Berkshire Regional Planning Commission
Clearinghouse Review Report

COMMENTS

SUBJECT: **Pittsfield Plaza Renovation**
EOEEA#: **14131**
LOCATION: **Pittsfield**
ESTIMATED COST: **$1.5 million**
REVIEW TYPE: **EENF**
PROPONENT: **Pittsfield Plaza Members, LLC**
COMMENTS DUE: **December 12, 2007**

PROJECT DESCRIPTION:

The Pittsfield Plaza site, located on West Housatonic Street (Route 20), was originally developed in the early 1960s. It more recently housed a cinema complex, a restaurant and several retail stores. The complex is partially occupied at this time. According to the EENF, the building complex is in disrepair and must be renovated. The site is bound to the north by an active rail line, to the east by residential properties, to the south by West Housatonic Street (Route 20), and to the west by Maloy Brook.

The redevelopment of the site will include renovating the existing building (105,625 sf), adding a small addition to the rear of the building (3,750 sf) and constructing a new restaurant (5,600 sf). Redevelopment also includes the demolition and reconstruction of the large paved parking lot that fronts the building. Permits required for the project include Site Plan and Special Exception [sic] Applications from the Pittsfield Community Development Board, a wetlands permit from the Pittsfield Conservation Commission, an access permit from MassHighway and a NPDES Stormwater Management Plan for the US EPA.

The filing indicates that the project does not exceed any MEPA threshold for a mandatory EIR, but then indicates that it is an Expanded ENF (with traffic study) and requests Waiver of a mandatory EIR or a Single EIR. Apparently, the proponent has submitted the EENF as a first step in the MEPA process and has requested a waiver from filing a future EIR. The project exceeds the ENF threshold for wetlands (impacts > ½ acre of wetlands), but since it has already received its Order of Conditions from the Pittsfield Conservation Commission and the appeal period for that order has expired, MEPA has ruled that wetlands is no longer subject to MEPA jurisdiction. The MEPA filing was received by MEPA on October 30th and therefore the project avoided a new requirement for a Greenhouse Gas emission quantification under a new MEPA policy which went into affect on October 31, 2007.

CONSIDERATIONS AND POTENTIAL ISSUES:

<u>Wetlands and Stormwater Management</u>

Most of the site is located within the 100-year floodplain (Bordering Land Subject to Flooding) of the brook, with essentially only the building complex above flood elevation. A significant portion of the building and parking lot (260,951 sq. ft. according to the EENF, but a different amount according the Notice of Intent filed with the Pittsfield Conservation Commission) are located within the Riverfront resource area. The current parking lot extends almost to the bank of Maloy Brook and floods on a frequent basis. The existing site does not have any stormwater treatment mechanisms; stormwater is currently piped and discharged untreated into the brook. The

original drainage system has not been maintained nor cleaned, and it is filled with silt. In addition to sand/silt deposits, debris and garbage has collected along the brook.

The EENF states that the project will demolish and reconstruct the parking lot. Stormwater management techniques include the construction of two stormwater basins, one north of the building and one at the southwest corner of the site, adjacent to Maloy Brook. Approximately 1.2-1.5 acres of pavement will be removed from along the brook, most notably in the southwest corner, where one of the stormwater basins will be located.

The proponent has filed an NOI and received an Order of Conditions (OOC) from the Pittsfield Conservation Commission. The NOI states that the new drainage system will discharge water into Maloy Brook through new outlet pipes including weirs and riprap to protect the bank from erosion. The work does not include changing the grade of the bank. Removal of debris and invasive species will involve 4,658 sf of temporary disturbance along the bank of the brook. The NOI states that the area of work will be less than 5 feet wide.

The NOI does not describe how the proposed project improvements will meet the standards of the Stormwater Management Policy. BRPC has received supplemental information that describing the proposed stormwater management system, which includes deep sump catch basins and the two stormwater basins. The Wetlands Permit Order of Conditions requires the property owner/manager to maintain all stormwater structures, record maintenance activities, and references an Operations and Management Plan.

