



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

Deval L. Patrick  
GOVERNOR

Timothy P. Murray  
LIEUTENANT GOVERNOR

Ian A. Bowles  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1181  
<http://www.mass.gov/envir>

May 7, 2010

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

PROJECT NAME : Greylock Glen Outdoor Recreation and  
Environmental Education Center  
PROJECT MUNICIPALITY : Adams  
PROJECT WATERSHED : Hudson  
EEA NUMBER : 14566  
PROJECT PROPONENTS : Massachusetts Department of Conservation and  
Recreation and Town of Adams  
DATE NOTICED IN MONITOR : April 7, 2010

Pursuant to the Massachusetts Environmental Policy Act (MEPA) (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** the preparation of an Environmental Impact Report (EIR).

As described in the Environmental Notification Form (ENF), the project consists of a new recreational and environmental educational facility on Mount Greylock's eastern slope, situated directly between downtown Adams and the Mount Greylock State Reservation. The project will include a new 170-room lodge and conference center, a 2,500-seat amphitheater, a new environmental education center and improvements to the existing on-site trail network that will serve hikers, equestrians, cross-country skiers and snowmobilers. The project site is currently owned by the Commonwealth but will be leased to and developed by the Town of Adams as the Commonwealth's provisionally designated developer. The Commonwealth is providing \$3,000,000 in matching funds to support the development. As part of this obligation, the Department of Conservation and Recreation (DCR) will be designing the project's multi-use trails system. In addition to providing funds to develop the trail system, the Commonwealth is also contributing to infrastructure improvements along Gould and Thiel Roads.

The current project proposal represents the most recent iteration of a longstanding effort to develop the project site for tourism and recreation. In 1989, the site was purchased by the Commonwealth in accordance with Chapter 676 of the Acts of 1985, a special act of the Legislature calling for the development and lease of the site to support recreational use and stimulate economic development. Prior development proposals for the site included at various

times ski resorts, golf courses, the creation of a new 25-acre lake, and other recreational components such as tennis courts and swimming pools. Virtually all of the prior proposals also included larger-scale lodging facilities such as condominiums, hotels and associated retail uses. As described further below, several of these prior proposals were previously reviewed and approved under MEPA. In fact, the project site currently contains remnants of previous resort development efforts, including an 18-hole golf course, the abandoned foundation of a 350-room hotel, and base structures for a ski lift and snow making facilities.

Because of the unique setting of the project site at the base of Mount Greylock, the state's highest mountain, and the ecological characteristics of the site, which includes wetlands and habitat for several rare or threatened species in Massachusetts, the project has historically faced opposition from recreational and environmental advocates and citizens organizations. However, the current proposal has been significantly scaled-back from the prior development schemes. As described in the ENF, the project will cluster development on previously developed areas of the project site and has significantly reduced the amount of land alteration that will occur and the amount of paving that will be needed. The project has been configured to avoid impacts to rare species habitat. Traffic impacts are expected to be greatly reduced and the project has reduced the number of new parking spots that will be created and will instead rely on existing parking lots in the Town of Adams and a shuttle system. Finally, the project's major buildings will be designed to be LEED certified. Overall, the environmental impacts associated with the current project are expected to be considerably reduced in comparison to previously-reviewed proposals.

The majority of the comments I have received on the ENF support, on balance, the revised plans for reduced development of the site. The Massachusetts Legislature has directed that the site be developed to encourage tourism and economic development in the Berkshires, and the task of MEPA review therefore is not to revisit the project purpose, but to ensure that the project is designed to minimize environmental impacts to the greatest extent feasible. While I acknowledge that certain other commenters continue to have significant concerns about the ongoing efforts to develop this site, I am satisfied that the plans described in the ENF represent a concerted and effective effort to avoid, minimize and mitigate environmental impacts in accordance with MEPA. I expect that DCR and state permitting agencies will continue to scrutinize the project during state permitting in order to ensure that the project's impacts are appropriately minimized and mitigated.

