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March 26, 2021

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

PROJECT NAME : Fiske Hill East Mixed Use Subdivision Roadway  
PROJECT MUNICIPALITY : Sturbridge and Southbridge  
PROJECT WATERSHED : Quinebaug  
EEA NUMBER : 16330  
PROJECT PROPONENT : Fiske Hill East Realty Trust  
DATE NOTICED IN MONITOR : February 24, 2021

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project consists of phased development of five lots off Main Street and Fiske Hill Road in Sturbridge and Southbridge which will be accessed via a new Subdivision Roadway. The Subdivision Roadway will be fully constructed prior to development of individual lots to provide frontage. The potential and conceptual uses of the five lots (totaling 175,000 square feet (sf)) in the full-build scenario are identified as follows:

- Lot 1 (2.43 acres) – Subdivision Roadway stormwater basin<sup>1</sup>
- Lot 2 (5.27 acres) – 12,000-sf Medical Arts/Urgent Care Facility
- Lot 3 (41.42 Acres) – 65 Dwelling Unit 55+ Senior Housing Community
- Lot 4 (79.44 Acres) – 120 Dwelling Unit Assisted Living Facility
- Lot 5 (4.42 Acres) – 14,500-sf retail building

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<sup>1</sup> Lot 1 will be deeded to the Town of Sturbridge.

Phase 1 will include construction of a 1,030-foot long 28-foot wide Subdivision Roadway off Main Street, which will end in a cul-de-sac with a 50-foot of right-of-way and sidewalks, and development of stormwater infrastructure on Lot 1. Phase 2 will include development of the Senior Housing Community (Lot 3). Subsequent phases will include development of the remaining lots over a timeframe of five to ten years. Planned development for these lots is conceptual at this time and the land uses were assigned to meet the community's needs in consultation with the Town of Sturbridge Planning Department. Lots 2 to 5 will include buildings, parking, stormwater management, utilities, landscaping, and other site development features that will require separate permitting from the local planning board and conservation commission. The project will connect to the existing Town of Sturbridge public water and sewer systems.

According to supplemental information provided on March 12, 2021, the Proponent is planning to subdivide a sizeable amount of acreage in the northern portion of the site for donation to the Massachusetts Division of Fisheries and Wildlife (DFW), the Town of Sturbridge, or another entity with the intent of ensuring the land's permanent protection. The land in question will likely amount to between approximately 35 and 65 acres (26 to 48 percent of the site). The subject land area contains important upland and wetland habitats that abut other land presently owned by DFW. Once the project is approved and the limits of development are known, the Proponent will then finalize the land area for donation and make arrangement with the DFW or appropriate final landowner.

### Segmentation

The MEPA regulations include anti-segmentation provisions to ensure that a project is not phased or segmented to evade, defer or curtail MEPA review. In determining whether a project is subject to MEPA jurisdiction or meets or exceeds any review thresholds, and during MEPA review, the entirety of the project is considered, including any likely potential expansion, and not separate phases or segments thereof. The following criteria are considered to determine whether the various work or activities constitute one project, including, but not limited to: whether the work or activities, taken together, comprise a common plan or independent undertakings, regardless of whether there is more than one Proponent; any time interval between the work or activities; and whether the environmental impacts caused by the work or activities are separable or cumulative.

The Proponent owns the project site which includes five lots. The proposed Subdivision Roadway will provide access to future development on Lots 2, 3, 4, and 5 (Lot 1 will contain stormwater infrastructure associated with the roadway). When a Proponent proposes the development of one portion of a larger contiguous area of land held under common control, MEPA review typically requires inclusion of the envelope of impacts of the entire contiguous area. The Proponent indicates that while construction of the Senior Housing Community on Lot 3 is currently proposed, it does not intend to develop the other three buildable lots in the near future (Lots 2, 4, and 5). However, to present a conservative impact analysis, the ENF identifies potential impacts associated with conceptual development of the lots based on a full-build analysis of each lot consistent with local zoning to determine if, considered together, the projects would exceed MEPA review thresholds. The cumulative impacts from the Subdivision Roadway, stormwater infrastructure on Lot 1, and proposed full-build development on Lots 2, 3, 4, and 5 exceed ENF review thresholds for Land, Wastewater, and Transportation, including creation of 9.3 acres of new impervious area. While the cumulative impacts of

the full-build out of the project site do not currently exceed any mandatory EIR thresholds, impacts associated with actual full-build development of Lots 2, 4, and 5 may result in greater impacts which could cumulatively exceed MEPA review thresholds for a mandatory EIR pursuant to 301 CMR 11.03(1)(a)(2) for creation of 10 or more acres of impervious area.

Comments from the Massachusetts Department of Environmental Protection (MassDEP) note that the total proposed new impervious area of 9.3 acres associated with the full-build project may underestimate the true build-out, and indicate that a Notice of Project Change (NPC) and/or EIR may be required for future phases. If development on Lots 2, 4, and/or 5 is proposed in the next five years, the Proponent should provide an updated cumulative impact analysis to and consult with the MEPA Office regarding the filing of a NPC and whether the cumulative impacts of the projects would exceed a mandatory EIR threshold.

### Project Site

The 134.3-acre project site is comprised of two tracts of undeveloped land that is predominately wooded. Most of the project site is in Sturbridge, with a small portion in Southbridge. Tract 1 is located in Sturbridge (20 Fiske Hill Road) and Southbridge (no address assigned). Tract 2 is located solely in Sturbridge (30 Main Street). Previous logging activities were conducted on a portion of the site. Main Street (Route 131) is under the jurisdiction of the Massachusetts Department of Transportation (MassDOT). The project site is bounded by undeveloped land to the north, Hillcrest Street and existing residential development to the east, Main Street to the south, and residential properties along Fiske Hill Road to the west. The site is zoned for residential use in Southbridge, and residential and commercial uses in Sturbridge. The site contains numerous wetland resource areas including a perennial stream in the very northern section of the site. Wetland resource areas include Bordering Vegetated Wetlands (BVW), Isolated Vegetated Wetlands (IVW), Land Under Water, and Bank, some of which are associated with an intermittent stream. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) (Map Numbers 25027C0933E and 25027C0931E, effective July 4, 2011) there are no Flood Hazard areas located on-site. Three potential vernal pools (PVPs) are located on abutting properties; the closest is within 75 feet of the site.

### Environmental Impacts and Mitigation

The ENF presents the full build-out scenario and impacts for the Subdivision Roadway and all five lots as currently envisioned. Only Phases 1 and 2 have specific proposals, with the other three phases described as conceptual. Potential environmental impacts of the project include alteration of 24.5 acres of land; creation of 9.3 acres of impervious area; alteration of approximately 160 linear feet (lf) of Bank and a minimum of 122,300 sf of Buffer Zone to BVW; generation of 2,600 new unadjusted average daily trips (adt); construction of 320 new parking spaces; new water use and wastewater generation of 31,475 gallons per day (gpd), respectively; and construction of 0.8 miles and 0.7 miles of new water and sewer mains, respectively. Measures to avoid, minimize, and mitigate environmental impacts include avoidance of direct impacts to wetland resource areas (with the exception of potential work associated with replacement of a culvert near Main Street); permanent protection of approximately 35 to 65 acres of land; construction of a stormwater management system; and implementation of construction period best management practices (BMPs).

