

Background Materials – May 23, 2022 – Planning Board Meeting

Prepared by Anne Capra, Director of Planning and Conservation, 5/20/22

Cable Access Channel 15 – Cable Access Channel 15 – The Cable Studio has indicated that this meeting will be live streamed on Channel 15.

AGENDA ITEM #1 Open Comment Period

This 10-minute period is set aside for the public to offer comments on items not on the posted agenda, in accordance with the adopted policy posted on the Town of South Hadley Planning and Conservation Department webpage here: [Policy-on-Open-Comment-Period---As-Adopted-2021-03-08 \(southhadley.org\)](#)

Action Needed: Allow members of the public to offer comments to the Board.

AGENDA ITEM #2 Minutes

Senior Clerk Colleen Canning will forward outstanding draft minutes directly to Board members.

Action Needed: Vote to approve the minutes.

AGENDA ITEM #3 Correspondence

A list of correspondence received is attached. Note – there are several correspondence letters regarding the Agenda Item #4 Elnk Special Permit application which will be read during the scheduled Public Hearing continuance.

Action Needed: No action needed.

6:30 PM AGENDA ITEM #4 - EINK Special Permit and Stormwater Management Permit Public Hearing Continuance, 7 Gaylord Street

Public Hearing Agenda and New Submittals

The Chair has advised that the first part of the hearing will be dedicated to Board questions for the applicant and peer review. Thereafter, the hearing will accept public comment. A significant number of letters from the public have been submitted, as inventories in the attached correspondence, and will be read into the record. Thereafter, the Board will begin deliberation on the Special Permit standards per 255-129 (<https://ecode360.com/30053888>). Per 255-28 Noxious Industrial Uses, the proposed chemicals are allowed in the Industrial B zoning district by approval of a Special Permit from the Planning Board.

Application and project plans are online here:

<https://www.southhadley.org/1164/11004/Gaylord-Street-7---Redevelopment-2022?activeLiveTab=widgets>

The most recent submissions are at the bottom of the webpage under the header “May 18, 2022 Submittals” and include a cover memo and exhibits A thru L.

EINK provided the following description of the 5/18/22 submittals:

The memo discusses (1) risk prevention and mitigation measures; (2) how the project will not adversely affect the day-to-day lives of our neighbors but rather will enhance the area and provide benefits to Town and residents; and (3) how the project meets all of the applicable Zoning Bylaw requirements for the issuance of a Special Permit. We cite several exhibits throughout the memo. The majority of these exhibits have been previously shared with the Board. However, we also include two newly created exhibits (Capaccio Environmental Engineering Inc.’s Dispersion Modeling Report and Arup US, Inc.’s Bulk Solvent Storage and Handling Hazard Review). We have cited several drawings. One of those – A-0108 – has been modified to add additional spill and firewater containment in the tanker unloading area. One last note regarding the exhibits, as requested by a Planning Board member, we have provided a clean copy of our Emergency Response Plan. To fix the formatting errors noted during the last Hearing, we have put the document through our internal document control system. We have greyed the last few pages of the document to distinguish between active and future items. The document is substantively the same as the previous version.

Peer Review

I have requested peer review of Exhibits F Bulk Solvent Storage Handling Hazard Review and Exhibits H and I Capaccio Toluene Air Dispersion Modeling. The peer review consultants from Weston and Sampson have said they can have a response for the meeting on Monday night and will be in attendance to answer questions.

Stormwater Management Permit

The Board must find either 1) approval of the stormwater management permit application subject to any conditions, modifications or restrictions required by the Board which will ensure that the project meets the purposes in Article I and the standards in Article VI and design requirements in Article VII and adequately protects water resources, as set forth in Chapter 200; or, 2) disapproval because project does not meet the purposes in Article I and the standards in Article VI and design requirements in Article VII and adequately protects water resources.

Peer review by Weston and Sampson (4/1/22 memo) found that the applicant’s submission was prepared in conformance with Section 200 with a few exceptions: 1) O&M Plan needed clarification regarding long-term operations, 2) sizing of the system based on revised calculations. The applicant revised the plans based on 1 inch of water quality volume due to the site being a LUHPPL (Land Uses with Higher Potential Pollutant Loads). The applicant has stated that they secure an easement for operation of the Stormceptor water quality unit which is on the adjacent property owned by Fuel Services. This can be a Condition of the Special Permit. (Note – Steve Chase of Fuel Services has submitted a letter of support for the project and acknowledges cooperation and coordination between their businesses regarding portions of the site with shred operations.)

Department Comments

Fire District #1 – Captain Jason Houle, 4/25/22

E Ink has met or exceeded all of the fire code requirements for this project. They have also addressed our other concerns. We have no objection to the project as proposed. The Dept. of Fire Services permit is for the tanks themselves. I don't know if they have applied for that permit yet. The FD will permit the liquids stored in the tanks.

Public Health Department – Sharon Hart, 3/23/22

I received a call from DEP, Catherine Skiba, and she identified a pre-permitting meeting with EINK would be for EINK and DEP Only. They will make available the minutes of that meeting. I suggest if needed we have a “local” meeting with EINK after their meeting with DEP.

Board of Health comment letter dated May 6, 2022 is included within the attached correspondence.

SHELD - Mark Gilmore, 3/14/22

SHELD has reviewed the application materials, and we have no objections to the project.

FD#1 Water Department - Jeff Cyr, 3/11/22

We have no comments

Police Department - Chief Gundersen, 3/11/22

Reviewed and no comments.

DPW Div. Water Pollution Control – Melissa Labonte, 3/14/2022

No comments for me.

Recommended Motions: Two separate motions and votes will be needed: 1) Special Permit; and, 2) Stormwater Management Permit. The Special Permit requires a 4 out of 5 member vote for approval. In the event that a full member is absent, the Alternate Member may vote. The Stormwater Permit requires 3 out of 5 vote for approval.

Action Needed: Hold the Public Hearing and deliberate on a Decision. If the Board closes the Public Hearing, a Special Permit Decision must be made within 90 days and filed with the Town Clerk. A Stormwater Management Permit must be made within 21 days of the close of the Public Hearing and filed with the Town Clerk.

The Board will also need to vote on the amount of a Performance Bond for Stormwater Management. This can be down at a future meeting based on a cost estimate provided by the applicant as reviewed by DPW.

