PALMER STATION
PLANNING + DESIGN

MassDOT Palmer Station Planning & Design

Environmental Scoping Report

PREPARED FOR

massDOT
Massachusetts Department of Transportation

MassDOT Rail & Transit Division
10 Park Plaza
Boston, MA 02116
617.366.7133

PREPARED BY

vhb

99 High Street
13th Floor
Boston, MA 02110
617.728.1770

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Project Overview

This memorandum summarizes potential environmental impacts and anticipated required environmental requirements, processes, and approvals associated with the preliminary design of Palmer Station in Palmer, Massachusetts.

The Project Area is located at 1199 South Main Street, Palmer, Massachusetts (**Figure 1**). The proposed site consists of an 8-acre parcel of land owned and partially occupied by Sanderson Macleod Inc., a local twisted wire brush manufacturer. The parcel is adjacent to the CSX railroad right of way (ROW) at approximately Milepost 82.8-83.1. The portion of the site on which the proposed parking area would be located is currently vacant and includes mowed turf grasses with trees and shrubs along the periphery. Track and platform infrastructure and station facilities would be located south of the existing CSX mainline. Access to the site would be from South Main Street to the south of the proposed parking area, and pedestrian access to the platform from the parking area is proposed through a transition plaza. An accessible walkway between the transition plaza and the west end of the platform would support emergency egress requirements.

The purpose of this memorandum is to review anticipated environmental regulatory requirements and summarize those environmental resources that may require additional review and analysis as design progresses. Additionally, this memorandum identifies key environmental resource areas to consider during the ongoing design process, so that avoidance measures and impact minimization may be incorporated.

Massachusetts Environmental Policy Act

The Massachusetts Environmental Policy Act (MEPA) requires certain projects that could result in significant environmental impacts to undergo a state review process that considers those potential impacts and explores alternatives and potential mitigation measures. Under MEPA, projects requiring state permits, state funding, or are undertaken by a state agency must undergo a review process if they meet or exceed certain review thresholds for environmental impact, as listed in 301 CMR 11.03.

As part of the analysis, all applicable criteria under 301 CMR 11.03 Review Thresholds (January 6, 2023) were reviewed to determine whether the Project may trigger MEPA. Based on current assumptions, the Project is not anticipated to exceed any thresholds at this time; these determinations should be revisited as design advances to confirm compliance. For example, the site is approximately eight acres, previously disturbed, and is not expected to create five or more

acres of new impervious area or disturb 25 acres of land. The site is outside mapped priority or significant habitat, and no impacts to state-listed species are anticipated. The Project uses an existing rail line and the threshold for new rail construction does not apply, and current plans do not anticipate generating 3,000 or more new average daily trips or constructing 1,000 or more parking spaces. As design progresses, review of MEPA thresholds should be reassessed to determine environmental impacts.

Figure 1: Project Area Map
Palmer Station | Palmer, Massachusetts



Path: \\vhb.com\gis\proj\Boston\15790.02 TO2-Palmer Station Design\Project\Palmer.aprx (zconner, 10/28/2025)

Source: MassGIS, ArcGIS Online

National Environmental Policy Act

The National Environmental Policy Act (NEPA) establishes a national framework for considering environmental impacts during federal decision-making processes. NEPA is required when a project requires a federal action. The Federal Rail Administration (FRA) would determine whether its role in awarding grants, issuing permits, approving land use, or making policy decisions constitutes a federal action with substantial federal control and responsibility. If that threshold is met, NEPA review is triggered. If federal funding is required for the future design and construction of the Project, NEPA would be required.

The FRA has established categorical exclusions (CEs) under NEPA to streamline environmental review for certain actions that do not typically involve significant environmental impacts and thus do not require detailed environmental assessment. It is anticipated that the Project will qualify for processing through the following FRA CE:

23 CFR 771.116(c)(21): *Assembly or construction of facilities or stations that are consistent with existing land use and zoning requirements, do not result in a major change in traffic density on existing rail or highway facilities, and result in approximately less than ten acres of surface disturbance, such as storage and maintenance facilities, freight or passenger loading and unloading facilities or stations, parking facilities, passenger platforms, canopies, shelters, pedestrian overpasses or underpasses, paving, or landscaping.*

The FRA requires that the Project Sponsor provides a sufficient level of documentation and analysis to help inform FRA's determination that a CE is the appropriate NEPA class of action. While design is still preliminary, the below sections aim to provide a summary of those resources that may require additional review and analysis as design progresses to support the CE.

