantings will provide a more consistent shade cover, and be more resilient, than the existing tree canopy.

As described in the FEIR, the project has been designed to mitigate the risks of extreme precipitation in the area to the maximum extent practicable. The MA Resilience Design Tool indicates that the recommended 2070 50-year storm event is associated with a 24-hr precipitation depth of 9.7 inches. The stormwater system improvements are designed to attenuate the present day 25-yr storm event which associated with a 24-hr precipitation depth of 6.09 inches based on National Oceanic and Atmospheric Administration (NOAA) Atlas 14 precipitation data. The project will result in a reduction in impervious surface (by 0.29 acres), which will reduce the generation of stormwater runoff. Deep sump catch basins, bioretention areas (rain gardens), and porous pavement are strategically integrated into the project's design to attenuate peak flows, capture and treat runoff, and enhance the overall resilience of the drainage system. While existing infrastructure limits the ability to construct the stormwater system improvements to fully attenuate the recommended design storm, the proposed improvements will result in decreased peak flow rates for projected 50-year storm events in both 2050 and 2070, as compared to existing conditions.

Greenhouse Gas (GHG) Emissions

In accordance with the MEPA Interim Protocol for Analysis of EJ Impacts, a GHG analysis was not required because the project is anticipated to generate less than 2,000 tons per year (tpy) of GHG emissions. Specifically, the project is not expected to result in the generation of any GHG emissions once construction is complete. The project will create and improve opportunities for multi-modal transportation within the project corridor.

⁶ <https://resilientma-mapcenter-mass-eoea.hub.arcgis.com/datasets/Mass-EOEEA::hot-spots/about>

Construction Period

Project construction is anticipated to commence in summer 2025 and conclude in spring 2028. As described in the FEIR, construction will be phased to occur in different portions of the corridor at different times, essentially in northeast, southeast, northwest, and southwest sections, in order to provide relief from the potential disruption across the full corridor. Cutting and removal of shade trees and any existing vegetation is proposed to occur when construction phase work is occurring in the relevant area to preserve shading as long as possible. Several comments submitted on the EENF/Proposed EIR expressed concern regarding construction impacts, particularly to traffic and business within the project corridor. As stated in the FEIR, through-lanes in each direction will be maintained throughout construction, and a Traffic Management Plan is being developed with public outreach as a key component. Access to all businesses and facilities will be maintained throughout construction, and all phases of work on sidewalks will maintain ADA compliance.

All construction and demolition activities should be managed in accordance with applicable MassDEP's regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10), and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The project should include measures to reduce construction period impacts (e.g., noise, dust, odor, solid waste management) and emissions of air pollutants from equipment, including anti-idling measures in accordance with the Air Quality regulations (310 CMR 7.11). I encourage the Proponent to require that its contractors use construction equipment with engines manufactured to Tier 4 federal emission standards, or select project contractors that have installed retrofit emissions control devices or vehicles that use alternative fuels to reduce emissions of volatile organic compounds (VOCs), carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment. Off-road vehicles are required to use ultra-low sulfur diesel fuel (ULSD). If oil and/or hazardous materials are found during construction, the Proponent should notify MassDEP in accordance with the Massachusetts Contingency Plan (310 CMR 40.00). All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the City to reuse or recycle construction and demolition (C&D) debris to the maximum extent. If asbestos is found, MassDEP must be notified prior to its handling or removal in accordance with the Asbestos regulations (310 CMR 7.15).

Mitigation and Section 61 Findings

The FEIR includes a separate chapter summarizing proposed mitigation measures and also includes draft Section 61 Findings for each Permit to be issued by Agencies. It contains commitments to implement these mitigation measures, identifies the parties responsible for implementation, and includes a schedule for implementation. As described in the FEIR, the Proponent has committed to implement the following measures to avoid, minimize and mitigate Damage to the Environment:

Environmental Justice/Public Health

- The creation and improvement of bicycle and pedestrian accommodations within the project corridor, encouraging multi-modal travel and providing recreational opportunities
- Use of construction BMPs (further described below) to minimize impacts associated with dust and noise
- Removal of impervious surface and the creation of green space
- Planting of 65 new trees to mitigate the cutting of 26 public shade trees, which are expected to be more resilient over time
- Stormwater system improvements to reduce inland flooding

- Conducting accessible public outreach and continuing to notify the public of project meetings
- Reduced crosswalk lengths, traffic signal programming, ADA compliance, and other measures to reduce pedestrian conflict is expected to benefit mobility-impaired residents
- Replacement of existing, outdated public water mains to improve reliability and distribution of drinking water