AGENDA ITEM #5 Planning & Conservation Department Report on Planning Projects and Development Updates

REDO Grants Awarded

The Town has received two Regional Economic Development Organization (REDO) Grants through the Western Mass Economic Development Corporation as follows:

\$35,500 for Intentional Programming to Activate the Village Commons District - \$20K will go toward outdoor furniture, \$500 for outdoor games, and \$15,000 for a pilot Mesh Wifi system. \$65,000 for Façade Improvements and Mesh Wifi Pilot for South Hadley Falls

Because this funding was part of a last minute round 2 made available, the project has an extremely tight timeframe of full allocation of funding by June 30th, with implementation complete by December 30th. I expect to issue a press release next week complete with links to project applications and website. More to come!

Chapter 200 Stormwater Bylaw Adopted at Town Meeting

The repeal and replace of this bylaw was adopted at Town Meeting. It now needs review by the Attorney General before incorporating into Ecode.

Master Plan Endorsed at Town Meeting

Congratulations!

AGENDA ITEM #6 Other New Business (topics which the Chair could not reasonably expect to be discussed/considered as of the date of this notice)

No new business had been submitted to me as of today.

**SOUTH HADLEY PLANNING BOARD
LIST OF CORRESPONDENCES
MAY 23, 2022 REGULAR MEETING**

Letters & Memos

- Email received May 10, 2022 from Kenneth Delphia, Bolton Street, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email received May 12, 2022 from Jeff Cyr, Crystal Lane, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email received May 12, 2022 from Brian Mannix, former Elm Street resident, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Letter with reference materials received May 13, 2022 from Mary Jane Else, Lyman Street, and Racheal Lea Scott, Country Lane, regarding SHELD's involvement in a peaker contract.
- Letter dated May 13, 2022 from the South Hadley Redevelopment Authority expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email dated May 13, 2022 from Mary Hollway regarding Harvey Hollway's support of for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email received May 16, 2022 from Sharon Sampson, Los Angeles Street, expressing concern for mice infestation at their home.
- Email received May 16, 2022 from Edward Clare, South Hadley, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email with attached social media post submitted May 17, 2022 from Matt Laughlin, Ridge Road, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Emailed letter received May 18, 2022 from Robert Pleasure, Jewett Lane, with reference materials regarding the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email received May 28, 2022 from Mitchell Mercier, Associated Flooring, expressing support for the Special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email received May 19, 2022 from Thomas Shea, South Hadley Resident, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Email received May 19, 2022 from Diane and Phillip LaRoche, Carew Street, expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.
- Letter received May 20, 2022 from The South Hadley & Granby Chamber of Commerce expressing support for the special permit application filed by E-ink for redevelopment at 7 Gaylord Street.

Notices

Amherst

- Notice received from the Amherst Planning Board for hearings on May 26, 2022 to consider amendments to the official zoning map and regulation schedule to add the ‘FEMA Floodplain Overlay District’.

Chicopee

- Notice received from the Chicopee Zoning Board of Appeals for a hearing on June 8, 2022 to consider a variance to allow construction of a single family at 1188 Montgomery Street.
- Notices received from the Chicopee Planning Board for the following hearings on June 2, 2022: 1) request for a waiver of frontage for the purpose of constructing a single family home at 1188 Montgomery Street; and 2) site plan review waiver for the construction of a new produce building and exterior cooler on an existing family farm located at 753 Montgomery Street.

Granby

- Notice from the Granby Planning Board for a hearing on May 24, 2022 to consider the site plan for the proposed Veterans Memorial Park to be located at 257-259 State Street.

Hadley

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Holyoke

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Fwd: FW: E Ink Expansion

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Wed, May 18, 2022 at 10:22 AM

From: outlook_E31ABDC2EEE62A61@outlook.com
Sent: Tuesday, May 10, 2022 7:50 AM
To: delphkenne
Subject: E Ink Expansion

Dear Anne,

I am a former E Ink employee for 10 years and employee of the previous a owners for 30, I am also a resident of South Hadley for as long. E Ink Safety is a high priority and has a excellent safety program. The employees there have been working with solvents on a daily basis, many of them for as many year as me and are very knowledgeable. E Ink is a excellent company with great paying jobs and a real plus for the town. This is great addition to the company and needed for E Ink to grow. I have reviewed the plans which have been approved by the state and the fire dept. and have no concerns with this new building and tank farm giving them my full support in moving forward with this project.

Thank You,

Kenneth Delphia

46 Bolton St.

South Hadley, Ma.

01075

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Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
(413) 538-5017 x6128
acapra@southhadleyma.gov

Fwd: EINK expansion

Anne Capra <acapra@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Thu, May 12, 2022 at 12:36 PM

Colleen,
Please add this to the Planning Board correspondence and the EInk, 7 Gaylord Street Special Permit file.
Thanks,
Anne

----- Forwarded message -----

From: **Jeff Cyr** <jeffcyr@verizon.net>
Date: Thu, May 12, 2022 at 12:22 PM
Subject: EINK expansion
To: acapra@southhadleyma.gov <acapra@southhadleyma.gov>
Cc: washworth@eink.com <washworth@eink.com>

Good afternoon Anne,

I'd like to voice my full support for the EInk expansion at their current facility on Gaylord St. E ink has been a welcomed addition to the depleted down town area of our great community. The fact that they want to continue investment in that area is even more exciting. With the most recent mass works grant the town received for Gaylord St and the beautification EInk has done in front of their facility, that area has a fresh new look which will only get better with the expansion. EINK has been a great contributing business to many events within the community as well. I am confident that with the input from all the various depts related to the expansion that it will be successful and I hope there are many others that support it as well. Projects and businesses like this are needed in order for the community to prosper.

Respectfully,

Jeffrey Cyr

Sent from the all new AOL app for Android

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Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
(413) 538-5017 x6128
acapra@southhadleyma.gov

Fwd: Eink

Anne Capra <acapra@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Thu, May 12, 2022 at 4:58 PM

Colleen,
Please add this to the Planning Board correspondence and the EInk Special Permit file.
Thanks,
Anne

----- Forwarded message -----
From: **brian mannix** <bmannix10@gmail.com>
Date: Thu, May 12, 2022 at 4:35 PM
Subject: Eink
To: <acapra@southhadleyma.gov>

Hi Mrs./Miss Capra,
I am not very good at writing letters so please forgive me for any mistakes.