Cultural Resources

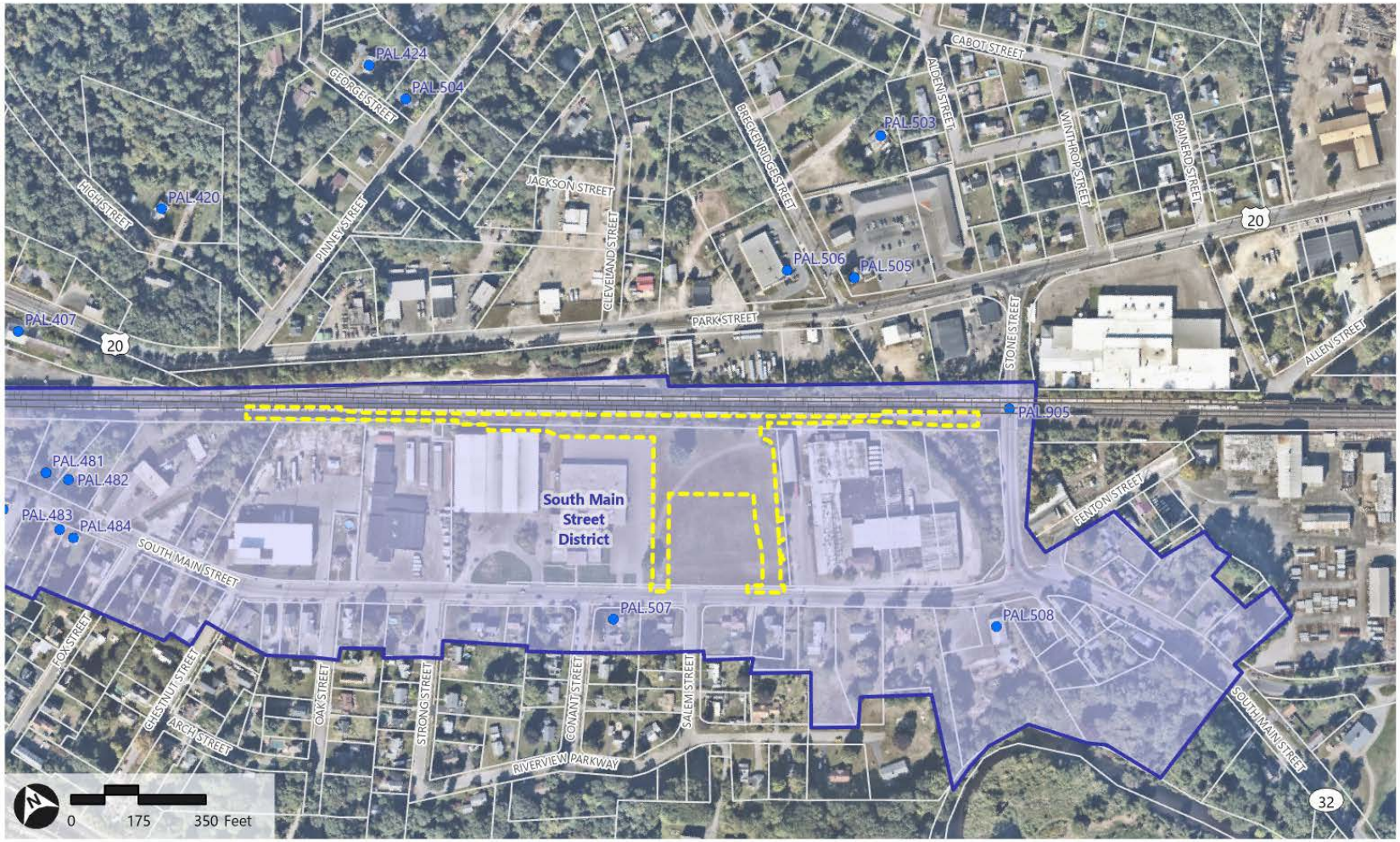
This section reviews anticipated implications involving the Section 106 process. The Project proposes the construction of a new station, with accompanying parking, circulation, trackwork, and platforms. Since the Project includes the construction of a new station, the scope of work is not anticipated to fall under Appendix A of the *2018 Program Comment to Exempt Consideration of Effects to Rail Properties within Rail Rights-of-Way*. Therefore, the Project would be subject to standard Section 106 review.