The southwestern stormwater basin and a portion of the north basin are located immediately adjacent to Maloy Brook. In general, BRPC encourages proponents to locate stormwater basins outside of wetland resource areas or buffer zones to minimize the chance that sediment accumulated in the basins may be scoured out, re-suspended and discharged into the resource as during an unusual storm event that overwhelms the basins. Neither the EENF nor the NOI discuss safeguards designed into the basins to prevent untreated overflows from entering Maloy Brook; and they do not discuss alternative design that would locate the stormwater basins farther away from the brook.

BRPC had several concerns about the design of the site. These included the following:

- Why was .25 acres of impervious surface area being discharged into Maloy Brook without treatment?
- It is unclear where the 4,658 sf of bank is temporarily being disturbed.
- It is unclear where on the site the approximately 45,000 sf of new development is occurring.
- It is unclear how the stormwater management system will also serve as compensatory flood storage.
- Is it possible to incorporate some Low Impact Development (LID) techniques into the site?
- Is the southwestern stormwater basin going to be lined? It appears that stormwater runoff from the western portion of the parking lot is not being handled by a treatment train of deep sump catch basins and the stormwater basins, and therefore sheet runoff could include high concentrations of vehicle-related pollutants.
- The stormwater basins will be planted with wetland vegetation. The *Stormwater Management Plan Post-construction* document does not give clear direction to property managers on how to monitor and maintain the stormwater management system and the wetland plan community so that they will function properly.

BRPC staff met with the proponent's design consultants on November 30th to discuss our concerns. The consultants indicated that they were willing to incorporate several small amendments to the design to alleviate many of our concerns regarding stormwater management. Specifically, the consultants agreed to these design considerations:

- Direct the .25 acres of impervious surface runoff at the northwest corner of the building into the piped stormwater system leading to the southern stormwater basin. This eliminates an untreated discharge into Maloy Brook.
- Add a series of deep sump catch basins along the southern edge of the western half of the parking lot. This will add a layer of protection and treatment to the runoff being directed into the southern basin. If the catch basins are maintained properly, this will also reduce the amount of sediment entering the basin, thus reducing the work needed to maintain the basin's functions, including water quality protection and flood storage capacity.
- Design and locate dumpster platforms to minimize potential of leachate in stormwater runoff, such as elevating the pad it rests upon and berming the pad's parameter.
- Reconsider option of LID stormwater techniques where possible. Incorporating sunken parking islands which serve as bioretention cells was specifically offered as an option.
- Amend the Stormwater Management Plan Post-construction document. Maintenance of stormwater BMPs is not intuitive. Clear guidance should be provided in the plan so that the average facility manager can follow the directions and maintain proper function of the BMPs. Built-up sediment will reduce storage capacity. We recommend:
  - Identify the legally-bound responsible party.
  - Provide clear, practical guidance on <u>when</u> to clean the sediment/debris from the basins. Section F, Maintenance and Inspection, states that "structures and outfalls are cleaned of sediment at least once a year during the month of April and at other times as necessary…" The plan should define "other times as necessary" and state at what level the accumulated sediment should be cleaned out. This includes measurements for both the sediment forebays and the main basin.
  - Provide guidance on <u>how</u> to clean the sediment from the basins to answer these questions: Does the facility manager hire a contractor? Is the removal and destruction of established plants appropriate? Is a wetland permit needed for the work? Where is the removed sediment disposed of?
  - Section F states that the 'PPT conduct monthly inspection of all areas covered by the Plan," but this area is not defined. The plan should include a site map with the stormwater infrastructure clearly labeled.

<u>Rare Species</u>

Maloy Brook is cited as supporting habitat for a rare wetland plant just downstream of the site. A biological survey was conducted along the brook at the site but the plant was not observed. The survey indicates that suitable habitat for the plant, shallow, open ponded areas, does not currently exist along the brook at the site. The OOC states that the removal of invasive plant species will be supervised by a Professional Wetland Scientist. There appear to be no plans to monitor the site to ensure successful new plantings and prohibit re-colonization of invasive species.