Although I am declining to require the preparation of an EIR because the project does not meet mandatory EIR thresholds and because the permitting agencies have indicated that any outstanding issues can be addressed during project permitting, DCR and the Town of Adams should continue to work closely with the state permitting agencies and project commenters to ensure that the impacts of the project are appropriately managed. Given the proximity of the proposed project to Mount Greylock, I ask that the Proponents take any and all feasible measures to ensure that the sensitive environmental resources surrounding the project site are fully protected. The project has committed to the permanent protection of 1,000 acres of the project site. I ask that DCR and the Town of Adams work to prioritize the permanent protection of this land as soon as possible, as requested by many commenters. The project Proponents have also committed to constrain land alteration to under 50 acres. To ensure that this commitment is met, I will require the Proponents to submit a Notice of Project Change (NPC) under MEPA for further review if the total land alteration associated with the project ultimately exceeds 50 acres. With these conditions in place, I am satisfied that the project will appropriately balance the

economic development objectives of the Legislature with the Commonwealth's stringent environmental protection standards. The project may proceed to permitting.

### Project Description

The project includes: a 100,000 square foot (sf)/170-room lodge and conference center with a 2,000 sf fitness center; a 2,500-seat amphitheater; an 11,000 sf environmental education center; a 6,000 sf maintenance building; a 140-site campground; and supporting infrastructure and amenities. The project also includes improvements and additions to the existing trail system that extends throughout the entire site as well as infrastructure improvements along Gould and Thiel Roads.

The Greylock Glen project site is approximately 1,063 acres, of which 48.5 acres will be developed. The project will be part of a 99-year lease to the Town of Adams. The site includes open fields, woodlands, wetlands, and ponds. The central portion of the site includes remnants of a partially constructed and abandoned resort development. Water and sewer infrastructure was constructed as part of this previous development and currently serves portions of the site (Gould and Thiel Roads). Remnants of previous farming activities and a resort development include an 18-hole golf course, the foundation of a 350-room hotel, base structures for ski lift facilities, snow making facilities, and storm drainage structures. According to the ENF, approximately 1,000 acres of the site will be permanently protected through a Conservation Restriction (CR).

Anticipated environmental impacts associated with the project include 48.5 acres of land alteration, 8.2 acres of new impervious area, 2,560 new average weekday daily trips, 913 new parking spaces, 3,700 linear feet (lf) of new water and sewer mains, an estimated 55,400 gallons per day (GPD) of water supply demand, 50,000 GPD of water withdrawal, and 50,363 GPD of wastewater generation, alteration of 1,028 sf of Bordering Vegetated Wetlands (BVW), 161 lf of Bank, and 367 sf of Land Under Water and 8 acres of Riverfront Area. In addition, the project site is within mapped Priority Habitat for numerous Rare Species.

### MEPA History

DCR's predecessor, the Department of Environmental Management (DEM) previously submitted an ENF, and Draft and Final EIRs for projects at Greylock Glen with greater environmental impacts than those currently proposed. A Certificate on the ENF (EEA #5499) was issued on April 25, 1985 for the Heritage Greylock project proposing the development of 457 acres for Nordic ski trails, alpine skiing, a 30-acre lake, a golf course, condominiums, a conference center with restaurants and shops, a performing arts center, and a campground. MEPA required the preparation of an EIR for this project. Guided by a Master Plan which proposed additional expansion of the project, a Draft EIR was filed in September 1986 for development of up to 1,275 residential units, a 200-room hotel/conference center, a golf course, a 25-acre lake, a 400 lf dam, alpine and Nordic skiing, a 40,000 sf commercial/public space, a 15,000 sf golf clubhouse/ski center, rustic lodging, 23 tennis courts, 12 pools, and 1,650 parking spaces. This project was never constructed.

A second Certificate on the ENF (EEA #11083) was issued on May 12, 1997 for the Greylock Center project which proposed a reduced scale of development on 60 acres. The Draft and Final EIRs (issued on September 16, 1998 and March 31, 2000, respectively) were found to

adequately and properly comply with MEPA and its implementing regulations. Again, this project was never constructed.

In 2004, an Amended Master Plan was developed by the Commonwealth for the creation of an Outdoor Recreation and Environmental Education Center (OREEC) facility at Greylock Glen. The current ENF reflects an evolution of that Master Plan concept.