The following table provides a breakdown of impacts for each lot.

| Preferred Alternative - As Shown on Conceptual Plan | Areas (Acres) |                      |          |        |          |         |           |          |
|---|---------------|----------------------|----------|--------|----------|---------|-----------|----------|
|   | Existing Site | Proposed Development | Roadway  | Lot 1  | Lot 2    | Lot 3   | Lot 4     | Lot 5    |
| Footprint of Buildings                              | 0             | 2.9+/-               | 0        | 0      | 0.3+/-   | 1.8+/-  | 0.5+/-    | 0.3+/-   |
| Internal Roadways                                   | 0             | 2.1+/-               | 1.0+/-   | 0      | 0        | 1.1+/-  | 0         | 0        |
| Parking and Other Paved Areas                       | 0             | 4.3+/-               | 0.2+/-   | 0      | 0.5+/-   | 1.7+/-  | 1.1+/-    | 0.8+/-   |
| Other Altered Areas                                 | 0             | 15.2+/-              | 0.2+/-   | 0.6+/- | 0.7+/-   | 11.0+/- | 1.3+/-    | 1.4+/-   |
| Undeveloped Areas                                   | 134.3+/-      | 109.8+/-             | 0        | 1.8+/- | 3.8+/-   | 25.8+/- | 76.5+/-   | 1.9+/-   |
| Totals  | 134.3+/-      | 134.3+/-             | 1.4+/-   | 2.4+/- | 5.3+/-   | 41.4+/- | 79.4+/-   | 4.4+/-   |
| Total Impervious Area                               | 0             | 9.3+/-               | 1.2+/-   | 0      | 0.8+/-   | 4.6+/-  | 1.6+/-    | 1.1+/-   |
| Total Land Disturbance                              | 0             | 24.5+/-              | 1.4+/-   | 0.6+/- | 1.5+/-   | 15.6+/- | 2.9+/-    | 2.5+/-   |
| Number of Housing Units                             | 0             | 185+/-               | 0        | 0      | 0        | 65+/-   | 120+/-    | 0        |
| Vehicle Trips Per Day                               | 0             | 2,613+/-             | 2,613+/- | 0      | 299+/-   | 385+/-  | 312+/-    | 1,617+/- |
| Parking Spaces                                      | 0             | 320+/-               | 0        | 0      | 40+/-    | 85+/-   | 120+/-    | 75+/-    |
| Water Usage/ Wastewater Generation (GPD)            | 0             | 31,475+/-            | 0        | 0      | 3,000+/- | 9750+/- | 18,000+/- | 725+/-   |

### Jurisdiction and Permitting

This project is undergoing MEPA review and requires an ENF pursuant to 301 CMR Sections 11.03(1)(b)(1), 11.03(1)(b)(2), 11.03(5)(b)(3)(c)<sup>2</sup>, 11.03(6)(b)(13), and 11.03(6)(b)(15) because it requires an Agency Action and will directly alter 25 or more acres of land, create five or more acres of impervious area, construct one-half or more miles in length of new sewer mains (provided the sewer mains are not located in the right of way of existing roadways), generate 2,000 or more new adt on roadways providing access to a single location, and construct 300 or more new parking spaces at a single location. The project requires an Access Permit and separate Non-Vehicular Access Permits from MassDOT.

The project requires an Order of Conditions from the Sturbridge Conservation Commission (SCC) (and, on appeal only, a Superseding Order of Conditions from MassDEP) and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the U.S. Environmental Protection Agency (EPA). The Subdivision Roadway will require a waiver from the Sturbridge Planning Board because it is proposed to be longer than the 500-foot limit (1,030 feet).

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

### Review of the ENF

The ENF provides a description of existing and proposed conditions, preliminary project plans, and an analysis of alternatives. It identifies measures to avoid, minimize and mitigate project impacts. The ENF provides a Traffic Impact Study and a Stormwater Management Report. As discussed above, comments from MassDEP note that impacts (particularly creation of impervious area) associated with conceptual plans may underestimate the true full build-out conditions and an NPC may be required.

<sup>2</sup> The ENF did not identify that the project exceeded this ENF review threshold.

The project will be peer reviewed locally through the Planning Board and SCC. Comments from the Sturbridge Planning Board identify support for the project. The Proponent submitted supplemental information on March 12, 2021 to address questions and comments provided at the MEPA consultation session on March 5, 2021, and on March 23, 2021 to provide a response to comments. For purposes of clarity, all supplemental materials are referred to herein as the “ENF” unless otherwise referenced.

### *Alternatives Analysis*

The ENF includes analysis of the following alternatives: No Build; Subdivision Roadway through to Fiske Hill Road (Alternative B); 55+ Senior Housing Community Access from Fiske Hill Road (Alternative C); Subdivision Roadway at 500-Foot Length (Alternative D); Single Commercial Development on Main and Residential Development on Fiske Hill (Alternative E); 55+ Senior Housing Community in Alternate Location (Alternative F); and the Preferred Alternative. Supplemental information provides a tabular comparison of impacts associated with Alternatives B, C, D, E, and the Preferred Alternative. The No Build alternative would leave the site undeveloped and avoid associated impacts. This alternative was dismissed because it would not meet the project goal of providing the community with needed alternative and senior housing, potential medical uses, an increase in commercial tax base and economic development within the area.

Alternative B would continue the Subdivision Roadway from Main Street through to Fiske Hill Road rather than ending in a cul-de-sac. While this alternative would achieve the goal of creating legal frontage, it would result in greater land alteration and impervious area, reduce the developable area on Lot 4, impact and disrupt the historic residential Fiske Hill neighborhood, and increase traffic on a smaller street. Alternative C would construct and access the Senior Housing Community from Fiske Hill Road instead of Main Street. Because the Suburban Residential zoning on Fiske Hill Road does not allow for this use, a subdivision roadway from Fiske Hill Road to the Rural Residential District would be required to create legal frontage within the Rural Residential District. This alternative would reduce the developable area on Lot 4, impact and disrupt the historic residential Fiske Hill neighborhood, and significantly increase traffic and impact traffic patterns on a smaller street. It could require construction of multiple water supplies and wastewater treatment plants with associated impacts because connecting to municipal utilities in Fiske Hill Road was opposed by the Water and Sewer Departments.

Alternative D would construct a 500-foot long subdivision roadway consistent with local subdivision regulations. This alternative would not meet the project purpose of creating legal frontage within the Rural Residential Zone for the development of a Senior Housing Community or the Assisted Living Facility. Alternative E would develop each of the two parcels individually with by-right uses off Main Street (Commercial) and Fiske Hill Road (Residential). Although this alternative would likely decrease potential land disturbance on-site, it would not meet the project goal of creating legal frontage in the Rural Residential Zone for the development of a Senior Housing Community, an established need in Sturbridge. The development of a single large commercial development off Main Street could also increase traffic on Main Street depending on the specific use. Alternative F would develop the Senior Housing Community in an alternate location in the Town of Sturbridge. Based on consultation with the Planning Department, there are no other large parcels of Rural Residential Land proximate to other developments, which would facilitate access to the parcel. The majority of larger properties close to developed areas of Sturbridge are either already developed, not located in the Rural Residential Zone, held as Open Space or in Conservation Restrictions, noted as Priority Preservation Lands, or would

result in greater environmental impacts to develop.