I understand Eink is planning to expand into part of the old building with some demo and major renovations. I have heard some concerns and talk by some of the locals, which is so common in this town. I guess I am writing as a former neighbor of E-ink for over 20 years. I am not sure how long they have actually been there, but I recently moved from 14 Elm Street about 2 months ago. My time on Elm Street was always positive. I raised my daughter there, she is now 21. Through all the years I have had no incidents with Eink or any of their employees. The parking lot is directly across from my front door. Everyone is always respectful, cautious about noise, I never see any trash,..ect. I have many conversations with several of them.

The building is very neat and well kept through out the year. The plants and flowers should be blooming soon. The sidewalks and parking lot are plowed and salted. I have never heard of any emergencies as far as chemicals and I have never smelled anything unusual. Even the deliveries, with the big trucks are very few and never too early or late. They are very good neighbors, better than some of my neighbors...JK.

Anyways give me a call if I can be of any help or answer any questions.
Thank You
Brian Mannix
(413) 563-6543

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Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
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acapra@southhadleyma.gov

May 7, 2022

Greetings,

We would like to begin by thanking you for your service to our town. We know it must be challenging to balance the needs of different groups in a small town. We would also like to assure you that we have contacted the SHEL D board to raise the concerns we detail here on two separate occasions.

We would like to talk to you about an issue that concerns us all. Project 2015A, the Peabody Peaker, was proposed by MMWEC (Massachusetts Municipal Wholesale Electric Company), which assists municipal light plants such as ours with fulfilling their responsibilities to residents and ratepayers.

The South Hadley Master Plan affirms that over the next ten years "climate change will have the single greatest impact on the future of South Hadley." Goal 3 of the Plan articulates that resiliency should be integrated "into every policy decision and investment the Town will make over the next ten years." In addition, SHEL D's own survey showed that a large majority of ratepayers favor increased reliance on renewables in electricity generation. We thus see South Hadley's climate impact as a legitimate concern of all townspeople and all town officials.

At the time it was proposed, the new peaker plant must have seemed like a good idea. The plant would help light plants fulfill their obligations to contract for "capacity" - electricity available for times of unusually high demand ("peaks"). The proposal received no public attention, even in Peabody, the town where it would be located. Peabody is a low-income community that already has two peaker plants. Residents in the area are burdened with low air quality and the diseases that come with it - heart disease, lung diseases, and asthma.

Seven years later, there is abundant electricity available at peak times, with more than three dozen peaker plants statewide. We now know much more about the burdens that particulate pollution places on people living near combusting facilities. We have also become conscious of the injustice of subjecting those with the least means to the greatest pollution burdens. Governor Baker has claimed, without evidence, that 2015A would reduce the pollution burden for residents of Peabody because it would replace older plants. No plans have been filed, however, to retire the two older, much smaller plants.

We also know much more about the looming disasters that are already being wrought by the greenhouse gasses we have pumped into the air. Models show that Massachusetts will be severely affected by storms and heat waves as the climate disaster unfolds. But, promisingly, there is hope. Wind and solar are now cheaper ways to generate electricity than natural gas, and they emit no carbon. Battery storage is now coming on board in a number of states such as New York and California. Banks of batteries can store energy generated by renewables, and are a cost-effective alternative to fossil-fuel powered peaker plants.

We are asking you to consider weighing in on the issue of South Hadley's participation in the Peaker contract. You may have heard that the costs of pulling out of the contract are too high to afford. This is, fortunately, not so. Two new reports show that it would be less expensive to pull out of the contract and

buy peak power on the market than to stay in the \$85 million dollar contract, in which South Hadley has a 10% share. Even greater savings would be realized if the town were to invest in battery storage as an alternative to purchasing peak power on the market. This is particularly true because of the spike in natural gas prices caused by the crisis in Ukraine.

We would not ask you to become involved in the affairs of another board if we did not think this issue was of vital importance to everyone in South Hadley. We are troubled in two ways by this contract. First, the contract, and our debt, lasts 30 years. It seems unlikely that gas-powered plants will be economically viable in 30 years, given the dropping prices of renewables and technological progress in battery storage. Second, we find the contract to be a moral burden. Given the urgency of the climate crisis, we don't believe South Hadley should invest in building new fossil fuel infrastructure which will further burden Peabody residents and accelerate the impacts of climate change. We, like you, want a liveable planet for our children's generation.

Please read the accompanying summaries, which show that there is no financial disadvantage to South Hadley's withdrawal from the Peaker contract. If you find these reports convincing, please consider communicating with the SHELD board.

Mary Jane Else
51 Lyman Street

Rachel Lea Scott
20 Country Lane



Risks for Peabody peaker owners go beyond capacity prices

This Applied Economics Clinic (AEC) policy brief—prepared on behalf of the Massachusetts Climate Action Network (MCAN)—presents risks that Municipal Light Plants (MLPs) should consider as they decide whether to retain their ownership shares in the Peabody peaking power plant or withdraw from the contract: 1) market risks, like capacity and fuel prices, and 2) climate/environmental risks. We find that New England capacity prices are projected to remain at current levels over the next decade. While ownership in the Peabody peaker protects against some capacity market risks, it leaves MLPs open to a variety of other important risks, including gas fuel prices, existing Massachusetts emissions reductions and Environmental Justice (EJ) community protection laws, future emission limits for the Commonwealth’s electric sector, and the potential for stronger EJ laws, new federal legislation, and/or regulatory changes that put fossil fuel-fired assets at a disadvantage.

Introduction

The Peabody “Project 2015A” peaker—a 60 mega-watt (MW) gas and oil-fired peaker plant in Peabody, Massachusetts—has been approved, but not yet built. In September 2020, the project received its air permit from the Massachusetts Department of Environmental Protection (DEP). In August 2021, the Massachusetts Department of Public Utilities (DPU) approved Massachusetts Municipal Wholesale Electric Company’s (MMWEC—the project operator) request for \$170 million in bonds to fund the facility. A “License and Use Agreement” between the City of Peabody and MMWEC allows the plant to be built on land owned by the City.

Fourteen Massachusetts MLPs have signed contracts to own a portion of the project: Boylston, Chicopee, Holden, Holyoke, Hull, Marblehead, Mansfield, Peabody, Russell, Shrewsbury, South Hadley, Sterling, Wakefield, and West Boylston. In April 2021, Holyoke and Chicopee alerted the DPU that they had informed MMWEC of their intent to withdraw from the contract. As the remaining twelve MLPs decide whether or not to remain in the Peabody peaker contract, there are multiple important risks for MLPs to weigh, including market risks (like capacity and fuel prices) and climate and environmental risks (like existing law and the potential for new and/or stronger laws) (see Table 1). There are many risks for these MLPs that extend beyond risks associated with the capacity market.

