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*Executive Office of Energy and Environmental Affairs*  
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February 14, 2020

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

PROJECT NAME : Centech Park North  
PROJECT MUNICIPALITY : Shrewsbury  
PROJECT WATERSHED : SuAsCo/Blackstone  
EEA NUMBER : 15950  
PROJECT PROPONENT : Town of Shrewsbury  
DATE NOTICED IN MONITOR : January 8, 2020

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62I) and Section 11.08 of the MEPA Regulations (301 CMR 11.00), I have reviewed the Final Environmental Impact Report (FEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Project Description

As described in the FEIR, the Master Plan for the project includes the construction of an approximately 450,000 square foot (sf) commercial development, associated access roadways, 812 parking spaces, a stormwater management system and utility infrastructure. The Master Plan identifies two separate development areas, Subdistrict A and B. The subdistricts are separated by a wetland system and will have separate access roads. Subdistrict A is located on the northwestern portion of the site and includes five buildings (total of 275,000 sf) and 497 parking spaces. Access to Subdistrict A will be provided via Road A from South Street. Subdistrict B is located on the southeastern portion of the site and consists of three buildings (total of 175,000 sf) and 315 parking spaces. Access to Subdistrict B will be provided via Road B from Route 20. The FEIR included a building breakdown consisting of the following:

**Subdistrict A**

<b>Building</b>	<b>Office Use (sf)</b>	<b>Industrial Use (sf)</b>	<b>Total (sf)</b>
A	10,000	15,000	25,000
B	8,400	12,600	21,000
C	14,000	21,000	35,000
D	64,000	96,000	160,000
E	13,600	20,400	34,000
<b>Total</b>	<b>110,000</b>	<b>165,000</b>	<b>275,00</b>

**Subdistrict B**

<b>Building</b>	<b>Office Use (sf)</b>	<b>Industrial Use (sf)</b>	<b>Total (sf)</b>
F	6,000	9,000	15,000
G	48,000	72,000	120,000
H	16,000	24,000	40,000
<b>Total</b>	<b>70,000</b>	<b>105,000</b>	<b>175,000</b>

Approximately 60 percent of the space is proposed for industrial uses and 40 percent will be for office uses. The Town of Shrewsbury (Town) is working with the Central Massachusetts Regional Planning Commission (CMRPC) to determine the best uses for the property based on current and projected market conditions. The mix of uses, project configuration, and building dimensions may change in response to market demand. The Town should consult with the MEPA Office to determine if future MEPA review may be required based on changes to the project, including changes in land use that will result in greater environmental impacts.

The project is proposed in phases: four phases in Subdistrict A and three phases in Subdistrict B. Phase 1A and 2A will include the construction of access roads, pedestrian access, utility and stormwater infrastructure, and landscaping. Construction of a cross-country water main connection between Road A and Road B is also planned for Phase 2A. Phases 1B, 1C, 1D 2B and 2C will include the construction of the individual lots along with associated driveways, pedestrian accommodations, utility and stormwater infrastructure, and landscaping. Construction on each lot will depend upon the final tenant fit out and needs.

**Changes to the Project Since Filing the DEIR**

No major programming changes have been proposed since the filing of the DEIR. Impacts to Bordering Vegetated Wetlands (BVW) have been reduced by 870 sf (from 3,930 sf to 3,060 sf) through the reconfiguration of Building F. The FEIR indicates that the Town is proposing to bank approximately 25 percent of the parking spaces (approximately 200 spaces) and reserve 25 percent of the remaining parking spaces for compact cars. Implementation of this measure is dependent on local zoning board approval. If implemented, this measure would reduce impervious area by 0.9 acres (from 14 acres to 13.1 acres). The FEIR included supplemental transportation analysis which identifies an additional study area intersection and

responds to MassDOT's comments on the DEIR. The FEIR also identifies the project's commitment to consider the location of industrial noise producing equipment and site features in relation to abutters in response to the Massachusetts Department of Environmental Protection (MassDEP)'s comments on the DEIR.

### Project Site

The 66.5-acre project site formerly known as the "Allen Property" was previously used for agricultural purposes. Approximately 2 acres of the site located along South Street is developed with three vacant buildings and a paved/gravel parking area. Additional area was previously disturbed due to agricultural uses but remains vegetated with scrub shrub vegetation. The site also includes mature forests and wetlands resource areas.

It is bounded by South Street and Charles River Laboratories to the north, a ground mounted solar field and residential properties to the west, commercial uses and Route 20 to the south and residential uses and South Street to the east. The previous owners of the property entered into a purchase and sale agreement with a residential developer in 2002; however, because much of the property had been assessed as Chapter 61A agricultural land, the Town was afforded the right of first refusal to match the residential developer's offer for approximately 49 acres of the parcel. The Town acquired the 49 acres and, through negotiations with the previous owner via the Shrewsbury Development Corporation (SDC), it acquired the remaining 17.5 acres. In 2009, a Flexible Development Overlay District and associated by-laws were established on the property to provide flexibility to develop office, research, health care, light industrial and accessory uses. The site is comprised of eight developable lots.

The project site is not located within a 100-year flood plain, but rather in an area of minimal flood hazard according to the Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) (Panel No. 25027C0639F). The site is not located within *Priority* and/or *Estimated Habitat* as mapped by the Division of Fisheries and Wildlife's (DFW) Natural Heritage and Endangered Species Program (NHESP) or within an Area of Critical Environmental Concern (ACEC). The site contains soils identified as Prime Farmland Soils which will be stockpiled for re-use on-site and, if available, surplus soil will be offered to local farmers.

### Jurisdiction and Permitting

The project is undergoing MEPA review and is subject to Mandatory EIR review pursuant to 301 CMR 11.03(1)(a)(2) because it requires a State Agency Action and involves the creation of ten or more acres of impervious area. The project also exceeds the ENF review thresholds at 11.03(1)(b)(1); 11.03(6)(b)(13); and 11.03(6)(b)(15) because it will result in the direct alteration of 25 or more acres of land; will generate 2,000 or more new add and construct 300 or more new parking spaces at a single location.<sup>1</sup> The project requires a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT). The project is subject to the MEPA Greenhouse Gas (GHG) Policy and Protocol.