The Preferred Alternative, as described herein, will construct a Subdivision Roadway to provide access to residential land where a manufactured Senior Housing Community and potentially an Assisted Living Facility would be developed as allowed uses. Comments from the Sturbridge Planning Board emphasize the need for housing for individuals aged 55 and over, and indicate that the proposed uses are consistent with the Master Plan (2011) and Housing Production Plan (2020).

### *Wetlands*

The full-build project will impact Buffer Zone to BVW and may require impacts to Bank, LUW, and additional impacts to Buffer Zone associated with the potential replacement of a culvert. The SCC will review the project for its consistency with the Wetlands Protection Act (WPA), Wetlands Regulations (310 CMR 10.00) and associated performance standards including stormwater management standards (SMS). The Proponent submitted a Notice of Intent (NOI) for review of the Subdivision Roadway and associated infrastructure; MassDEP provided comments on the NOI on December 30, 2020. SCC comments indicate that peer reviews have been initiated to assist in determining compliance with the WPA (including wetland delineations) and local wetland and stormwater bylaws. In addition, the SCC has requested the submission of additional information relative to review of the NOI.

Wetlands in the vicinity of the proposed Subdivision Roadway were delineated and field located during the existing conditions survey. Wetlands beyond the vicinity of the Subdivision Roadway are depicted on plans based on the limits of delineation shown on Abbreviated Notice of Resource Area Delineation (ANRAD) Plans from 2007; the ANRAD has since expired and these wetlands will be re-delineated and survey located at the time each individual lot is proposed for development. Peer review has identified additional potential wetland resource areas, revisions to the flagged wetland lines and areas of PVP habitat which will require additional evaluation during the NOI review process. PVP evaluations in the vicinity of the Subdivision Roadway will be conducted in the spring of 2021 as requested by the SCC. The ENF indicates that none of these PVPs will be impacted by the project. SCC comments indicate that additional resource areas identified near Main Street, including Bank and BVW and a potential IVW, will need to be field located and shown on plans. There is evidence of past wetland fill in this location where a culvert pipe was installed and connected to MassDOT's drainage infrastructure in Main Street.

Construction of the roadway and stormwater BMPs in Phase 1 will occur within the Buffer Zone to a BVW. The Proponent proposes restoration work in association with the proposed road construction. Two areas of Buffer Zone previously altered by logging activity will be seeded with Conservation and Wildlife Seed Mix and planted with a variety of native shrubs and an unpermitted wetland crossing will be removed and the underlying BVW restored. Plans will need to be developed to depict Bank and other resource areas identified during the peer review and the Proponent will be required to calculate impacts to resource areas associated with any proposed culvert replacement activities. The NOI should be revised to address the results of the PVP study, identify any project changes based on the presence of additional resource areas and demonstrate the consistency of the work with the WPA, local bylaws, and MassDOT requirements. Supplemental information indicates that the Proponent will consult with the SCC and MassDOT regarding the culvert replacement, removal, or upgrading of the culvert as part of Phase 1 activities. It is likely the culvert will need to be removed, and the 80 lf of culvert will need to be

replaced with an open channel which will provide for the replacement of approximately 160 lf of existing intermittent stream bank which is provided by the culvert. The open channel would terminate at a drop inlet type structure in the location of the existing terminus manhole. The Proponent will submit a revised concept plan to the SCC.

In addition, future development is proposed to be served by public sewer via either the Town of Sturbridge or the Town of Southbridge. SCC comments indicate that the location of lines, pump houses, and other elements associated with sewer infrastructure for future development should be shown on plans to determine if additional work will occur within areas of jurisdiction, and if so, the Proponent should calculate associated impacts to wetland resource areas. The NOI should be revised to include this information. Supplemental information indicates that the project would not be practical without a municipal sewer connection; if sewer availability becomes problematic, development potential of the lots would be significantly reduced.

As noted above, wetlands impacts are limited to those associated with the culvert replacement as part of Phase 1 and are not anticipated for the buildout of lots 2, 3, 4 and 5. However, upon further wetland delineation, wetland impacts associated with the development of these lots may be identified. The ENF acknowledges that subsequent NOIs will be required for the development of Lots 2, 3, 4 and 5. Upon receipt of these NOIs, MassDEP anticipates providing additional comments to the SCC regarding consistency of the proposed work pursuant to 310 CMR 10.00. SCC comments indicate that it identified concerns with potential future cumulative wetland impacts which may be associated with the phased lot development on this site and requested additional information on the planned uses to assist with its review of the project. In response to these concerns, the ENF includes a concept plan for the full buildout of each lot, which avoids direct impacts to all wetland resource areas (with the exception of work associated with the culvert replacement as described above). As previously mentioned, the Proponent will be required to revise the concept plan following investigation of the additional wetland areas. There are additional upland areas on Lot 4 which could be developed beyond what is shown on the concept plan; however, the Proponent indicates that up to 65 acres of this area will be permanently protected. As noted above, if development on Lots 2, 4, and/or 5 is proposed in the next five years, the Proponent should provide an updated cumulative impact analysis to and consult with the MEPA Office to determine the need for additional MEPA review.

#### *Land and Stormwater*

The full build scenario as conceptualized in the ENF will result in the creation of 9.3 acres of new impervious surfaces and is subject to the SMS pursuant to 310 CMR 10.05(6)(k). A Stormwater Management Report has been submitted as part of the NOI and is included in the ENF. For roadway work proposed under Phase 1, the Proponent will use deep sump catch basins, a proprietary hydrodynamic separator, sediment forebay, water quality swale and an above-ground infiltration basin to comply with the requirements of the SMS. When Lots 2, 3, 4 and 5 are developed during subsequent phases, additional stormwater management systems will be required as part of future NOIs and potential NPCs. MassDEP anticipates providing additional comments on the NOIs relating to future development and associated stormwater management. Future lot uses and whether they will meet the definition of a Land Uses with Higher Potential Pollutant Loads should be considered by the Proponent, and if applicable, factored into stormwater management design.

The Proponent should prioritize implementation of low impact development (LID) measures to improve stormwater management for Phase 2 and subsequent phases. Supplemental information indicates that LID design measures will be implemented in the site designs of future developments to minimize land clearing and impacts to resources areas; it also identifies potential LID approaches that will be considered for Lots 2, 3, 4, and 5 including country drainage, tree preservation, vegetated buffers/filter strips, reducing impervious area, rain gardens/bioretenention cells, drywells/subsurface infiltration, rain barrels, and soil bioengineering/ vegetative stabilization. I strongly encourage the Proponent to reduce impervious area and avoid tree removal to the maximum extent practicable. LID designs should be carefully considered, and where not used, the NOI, and the NPC, if required, should provide a thoughtful explanation as to why they are infeasible for implementation on-site.