Public Shade Trees

- Existing public shade trees to be retained through the redesign (including existing trees outside of the ROW) will be protected through tree protection measures (such as fences and signage)
- With the available space created by the design, construction plantings will include replacements for the removal of 26 public shade trees to be cut, and planting 39 additional trees, as well as varied understory species and spaces
- New trees to be planted will be spaced more optimally than existing trees for air and light circulation to promote a healthy canopy
- Existing, compacted, and inadequate soil in planting spaces will almost triple to 1,000 cubic feet of soil per tree, which will enhance root health and encourage faster growth and restoration of the canopy
- Green space with understory plantings will also almost triple as compared to existing conditions, and the project will provide a greener streetscape upon maturation than exists currently
- Low-growing understory plants to be planted will help prevent disturbance of tree planting areas while providing more habitat for insects and birds

Transportation

- Redesigning the roadway to improve safety and address existing and historic bicycle and pedestrian crash clusters
- Creation of four dedicated curbside loading zones to improve visibility and enhance safety for deliveries
- Improving signage; signal and turning programming at intersections will be planned for efficiency to reduce wait times and traffic congestion
- The proposed expanded sidewalk and outdoor space provides additional locations for winter snow storage which currently exacerbates issues with loading, visibility, and accessibility; the City is also committing to prioritize snow removal from pedestrian and bicycle spaces
- Implementation of parking study recommendations to help ease parking issues overall and in preparation for the project
- The number of ADA accessible spots will increase from 5 to 7 and be spaced along the corridor as evenly as feasible
- The entire project corridor will be made fully ADA-compliant
- Curb extensions are proposed to shorten crosswalks in addition to changes in road geometry, ensuring better visibility for both pedestrians and drivers
- Sidewalks will be expanded at various locations, ranging from 6 feet to 35 feet, accommodating wider pedestrian walkways, outdoor dining, seating, informal gathering and play spaces, and public art
- Continuous, separated, sidewalk-level bike lanes will be constructed in both directions through the project corridor
- The number of bicycle racks and ride share stations along the corridor will be maintained or increased

- Improvements to bus stop amenities along the PVTA B43 route, such as shelters, lighting, passenger information, outdoor seating, and bike parking
- Improvements to the space for bus queuing and ensures sidewalk space for accessibility to avoid entrance and egress from the roadway

Climate Change Adaptation and Resiliency

- Green space and porous pavement will increase with a net reduction in impervious surfaces by 0.29 acres
- Use of low impact development (LID) techniques to improvements to the stormwater management system
- Following construction, peak flow rates will decrease for projected 50-year storm events in both 2050 and 2070 as compared to existing conditions
- Aging underground water, sewer, and drainage lines at the end of their useful life, will be replaced with modern and more resilient utilities
- Redesigning the project corridor to encourage walking, biking, and transit and in turn reducing dependence on vehicles
- Although the project will reduce tree canopy shade in the near-term, once established, a more continuous canopy will mitigate the urban heat island effect, filtering air pollution, and providing essential shade
- Choosing streetscape materials that have lower heat absorption characteristics and drastically reducing asphalt to mitigate heat island effects
- Tree and plant species will be selected or considered for salt, heat, and pollution tolerance to cope with future stressors in an urban environment

Construction Period

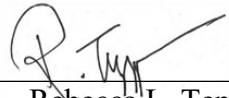
- Phasing construction to provide relief from disruption across the full corridor
- Creation of a construction phase website to support Main Street businesses and communicate throughout the construction
- If adjacent grading, vibrations, or equipment movement are required in proximity to historic buildings, building protection measures such as pads or fencing will be incorporated
- A Traffic Management Plan will be implemented to provide guidance and reduce disruption during construction, signal programming will be set for traffic efficiency, and at least one lane in each direction will be maintained on Main Street throughout construction
- Access to all properties along Main Street corridor will be maintained throughout construction and all ramps and sidewalks will remain ADA accessible
- Implementation of a Stormwater Pollution Prevention Plan (SWPPP), which will include conditions and detailed descriptions of stormwater controls, erosion and sedimentation controls, pollution prevention controls, and temporary stabilization controls to be implemented during construction
- Temporary erosion control devices will be monitored throughout construction to ensure they remain effective
- The contractor will implement industry best practices for dust suppression during active demolition and construction such as wetting surfaces, sweeping, and covers
- Restricting night work except to brief periods related to roadway repaving, and maintaining approved construction hours to reduce noise impacts; equipment will be maintained with mufflers and other noise reducing features
- All appropriate measures will be taken by the contractor to segregate, salvage, reuse, or recycle

- demolition debris to divert waste from landfills; here reuse and recycling are not feasible, materials will be hauled and disposed of at an approved disposal facility per local, state and federal regulations
- A Licensed Site Professional (LSP) will be contacted when necessary to verify if notification is required, further assess and manage the site, direct response actions, and specify procedures for work performed in any suspected contaminated areas
- All construction and demolition (C&D) activities will 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)

Conclusion

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

June 14, 2024
Date



Rebecca L. Tepper

Comments received:

No additional comments received

RLT/ELV/elv