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<sup>1</sup> The project as presented in the ENF exceeded EIR traffic thresholds at 11.03(6)(a)(6) and 11.03(6)(a)(7). Revisions to the project have reduced trip generation and parking to below EIR thresholds.

The project will require an Order of Conditions for multiple components of the project from the Shrewsbury Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions from the Massachusetts Department of Environmental Protection (MassDEP)), and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the United States Environmental Protection Agency (EPA).

The Town received Financial Assistance in the form of a Site Readiness Grant from MassDevelopment, a state authority. Therefore, subject matter jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations. These include land alteration, transportation, wetlands, stormwater, air quality and GHG Emissions.

### Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include New alteration of 26.9 acres of land, creation of 14 acres of new impervious area, alteration of 3,060 sf of BVW, generation of 2,664 new adt, construction of 812 parking spaces, an increase water demand and wastewater generation by 29,500 gallons per day (gpd).

Measures to avoid, minimize and mitigate potential impacts include wetland replication, roadway and transportation improvements and the construction of a stormwater management system designed to meet or exceed MassDEP's standards. The building designs incorporate energy efficiency measures to minimize GHG emissions, though full electrification, or complete electric vehicle (EV) infrastructure are not being considered at this stage. During the construction period, mitigation measures will include sedimentation and erosion controls, designated truck routes, measures to minimize emissions of air pollutants by construction vehicles, and noise, dust and odor controls.

### *Review of the FEIR*

The FEIR was generally responsive to the Scope. It included a description of the project, identified existing conditions, described potential environmental impacts and updated mitigation measures. The FEIR identified minor changes to the project that have occurred since the DEIR was filed. The FEIR lacked details on wetland impacts and consistency with applicable performance standards. The FEIR included additional transportation analysis, information on proposed GHG mitigation measures, responses to comments, and revised draft Section 61 Findings. Due to the conceptual nature of the Master Plan, the Town should consult with the MEPA Office on whether future programming changes to the project may warrant further MEPA review.

### Land Alteration

Approximately 2 acres of the site is developed and consists of vacant structures and a parking area. The project will result in the new alteration of 26.9 acres of land and creation of 14 acres of new impervious area for total of 16 acres of impervious surface. Approximately 14.9 acres will be considered altered but will consists of landscaping, stormwater management

components and grading. The FEIR identifies 28.9 acres of developed area and 37.6 acres of undeveloped area including a 29.5-acre open space area. The FEIR indicates that the Town does not intend to put a preservation or conservation restriction on the land. If pedestrian walkways or other development is proposed within this area for passive/active recreational uses, the Town should consult with the MEPA office on whether additional MEPA review is required. Approximately 57% of the site will remain undeveloped. I encourage the Town to continue to reduce impervious area through further reduction of parking, incorporation of pervious surfaces and additional landscaped areas.

### Wetlands and Stormwater

As noted earlier, the project will result in 1,260 sf of permanent impacts and 1,800 sf of temporary impacts to BVW. Of the permanent BVW impacts, approximately 720 sf of impacts are associated with the construction of the access road to Subdistrict A (Road A). An Order of Conditions was issued by the Shrewsbury Conservation Commission for the construction of Road A on June 18, 2019, which was not appealed. The remaining 540 sf of permanent impact is associated with the construction of the access road to Building E. Wetland impacts will be replicated at a 2:1 ratio. Installation of the water main between the two subdistricts will result in 1,800 sf of temporary impact to BVW. Work proposed on each lot and the water main loop connection are anticipated to require separate Orders of Conditions from Shrewsbury's Conservation Commission. The FEIR identified the reconfiguration of Building F which eliminated 820 sf (22%) of BVW impacts associated with the removal of proposed retaining walls. A pedestrian connection between the two subdistricts, which would increase impacts to wetlands, is not currently proposed.

The FEIR indicates that all future work associated with wetland impacts and replication will comply with the performance standards outlined in the Wetlands Protection Act (WPA). However, it does not provide details demonstrating how the project will be designed and constructed consistent the WPA as directed by the Scope in the DEIR. Comments from MassDEP note that while the FEIR indicates that no Bank will be impacted by the project, additional information will be required during the local permitting process to confirm this assertion. If such impacts are present, Bank should be identified at all crossing locations on plans (including for the temporary watermain crossing) during the local permitting process.

The project site includes two designated Potential Vernal Pools (PVPs). Vernal Pools qualify as Outstanding Resource Waters (ORWs) which are considered critical areas under MassDEP's SMS. The updated site plan submitted with the FEIR did not provide sufficient details on the boundaries of the PVPs in relation to stormwater management components. Therefore, MassDEP was unable to provide meaningful review on whether the stormwater management plan for the project will be designed to meet all Stormwater Standards and setbacks for ORWs and Vernal Pools. Additionally, the proposed crossing to Building E is along the perimeter of a PVP. During the local permitting process, the Proponent should describe specific access and stormwater management designs that avoid, minimize, and mitigate adverse impacts to vernal pools and associated vernal pool habitat during the development of Buildings D and E, and during the construction of the water main. Future filings should include a Stormwater Management Report that verifies how the remaining portions of the Project will meet the

Massachusetts Stormwater Standards. The Shrewsbury Conservation Commission will review the remainder of the project for consistency with the WPA and implementing regulations (310 CMR 10.00) and associated performance standards including MassDEP's stormwater management standards.