Transportation

When BRPC staff met with the proponent's design consultants on November 30th to discuss our concerns, the consultant provided a series of responses to the Berkshire Regional Planning Commission, Clearinghouse Review Report -"Draft Comments". These contained the following information:

1. An "existing traffic volume summary" and "site trip generation summary" tabular forms, per BRPC request. As a result of a BRPC request made at the November 30th meeting, the Consultant also provided acknowledgment of a "Christmas Season" designation at Land Use Code 820 – Shopping Center
2. A location map that depicts the traffic counter locations
3. Provision of derivation/calculation of average ratio used for calculation of AM peak hour traffic based on PM peak hour traffic – The consultant used the same ratio at all legs of all intersections (even side streets) without the calculation worksheet showing derivation of the ratio. The Consultant acknowledged a typographical error on page 4 that (1) should read "Sum of the 7:00 and 9:00 volume …"; this error was not corrected in the December 3, 2007 packet that provided by LADA .
4. Derivation of seasonal factor
5. Explanation of discrepancy between average daily traffic presented in the EENF and that which was the basis for the traffic signal warrant
6. Through coordination with MassHighway District 1, the consultant is considering the feasibility of inclusion of a pedestrian phase in the traffic signal
7. Verification as to distribution of site generated trips being 50/50
8. Provision of a corrected key graphical figure
9. Acknowledgment that Hungerford Street/Fort Hill Avenue is a significant connector

A MEPA site visit was held on the morning of December 5th.

BRPC still has the following concerns, subsequent to the additional information provided on November 30th and December 3rd, as well as the MEPA site visit, about transportation/traffic issues:

1. There **appears** to be a discrepancy between what was provided to BRPC at the November 30th meeting and what was FedExed to the all reviewers. Exhibits 18-23 that were provided on Friday, November 30 were not provided in the FedEx packet that was sent on December 3rd. If this is the case, there is information that might be relevant to review of the data that may or may not have been provided to all parties.
2. In the data that was sent on December 3rd, there are incorrect assignments of LOS if the delay is correct. For instance, for the PM Peak Hour condition with a signal at the site drive, at Gale Avenue, the delay is said to be 131.5 seconds; however the LOS assigned is "E" and should be "F". BRPC believes it is only a typographical error for the LOS assigned, but the data as shown is not accurate.
3. BRPC staff had to extract data from what the consultant provided and create its own tables that actually are useful in assessing and/or analyzing the traffic data. BRPC has created the following tables by extracting and organizing the consultant's data:

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Average Monthly Conditions

INT #	Traffic Control	Intersections	PM Peak Hour											
			Unsignalized @ Site Dr									Signal @ Site Dr		
			Existing (2007)			2012 (No-Build)			2012 (Build)			2012 (Build with Imprv.)		
			Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay
1	Unsignalized	Forth Hill Avenue at Gale Avenue	5	B	10.4	5	B	10.5	5	B	10.9	5	B	10.9
2	Unsignalized	Route 20 at Oswald Avenue	22	C	19.3	23	C	20.6	26	D	29.4	26	D	29.4
3	Unsignalized	Route 20 at Gale Avenue	19	C	20.9	20	C	22.5	23	D	32.8	23	F	59.8
4	Unsignalized	Route 20 at Shell Gas Station and Boat Business Site Dr	54	D	32.0	57	E	38.3	57	F	87.1	57	F	409.5
5	Unsignalized	Route 20 at Pittsfield Shop. Plz. and McDonalds Ent. Site Dr.	12	D	31.1	15	D	34.4	197	F	N/A	2080	B	15.8
6	Signal	Route 20 at Britton Street	1208	F	263.1	1270	A	2.6	1555	A	3.1	1555	A	3.1
7	Signal	Route 20 at Barker Road	1477	F	145.5	1582	A	5.3	1857	A	6.6	1857	A	6.6
8	Unsignalized (2007) Signal (2017)	Route 20 at South Merriam Street	65	F	61.3	1504	B	11.1	1765	B	14.2	1765	B	14.2
32	Unsignalized	Route 20 at McDonald's Exit Site Drive	11	C	17.1	12	C	18.2	12	D	26.5			