The ENF did not review potential conditions at the site under future climate change scenarios or how the project design will make this infrastructure resilient under those conditions. I encourage the Proponent to implement measures that incorporate future climate change projections as the design of the project is finalized and proceeds to permitting. In particular, I encourage the Proponent to incorporate climate change data into design elements such as stormwater system sizing and roadway elevation, if applicable, and use ecosystem-based adaptation measures to mitigate stormwater runoff, such as integration of tree canopy cover, rain gardens, and LID stormwater management techniques.

### *Transportation*

The project requires a Vehicular Access Permit from MassDOT because it abuts and would be accessed from Route 131. The project will also require separate Non-Vehicular Access Permits for utility work. The ENF includes a Transportation Impact Assessment (TIA), prepared in general conformance with the current MassDOT/EOEEA *TIA Guidelines*. MassDOT comments indicate that the ENF adequately discusses the transportation impacts of the project and do not recommend further MEPA review based on transportation-related issues. The Proponent should continue consultation with the Towns of Sturbridge and Southbridge and appropriate MassDOT units.

The full-build project will include 320 parking spaces and is expected to generate 2,613 adt. The parking provision includes off-street parking for up to two vehicles for each unit within the Senior Housing Community. Access will be provided via the 1,030-foot new Subdivision Roadway that connects to Main Street in Sturbridge and terminates at a cul-de-sac within the subdivision. In addition, emergency access/egress is proposed through an existing access easement at the corner of Idlewood Street and Crestwood Drive, through property owned by the Town of Southbridge.

### *Trip Generation*

The development program analyzed in the TIA included a 3,000-sf office building, which was later removed to accommodate stormwater management for the Subdivision Roadway. Based on Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10th Edition) Land Use Codes (LUCs) 251 (Senior Adult Housing-Detached), 254 (Assisted Living), 650 (Free-Standing Emergency Room), and 820 (Shopping Center), the project is estimated to generate 2,613 adt including 224 and 213 vehicle trips during the weekday morning and evening peak hours, respectively, and 246 vehicle trips during the Saturday peak hour. The trip generation reflects the total trip generation without inclusion of the office facility; however, the traffic operations analysis in the TIA included the office facility.

### *Traffic Operations*

The TIA provides an analysis of study area intersections for the 2020 Existing, 2027 No-Build, and 2027 Build conditions. Project-related impacts were analyzed at the following intersections: Route 131/Subdivision Roadway, Route 131/Fiske Hill Road and Route 131/Wallace Road. Existing volumes are based on counts conducted in October 2007 because newer counts were unavailable. The 2007 volumes were inflated using an average annual growth rate derived from MassDOT's annual growth rates for 2014 through 2019. The average annual growth rate (0.0034) was then applied over 13 years to adjust the volumes to 2020. According to MassDOT guidance, a seasonal adjustment factor was also applied to the volumes, to reflect an average month. The same annual growth rate used to adjust the volumes to 2020, was applied to develop the 2027 future roadway volumes. Project trips were proportionally assigned to all relevant approaches at the study area intersections, based on existing travel patterns, to generate the 2027 Build scenario.

The TIA indicates that study area intersections operate at level-of-service (LOS) D or better in the 2027 Build scenario. Overall, the project is expected to result in little to no impact on traffic operations. The southbound approach to Route 131 on the Subdivision Roadway operates at LOS D or E during the peak period, when the roadway is evaluated with a single southbound lane. The roadway design was revised to include independent left-turn and right-turn lanes which resulted in some improvement at the intersection. The Proponent should work with MassDOT during the permitting process to select the appropriate alternative for the Subdivision Roadway approach to Route 131. In addition, the Proponent will be required to analyze warrants for a left-turn lane into the site through the permit application.

### *Multimodal Access and Improvements*

Access will be provided via the new Subdivision Roadway that connects to Route 131 and terminates in a cul-de-sac within the subdivision. The roadway will be located 500 feet east of the Route 131/Fiske Hill Road intersection. A sidewalk will be provided on both sides of the Subdivision Roadway. The Subdivision Roadway right-of-way will be 50 feet wide and the paved roadway will be 28 feet wide. Site distance measurements indicate that the Subdivision Roadway will have suitable site line distances. MassDOT comments will require that access to all buildings be designed with an accessible and clear pedestrian connection between Route 131 and the building entrances.

Regularly scheduled public transit service is not available near the project site. The Proponent should work with the Worcester Regional Transit Authority (WRTA) and MassDOT District 3 to determine whether WRTA bus stop facilities are appropriate near the project site, and if so, where they should be located, subject to approval from all parties.

### *Safety*

None of the study area intersections experience crash rates above the State and/or District 3 averages for unsignalized intersections, nor are any study area intersections potential Highway Safety Improvement Program (HSIP)-eligible clusters. The TIA notes that Route 131 was reconfigured in 2012 to include a left-turn lane at each of the study area intersections and a right-turn lane at Fiske Hill Road.

### *Transportation Demand Management (TDM)*

The ENF does not identify TDM measures that will be implemented as part of the project. MassDOT comments recommend that the Proponent consider implementing TDM measures aimed at minimizing single occupancy vehicle (SOV) trip generation which may include the following:

- Provision of on-site amenities and conveniences to reduce demand for SOV travel;
- Provision of carpooling and vanpooling programs and perks;
- Provision of free or subsidized transit passes; and
- Provision of robust bicycle and pedestrian amenities and connections.

### *Wastewater*

The project will generate 31,475 gpd of wastewater and includes installation of approximately 0.7 miles of new sewer, which will connect to the existing sewer on Main Street in Sturbridge. The existing sewer currently conveys wastewater to the Southbridge Publicly Owned Treatment Works (POTW) for treatment and disposal. The flow can be redirected to the Sturbridge POTW in the future if the Town of Sturbridge installs a new pump station at the town line. Supplemental information provides additional information regarding the proposed sewer. MassDEP comments indicate that the proposed sewer will not require a permit from MassDEP if it meets all the conditions of the applicable sections in the Sewer System Extension and Connection Permit Program Regulations pursuant to 314 CMR 7.05(1) (Activities Not Requiring a Permit). The proposed sewer will be approved/permitted by the Town of Sturbridge sewer authority.

### *Water Supply*

The project will use 31,475 gpd of drinking water. The Town of Sturbridge is regulated through MassDEP's Water Management Act (WMA) Program to withdraw an annual average volume of 1.12 million gallons per day (MGD). Actual withdrawals from 2017 through 2019 ranged from 0.50 to 0.53 MGD. MassDEP comments concur with the Sturbridge Water Department that there is adequate capacity for the proposed flows. MassDEP comments also concur with the Sturbridge Water Department's preference that the proposed water line for the project be extended overland from the end of the proposed cul-de-sac to Fiske Hill Road because it will eliminate the dead-end from the existing water line on Main Street, improve water quality, and provide separate feeds to users along the existing line in the event there is a water main break.