These activities have the potential to cause physical impacts if the limits of work are determined to be within a historic property, and/or non-physical impacts such as visual effects to historic properties in the vicinity of the Project. Upon initiation of Section 106, MassDOT and the Project team will work with the FRA, Massachusetts Historical Commission (MHC), and other identified consulting parties to develop an Area of Potential Effect (APE), identify historic resources within the APE, and evaluate impacts on those historic properties. MassDOT will coordinate with the FRA to identify potential consultations with federally recognized Tribes.

A review of the MHC Massachusetts Cultural Resources Information System (MACRIS) indicates the proposed station is within the South Main Street District (MHC ID# PAL.E) inventoried area (**Figure 2**). As the last issued opinion by the MHC was in the 1980s, there would be potential for the inventoried area to be recategorized as eligible for listing in the National Register of Historic Places (National Register). Eligible historic districts may encompass a variety of uses that

contribute to their historic significance. Properties cannot be excluded based solely on current use. It is premature to determine whether properties within or adjacent to the Project Area qualify for listing on the National Register of Historic Places. This determination will occur as part of the Section 106 review process.

Figure 2: Historic Resources
Palmer Station | Palmer, Massachusetts



Source: MassGIS, ArcGIS Online, MHC, NearMap

If the South Main Street District is determined to be eligible for listing in the National Register, then there would be potential for the inventoried area to be considered a historic resource protected by Section 4(f) of the U.S. Department of Transportation Act of 1966. Section 4(f) protects public parks, recreation areas, wildlife and waterfowl refuge, and historic sites from federal transportation project impacts. Resource and Section 4(f) consultation may be required. The FRA cannot approve the use of Section 4(f) resources unless there is no feasible and prudent alternative to the use of the resource, and the action includes all possible planning to minimize harm to the property.

Noise and Vibration

This section evaluates potential noise and vibration impacts from the proposed Project. The station would be located on vacant land in an area with mixed residential and industrial uses. The closest noise and vibration sensitive receptors include:

- Residential properties on S Main Street (approximately 300 feet south);
- Residential properties on Pinney Street (approximately 1,000 feet northwest);
- Residential properties on Breckenridge Street (approximately 700 feet northeast); and,
- Residential properties on Fenton Street (approximately 1,000 feet southeast).

Noise

Noise from passenger rail stations typically includes vehicles entering and leaving parking areas (particularly during early morning hours), idling locomotives, public address announcements, and locomotive horns when approaching or departing a station. According to the Federal Transit Administration's (FTA's) Transit Noise and Vibration Impact Assessment Manual (FTA Manual), potential noise impacts can occur within 1,600 feet of passenger rail stations when horn blowing is required, and up to 250 feet when horns are not used. Per a Proposed Rule by the FRA, no Federal regulation requires a railroad to sound a locomotive horn when arriving at or passing by a passenger station.[1] Railroads may establish their own station horn policies through their operating rules. If a railroad sets a policy to sound locomotive horns at passenger stations, it is not subject to federal regulation for minimum sound level requirements. Noise from other Project sources are not anticipated to trigger a noise assessment at this time.

Given these distances and the proximity of noise sensitive land uses, a detailed noise assessment is not anticipated to be required.

Vibration

Vibration from passenger rail stations occurs when locomotives and rail cars use the station track, which would be directly adjacent to the main line. Since the station track would be located south of the main line, only vibration sensitive land uses south of the tracks need consideration, as vibration sources would be closer to these receptors.