Peak Monthly Conditions

INT #	Traffic Control	Intersections	PM Peak Hour											
			Unsignalized @ Site Dr									Signal @ Site Dr		
			Existing (2007)			2012 (No-Build)			2012 (Build)			2012 (Build with Imprv.)		
			Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay
1	Unsignalized	Forth Hill Avenue at Gale Avenue	6	B	10.8	6	B	10.9	6	B	11.3	6	B	11.3
2	Unsignalized	Route 20 at Oswald Avenue	25	B	23.5	26	D	25.5	29	E	38.4	29	E	38.4
3	Unsignalized	Route 20 at Gale Avenue	22	D	25.9	23	D	28.5	26	E	43.9	26	E**	131.6
4	Unsignalized	Route 20 at Shell Gas Station and Boat Business Site Dr	62	F	59.6	65	F	89.9	65	F	230.7	65	F	*
5	Unsignalized	Route 20 at Pittsfield Shop. Plz. and McDonalds Ent. Site Dr.	16	E	42.2	17	E	48.3	199	F	N/A	2283	B	18.8
6	Signal	Route 20 at Britton Street	1392	F	377.1	1463	A	3.0	1748	A	3.8	1748	A	3.8
7	Signal	Route 20 at Barker Road	1702	F	198.6	1818	A	6.3	2093	A	9.0	2093	A	9.0
8	Unsignalized (2007) Signal (2017)	Route 20 at South Merriam Street	75	F	264.9	1731	B	14.8	1992	C	20.6	1992	C	20.6
32	Unsignalized	Route 20 at McDonald's Exit Site Drive	13	C	20.6	14	C	22.4	14	D	34.7			

NOTE: For unsignalized intersections, the conditions represents the left turn LOS and delay from the side street.
For unsignalized intersections, the volumes represents the left turn volume from the side street.

* the computer model fails at this magnitude of delay
** BRPC transcribed the data from what the consultant provided and does NOT agree with the assignment of LOS based on delay

Average Monthly Conditions

INT #	Traffic Control	Intersections	SAT. MID-DAY Peak Hour											
			Unsignalized @ Site Dr									Signal @ Site Dr		
			Existing (2007)			2012 (No-Build)			2012 (Build)			2012 (Build with Imprv.)		
			Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay
1	Unsignalized	Forth Hill Avenue at Gale Avenue	6	B	10.3	6	B	10.4	6	B	10.8	6	B	10.8
2	Unsignalized	Route 20 at Oswald Avenue	23	C	18.4	24	C	19.5	28	B	32.1	28	B	32.1
3	Unsignalized	Route 20 at Gale Avenue	37	C	20.9	39	C	22.6	43	E	41.1	43	F	87.2
4	Unsignalized	Route 20 at Shell Gas Station and Boat Business Site Dr	43	C	24.8	45	D	27.0	45	F	65.8	45	F	251.9
5	Unsignalized	Route 20 at Pittsfield Shop. Plz. and McDonalds Ent. Site Dr.	14	D	26.5	15	D	29.0	257	F	N/A	2274	C	20.3
6	Signal	Route 20 at Britton Street	1023	F	212.0	1075	A	2.8	1473	A	3.3	1473	A	3.3
7	Signal	Route 20 at Barker Road	1214	F	119.7	1305	A	5.1	1693	A	5.9	1693	A	5.9
8	Unsignalized (2007) Signal (2017)	Route 20 at South Merriam Street	42	C	24.9	1270	A	7.3	1636	B	10.6	1636	B	10.6
32	Unsignalized	Route 20 at McDonald's Exit Site Drive	14	C	15.7	15	C	16.6	15	D	27.8			

Peak Monthly Conditions

INT #	Traffic Control	Intersections	SAT. MID-DAY Peak Hour											
			Unsignalized @ Site Dr									Signal @ Site Dr		
			Existing (2007)			2012 (No-Build)			2012 (Build)			2012 (Build with Imprv.)		
			Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay	Volumes	LOS	Delay
1	Unsignalized	Forth Hill Avenue at Gale Avenue	7	B	10.6	7	B	10.7	7	B	11.2	7	B	11.2
2	Unsignalized	Route 20 at Oswald Avenue	27	C	22.1	28	C	23.8	32	E	42.1	32	E	42.1
3	Unsignalized	Route 20 at Gale Avenue	43	D	26.6	45	D	29.5	49	F	61.7	49	F	233.3
4	Unsignalized	Route 20 at Shell Gas Station and Boat Business Site Dr	50	E	36.1	53	E	44.9	53	F	166.2	53	F	899.7
5	Unsignalized	Route 20 at Pittsfield Shop. Plz. and McDonalds Ent. Site Dr.	16	D	34.5	17	E	38.6	259	F	N/A	2462	C	23.5
6	Signal	Route 20 at Britton Street	1180	F	330.6	1241	A	3.1	1640	A	3.9	1640	A	3.9
7	Signal	Route 20 at Barker Road	1400	F	139.5	1502	A	5.8	1891	A	8.1	1891	A	8.1
8	Unsignalized (2007) Signal (2017)	Route 20 at South Merriam Street	48	E	48.8	1462	A	8.5	1828	B	14.4	1828	B	14.4
32	Unsignalized	Route 20 at McDonald's Exit Site Drive	16	C	18.2	17	C	19.6	17	E	35.7			