### *Construction Period*

All construction and demolition (C&D) 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 and handling/disposal of clean wood associated with tree removal and land clearing). I refer the Proponent to comments from MassDEP regarding construction-period measures. The Proponent will install BMPs on the project site to control erosion and sedimentation during the construction period. The project will require the preparation of a Stormwater Pollution Prevention Plan

(SWPPP) in accordance with the NPDES CGP. 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 40.0000). The Proponent should develop a spills contingency plan. All construction activities should be undertaken in compliance with the conditions of all State and local permits. I encourage the Proponent to reuse or recycle C&D debris to the maximum extent.

### Conclusion

The ENF has adequately described and analyzed the project and its alternatives, and assessed its potential environmental impacts and mitigation measures. Based on review of the ENF and comments received on it, and in consultation with State Agencies, I have determined that an EIR is not required.

March 26, 2021

Date



Kathleen A. Theoharides

### Comments received:

|            |  |
|------------|--|
| 03/09/2021 | Maureen Doyle  |
| 03/11/2021 | Sturbridge Planning Board  |
| 03/16/2021 | Sturbridge Conservation Commission   |
| 03/16/2021 | Massachusetts Department of Environmental Protection (MassDEP) –<br>Central Regional Office (CERO) |
| 03/16/2021 | Massachusetts Department of Transportation (MassDOT)   |

KAT/PPP/ppp

## Patel, Purvi (EEA)

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**From:** Maureen Doyle <doylemaureen3@gmail.com>  
**Sent:** Tuesday, March 9, 2021 8:47 PM  
**To:** Patel, Purvi (EEA)  
**Subject:** MEPA hearing 3/9/2021

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi! I attended the MEPA hearing today for the proposing 55+housing development in Sturbridge (it overlaps a slight bit into southbridge, where i live).

First of all, you did a great job! that was the best lead presentation i have seen during COVID!

First of all, i want to voice concern for the vernal pools. Vernal pools are so important ; i'm not sure what Sturbridge's wetland bylaws say about their existence, but if there are any vernal pools, i hope they will be used as educational. it would be nice to have a bench near them or a sign indicating their importance. I am very glad about this Lot 4 potentially being donated to MA fish and wildlife! That is great for a continuous corridor for passage for animals from the Fish and Wildlife Parcel in Southbridge. I'm sure they are donating the land due to all the wetlands and ledge but it is still good land for wildlife.

I will reach out to the Con Com agent and share my ideas about the vernal pools.

Take care! Thanks for your work on this!! peace, maureen doyle (a member of the Southbridge Con com and a resident of Southbridge)



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# Town of Sturbridge

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Jean M. Bubon, AICP Town Planner

Email: [jbubon@town.sturbridge.ma.us](mailto:jbubon@town.sturbridge.ma.us)

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## MEMORANDUM

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**TO:** PURVI PATEL  
**FROM:** JEAN M. BUBON, AICP, TOWN PLANNER (JMB)  
**CC:** FISKE HILL EAST  
**SUBJECT:** FISKE HILL EAST MIXED USE SUBDIVISION ROADWAY MEPA ID 16330  
**DATE:** 3/11/2021

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We have begun review of the application and plans submitted by McClure Engineering on behalf of Fiske Hill East Realty Trust for a Definitive Subdivision Plan entitled "Definitive Subdivision Plan "Fiske Hill East" 30 Main Street & 20 Fiske Hill Road, Sturbridge, Massachusetts owned by: Fiske Hill East Realty Trust – 97 Arnold Road, Fiskdale, MA 01518". The plans submitted were prepared by McClure Engineering, Inc. – 119 Worcester Road, Charlton, MA 01507. The property is located off of 30 Main Street and 20 Fiske Hill Road, Sturbridge. A Preliminary Subdivision Plan for this project was approved in 2007. At that time there was a potential applicant for an Assisted Living Facility which was well aligned with the needs of the community. Due to a downturn in the economy, the project never materialized. The Planning Board opened the Public Hearing on January 26, 2021.

During the Public Hearing the Planning Board discussed and voted on a series of waivers that were requested by the applicant. All but one, the waiver request to reduce the paved roadway width were approved by the Board. The waiver was recommended by staff, but concerns were raised by a Board member in regards to adequate access for Fire Apparatus. After discussion, it did not appear there would be sufficient votes to approve the request and a compromise was reached with regards to pavement width. The plans now will be revised to include a minimum pavement width of 28' instead of the 24' originally requested.

Approximately one year ago, the property owner reached out to the Town as he had a potential purchaser for some of the residential land to construct a manufactured housing community for 55 and over individuals. The Town was in the midst of preparing our Housing Production Plan and the need for housing for individuals 55 and over was noted as a need. It is anticipated that the changing age composition of Sturbridge will result in a greater demand for housing better suited for aging households as well as households with fewer members. The steadily increasing median age and proportion of aged 65+ population in Sturbridge is reflective of national trends, as the Baby Boomer generation approaches and surpasses

retirement age. Projected population increases are expected in the 85+ category which is expected to see a 65% increase by 2040 and the 65 to 84 age bracket which is projected to increase 35% by 2040<sup>1</sup>.

The proposed subdivision roadway is required to provide access to the residential land where a manufactured housing 55+ community would be allowed, and hopefully an Assisted Living Facility. The construction of both the 55+ community and the Assisted Living Facility are projects the Town would like to see constructed. In fact, the Housing Production Plan recommends that the Town consider amending its zoning bylaws to allow for more opportunities for senior housing and assisted living facilities to be constructed.

The Planning Board met with the project proponents to review their conceptual plans for this 55+ community that would be complete with sidewalks and a community room and open space to serve the needs of the residents. The property is located off of Main Street which would provide residents with easy walking access to shops and services. A short commute away there are several large grocery stores and other retailers as well.

The Commercial portion of the subdivision is proposed to accommodate a medical arts/urgent care facility and a small convenience store/strip mall development. These proposals are consistent with local plans as the Master Plan (2011) specifically called out this area for additional medical offices and an urgent care facility. While these are conceptual uses at this time, it is hoped that once the roadway is constructed, it will be possible to find potential tenants/purchaser that will develop these proposed uses.

The Planning Board has retained Pare Corporation to conduct a Peer Review of this project including overall subdivision layout and construction, stormwater management system and traffic impacts. At this time no major concerns have been noted during this review. Some additional information has been requested in regards to the traffic study. Since the roadway width was revised, a new reviewed will be required once the revised plans have been completed.

The Conservation Commission has requested additional analysis in regards to wetlands issues and potential vernal pools and therefore the Planning Board has continued this Public Hearing into April to allow the applicant time to perform additional study. While we realize there are environmental features on site that must meet the wetland bylaw requirements; this department realizes the value that this proposal can provide to the community in terms of providing uses that are consistent with the Town's Plans; as noted the plan is consistent with the Housing Production Plan and Master Plan, but this proposal is also consistent with the Open Space Plan as there is the opportunity to expand the green corridor that the potential donation of open space will help accomplish.

If there is any additional information, we can provide, please let us know.

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<sup>1</sup> Sturbridge Housing Production Plan 2020-2024.