Table 1. Risks for Peabody peaker owners to consider

Risk category	Risk type
Market	Capacity price volatility
	Capacity price projections
	Fuel price volatility
	Fuel price projections
Climate/ Environmental	Environmental Justice protections
	Existing Massachusetts climate law
	Potential for stronger Massachusetts law
	Potential for new federal law(s)

Market Risks

MMWEC claims that owning a share of the Peabody peaker “stabiliz[es] Participants’ capacity costs”¹ against what it characterizes as “very volatile”² prices in ISO-New England’s (ISO-NE, the regional grid operator) forward capacity market by supplying them with a capacity resource that helps meet their capacity obligations under ISO-NE, rather than paying the market rate.

ISO-NE’s forward capacity market prices hit an all-time high of an inflation-adjusted \$396 per megawatt (MW)-day in the capacity auction for 2017/18 and a low of \$66 per MW-day in the 2023/24 auction. As MMWEC suggests, ISO-NE’s capacity market has shown greater price variability and often higher prices compared to those of other ISO’s (see Figure 1 below). New England’s 2021 *Avoided Energy Supply Component (AESC) Study* expects ISO-NE capacity prices to remain at or below the



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most recent auction prices in ten of the next eleven capacity auctions across multiple future scenarios (see Figure 2). There is also a risk that capacity market prices fall dramatically, which would make it cheaper for MLPs to buy capacity on the market rather than owning capacity.

Figure 1. ISO-NE, PJM and MISO capacity market results, 2010/11 through 2024/25 (\$2020/MW-day)

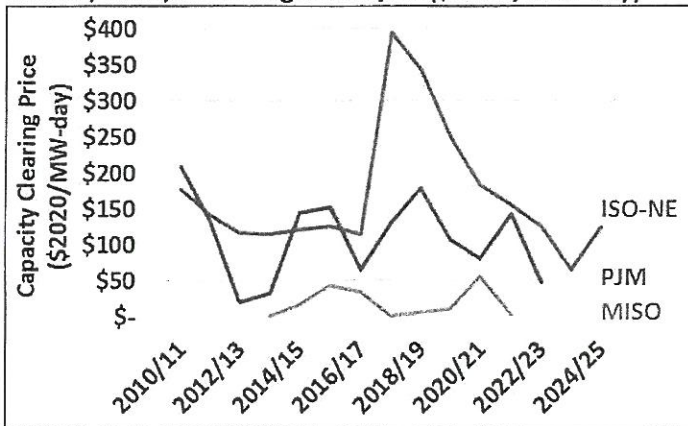
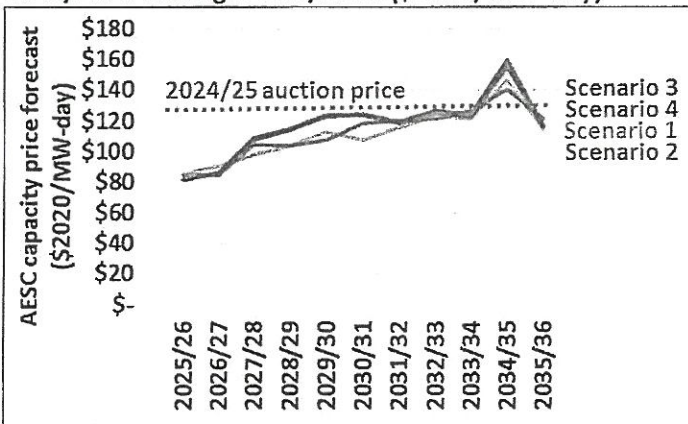


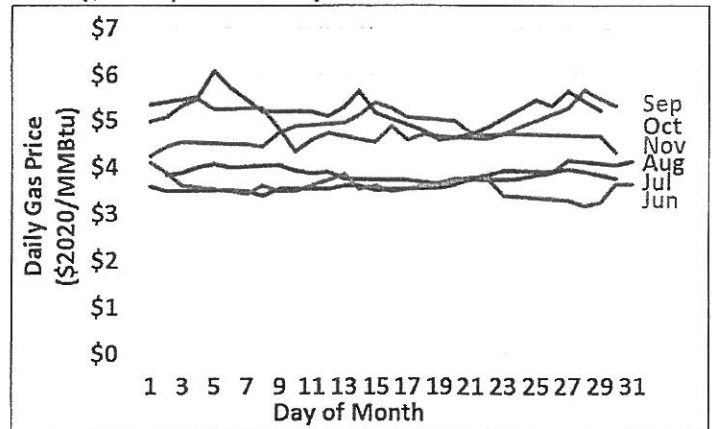
Figure 2. 2021 AESC ISO-NE capacity price forecast, 2025/2026 through 2035/2036 (\$2020/MW-day)



While capacity market risks are an important consideration, there are other market risks that MLPs should also address in their investment decisions, such as gas price volatility. U.S. gas prices vary greatly from day to day, including wide swings in their values: between June and December 2021, daily gas prices fluctuated between \$3 and \$6 per MMBtu (see Figure 3). Gas prices are also expected to increase over time,

rising from about \$2 per million Btu (MMBtu) in 2020 to over \$3.50 per MMBtu by 2034, a substantial increase to customer costs.

Figure 3. Henry Hub daily gas prices, June-December 2021 (\$2020 per MMBtu)



Climate and Environmental Risks

Existing Massachusetts law requires that statewide emissions be reduced by half (from 1990 levels) within this decade and reach net zero by 2050, setting strict limits on fossil fuel-fired capacity resources like the Peabody peaker. Massachusetts law mandates that these emission reductions be achieved in an equitable manner, accounting for the unjust distribution of existing environmental harms by providing important legal protections for Environmental Justice (EJ) communities. As the Commonwealth works to achieve its legal goals, strengthens existing legal mandates, and introduces new climate legislation, risks for fossil fuel-fired capacity will deepen and proliferate. New federal climate laws and regulations also pose potential risks to fossil fuel-fired capacity.