### Jurisdiction and Permitting

The project is undergoing review pursuant to Sections 11.03(1)(b)(1), 11.03(1)(b)(2), 11.03(3)(b)(1)(f), and 11.03(6)(b)(14) of the MEPA regulations because it is being undertaken by a State Agency and will result in the direct alteration of 25 or more acres of land, the creation of five or more acres of impervious area, the alteration of one-half or more acres of other wetlands (Riverfront Area), and the generation of 1,000 or more new average daily trips on roadways providing access to a single location and the construction of 150 or more new parking spaces at a single location. The project will require: an Order of Conditions from the Adams Conservation Commission (and, on appeal only, a Superseding Order of Conditions from the Massachusetts Department of Environmental Protection (MassDEP)); a Sewer Extension Permit from MassDEP; review by the Natural Heritage and Endangered Species Program (NHESP); review by the Massachusetts Historical Commission (MHC); and a National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP) from the United States Environmental Protection Agency (US EPA). The project may require a Section 401 Water Quality Certificate from MassDEP and a Section 404 Programmatic General Permit (PGP) from the United States Army Corps of Engineers (ACOE).

The project will be partly undertaken and financed by DCR, a State Agency. Therefore, MEPA jurisdiction for this project is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations.

### Land Use and Alteration

The proposed project will result in the alteration of 48.5 acres (4.6%) of the 1,063-acre site including 29 acres for the core development area (lodge and conference center, performing arts amphitheater, maintenance facility, environmental education and Nordic ski center and campground), and 19.5 acres for the creation of new trails. The bulk of the development is clustered at the junction of Gould and Thiel Roads, which has undergone previous development activity, with the camping located a short distance to the west. I note the Proponents' commitment to incorporating design opportunities such as Low Impact Development (LID) stormwater techniques to further limit project impact.

Approximately 20 acres of the 29 acres will remain green space. Of the existing 32-mile trail system, approximately 15 miles of trails will be abandoned and replaced with new trails for a net gain of 0.2 miles of trails. The development of trails will result in the alteration of 8 acres of Riverfront Area and 1,028 sf of BVW. The Proponents have indicated that trails will be designed to avoid traversing rare species habitats. I refer the Proponents to the comments from the Berkshire Regional Planning Commission (BRPC) regarding the establishment of ADA-compliant routes and trails.

As noted in many of the comment letters I have received, the land alteration associated with this project is closely approaching, but does not exceed, the 50-acre threshold for the mandatory preparation of an EIR under the MEPA regulations. As noted above, to ensure that the Proponents' commitment to constrain land alteration impacts to below 50 acres is met, I will require the preparation of an NPC in accordance with 301 CMR 11.10 should the project exceed 50 acres of land alteration in the future. I strongly encourage the Proponents to continue to explore ways to minimize land alteration to the maximum extent feasible and to pull development areas away from sensitive wetland resource areas and rare species habitats.

### Open Space

According to the ENF, approximately 1,000 acres of the project site will be placed under a Conservation Restriction (CR) to ensure its permanent protection. The 32-mile trail system will be located within the proposed CR area. The Proponents have indicated that the Amended Master Plan includes a condition requiring a Certificate of Occupancy from the Town of Adams for the lodging component prior to the placement of the land under a CR. I have received numerous comments which question the delay in protecting the land subsequent to the receipt of a Certificate of Occupancy. As stated above, I ask that the Proponents explore all possible means of permanently protecting the 1,000 acres of land as soon as possible.

### Sustainable Design

Because the project buildings will be leased from the Commonwealth, the Proponents must consider the recommendations and energy-related measures included in Executive Order No. 484, Leading by Example. The Proponents have committed to pursuing certification from the U. S. Green Building Council's Leadership in Energy and Environmental Design (LEED) at a minimum Gold level for buildings at Greylock Glen. I strongly encourage the Proponents to pursue integrated building designs to achieve the highest level of LEED practicable. The ENF included comprehensive Sustainable Design Guidelines to guide the project's development practices. The Guideline discusses:

- site practices including the use of xeriscaping, LID techniques for stormwater control and groundwater recharge, and siting facilities in response to natural gradients of the land;
- energy conservation based on architecture including high performance building envelopes, passive heating and cooling approaches, daylighting, and energy efficient fixtures with light sensors and timers;
- energy efficient HVAC systems including ground source and air source heat pumps; and
- onsite renewable energy including photovoltaic (PV) and solar thermal systems.

I strongly encourage the Proponents to adopt all feasible energy efficiency and sustainable design measures in designing and constructing this project. I refer the Proponents to the comments from Mass Audubon regarding building orientation to maximize passive solar effects.

### Rare Species

According to the ENF, the project site falls within mapped *Estimated* and *Priority Habitat* of numerous rare species pursuant to the Massachusetts Endangered Species Act