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

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

March 16, 2021

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

Attention: MEPA Unit – Purvi Patel

Re: Environmental Notification Form (ENF)  
Fiske Hill East Mixed Use Subdivision Roadway  
Sturbridge and Southbridge  
EEA #16330

Dear Secretary Theoharides,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the ENF for the Fiske Hill East Mixed Use Subdivision Roadway (the "Project") in Sturbridge and Southbridge. Fiske Hill East Realty Trust (the "Proponent") is proposing to construct a 1,030-foot road off Main Street (Route 131) to create frontage for the development of five lots on 30 Main Street and 20 Fiske Hill Road, which may include four residential and/or commercial developments and one stormwater management system. The 28-foot-wide roadway will be a cul-de-sac with a 50-foot of right-of-way and sidewalks. The Project is located on 134 acres of predominantly wooded land. Most of the Project property is in Sturbridge, with a small portion in Southbridge. There was logging activity on a portion of the property in the past.

Lot 1 (2.43 acres) will be the site of a stormwater basin that will be deeded to the Town of Sturbridge. The development of the roadway and Lot 1 comprise Phase 1 of the Project. Lot 3 (41.42 acres) will include 65 units of housing for individuals over the age of 55. The development of Lot 3 is Phase 2 of the Project. Potential future developments include a 12,000 square-foot (sf) medical arts/urgent care facility on Lot 2 (5.27 acres), a 120-unit assisted living facility on Lot 4 (79.44 acres) and a 14,500 sf retail building on Lot 5 (4.42 acres). The Project will connect to the existing Town of Sturbridge public water and sewer systems.

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

- 301 CMR 11.03(1)(b)(1) - Direct alteration of 25 or more acres of land, unless the Project is consistent with an approved conservation farm plan or forest cutting plan or other similar generally accepted agricultural or forestry practices;
- 301 CMR 11.03(1)(b)(2) - Creation of five or more acres of impervious area;
- 301 CMR 11.03(6)(b)(13) - Generation of 2,000 or more New adt on roadways will be constructed on 24.5 acres and will comprise 175,000 square feet (sf)providing access to a single location;
- 301 CMR 11.03(6)(b)(15) - Construction of 300 or more New parking spaces at a single location.

Although the Project is referred to as the “subdivision roadway,” the ENF presents the full build-out scenario and impacts for all five lots as currently envisioned. MassDEP notes that only Phases 1 and 2 have specific proposals, with the other three phases described as “conceptual.” The calculation of new impervious area of 9.3 acres may underestimate the true build-out; therefore, MassDEP suggests that a Notice of Project Change and/or EIR may be required for future phases.

The Project requires the following State Agency Permits:

- Massachusetts Department of Transportation (MassDOT) Access Permit;
- MassDEP - Superseding Order of Conditions (if local Order of Conditions is appealed).

MassDEP offers the following comments on the Project:

### **Wetlands**

Although specific uses for all the building lots have not been finalized, the Proponent states that Lot 1 will serve as the location of the proposed stormwater basin required by the roadway proposed as Phase 1. Lot 3 will be developed into an age-restricted housing community under Phase 2 of the Project. The remaining lots will likely be developed with additional residential or commercial uses consistent with current zoning. Construction of the roadway and stormwater Best Management Practices in Phase 1 will occur within the Buffer Zone (BZ) to a Bordering Vegetated Wetland (BVW) but will not result in the direct alteration of wetland resource areas. It is also anticipated that a full build-out of all five lots in accordance with the conceptual development plan outlined in the ENF will not result in the direct alteration of wetland resource areas.

The Proponent proposes restoration work in association with the proposed road construction. Two areas of BZ – previously altered by logging activity– will be seeded with Conservation and Wildlife Seed Mix and planted with a variety of native shrubs and an unpermitted wetland crossing will be removed and the underlying BVW restored.

The Proponent submitted a Notice of Intent (NOI) for the complete length of the subdivision roadway to the Sturbridge Conservation Commission (the “Commission”) and MassDEP on December 10, 2020. Upon completion of the technical review of the NOI, MassDEP provided comments to the Proponent and the Commission in a File Number Notification Letter issued on December 30, 2020. The Proponent has acknowledged that subsequent NOIs will be required for the development of Lots 2, 3, 4 and 5. Upon receipt of these applications, MassDEP anticipates providing additional comments to the Commission relating to the applicability of the Massachusetts Wetland Protection Act and Regulations (310 CMR 10.00) to the proposed work.

### *Stormwater*

The full build scenario as conceptualized in the ENF will result in the creation of  $\pm 9.3$  acres of new impervious surfaces and is subject to the Massachusetts Stormwater Standards (the “Standards”) under 310 CMR 10.05(6)(k). For roadway work proposed under Phase 1, the Proponent intends to use deep sump catch basins, a proprietary hydrodynamic separator, sediment forebay, water quality swale and an above-ground infiltration basin to achieve compliance with the requirements of the Standards.

When Lots 2, 3, 4 and 5 are developed during subsequent Phases, additional stormwater management systems will be required as part of future Notices of Project Change or NOI submittals. MassDEP anticipates providing additional comments relating to the future developments and associated stormwater management. The future uses of the parcels and whether they will meet the definition of a Land Uses with Higher Potential Pollutant Loads should be considered by the Proponent, and if applicable, factored into stormwater management design.

MassDEP recommends thorough consideration of low impact development (LID) measures to improve the stormwater management within Phase 2. LID is an approach to stormwater management that minimizes runoff impacts by maintaining and mimicking existing hydrologic functions through site design techniques such as disconnecting runoff flow pathways and dispersing stormwater control across the site, reducing impervious areas, and minimizing clearing and grading while preserving natural resources and drainage patterns. Additional information on LID techniques can be found at: <https://www.mass.gov/low-impact-development>. LID designs should be carefully considered, and where not used, the NPC should provide a thoughtful explanation as to why they are infeasible for implementation on-site.

### *Other Permits*

The Project construction activities will disturb one or more acres of land and therefore, will require a National Pollutant Discharge Elimination System (NPDES) Stormwater Permit for Construction Activities. The Proponent can access information regarding the NPDES Stormwater requirements and an application for the Construction General Permit and the Multi-Sector General Permit at the EPA website: <https://www.epa.gov/npdes/2017-construction-general-permit-cgp>.

### **Water Supply**

The Project will use 31,475 gallons per day (gpd) of drinking water. The Town of Sturbridge is regulated through MassDEP’s Water Management Act (WMA) Program to withdraw an annual average volume of 1.12 million gallons per day (MGD). Actual withdrawals from 2017 through 2019 ranged from 0.50 to 0.53 MGD. MassDEP agrees with the Sturbridge Water Department that there is adequate capacity for the proposed flows.

Sturbridge Water Department would prefer the proposed water line for the Project to be extended overland from the end of the proposed cul-de-sac to Fiske Hill Road, eliminating the dead end from the existing water line on Main Street/Route 131 and providing a needed loop. MassDEP agrees with this proposal because it will eliminate the dead-end line, improve water quality, and provide two separate feeds to users along the existing line in the event there is a water main break.

## Wastewater

The Project will generate 31,475 gpd of wastewater. The Proponent proposes to install 0.7± miles of new sewer, which will connect to the existing sewer on Main Street/Route 131 in Sturbridge. The existing sewer currently conveys wastewater to the Southbridge Publicly Owned Treatment Works (POTW) for treatment and disposal. The flow can be redirected to the Sturbridge POTW in the future if the Town of Sturbridge installs a new pump station at the town line. The ENF provides no details about the proposed sewer. The proposed sewer will not require a permit from MassDEP if it meets all the conditions of the applicable sections in 314 CMR 7.05(1), including MEPA requirements. The proposed sewer shall be approved/permitted by the Town of Sturbridge sewer authority.