The FEIR does not include any commitments to low impact development (LID) stormwater management measures but indicates that the project will consider the use of bioretention areas, grassed swales, and rainwater collection cisterns. The FEIR included a figure depicting potential locations for LID stormwater management measures. The project should continue to maximize the use of LID techniques for stormwater management and identify LID stormwater management measures on plans during the local permitting process. The Town of Shrewsbury joined the Municipal Vulnerability Preparedness (MVP) Program which includes identification of municipal climate change hazards. Through the MVP program, the Town received funding to conduct a planning process for climate change resiliency and implementing priority projects. The results of the initial community-driven process were presented in a *Summary of Findings* published in 2019. The Town identified intense rain events and flooding as a top hazard of concern. LID measures are an important tool in combatting the effects of more frequent intense rain events and flooding caused by climate change. LID measures maintain natural drainage flow paths, minimize land clearance, and reduce impervious surfaces—all of which reduce stress on habitats and promote natural resiliency. I strongly encourage the Town in future permitting processes, and through bid documents or other legal arrangements with tenants, to consider LID stormwater management and other measures to increase the resiliency of the project site.

### Traffic and Transportation

The FEIR included supplemental transportation analyses in response to MassDOT's comments on the DEIR. As directed by MassDOT, the Town analyzed whether additional intersections along Route 9 west of the South Street intersection should be included in the study area based on the *Transportation Impact Assessment Guidelines* for intersections exceeding 100 vehicles on all approaches during peak travel periods. The supplemental analyses determined that based on these guidelines, the study area should be expanded to include the intersection of Route 9 eastbound (EB) at Grafton Street. The FEIR provided an updated safety and capacity analyses for this intersection. The safety analysis provided a summary of crash rates derived from MassDOT and the Towns of Shrewsbury and Northborough for the period between 2014 and 2018. Crash rates for the intersections were below MassDOT statewide and District 3 averages. The capacity analysis for the intersection indicates that both levels of service and delay are expected to operate within acceptable ranges during the AM and PM peak hours for the future No-Build and Build conditions. As a result of this supplemental analysis, the monitoring program has been updated to include monitoring the Route 20 at Centech Boulevard intersection prior to build-out of Subdistrict B. Additional transportation mitigation commitments are identified in the mitigation section below.

### Greenhouse Gas Emissions

The FEIR provided a response to the Department of Energy Resources' (DOER) comment letter regarding the opportunities for energy efficiency through electrification of the project. As described in the FEIR, the decision to use heat pumps for space heating, cooling and hot water will be made by individual tenants. I continue to encourage the Town to commit to electrification based on the positive analysis presented in the DEIR and the ability to lower energy costs for businesses while significantly reducing GHG emissions over time.

The FEIR indicates that GHG emissions projections and mitigation commitments have not changed since the DEIR. The GHG analysis included in the DEIR calculated stationary source CO<sub>2</sub> emissions from the proposed building sources using eQuest v3.65 modeling software. The Town of Shrewsbury adopted the Stretch Energy Code (SC) subsequent to its designation as a Green Community under the provisions of the *Green Communities Act of 2008*. Therefore, the project will be required to meet the applicable version of the SC in effect at the time of construction. Buildings over 100,000 sf are required to demonstrate that the energy use will be at least 10% below that a baseline of ASHRAE 90.1-2013. The SC applies to Building D (160,000 sf) and Building G (120,000 sf). Mobile source GHG emissions were calculated using the EPA MOVES emissions model, MassDEP guidelines and data from the mesoscale analysis. Emissions were calculated for the 2019 Existing, 2026 No Build and 2026 Build conditions. The analysis estimates emissions reductions associated with the TDM program and intersection improvements. The GHG analysis indicates that the Base Case will generate approximately 2,194.3 tons per year (tpy) of GHG emissions, consisting of 1,218 tpy of stationary source emissions and 976.3 tpy of mobile source emissions. The Preferred Alternative will reduce stationary source emissions by 217.8 tpy to 1,000.2 tpy (17.9 percent) and will decrease mobile source emissions by 19.6 tpy to 956.7 tpy (2 percent). Overall emissions will be reduced by 237.4 tpy (10.8 percent).

The majority of the 66.5-acre project site consists of scrub shrub vegetation, wetland areas and previously developed areas. The analysis indicated that the project will result in the removal of 5 acres of mature forest, 326 tons of sequestered carbon will be released at the time of construction and 1.02 tons of carbon sequestration per year will be lost.

The FEIR did not include a revised mobile source GHG analysis which reflects changes to traffic mitigation since the DEIR. The FEIR indicates that the project will construct 10% of the parking spaces as electrical vehicle (EV) ready. I encourage the project to incorporate a minimum of 5% EV parking spaces with associated infrastructure.

Comments from the Department of Energy Resources (DOER) indicate that the project has committed to above-code envelope performance, above code rooftop PV readiness and heating, ventilation and air conditioning (HVAC) efficiency measures. However, the Town is not committing to electrification of space and water heating with cold-climate air source heat pumps (ASHPs). As described in DOER's comment letter, full electrification would reduce GHG emissions by 71 tpy, reduce utility costs by \$6,250/year, and potentially qualify the project for Alternative Energy Credits (AECs) worth approximately \$13,500/year. I encourage the Town to consider replacing planned gas-fired equipment with cold-climate rated efficient electric

heat pumps/Variant Refrigerant flow (VRF) and cold-climate ASHPs for space heating; and replace planned electric resistance water heating equipment (which are less efficient) with heat pump water heaters.

### Water Supply and Wastewater

The FEIR described measures that will be implemented to ensure efficient water use including use of drought tolerant plantings, capturing and reusing rainwater for irrigation purposes, installation of low flow plumbing fixtures, and development/implementation of maintenance and employee education programs. The project is expected to direct wastewater flows to the Westborough Wastewater Treatment Plant (WWTP). However, if it is determined that an alternate destination is to be considered to handle wastewater flows, the Town will ensure that the required infrastructure is designed in conformance with all local and state regulations and necessary permits are sought of the connection. The project will comply with the 4:1 infiltration/inflow (I:I) mitigation ratio as required for a new connections to Shrewsbury's municipal sewer system. Comments from MassDEP indicate that the Town should document the removal of I/I and report to MassDEP summary of actions taken for the I/I removal pursuant to its NPDES reporting requirements as co-permittee of the Westborough WWTP.