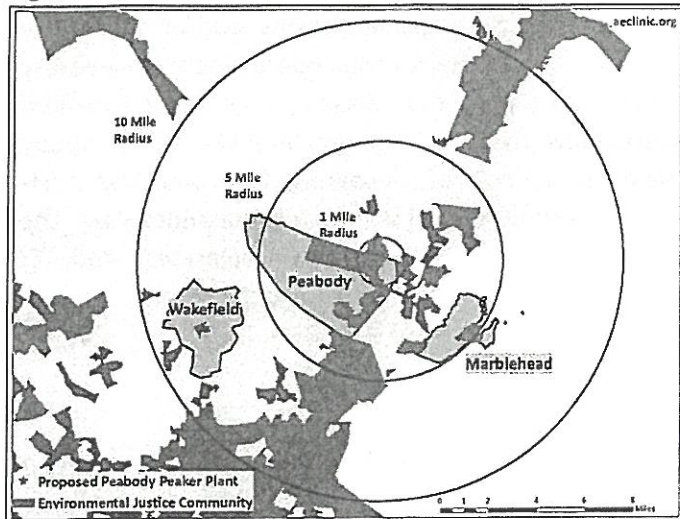
The risks of more robust protections for EJ communities as they relate to energy infrastructure directly impact the viability and operating costs of the proposed Peabody peaker. Multiple EJ communities are located in close proximity to the planned site of the Peabody peaker (see Figure 4 below).



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Figure 4. EJ communities near the Peabody peaker



In March 2021, Massachusetts passed *An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy* (Climate Roadmap Act). In addition to setting Commonwealth-wide emission reduction targets of 50 percent by 2030, 75 percent by 2040 and net zero emissions by 2050, the law also includes several important EJ provisions that:

- Codify EJ definitions into law using criteria based on income, race, and English-language proficiency;
- Require an environmental impact report “for any project that is likely to cause damage to the environment and is located within a distance of 1 mile”³ of an EJ population;
- Create new standards for public participation in the decision-making process, such as offering translation services for public meetings and making project documentation publicly available;
- Establish a new EJ council to advise the Secretary of Energy and Environmental Affairs (EEA); and
- Require DEP—by September 2022—to conduct project impact analyses that account for the cumulative impacts experienced by the community in question, using publicly solicited feedback from the community itself.

Under the Climate Roadmap Act, the EEA and its

Massachusetts Environmental Policy Act Office (MEPA)—which is responsible for environmental impact reviews—have produced updated EJ policies. The new policies expand the share of projects that will be subject to environmental review by, for example, mandating that *any* proposed project within 1 mile of an EJ population must undergo an environmental review and that the review must assess “existing unfair or inequitable environmental burden[s]”⁴ in the impacted EJ communities. The new policies also require that “existing facilities in [EJ] neighborhoods comply with state environmental, energy, and climate change rules and regulations.”⁵ The proposed Peabody peaker is located within 1 mile of EJ populations. Moving forward, there is reason to anticipate that existing EJ protections will get stronger rather than weaker: for example, the 1-mile environmental review mandate may be expanded—Figure 4 shows any EJ community located within 1, 5, and 10 miles of the proposed Peabody peaker. All MLPs with ownership stakes will be affected if the Peabody peaker cannot run because of its negative impacts on nearby EJ communities.

In Peabody, there are cumulative, inequitable impacts from other polluting, hazardous, and toxic facilities to consider. According to the U.S. Energy Information Administration, there are already two polluting electric generators in Peabody: the gas-fired 65 MW Waters River and 7 MW Rousselot plants. According to the U.S. Environmental Protection Agency’s (EPA) Toxics Release Inventory, seven facilities in Peabody release toxic chemicals that pose a threat to human health and the environment. EPA’s Environmental Justice mapping tool ranks the Peabody area in the 80 to 95th percentile (nationally) for proximity to hazardous waste sites. Even though the Peabody project has been approved without a review of environmental burdens, EEA/MEPA should on their own initiatives undertake a review assessing compliance with all state rules and regulations.

In December 2020 (prior to the adoption of Massachusetts’ Climate Roadmap Act), the EEA published a *2050 Decarbonization Roadmap* that



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identified “cost-effective and equitable strategies”⁶ that would enable the Commonwealth to reach its net zero by 2050 goal. These tactics included adding new renewable generating capacity “at a pace that is much faster than historic or current levels.”⁷ Since the adoption of the Climate Roadmap Act, the EEA is also mandated to establish specific emissions limits every five years for the electric sector.⁸ Power-sector emission limits will increase the likelihood that fossil fuel-fired assets—like the Peabody peaker—become stranded (i.e. abandoned) before the end of their useful life because they are no longer permitted to run.

There is also the potential for new, federal climate law limiting greenhouse gas emissions and/or regulatory changes at ISO-NE and/or the Federal Energy Regulatory Commission (FERC) that disadvantage fossil fuel-fired assets. New fossil fuel generation like the Peabody peaker is at risk of becoming less and less cost-effective—to the point of obsolescence—as the renewable energy transition accelerates and EJ protections continue to mature and develop.

Notes

- 1) MMWEC. June 22, 2021. “Project 2015A: Public Information Session.” Slide 18. Available at: <https://bit.ly/3LeIVzj>.
- 2) Ibid. Slide 13.
- 3) The 192nd General Court of the Commonwealth of Massachusetts. March 26, 2021. An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy. Chapter 8. Section 58. Available at: <https://malegislature.gov/Laws/SessionLaws/Acts/2021/Chapter8>.
- 4) MEPA. December 2021. “301 CMR: EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS. 301 CMR 11.00: MEPA REGULATIONS.” Available at: <https://www.mass.gov/doc/december-2021-301-cmr-1100-clean/download>. PDF page 24.
- 5) EEA. June 24, 2021. “Environmental Justice Policy of [EEA].” Article 97. P. 5-6. Available at: <https://www.mass.gov/doc/environmental-justice-policy6242021-update/download>.
- 6) EEA. December 2020. “Massachusetts 2050 Decarbonization Roadmap.” Available at: <https://www.mass.gov/doc/ma-2050-decarbonization-roadmap/download>. Cover page.
- 7) Ibid. Page 65.
- 8) Climate Roadmap Act. Section 3A.

Works Cited

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Addendum - Assessment of Potential Alternatives for Project 2015A in Peabody, Massachusetts

Prepared by Strategen Consulting

Maria Roumpani

Eliasid Animas

For Clean Energy Group.

February 2022

Summary

The Massachusetts Municipal Wholesale Electric Company (MMWEC) is proposing to build Project 2015A, a nominal 60 MW natural gas and oil peaking power plant in Peabody, Massachusetts. The purpose of the project is to respond to a need for additional electrical generating capacity in the Northeast Massachusetts zone of the ISO-NE system, especially during periods of peak demand. Nonetheless, a peaking plant is not the only technology capable of providing peak capacity to the region, cleaner alternatives include energy from renewables, energy storage technologies, and the market.