[1] The Federal Railroad Administration. *Enhancing Railroad Discretion in Sounding Locomotive Horns at Passenger Stations.* Federal Register Volume 90, Issue 124 (July 1, 2025). https://www.federalregister.gov/documents/2025/07/01/2025-12157/enhancing-railroad-discretion-in-sounding-locomotive-horns-at-passenger-stations.

According to the FTA Manual, potential vibration impacts can occur within 200 feet of residential land uses from conventional commuter railroad operations. Given that the closest vibration sensitive land use is 300 feet away, a detailed vibration assessment would not be required for the station alone.

Air Quality

The Project is located within Hampden County, Massachusetts, which is not within a National Ambient Air Quality Standard Non-Attainment or Maintenance area. As new trains are being introduced to the line, there is potential for an increase in emissions due to operations. FRA Form F 217, Section G, notes that FRA may still request additional information, including an emissions analysis for new passenger train service, construction traffic, and vehicular traffic to comply with the Clean Air Act's General Conformity requirements. As the site is not within a National Ambient Air Quality Standard Non-Attainment or Maintenance Area, an emissions analysis is unlikely.

Hazardous Materials and Waste

Review of the Massachusetts Department of Environmental Protection (MassDEP) Bureau of Waste Site Cleanup online database of Waste Site & Reportable Releases[2] identified documented releases of oil and/or hazardous materials (OHM) that may potentially impact the proposed Project Area. The presence of a state-listed release (i.e., disposal site) indicates that a release of OHM has been reported to MassDEP. According to the MassDEP database, four disposal sites were identified within 500 feet of the Project Area. Two of these disposal sites (Jarvis East, 127 South Main Street, Palmer, RTNs 1-681 and 1-140) have the potential to impact environmental conditions within the Project Area due to the active regulatory status of the disposal site and the unknown extent of the identified volatile organic compounds plume in the groundwater (see **Figure 3**).

Groundwater at these disposal sites flows to the southwest and its depth ranges between nine and 32 feet below the ground surface. The Project scope includes building foundations for the passenger platform and could include building foundations and installation of new water and sewer service for the potential restroom, all of which are anticipated to require less than nine feet of excavation. Shallow foundations are expected for structural work, with no major subsurface work anticipated. If design changes require deeper foundations, excavation depth thresholds will require reevaluation.

If contaminated groundwater is encountered at or within 500 feet of the proposed dewatering location, specifications will be required for the handling and/or disposal of contaminated dewatering effluent. Licensed site professional services would be engaged to develop a Contaminated Groundwater Management Plan and/or prepare the applicable Massachusetts Contingency Plan submittals if contaminated groundwater is encountered.

Due to the commercial uses of nearby properties and developed nature of the Project Area, there is the potential for undocumented releases of OHM to be present, which may require special handling and management during construction.

[2] https://eeaonline.eea.state.ma.us/portal#!/search/wastesite

As hazardous materials may be encountered during construction, and property acquisition is necessary, a Phase I Environmental Site Assessment is required. If the Phase I Environmental Site Assessment recommends a Phase II site assessment, it would be required to be submitted with the CE, and information regarding mitigation and cleanup measures to remediate any hazardous materials identified and steps to ensure local community protection from contamination during construction and operation would be required.

Waters of the United States

Based on a desktop evaluation of wetlands and waterways within the vicinity of the Project Area, there are no state regulated wetland resources or federally jurisdictional Waters of the United States (WOTUS) on the subject parcel. However, an unnamed perennial stream is culverted under the ROW to the east of the site, and a potentially jurisdictional drainage feature/intermittent stream exists off site to the west. See **Figure 3**. While direct impacts to waterways or bordering vegetated wetlands would not be anticipated to occur due to station construction, track work within the existing ROW to accommodate the station platform and relocated siding tracks would be required nearby. As design progresses, wetland delineation would be required to confirm the boundaries of these resource areas.

Figure 3: Environmental Resources
Palmer Station | Palmer, Massachusetts



Source: MassGIS, ArcGIS Online, NearMap

U.S. Clean Water Act

Sections 401 and 404 of the Clean Water Act (CWA) regulate WOTUS as defined by the U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual. The perennial stream to the east of the site would be considered a USACE jurisdictional WOTUS. The requirement to seek USACE authorization for the construction of the Palmer Station would only be triggered by work within the waterway or direct impacts to any contiguous vegetated wetlands. Based on the conceptual design under consideration, no work within the waterway or wetland impacts is proposed, therefore USACE CWA permitting would not be required.