### Mitigation and Section 61 Findings

The FEIR identifies measures to avoid, minimize and mitigate Damage to the Environment and includes draft Section 61 Findings. If the project proposes a significant change in programming based on the planned tenancy compared to the FEIR, the Town or future tenant will be expected to submit a Notice of Project Change, together with revised Section 61 finding and mitigation commitments. The Section 61 Findings include a commitment to provide a GHG self-certification. Following completion of construction of the project, the Town or future tenant must provide a certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the mitigation measures proposed in the FEIR have been incorporated into the buildings. Alternatively, the Town or future tenant may certify that equivalent emissions reduction measures have been adopted that collectively are designed to reduce GHG emissions by the same percentage as the measures outlined in the FEIR and based on the same modeling assumptions. The certification should be supported by plans that clearly illustrate where GHG mitigation measures have been incorporated, and the Town will be expected to include all legal requirements set forth in this certificate and MEPA regulations in its tenant guidelines as well as any other instruments, including bid documents and land disposition agreements, documenting transfer of the Town's ownership interest and legal obligations related to the Project site. In addition, any material reduction in mitigation commitments will result in the need to file a Notice of Project Change.

The current mitigation commitments and Section 61 Findings submitted by the Town are as follows:

### *Land Alteration*

- Bank approximately 25 percent of parking and dedicate 25 percent of parking for compact spaces to reduce 0.9 acres of impervious area if approved by the Shrewsbury Zoning Board.

### *Wetlands and Stormwater*

- Wetland replication at 2:1 ratio
- The proposed drainage design will be consistent with maintaining natural drainage flow patterns to the extent practicable;
- Stormwater runoff will be treated for TSS removal using a mix of deep-sump, hooded catch basins, proprietary stormwater quality units, and forebays prior to infiltration or discharge;
- Stormwater management systems will be designed to provide 44% TSS removal for pretreatment prior to infiltration, and a total of 80% minimum TSS removal prior to discharge across the site;
- Surface and subsurface detention systems will be designed to promote groundwater recharge and retain the 1-inch water quality volume for the total impervious cover proposed onsite;
- Stormwater management systems will be designed to attenuate peak rates of runoff for the 2-, 10-, 25- and 100-year, 24-hour design storms;
- Low impact development (LID) techniques such as bioretention areas and water quality swales will be considered for use on the individual lots on a case-by-case basis as appropriate and feasible due to site constraints during the design and permitting stages of the Project; and
- The Project is considered a mix of new development and redevelopment; however, the Site will be designed as if it is a new development so as to meet more stringent stormwater requirements.

### *Traffic and Transportation*

#### *Operations*

- Traffic signal timing modifications at the Route 20/South Street/Green Street intersection within 6 months of initial occupancy of Subdistrict A.
- Implementation of short-term/low cost improvements at the Route 9/South Street intersection as outlined in the RSA (i.e. replacing/relocating/installing signs; verifying signal clearance times and relocating the school bus stop further south along South Street).
- Additional mitigation that will be implemented subject to meeting applicable monitoring thresholds include:
  - Widening the South Street approach to Route 20 to provide an exclusive right turn lane upon meeting mitigation thresholds which would consist of (a) an average approach delay exceeding 55 seconds (LOS E) for the southbound

South Street Approach to route 20; or (b) vehicle queues on South Street that extend to or beyond Chestnut Street.

- Implementing traffic signal modifications at the Route 20/Centech Boulevard/Cherry Street intersection upon meeting mitigation thresholds, which would consist of intersection operational analysis to determine if modifications are necessary to achieve operations equal to or better than those documented in the DEIR for the No-Build condition.

The Town should continue to coordinate with MassDOT to ensure proposed improvements are consistent with and would not preclude implementation of recommended long-term improvement for the Route 20 Corridor.

#### *Transportation Monitoring Program*

- The Town will be required to conduct an annual traffic monitoring program for a period of five years, beginning six months after occupancy of the project. At minimum, the monitoring program will include:
  - Simultaneous automatic traffic recorder (ATR) counts at the site driveway for a continuous 24-hour period on a typical weekday;
  - Travel survey of employees at the site; and
  - Weekday AM and PM peak hour turning movement counts (TMCs) and operations analysis at site driveways and mitigated intersections.

#### *Transportation Demand Management*

- Provision of Employee Transportation Coordinator (ETC) to disseminate TDM information to tenants;
- Posting of service and schedule information for WRTA and MBTA services;
- Encouragement of tenants to provide public transportation subsidy program for employees and visitors;
- Evaluation of alternative means for connecting the project site to the Grafton MBTA Commuter Rail Station such as through rideshare services, bike share service, tenant employee carpool options, and rideshare matching service with other nearby employers along South Street;
- Provision of bicycle racks for employees and visitors;
- Encouragement of tenants to provide alternative work arrangements;
- Provision of preferential parking for carpools, vanpools, car sharing, and low-emission vehicles;
- Electrical conduit will be provided for a minimum of 10% of parking spaces;
- Encouragement of commercial tenants for provision of a guaranteed ride home program.

#### *GHG Emissions*

The following building related energy efficiency measures will be pursued by the project:

- For Building A, B, C, E, & F:
  - aggregate vertical area weighed U value 0.145 (vertical assembly consisting of 60% framed, insulated wall have R-13+R13c.i. and 40% window having U-0.29).
  - Lighting power density of 0.85W/sf.
- For Building D, G, & H:
  - aggregate vertical area weighed U value: 0.063. (Vertical assembly consisting of 94% framed, insulated wall having R-13+R-13c.i. and 6% window having U-0.29).
  - Lighting power density of 0.60 W/sf.
- 60% of the rooftop will be solar ready
- 90% efficient gas-fired furnace
- 95% efficient electric water heaters
- Tenant Guidelines to ensure:
  - Where heating and cooling systems are not provided by the lessor, systems with an efficiency equivalent to the Mitigation Case are provided.
  - Where hot water heaters are not provided by the lessor, the tenant will be required to install hot water heaters with an efficiency equivalent to the Mitigation Case.
  - Where interior lighting is not provided by the lessor, the tenant will be required to design interior hard-wired lighting systems with light power densities equivalent to the Mitigation Case.
  - Where electric appliances are not provided by the lessor, the tenant will be required to install Energy STAR rated appliances.
  - Consideration of air source heat pumps for space heating, cooling and hot water.