In June 2021, Strategen assessed the economics of energy storage as an alternative to Project 2015A. The report provided information about the ability of energy storage to provide peaker plants, including a short list of recent energy storage projects that have been deployed to replace fossil-fueled peakers. The analysis concluded that energy storage is not only a viable replacement option for the needed capacity, but that it is also preferable from an environmental perspective and results in significant benefits for consumers, including cost savings and environmental justice issues.¹

The purpose of this addendum is to explore yet another avenue for the replacement of project 2015A. Specifically, this analysis focuses on the purchase of capacity from the market. We find that the participating municipal light plants could fulfill their capacity obligations by buying capacity from the market at a lower cost than participating in Project 2015A.

ISO-NE Capacity Obligations & Prices

Project 2015A Capacity Obligations

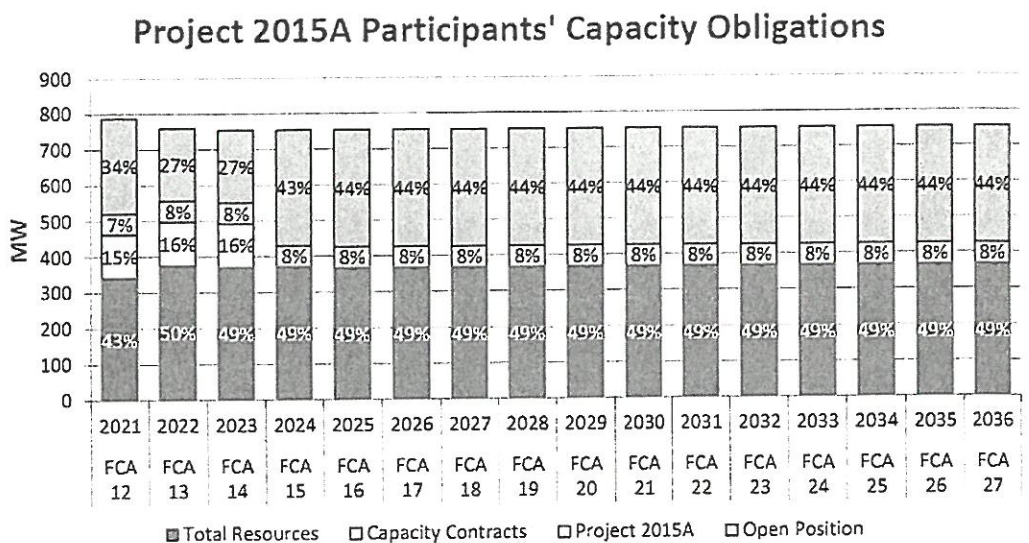
Project 2015A participants include 14 municipal light plants (MLPs), all of which, as load-serving entities are required to provide capacity to the Independent System Operator of New England (ISO-NE). The capacity provided should cover the MLP's peak load, plus a reserve margin. Project 2015A, a 60MW nominal capacity gas plant is projected to provide approximately 8% of the total Capacity Load Obligation of the Project Participants. Project 2015A has obtained a Qualified Capacity Value from ISO-NE's capacity qualification process totaling 57.97 MWs.² For the Capacity Periods after 2022, the Capacity Load Obligation of Project

¹ Strategen, 2021. [Assessment of Potential Energy Storage Alternatives for Project 2015A in Peabody, Massachusetts](#)

² DPU 21-29, Information Request [DPU 1-7](#)

2015A participants is expected to be 754.99MW. Thus, Project 2015A is expected to provide 7.68% of the participants' capacity load obligation as presented in the graph below.

Figure 1: Project 2015A Participants' Capacity Obligations³



Capacity Market in ISO-NE

Capacity prices in Massachusetts are set in the ISO-NE Forward Capacity Market (FCM), a long-term market that ensures resource adequacy, both zonally and for the ISO-NE system as a whole. The market is designed to promote economic investment in capacity resources when and where they are needed. Capacity assets that may participate in the FCM include new and existing resources, comprised of generating resources, imports, demand response resources, and energy efficiency resources.

To purchase sufficient capacity to satisfy the region's future resource adequacy needs and allow enough time to construct new capacity resources, Forward Capacity Auctions (FCAs) are held each year approximately three years in advance of the 12-month Capacity Commitment Period during which time the resources that clear in an FCA must meet their assumed obligation. Resources compete in the auctions to obtain a commitment to supply capacity in exchange for a market-priced capacity payment. Those that clear the auction receive a monthly capacity payment in that future year in exchange for their commitment to provide power or curtail demand when called upon by the ISO. The payments are in addition to the revenues those resources are eligible to receive in the ISO-NE energy and ancillary services and other markets.

New England's most recent annual capacity auction (FCA-15) for power system resources concluded in February 2021 with sufficient resources to meet peak demand in the 2024-2025 period. Clearing prices ranged from \$2.48/kW-month in Northern New England to \$3.98/kW-month in Southeast New England. FCA-15 indicates the first year that almost 600 MW of battery storage cleared the NE market including two new standalone projects: a 150 MW/300 MWh system near a cranberry bog south of Boston, Massachusetts and

³ DPU 21-29, Joint Direct Testimony of Ronald C. Decurzio and Glenn R. Trueira, [Attachment 6](#)

a 175 MW/350 MWh battery in Gorham, Maine. The auction also included a significant increase in load management resources, including almost 170MW of new demand resources.

Analysis

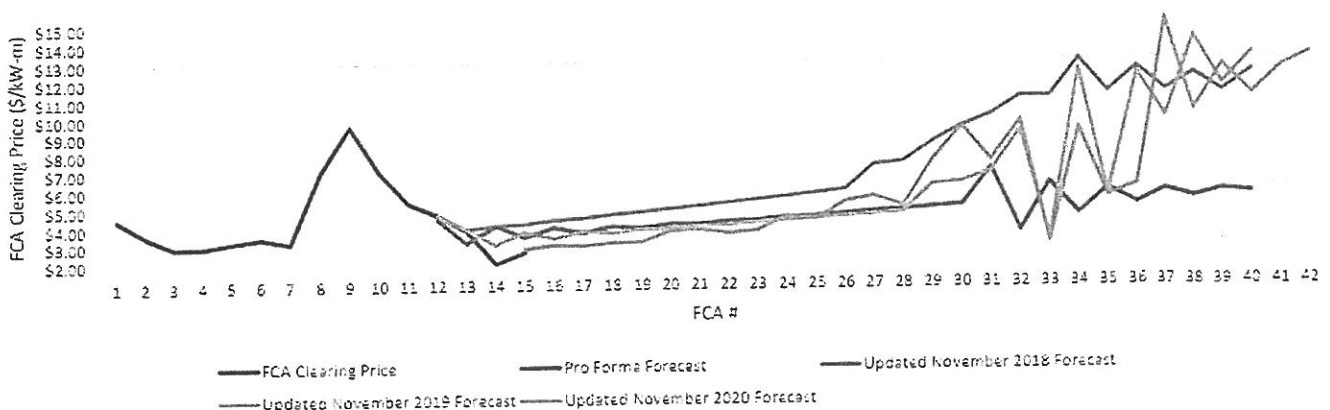
In the original report, we compared Project 2015A with the alternative of installing energy storage and found that storage could outperform Project 2015A on a net cost basis, while also delivering environmental benefits. In this addendum, we explore the option of buying capacity from the market instead of participating in the 2015A project. For this, we compare the cost of constructing the gas unit versus the option of buying capacity from the market during the next ten years.