## Air Quality

Construction activities must conform to Massachusetts Air Pollution Control regulations governing nuisance conditions at 310 CMR 7.01, 7.09 and 7.10 and not cause or contribute to a condition of air pollution due to dust, odor or noise. As such, the Proponent should propose measures to prevent and minimize dust, noise, and odor nuisance conditions that may occur during construction. Because the Project is located close to moderately traveled roadways and residential development to the east and southwest, excessive dust generation may be a concern. The Proponent should consider commercially available dust suppression methods including use of a water truck and/or spreading calcium chloride during the construction period.

MassDEP requests that all non-road diesel equipment rated 50 horsepower or greater meet EPA's Tier 4 emission limits, which are the most stringent emission standards currently available for off-road engines. If a piece of equipment is not available in the Tier 4 configuration, then the Proponent should use construction equipment that has been retrofitted with appropriate emissions reduction equipment. Emission reduction equipment includes EPA-verified, CARB-verified, or MassDEP-approved diesel oxidation catalysts (DOCs) or Diesel Particulate Filters (DPFs). The Proponent should maintain a list of the engines, their emission tiers, and, if applicable, the best available control technology installed on each piece of equipment on file for Departmental review. The ENF states that "efforts will be advanced" to meet these standards; MassDEP suggests that best efforts should be made.

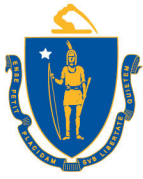
MassDEP appreciates the opportunity to comment on the Project. If you have any questions regarding these comments, please do not hesitate to contact JoAnne Kasper-Dunne, Central Regional Office MEPA Coordinator, at (508) 767-2716.

Very truly yours,



Mary Jude Pigsley  
Regional Director

cc: Commissioner's Office, MassDEP



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



March 16, 2021

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

RE: Sturbridge: Fiske Hill East Mixed Use Subdivision Roadway – ENF  
(EEA #16330)

ATTN: MEPA Unit  
Purvi Patel

Dear Secretary Theoharides:

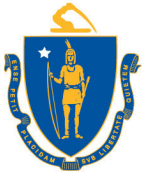
On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Environmental Notification Form for the Fiske Hill East Mixed Use Subdivision Roadway project in Sturbridge and Southbridge, as prepared by the Office of Transportation Planning. If you have any questions 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  
Barry Lorion, P.E., District 3 Highway Director  
Neil Boudreau, Assistant Administrator of Traffic and Highway Safety  
Planning Board, Town of Sturbridge  
Planning Board, Town of Southbridge  
Central Massachusetts Regional Planning Commission



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



## MEMORANDUM

TO: David Mohler, Executive Director  
Office of Transportation Planning

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

DATE: March 16, 2021

RE: Fiske Hill East Mixed Use Subdivision Roadway – ENF  
(EEA #16330)

The Public/Private Development Unit (PPDU) has reviewed the Environmental Notification Form (ENF) for the proposed Fiske Hill East Mixed Use Subdivision Roadway project in Sturbridge and Southbridge. The project site consists of approximately 134 acres bounded by undeveloped land to the north, Hillcrest Street and existing residential development to the east, Main Street (Route 131) to the south, and residential properties along Fiske Hill Road to the west. The project is located at 30 Main Street and 20 Fiske Hill Road. The site is currently undeveloped, and portions of the site were formerly used for logging.

The project consists of new development on five separate lots totaling 175,000 square feet (sf) of development, served by the Subdivision Roadway. The first phase of the project will be construction of the Subdivision Roadway. Lot 1 will be used for the stormwater management system for the roadway and will be deeded to the Town of Sturbridge. The second phase will be development of Lot 3, consisting of a 65-unit, 55+ Senior Housing Community. Subsequent phases will include development of the remaining lots over a timeframe of five to ten years. The planned development for these lots is conceptual at this time and the land uses were assigned to meet the community's needs in consultation with the Town of Sturbridge Planning Department. Lot 2 is envisioned as a 12,000-sf Medical Arts/Urgent Care Facility, Lot 4 as a 120-unit Assisted Living Facility, and Lot 5 as a 14,5000-sf retail building.

The full-build project will include 320 parking spaces and is expected to generate 2,613 vehicle trips per day. The parking provision includes off-street parking for up to two vehicles for each unit within the Senior Housing Community. Access will be provided via the 1,030-foot new Subdivision Roadway that connects to Main Street in Sturbridge and terminates at a cul-de-sac within the subdivision. In addition, emergency access /egress is proposed through an existing access easement at the corner of Idlewood Street and Crestwood Drive, through property owned by the Town of Southbridge. The project parking provision and trip generation exceed the Massachusetts Environmental Policy Act (MEPA) ENF transportation thresholds. The project requires a Vehicular Access Permit from MassDOT

because it abuts and would be accessed from Route 131, which is a State Highway. A permit application (#3-2020-0640) has been submitted to MassDOT, and the review process will begin once a MEPA certificate is issued to the Proponent. The Proponent will also need to apply for separate Non-Vehicular Access Permits for utility work as required.

The ENF includes a Transportation Impact Assessment (TIA), prepared in general conformance with the current MassDOT/EOEEA *TIA Guidelines*. The ENF adequately discusses the transportation impacts of the project.

### Trip Generation

The ENF determined that Institute of Transportation Engineers (ITE) *Trip Generation Manual* (10<sup>th</sup> Edition) Land Use Codes (LUCs) 251 – Senior Adult Housing-Detached, 254 – Assisted Living, 650 – Free-Standing Emergency Room, and 820 – Shopping Center would most accurately reflect the proposed development. At the time that the TIA was prepared, the development program included a 3,000-sf office building, which was later removed from the development program to accommodate stormwater management for the Subdivision Roadway. The following trip generation reflects the total trip generation without the office facility included; however, the traffic operations analysis in the TIA included the office facility. Accordingly, the project is estimated to generate 2,613 vehicle trips on an average weekday including 224 vehicle trips during the weekday morning peak hour, 213 vehicle trips during the weekday evening peak hour, and 246 vehicle trips during the Saturday peak hour.

### Traffic Operations

In the TIA, the Proponent provides a comprehensive analysis of study area intersections for the 2020 existing, 2027 No-Build, and 2027 Build conditions. Project-related impacts were analyzed at two intersections northwest of the Subdivision Roadway, Route 131 at Fiske Hill Road and Route 131 at Wallace Road, in addition to Route 131 at the proposed Subdivision Roadway. The existing volumes are based on counts conducted in October 2007 because no newer counts were available. The 2007 volumes were inflated using an average annual growth rate derived from MassDOT's annual growth rates provided for 2014 through 2019. The average annual growth rate (0.0034) was then applied over 13 years to adjust the volumes to 2020. According to MassDOT guidance, a seasonal adjustment factor was also applied to the volumes, to reflect an average month.