NOTE: For unsignalized intersections, the conditions represents the left turn LOS and delay from the side street.
For unsignalized intersections, the volumes represents the left turn volume from the side street.

From these tables, it is evident that there are significant changes under the 2012 build conditions, both with and without a signal at the site drive, during both Friday PM Peak and

Saturday mid day Peak Hour. The degradation in LOS is cause for concern at the following intersections (Please note that this data is in the format of #of vehicles/LOS/Delay (in seconds)):

Average Seasonal Traffic During a Weekday Peak Hour

Intersection	Existing Conditions PM Peak HR	Unsignalized PM Peak HR Build 2012 Ave. Month	Signalized PM Peak HR Build 2012 Ave. Month
Critical intersections			
RTE20 @ Gale	19/C/20.9	23/D/32.8	23/F/59.8
RTE20 @ Shell Gas	54/D/32.0	57/F/87.1	57/F/409.5
less critical intersection			
RTE20 @ Oswald	22/C/19.3	26/D/29.4	26/D/29.4

Peak Seasonal Traffic During a Weekday Peak Hour

Intersection	Existing Conditions PM Peak HR	Unsignalized PM Peak HR Build 2012 Peak Month	Signalized PM Peak HR Build 2012 Peak Month
Critical intersections			
RTE20 @ Gale	22/D/29	26/E/43.9	26/F/131.6
RTE20 @ Shell Gas	62/F/59.6	65/F/230.7	65/F/*
less critical intersection			
RTE20 @ Oswald	25/C/23.5	29/E/38.4	29/E/38.4

* the delay for a vehicle waiting to exit the Shell gas station turning left is immeasurable.

We should point out that in the information provided to all reviewers, the proponent's consultants have used incorrect LOS (C, D, E or F) in some cases. This may easily cause less technical reviewers to miss the impact of the substantial degradation in LOS at the unsignalized intersections.

Although the consultant states (p. 5 of 8 of the December 3rd material) that "What cannot be ascertained from the table is that this LOS will only be experienced by a small number of vehicles," BRPC maintains (a) 57 vehicles in one hour is significant and (b) mitigation should be considered. The consultant's comment (p.5 of 8) that "Overall, the intersection will operate a 7.7 second average delay per vehicle" is moot; as has been established, the overall analysis at an unsignalized intersection is meaningless. The LOS experienced by motorists at the approaches is what matters.

As of this date, December 5th, the consultant has not been willing to acknowledge the existence of mitigation alternatives, let alone explore them. In the absence of at least one mitigation measure – the center turn lane as BRPC presented during the December 5th site visit being the most obvious one – BRPC would ask for denial of the waiver. Should the consultant comply with the MEPA request for consideration of a center turn lane that would extend from the intersection with Gale Avenue to just east of the Shell Gas Station, or some other appropriate mitigation measure(s), BRPC's concerns would be eliminated.

Consistency with Local & Regional Plans

Redevelopment of existing underutilized properties is consistent with the *Regional Plan for the Berkshires*. Efforts to reduce the impacts of the redevelopment on the environment are also consistent with the plan. While BRPC believes that redeveloping sites such as this one is appropriate and supportable, redevelopment should be done in a fashion which makes a significant improvement to the existing very substandard conditions. BRPC encourages the proponents to consider employing LID techniques such as dispersing and infiltrating stormwater runoff to reduce peak flows and facilitate groundwater recharge. Techniques such as dry well or rain barrels, bioretention cells and stormwater chambers may be mechanisms to reduce runoff, while possibly serving as additional flood storage capacity areas. Similarly, maintaining the capacity of the regional arterial highways is also an important regional policy. Without appropriate mitigation, this project would not comply with regional policies regarding preservation of the existing highway system.