Developing price forecasts for future FCAs is a difficult exercise that includes several caveats. Market clearing prices are determined by changes in supply and demand. Supply changes include additions of battery storage, solar, wind, and natural gas-fired power plants, as well as retirements of older thermal generation plants and while clear trends exist for such changes, predicting unit additions and retirements on annual basis cannot be accurate. Policy changes or changes in participation rules can also significantly affect clearing prices.

However, MWECC has already provided a forecast (updated in November 2020) conducted by IHS Markit. We use this forecast to inform our analysis.

Figure 2: FCA Clearing Prices - IHS Markit Forecast⁴

FCA Capacity Clearing Prices & Forecasted FCA Capacity Clearing Prices provided by IHS Markit
February 24, 2021



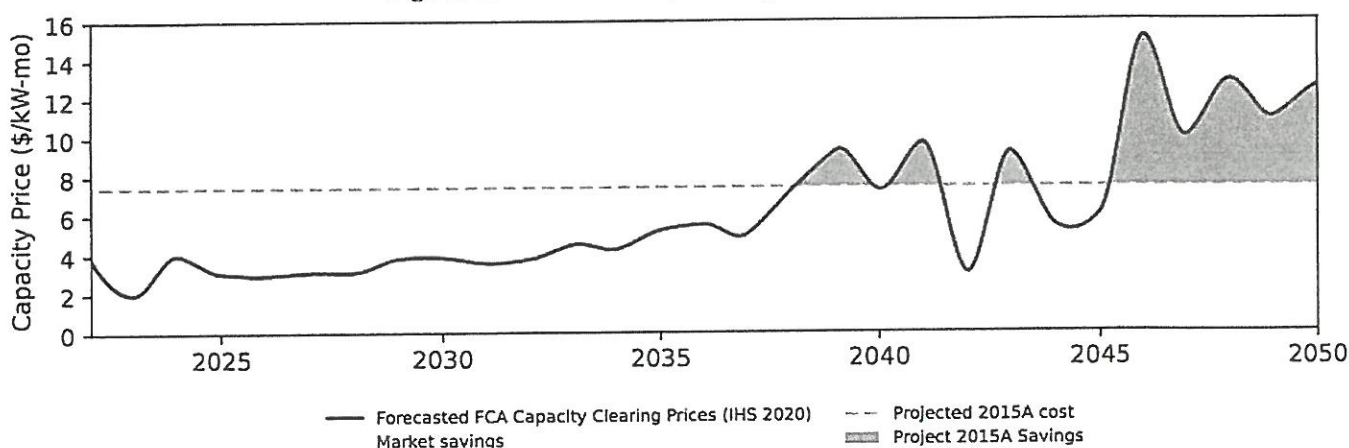
In this analysis, we compare the cost of \$84.3 million⁵ for constructing Project 2015A to the cost of buying from the market. Based on a useful life of 30 years, and a discount rate of 4.5%, we estimate the annualized payment for Project 2015A is approximately \$5.175 million per year.

⁴ DPU 21-29, Joint Direct Testimony of Ronald C. Decurzio and Glenn R. Trueira, [Attachment 5](#)

⁵ DPU 21-29, Joint Direct Testimony of Ronald C. Decurzio and Glenn R. Trueira, [Attachment 3](#)

On the other hand, fulfilling a 57.97MW capacity need from the FCA would require a payment of approximately \$1.4million in 2023 and \$3.5 million in 2037, resulting in significant savings for the participating MLPs. In 15 years, expected savings for the MLP amount to over \$29 million which approximately cover the termination costs for Project 2015A. Continued operations of Project 2015A post-2036 and up to 2050 would result in savings of approximately \$23.5 million, as forecasted capacity prices increase in the last decade. The graph below shows that relying on the market results in savings during (approximately) the first 15 years, while there might be some additional costs in later years. It is important to recognize that projected capacity prices in those later years are highly uncertain. However, in reality, those high capacity prices might never materialize. MLPs will be paying for an expensive capacity resource having traded off significant short term costs for (highly uncertain) long term gains.

Figure 3: FCA cost versus Project 2015A cost



Project 2015A although assigned a 30-year useful life, will not be able to operate in 2050 and beyond without conversion or other costs to reduce its environmental impact. Thus, our finding that MLPs could purchase capacity from the market at a lower cost can be further emphasized if we assume a shorter and more realistic useful life for Project 2015A. Furthermore, withdrawing from Project 2015A could protect MLPs from budget overruns increasing their potential cost savings.