### *Water and Wastewater*

- Efficient water use strategies that will be employed to reduce overall potable water use onsite include:
  - Use of drought tolerant plantings
  - Use of rainwater cisterns at buildings to capture and reuse rainwater for irrigation
  - Installation of low-flow plumbing fixtures; and
  - Development/implementation of maintenance and employee education programs.
- The Project will introduce new watertight sewer mains which will limit infiltration entering the sewer system on-site; and
- All utility work performed within South Street and Route 20 will be fully coordinated with the Town and MassDEP (as applicable) to ensure safe and efficient construction practices are conducted.

### *Construction*

- Hours of construction will be limited to Monday through Saturday 7:00 am to 7:00 pm. No construction activities will occur on Sundays and holidays;

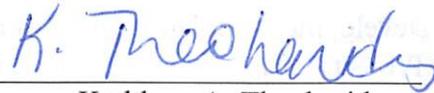
- Construction fencing will be installed around all construction areas prior to the commencement of work. Access to the site will be closed at the end of each work-day;
- Erosion Control Best Management Practices will be implemented and maintained on the site at all times during construction;
- Dust control will be implemented via water trucks and covering of stockpile areas;
- Stone construction entrances will be implemented to minimize off-site soil tracking;
- Regular street sweeping will be conducted to remove any sediment that is deposited on local roadway adjacent to the site;
- Designated construction entrances will be established with appropriate warning signage;
- The Project will be constructed in phases to limit the amount of open earth at any given time; pen soils areas will be stabilized immediately upon establishment of final grades;
- Construction noise will be minimized to the extent possible. Construction Vehicles will not be allowed to warm up prior to designated construction hours;
- Provide additional methods to reduce idling onsite such as provide driver training, perform periodic inspections by site supervisors, and install signage to limit idling to five minutes or less on site;
- Noise generating equipment such as earth processing will be located as far as possible from sensitive receptors;
- The contractor will adhere to the Stormwater Pollution Prevention Plan(s) to be prepared for the Project;
- Construction materials including demolition debris will be recycled to the maximum extent possible; and
- Blasting will be conducted under strict adherence to State guidelines and as directed by the State Fire Marshall.

### Conclusion

Based on a review of the FEIR, comments letters, and consultation with State Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. Outstanding issues can be addressed during State and local permitting and review. The project may proceed to permitting. State Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

February 14, 2020

Date



Kathleen A. Theoharides

### Comments received:

02/07/2020 Massachusetts Department of Environmental Protection (MassDEP) Central Regional Office (CERO)  
 02/07/2020 Massachusetts Department of Transportation (MassDOT)  
 02/07/2020 Department of Energy Resources (DOER)

KAT/EFF/eff



COMMONWEALTH OF MASSACHUSETTS  
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**Charles D. Baker**  
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**Karyn E. Polito**  
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**Kathleen A.  
Theoharides**  
Secretary

**Patrick C. Woodcock**  
Commissioner

12 February 2019

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

RE: Centech Park North, Shrewsbury, Massachusetts, EEA #15950

Cc: Maggie McCarey, Director of Energy Efficiency, Department of Energy Resources  
Patrick Woodcock, Acting Commissioner, Department of Energy Resources

Dear Secretary Theoharides:

We've reviewed the Final Environmental Impact Report (FEIR) for the above project. The proposed project includes 450,000-sf of office, warehouse, and retail buildings.

### **Executive Summary**

The project is taking measures to reduce emissions, resulting in a Mitigation Level<sup>1</sup> of 13%. Committed measures include above-code envelope performance, above code rooftop PV readiness, HVAC improvements, and other measures.

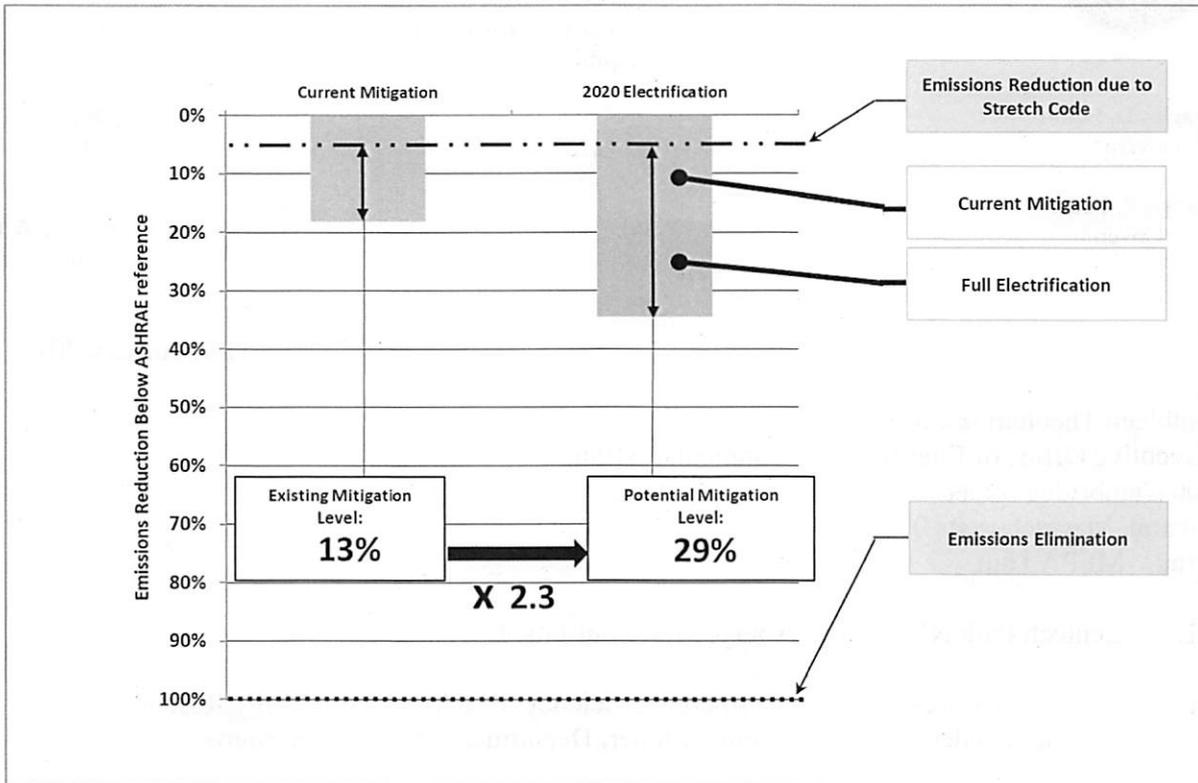
Mitigation Level could be improved to 29%, about a x2.3 increase, by fully electrifying space and water heating. We recommend full electrification. Full electrification would reduce emissions, reduce operating costs, and potentially qualify the project for Alternative Energy Credits worth about \$13,500/yr.<sup>2</sup> The currently-planned fossil fuel based systems will cost more to operate, have higher emissions, and wouldn't qualify for AECs.