COMMENTS AND RECOMMENDATIONS:

The proponent has requested a waiver from an EIR. The traffic analysis, as corrected and with the supplemental information, clearly shows that the project exceeds mandatory EIR thresholds regarding traffic. At this time, the EENF and its supporting materials do not provide any information regarding traffic mitigation measures, which would be required in an EIR. Without that information to support the request for an EIR waiver, BRPC is placed in the position of having to request a limited scope EIR, focused on identifying and analyzing appropriate traffic mitigation measures. BRPC respectfully recommends that the Secretary deny the proponent's request for a waiver from an EIR, due to lack of appropriate traffic mitigation. While there remains some concerns regarding flood storage and stormwater management, we believe these can be properly addressed, with the aid of City's engineering consultant, during the Special Permit process.

BRPC recommends that a future EIR contain the following information:

Traffic and Transportation

Traffic mitigation which should be fully assessed and documented should include:

- The possible addition of a left turn lane on West Housatonic Street at the site entrance (probably needed into both the shopping center and MacDonald's sites). If the development necessitates a left-turn lane, the developer is in a position to provide any additional right-of-way necessary to accomplish that and simply because it is inconvenient to widen West Housatonic Street does not provide adequate justification to avoid that mitigation.
- Shoulder widths on West Housatonic Street should meet MassHighway standards for provision of a designated bike lane, after any necessary modifications to West Housatonic Street to meet the needs of vehicles.
- A traffic signal with a pedestrian push-button phase to allow safe access across the street for employees and shoppers.
- Should a traffic signal be warranted (and only if a signal is warranted), the consultant should assess the feasibility and/or benefit of synchronizing the traffic signal at the

proposed site drive with the one that is slated for construction at the intersection of Barker Road.

- Accommodation for a bus stop, including a shelter, on the shopping center side of West Housatonic Street. The proponent should consult with the Berkshire Regional Transit Authority during preparation of the EIR on this point.
- Identify and analyze appropriate traffic mitigation measures for the Gale Avenue, Oswald Avenue, and Shell gas station intersections. Various alternatives should be identified and analyzed. For instance, center turn lanes might be provided at those locations. However, that should not be the only alternative considered; it is just provided as an example.

In addition, the proponent should provide corrected traffic information in a concise, consolidated traffic impact study.

Wetlands/Stormwater/Flood Storage

The proponent's consultants have indicated a willingness to amend the design of the site to improve and further mitigate the impacts of stormwater runoff to Maloy Brook. We support and strongly encourage the proponent to work cooperatively with the City to incorporate the design amendments listed in the Wetlands and Stormwater Management section of these comments. We also encourage the proponent to work cooperatively with the City's engineering consultant to ensure proper stormwater management and flood storage capacity.

If, during the City's Special Permit process, the proponent incorporates the abovementioned improvements/amendments to the stormwater management system, and if the proponent can prove to the City that flood storage capacity is ensured through its designs, BRPC believes that the intent of the MEPA process for wetlands/stormwater/flood storage has been met and that further MEPA review is not warranted. Although wetlands and stormwater management are outside MEPA purview, BRPC respectfully requests that MEPA require the proponent to provide an amended drainage area map showing the new stormwater management techniques that the proponent agreed to incorporate into the site design, including treatment for the .25 acre area at the northwest of the building, adding deep sump catch basins on the western portion of the parking lot, sunken bioretention islands, and an elevated and/or bermed dumpster pad. BRPC also requests that the revised O&M plan for the stormwater management system also be included. These materials can be provided along with the supplemental documentation that will be required as part of the ongoing MEPA process.

Regarding future projects involving the MEPA process, BRPC encourages the permitting boards of Pittsfield to work cooperatively and withhold issuing permits until the MEPA process has been initiated. The intent of MEPA is to review and analyze the cumulative potential environmental and cultural impacts of large development projects, and this can only be done if local and state permitting authorities work cooperatively and within the same project timeline. It should be noted that the Massachusetts Department of Environmental Protection, Western Region, and MassHighway District 1 prefer that proponents and local boards initiate the MEPA process as a first stage in the review and permitting of large projects.

These comments were approved by the Berkshire Regional Planning Commission's Executive Committee at their meeting on December 5, 2007.