The same annual growth rate used to adjust the volumes to 2020, was applied to develop the 2027 future roadway volumes. The project trips were proportionally assigned to all relevant approaches at the study area intersections, based on existing travel patterns, to generate the 2027 Build scenario. As presented in the TIA, in the 2027 Build scenario the study area intersections operate at level-of-service (LOS) D or better. Overall, the project causes little to no impact on traffic operations. The southbound approach to Route 131 on the Subdivision Roadway operates at LOS D or E during the peak period, when the roadway is evaluated with a single southbound lane. The roadway design was revised to include a left-turn lane and a right-turn lane, with this configuration the intersection shows some

improvement. The Proponent should work with MassDOT during the permitting process to select the appropriate alternative for the Subdivision Roadway approach to Route 131. Additionally, through the permit application, MassDOT asks that the Proponent analyze warrants for a left-turn lane into the site.

#### Multimodal Access and Improvements

Access will be provided via the new Subdivision Roadway that connects to Route 131 and terminates in a cul-de-sac within the subdivision. The roadway will be located 500 feet east of the Route 131 at Fiske Hill Road intersection. A sidewalk will be provided on both sides of the Subdivision Roadway. The Subdivision Roadway right-of-way will be 50 feet wide and the paved roadway will be 28 feet wide. Site distance measurements show that the Subdivision Roadway will have suitable site line distances. MassDOT asks that access to all buildings be designed with an accessible and clear pedestrian connection between Route 131 and the building entrances.

#### Safety

The safety analysis in the TIA determined that none of the study area intersections experience crash rates above the State and/or District 3 averages for unsignalized intersections, nor are any study area intersections potential Highway Safety Improvement Program (HSIP)-eligible clusters. Route 131 at Fiske Hill Road experienced ten crashes in the past five years and Route 131 at Wallace Road experienced zero crashes in the past five years. The TIA notes that in 2012 Route 131 was reconfigured to include a left-turn lane at each of the study area intersections and a right-turn lane at Fiske Hill Road.

#### Transportation Demand Management (TDM)

The ENF does not include TDM measures. MassDOT recommends that the Proponent consider implementing TDM measures aimed at minimizing single occupancy vehicle (SOV) trip generation. Such measures may include the following:

- Provision of on-site amenities and conveniences to reduce demand for SOV travel;
- Provision of carpooling and vanpooling programs and perks;
- Provision of free or subsidized transit passes; and
- Provision of robust bicycle and pedestrian amenities and connections.

Regularly scheduled public transit service is not available near the project site. The Proponent should work with the Worcester Regional Transit Authority (WRTA) and District 3 to determine whether WRTA bus stop facilities are appropriate near the project site, and if so, where they should be located, subject to approval from all parties.

MassDOT recommends that no further environmental review be required based on transportation-related issues. The Proponent should continue consultation with the Towns of Sturbridge and Southbridge and appropriate MassDOT units, including PPDU and the District 3 Office. If you have any questions regarding these comments, please contact me or Catrina Meyer at *Catrina.Meyer@dot.state.ma.us*.



# Town of Sturbridge

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## Conservation Commission

March 16, 2021

Ms. Purvi Patel  
Ma Environmental Policy Act (MEPA) Office  
Executive Office for Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Fiske Hill East Mixed Use Subdivision  
EEA No. 16330

Dear Ms. Patel,

Members of the Sturbridge Conservation Commission have reviewed the ENF and attended the meeting for the Fiske Hill East Mixed Use Subdivision. I would like to submit the following comments on their behalf to MEPA for consideration.

To date, a Notice of Intent has been submitted to the SCC for the subdivision roadway and associated infrastructure pursuant to the Wetlands Protection Act (WPA) and the Sturbridge Wetland Bylaw (SWB). The application is currently under review and is continued to provide for additional information. The SCC has requested additional information to assist with their review under both the WPA and the SWB. Peer reviews have been initiated to assist the SCC with compliance with the MA Stormwater Standards and the Town of Sturbridge Stormwater Bylaw. A peer review of the wetland delineation has also been initiated by a professional wetland scientist.

The wetland peer review has identified additional potential wetland areas, revisions to the flagged wetland lines and areas of potential vernal pool habitat which all require additional evaluation. A vernal pool study will be initiated this Spring. In addition, additional resource areas identified near Main Street which includes Bank and Bordering Vegetated Wetlands and a potential Isolated Vegetated Wetland will need to be field located and shown on the plan. At this time, it is unclear if/how the results of the study and the additional resource areas may affect the project.

The SCC has raised concerns with potential future cumulative wetland impacts which may be associated with the phased lot development on this site which will not be accounted for or reviewed at this time. The SCC requested additional information on the planned uses to assist with their review of this project. The ENF includes a concept plan for lot build out. It is indicated that this concept is to reflect a full buildout. There are additional upland areas on Lot 4 which could be developed beyond what is shown on this concept. The concept plan indicates that no direct wetland impacts would be necessary to develop these lots. The concept plan should be revised and distributed after the additional wetland areas are further investigated and incorporated into the plans. The SCC in making its decision should review the full project to measure the wetland impacts.

Members of the SCC and myself performed a site visit with the peer reviewer on March 9, 2020. At the site visit, there was some concern raised while viewing areas near Main Street. There is evidence of past wetland fill here which will require additional review. A culvert pipe was located which likely had been

# Sturbridge Conservation Commission

illegally installed and connected to MA DOT's drainage structure associated with Route 131/Main Street. Plans will need to be developed reflecting Bank, a protected resource area, which will account for the interests of that resource area under the WPA and the SWB and for any MA DOT requirements. Another area of wetland impact was observed on site. These items may affect the outcome of the project. This is currently unknown until this is further reviewed.

Again, the SCC needs to review the full build out to measure the impact of this project including potential impacts from stormwater changes and discharges on the wetland resource areas.

In addition, the current proposal has indicated that the future developments will be serviced by public sewer. Sewer connection to the Town of Sturbridge or the Town of Southbridge have both been discussed. It is unknown if a decision has been made for which entity will be utilized and what impacts may be associated with that plan. The sewer infrastructure is relevant to the SCC's review. The location of lines, pump houses etc. will need to be shown on the plans as this is part of the current proposal. It would appear that additional infrastructure would be required to accommodate either connection. It is unclear if this could result in additional work within jurisdiction such as the construction of pump houses near wetlands. In particular, there may not be adequate areas near Main Street outside of the plans for sewer have to been finalized.

If the sewer connection to either town may become a concern and not an option, the plans would have to change to provide private septic designs for each lot. The concept plan does not account for this scenario and would appear to result in additional land alteration and encroachment into jurisdictional wetland buffer zones which may or may not be permissible. Confirmation that public sewer is an option should be required to ensure no additional cumulative impacts. This is an important component to the feasibility of this project. A definitive decision on this is needed as part of the permitting process and needs to be shown on the plan.

The project applicant has verbally informed the SCC that he will be making a land donation. There has been no commitment in writing. This should be committed to in writing. Thank you for the opportunity to comment on the project.

On behalf of the Sturbridge Conservation Commission,  
Sincerely,



Rebecca Gendreau  
Conservation Agent