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<sup>1</sup> Mitigation Level is the percent points of GHG reduction beyond the reduction that would occur as a result of following state and local building codes. A Mitigation Level of 0% means that no mitigation is proposed.

<sup>2</sup> Assume value of AEC of \$15/MWhr

The illustration below provides an illustration of the project's current and potential Mitigation Level.



In summary:

- The currently-proposed (and committed) building efficiency strategies deliver a Mitigation Level of 13%.
- Fully electrifying space and water heating could more than double Mitigation Level to 29%.

### Summary of Current Commitments

The following are a summary of the project's key GHG commitments:

- Building A, B, C, E, & F:
  - aggregate vertical area weighed U value: 0.145. (Vertical assembly consisting of 60% framed, insulated wall having R-13+R-13c.i. and 40% window having U-0.29)
  - Lighting power densities of 0.85 W/sf
- Building D, G, & H:

Centech Park North, EEA #15950  
Shrewsbury, Massachusetts

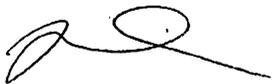
- aggregate vertical area weighed U value: 0.063. (Vertical assembly consisting of 94% framed, insulated wall having R-13+R-13c.i. and 6% window having U-0.29)
- Lighting power densities of 0.60 W/sf
- 60% of the rooftop will be solar PV ready
- 90% efficient gas-fired furnace
- 95% efficient electric water heaters
- Energy STAR appliances provided or required by tenant manual.

### **Recommended Additional Commitments**

The project evaluated air source heat pump technology for space and water heating in the DEIR submission and determined ASHP's reduce GHG emissions by 71 tons/year, save the project approximately \$6,250 in utility savings, and could generate an estimated potential AEC income of \$13,485 per year. Based on this, we recommend that the project commit to the following additional mitigation measures:

- Replace currently-planned gas-fired equipment with cold-climate rated efficient electric heat pumps/VRF and commit to requiring cold-climate air source heat pumps for additional space heating.
- Replace currently-planned electric resistance water heating equipment with heat pump water heaters and commit to requiring heat pumps for additional water heating.

Sincerely,



Paul F. Ormond, P.E.  
Energy Efficiency Engineer  
Massachusetts Department of Energy Resources



Brendan Place  
Clean Energy Engineer  
Massachusetts Department of Energy Resource



Charles D. Baker, Governor  
Karyn E. Polito, Lieutenant Governor  
Stephanie Pollack, MassDOT Secretary & CEO

**massDOT**  
Massachusetts Department of Transportation

February 7, 2020

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

RE: Shrewsbury: Centech Park North – FEIR  
(EEA #15950)

ATTN: MEPA Unit  
Erin Flaherty

Dear Secretary Theoharides:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the proposed Centech Park North project in Shrewsbury, 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

cc: Jonathan Gulliver, Administrator, Highway Division  
Patricia Leavenworth, P.E., Chief Engineer, Highway Division  
Neil Boudreau, Assistant Administrator of Traffic and Safety Engineering  
Barry Lorion, P.E., District 3 Highway Director  
Planning Board, Town of Shrewsbury  
Worcester Regional Transit Authority  
Central Massachusetts Regional Planning Commission  
PPDU Files



Charles D. Baker, Governor  
Karyn E. Polito, Lieutenant Governor  
Stephanie Pollack, MassDOT Secretary & CEO



## MEMORANDUM

TO: David Mohler, Executive Director  
Office of Transportation Planning

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

DATE: February 7, 2020

RE: Shrewsbury: Centech Park North – FEIR  
(EEA #15950)

The Public/Private Development Unit (PPDU) has reviewed the Final Environmental Impact Report (FEIR) for the proposed Centech Park North project in Shrewsbury. The 66.5-acre site, located in the vicinity of 384-386 South Street and 704-764 Hartford Turnpike (Route 20), currently consists of three vacant structures associated with former agricultural use, a paved parking area, and undeveloped land. Approximately 450,000 square feet of development consisting of approximately 180,000 square feet of office space and 270,000 square feet of industrial space across two development subdistricts (Subdistrict A and Subdistrict B) and eight buildings are proposed. Two site access driveways are proposed: access from South Street would serve approximately 275,000 square feet of space across five building lots in Subdistrict A, with access from Route 20 serving approximately 175,000 square feet of space across at three building lots in Subdistrict B. The 40%/60% split of office space to industrial space is proposed for each Subdistrict.

Based on the information presented in the FEIR, the Full-Build project is expected to generate 2,664 new vehicle trips on an average weekday, with 317 new vehicle trips during the weekday morning peak hour and 316 new vehicle trips during the weekday evening peak hour. Access to the site would be provided via one full-access driveway off of South Street and one right-in/right-out driveway off of Route 20. A Vehicular Access Permit from MassDOT will be required because Route 20 is a state-owned roadway.