Massachusetts Wetlands Protection Act

The Massachusetts Wetlands Protection Act (WPA, Chapter 131 S. 40) regulates wetland resources as defined in the WPA and the associated Massachusetts Department of Environmental Protection (MassDEP) Regulations (the Regulations, 310 CMR 10.00) and their buffer zones. Pursuant to the Regulations, areas within 200 feet of perennial streams are considered Riverfront Area (RFA) and areas within 100 feet of certain resources (e.g. Bordering Vegetated Wetlands and Bank) are considered WPA jurisdictional as the 100-foot Wetland Buffer Zone (the Buffer Zone). Work within RFA and or the Buffer Zone would trigger the need to file a WPA Notice of Intent (NOI) with the Palmer Conservation Commission (the Commission). For the Commission to approve the project, the NOI would need to demonstrate that the project as proposed meets the applicable WPA Performance Standards in the Regulations.

Riverfront Area

The RFA that would be altered for construction of the station occurs within the ROW and is occupied by an existing siding track. Consequently, in accordance with 310 CMR 10.04 the area would be considered previously developed and the project would constitute redevelopment of a degraded area. As such, it would be required to meet the WPA Performance Standards at 310 CMR 10.58 (5) (a) through (h), which includes that the proposed work shall result in an improvement over existing conditions of the capacity of the RFA to protect the interests identified in M.G.L. c. 131 § 40, stormwater management is provided according to the MassDEP standards, and that the proposed work shall not be located closer to the river than existing conditions or 100 feet, whichever is less.

Buffer Zone

It is assumed that work would also occur within the 100-foot Buffer Zone to a Bordering Vegetated Wetland (BVW) fringing on the perennial stream and the Bank of the stream. Appropriate construction-period controls would be required to ensure that the work within the 100-foot Buffer Zone will not adversely affect the BVW or the Bank.

Mitigation Requirements

Based on the conceptual design, there will be no direct impacts to regulated resources other than degraded RFA within the ROW. Therefore, the need for in-kind mitigation of wetland resources is not anticipated. Given the requirement at 310 CMR 10.58 (5)(a) that the project must result in an improvement to conditions, mitigation would be required within the RFA in the project area to enhance the resource to increase the protection of the interests of the WPA.

This would likely consist of removing debris, eliminating invasive species, native plantings to enhance wildlife habitat values, stormwater management to improve water quality, and restoration of the area from which the existing siding would be removed to the extent feasible. Required mitigation for work in the Buffer Zone of other wetlands would largely consist of construction-period implementation of erosion and sedimentation controls, such as erosion control barriers, catch basin inlet protection, and management of dewatering discharges. The design would also need to meet the MassDEP Stormwater Management Standards.

Threatened and Endangered Listed Species

While no impact on federally listed threatened or endangered species is anticipated, the Project would still require review by the FRA under Section 7 of the Endangered Species Act as part of the NEPA process.

The United Station Fish & Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool was accessed on October 10, 2025, to identify species and critical habitat in the Project Area. IPaC identified the proposed federally threatened species monarch butterfly (*Danaus plexippus*) as having the potential to be affected by activities. As the monarch butterfly is proposed as threatened, no USFWS consultation would be required. USFWS consultation may be required if the species is officially designated as threatened. No designated critical habitat overlaps the Project area.

No other threatened, endangered, or other special-status species were identified in or adjacent to the Project Area.

Summary

Based on the current Conceptual Design, the Project does not trigger review under MEPA. However, NEPA review will be required if federal funding is pursued. As the design advances, environmental review requirements will be reassessed and confirmed. Should NEPA review be necessary, additional environmental analysis will be incorporated as part of the FRA's NEPA process, in close coordination with FRA and other relevant agencies. The NEPA documentation will address all required analyses, including a noise and vibration existing conditions assessment and Section 106 historic resource documentation. Agency consultations will be conducted in accordance with Section 7, Section 106, and, if applicable, Section 4(f) requirements.