The FEIR includes an updated Transportation Impact and Access Study (TIAS) prepared in general conformance with the current MassDOT/EOEEA *Transportation Impact Assessment Guidelines*. The FEIR has addressed most of the concerns raised in the DEIR comment letter and includes a comprehensive mitigation program with a monitoring and implementation plan to address the long-term build out of the project. We offer the following comments on the FEIR:

An evaluation to determine whether intersections along Route 9 west of the South Street intersection are merited for inclusion in the study area is included in the FEIR and confirm that the Route 9/Grafton Street intersection met that criteria. Accordingly, the TIAS includes capacity and safety analyses for this intersection. The safety analysis provides a summary of crash rates

derived from MassDOT and the Towns of Shrewsbury and Northborough for the continuous five-year period of 2014 through 2018. Crash rates for the intersection fall below the MassDOT statewide and District 3 averages. Also, the capacity analysis for the intersection indicates that both levels of service and delay are expected to operate within acceptable ranges during the AM and PM peak hours for the future No-Build and Build conditions.

The FEIR mitigation for the project includes implementing the following measures:

- Traffic signal timing modifications at the Route 20/South Street/Green Street intersection within 6 months of initial occupancy of Phase I (Subdistrict A).
- Short-term/low cost improvements at the Route 9/South Street intersection as outlined in the RSA (replacing/relocating/installing signs, verifying signal clearance times and relocating the school bus stop further south along South Street).
- A Transportation Demand Management (TDM) program.
- A transportation monitoring program to be conducted for a period of 5 years beginning 6 months following occupancy of the site.

Additional mitigation that will be implemented subject to meeting applicable monitoring thresholds includes:

- Widening the South Street approach to Route 20 to provide an exclusive right turn lane upon meeting mitigation thresholds, which would consist of (a) average approach delay exceeding 55 seconds (LOS E) for the southbound South Street approach to Route 20; or (b) vehicle queues on South Street that extend to or beyond Chestnut Street.
- Implementing traffic signal timing modifications at the Route 20/Centech Boulevard/Cherry Street intersection upon meeting mitigation thresholds, which would consist of intersection operational analysis determining if modifications are necessary to achieve operations equal to or better than those documented in the DEIR for the No-Build condition.

The Proponent should continue to coordinate with MassDOT to ensure proposed improvements are consistent and would not preclude implementation of recommended long-range improvements for the Route 20 Corridor.

#### Transportation Demand Management Program

The Proponent has identified the following Transportation Demand Management (TDM) measures with the goal of reducing single-occupancy vehicle trips by employees and patrons of the project:

- Provision of an Employee Transportation Coordinator (ETC) to disseminate TDM information to tenants;
- Posting of service and schedule information for WRTA and MBTA services;

- Encouragement of tenants to provide a public transportation subsidy program for employees and visitors;
- Evaluation of alternative means for connecting the project site to the Grafton MBTA Commuter Rail Station such as through rideshare services, bike share services, tenant employee carpool options, and rideshare matching services with other nearby employers along South Street;
- Provision of bicycle racks for employees and visitors;
- Encouragement of tenants to provide alternative work arrangements;
- Provision of preferential parking for carpools, vanpools, car sharing, and low-emission vehicles;
- Consideration of charging stations for electric vehicles; and
- Encouragement of commercial tenants for provision of a guaranteed ride home program.

The Proponent is invited to consult with MassDOT to help implement the TDM program. MassDOT recently launched the Workforce Transportation Program to provide funding to help employers meet workforce transportation needs, including first mile/last mile connections. The Proponent should inform future tenants of this program and encourage its use by employees moving forward.

#### Transportation Monitoring Program

The Proponent is required to conduct an annual traffic monitoring program for a period of five years, beginning six months after occupancy of the project. At a minimum, the monitoring program should include:

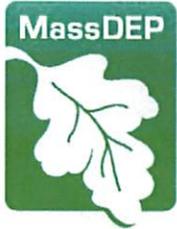
- Simultaneous automatic traffic recorder (ATR) counts at the site driveway for a continuous 24-hour period on a typical weekday;
- Travel survey of employees at the site; and
- Weekday AM and PM peak hour turning movement counts (TMCs) and operations analysis at site driveways and mitigated intersections.

The goals of the monitoring program will be to evaluate the assumptions made in the Environmental Impact Report and the adequacy of the mitigation measures, as well as to determine the effectiveness of the TDM program. The results of each iteration of the monitoring program should be summarized in a technical memorandum provided to MassDOT. This monitoring plan (timing, duration, etc.) should be revisited with MassDOT's PPDU and the District 3 Office prior to its implementation.

#### Section 61 Finding

The FEIR includes an updated Draft Section 61 Finding, outlining the mitigation measures, the TDM program and the monitoring program the Proponent has committed to implementing in conjunction with this project. The Draft Section 61 Finding will be the basis for MassDOT to issue a final Section 61 Finding for the project.

The Proponent should continue consultation with appropriate MassDOT units, including PPDU and the District 3 Office, during the occupancy of the project to implement and update the mitigation program as necessary. If you have any questions regarding these comments, please contact me at (857) 368-8862.



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

Kathleen A. Theoharides  
Secretary

Martin Suuberg  
Commissioner

February 7, 2020

Secretary Kathleen Theoharides  
Executive Office of Environmental Affairs  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114

Attention: MEPA Unit – Erin Flaherty

Re: Final Environmental Impact Report (FEIR)  
Centech Park North  
Shrewsbury  
EEA #15950

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the FEIR for the Centech Park North Project in Shrewsbury (the "Project"). The Town of Shrewsbury (the "Proponent") proposes approximately 450,000 square feet of mixed-use commercial space comprising 40% office space and 60% industrial space. Since issuance of the Secretary's Certificate on the Draft Environmental Impact Report (DEIR), the Project has been further revised and has reduced environmental impacts compared to both the DEIR and the original Environmental Notification (ENF). Specifically, the total amount of impervious area and wetlands and buffer zone impacts have been further reduced as part of the FEIR.

The Project will alter 26.9 acres of land, create approximately 13 acres of impervious area and will alter approximately 1,260 square feet (sf) of Bordering Vegetated Wetlands (BVW), with temporary alteration of approximately 1,800 sf of BVW. The Project will be serviced by municipal water and sewer systems and is estimated to generate approximately 29,500 gallons per day (gpd) of wastewater and 29,500 gpd potable water demand. New power and gas services are also proposed to the Site.

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

- 11.03 (1)(a)(2) – Creation of 10 or more acres of impervious area
- 11.03 (1)(b)(1) – Direct alteration of 25 or more acres of land
- 11.03 (6)(a)(6) – Generation of 3,000 or more new ADT on roadways providing access to a

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

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MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

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single location

- 11.03 (6)(a)(7) – Construction of 1,000 or more new parking spaces at a single location

The Project requires the following State Agency Permits:

- Highway Access Permit – Massachusetts Department of Transportation

MassDEP offers the following comments:

### **Water Supply**

The FEIR addressed the DEIR comment regarding the source of water for irrigation. The FEIR states that the Proponent will consider the capture and reuse of stormwater for irrigation and does not propose connections to the municipal water supply to serve irrigation systems.

### **Wastewater**

The FEIR estimates that the Project will generate approximately 29,500 gpd of wastewater that will be conveyed through municipal sewers to the Westborough Wastewater Treatment Plant, which is jointly owned and operated between the Towns of Westborough and Shrewsbury. Since the 2014 promulgation of revisions to 314 CMR 7.00, no state permit for the construction of sewers is required. All permitting will be administered at the local level.

The FEIR states that the Town of Shrewsbury will impose a local restriction of 4 gallons of infiltration/inflow (I/I) removal for each gallon of sewage introduced into the Town's sewer system. The Proponent will coordinate with Shrewsbury to remove approximately 118,000 gallons of I/I. The Town of Shrewsbury should document the removal of I/I and report to MassDEP a summary of actions taken for I/I removal pursuant to its National Pollutant Discharge Elimination System (NPDES) reporting requirements as co-permittee of the Westborough Wastewater Treatment Plant.

### **Wetlands**

The Project, as described in the FEIR, will result in a 22% reduction in alterations to BVW compared to the DEIR, with a total net alteration of 3,060 square feet of BVW. Permanent BVW alteration will be comprised of 720 sf associated with the construction of Roadway A, and 540 sf required to access Building E. The installation of a waterline between roads A and B will temporarily alter 1,800 sf of BVW. The Proponent eliminated previously proposed BVW fill associated with the construction of Building F. The Proponent states that Bank will not be altered during the construction of any of the components of the Project, however, the FEIR does not provide definitive evidence that Bank is not present at the locations of the proposed crossing for Building E or within the proposed route of the waterline crossing.

Two ponded areas designated by the Massachusetts Natural Heritage and Endangered Species Program as Potential Vernal Pools (PVPs), with vernal pool features verified by the Proponent, are present on the property. The updated site plan submitted with the FEIR only shows the approximate location, not the boundaries, of these PVPs, therefore MassDEP is unable to determine if the Project will adversely impact these features or adjacent vernal pool habitat. Additionally, the proposed crossing to Building E is along the perimeter of a PVP. The Proponent should consider access and stormwater management designs that avoid, minimize, and mitigate adverse impacts to vernal pools and associated

vernal pool habitat during the development of Buildings D and E, and during the construction of the waterline.

The Proponent received an Order of Conditions from the Shrewsbury Conservation Commission on June 18, 2019, approving the construction of Road A. The Proponent will be required to submit one or more Notices of Intent (NOIs) to the Shrewsbury Conservation Commission and MassDEP for the construction of and access to Building E, the construction of Road B, the construction of any buildings within areas jurisdictional under the Wetlands Protection Act, and the waterline loop between Roads A and B. Upon receipt of the NOI filing(s), MassDEP may provide project-specific comments to the Shrewsbury Conservation Commission and the Proponent as part of the File Number Issuance Notification Letter. The Proponent shall design the remaining portions of the Project to meet all performance standards identified in the Massachusetts Wetlands Protection Act Regulations, 310 CMR 10.00, for work proposed in each affected wetland resource area. If present, Bank shall be shown on the Site Plans at all crossing locations (including the temporary waterline crossing), the access crossing for Building E shall be designed to meet the Massachusetts Stream Crossing Standards, and a Wildlife Habitat Evaluation shall be included with the NOI if Bank or other resource area impacts exceed the thresholds for wildlife habitat significance.

#### *Stormwater*

The Project, as presented in the FEIR, has a 6% reduction in proposed impervious areas compared to the DEIR. The NOI filing(s) should include a Stormwater Management Report that verifies how the remaining portions of the Project will meet the Massachusetts Stormwater Standards. The DEIR stated that PVPs with verified vernal pool features are present on the subject site. Vernal Pools qualify as Outstanding Resource Waters (ORWs). The stormwater management plan for the Project should preserve the hydrology and water quality of the Vernal Pools and meet all Stormwater Standards and setbacks associated with ORWs and Vernal Pools.

The Certificate on the DEIR instructed the Proponent to evaluate the use of Low Impact Development (LID) techniques for stormwater management, including but not limited to pervious pavement, raingardens/bioretention areas, bioswales, tree box filters, green roofs, and the reuse of roof runoff for irrigation. The FEIR states that LID techniques, consisting of bioretention areas, grassed swales, and rainwater collection cisterns, will be “considered for use on the individual lots” depending on site constraints. The Proponent shall commit to incorporating LID measures into the design of the remaining phases 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 Andrea Briggs, Central Regional Office MEPA Coordinator, at (508) 767-2734.

Very truly yours,



Mary Jude Pigsley  
Regional Director