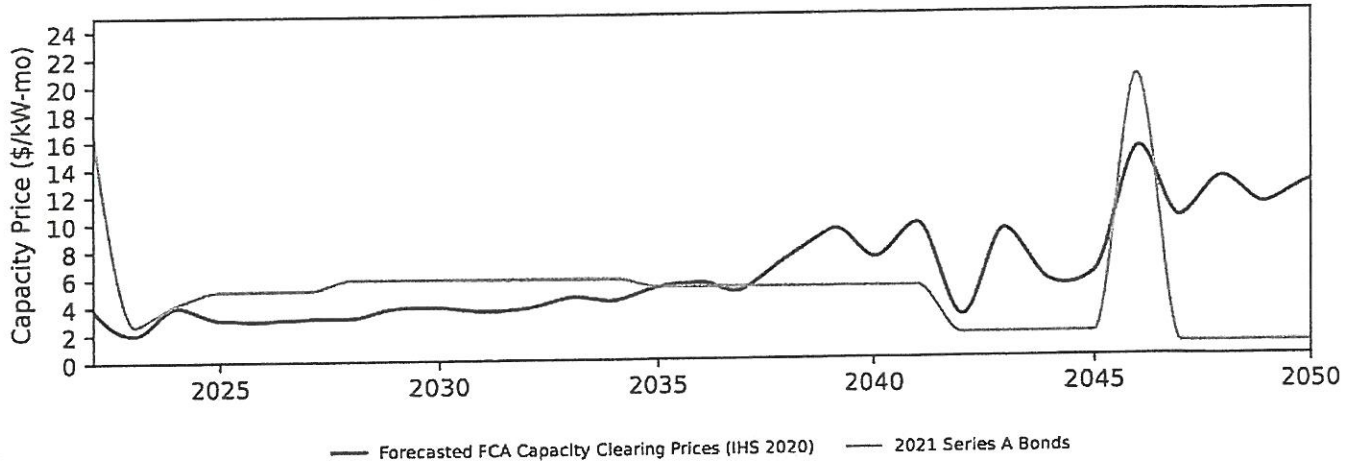
2021A Bonds

Project 2015A could be financed through the issuance of the Series 2021A Bonds.⁶ Morgan Stanley & Co. LLC will act as the Underwriter for the Series 2021A Bonds. The Underwriter has agreed to purchase the Series 2021A Bonds from MMWEC at a purchase price of \$73,218,857.73 which is the principal amount of the Series 2021A Bonds, less an Underwriter's discount of \$285,642.42, plus an original issue premium of \$12,654,500.15. This means that MMWEC will be receiving approximately \$73 million. Additional funds of \$10 million from Peabody Municipal Light Plant's (PMPL) capital contribution will be used to pay the costs of acquisition and construction. Even under the assumption that no additional funds will be needed, the issued bonds come at a total net present value cost of approximately \$60 million plus the use of PMPL's \$10 million contribution, which again exceeds the cost of buying from the market (even under the most Project 2015A-

⁶ [Project 2015A Bonding](#)

favorable scenario of high-capacity prices, no budget overruns, and no incremental capital expenses for a 30-year life, despite the state's 2050 commitment). The graph below shows the cost of buying from the market versus the payments MMWEC will have to make including principal amounts and interest (and PMPL's capital contribution in 2022).

Figure 4: FCA cost versus Bond Payments



Operating Revenues and Costs

Our analysis does not include energy costs, primarily because Project 2015 is projected to be a capacity resource. According to MMWEC, Project 2015A is a capacity resource, not an energy resource, as it is expected to run approximately just 239 hours per year, or 2.72% of the time.⁷ Thus, the comparison focuses on the capital cost of constructing Project 2015A. However, on a net cost basis, we would also need to account for revenue from the participation of Project 2015A in markets other than capacity, as well as the additional costs of operating the unit. ISO-NE engaged Concentric Energy Advisors (CEA) to conduct an independent analysis of the cost of new entry values for different technologies, which can be used to provide estimates of those parameters.^{8,9} The CEA analysis finds that a simple cycle unit could have additional revenues from market participation as well as significant operating costs. Additional revenues and operating costs are projected to be approximately the same and as such do not have an impact on the findings of this report.¹⁰

⁷ Project 2015A [Frequently Asked Questions](#), Slide 21

⁸ Concentric Energy Advisors, Mott MacDonald, [ISO-NE Net CONE and ORTP Analysis](#), September 2020

⁹ The CEA analysis uses a number of slightly different parameters: for example, different projected capacity factors for a simple cycle unit. Still, the projections can be used as rough estimates of additional revenues and costs. Project 2015A with a lower projected capacity factor is expected to result in even lower revenues (and consequently higher net costs).

¹⁰ Table 35: Summary of Revenue Offsets for Candidate Reference Units (2025\$/kW-mo) projects pay for performance revenues of \$0.843/kW-mo, scarcity revenues of \$1.082/kW-mo, Energy & Ancillary Services (E&AS) revenues of \$2.548/kW-mo for units with a capacity factor of 4-5%, and ISO-NE Energy Security Improvements Revenues of \$0.447/kW-mo. Scaling down the EA&S from the CEA model (https://www.iso-ne.com/static-assets/documents/2020/11/a4_a_i_cone_orpt_dispatch_models.zip) to Project 2015A's projected capacity factor results in \$1.60/kW-mo E&AS revenue and total revenue of \$3.98/kW-mo (all values expressed in 2025\$). Table 18: Total Fixed O&M Components projects fixed costs of \$47.95/kW-yr (\$4/kW-mo). Thus, project revenues and operating costs are projected to be approximately the same and as such do not change the findings of this report.

MMWEC has provided a graph similar to Figure 3 with a significantly lower cost associated with the construction and operation of Project 2015A.¹¹ The MMWEC graph includes potential revenues but fails to explain whether operating costs are also included. No information is provided about the cost estimate. Furthermore, it is unclear whether the time value of money is included in the analysis.¹²

Our analysis does not include environmental benefits, as when capacity or energy is bought from the market, the replacement resource for Project 2015A cannot be clearly defined. However, with a net zero target for 2050, we can conclude that the energy mix in the market will have a decreasing emissions rate and as such has the potential of environmental benefits compared to the proposed gas unit.

Capacity Price Sensitivity

As previously stated, forecasting capacity prices for the next 30 years is very challenging, however, it is a crucial input in the comparison of Project 2015A versus the alternative of fulfilling capacity obligations through the capacity market. For this reason, we provide an additional data point to inform our findings.

ISO-NE developed the 2021 Avoided Energy Supply Component (AESC) Study (AESC 2021). The study was sponsored by a group representing all of the major electric and gas utilities in New England as well as efficiency program administrators, energy offices, regulators, and advocates. AESC 2021 contains cost streams of marginal energy supply components that can be avoided in future years due to reductions in the use of electricity, natural gas, and other fuels as a result of program-based energy efficiency or other demand-side measures across all six New England states.¹³ To determine the values of energy efficiency and other demand-side measures, avoided costs, including capacity costs, are calculated and provided for each New England state in four hypothetical futures (counterfactuals) in which the New England program administrators do not install any new demand-side measures in 2021 or later years.

These hypothetical futures are not forecasts. Each of them represents a future that lacks some amount of anticipated demand-side measures. Furthermore, as is true for all scenarios, actual prices in the future will be different than the long-term prices calculated in the AESC study since true prices will be subject to short-term variations in energy markets that are not known at this point in time.

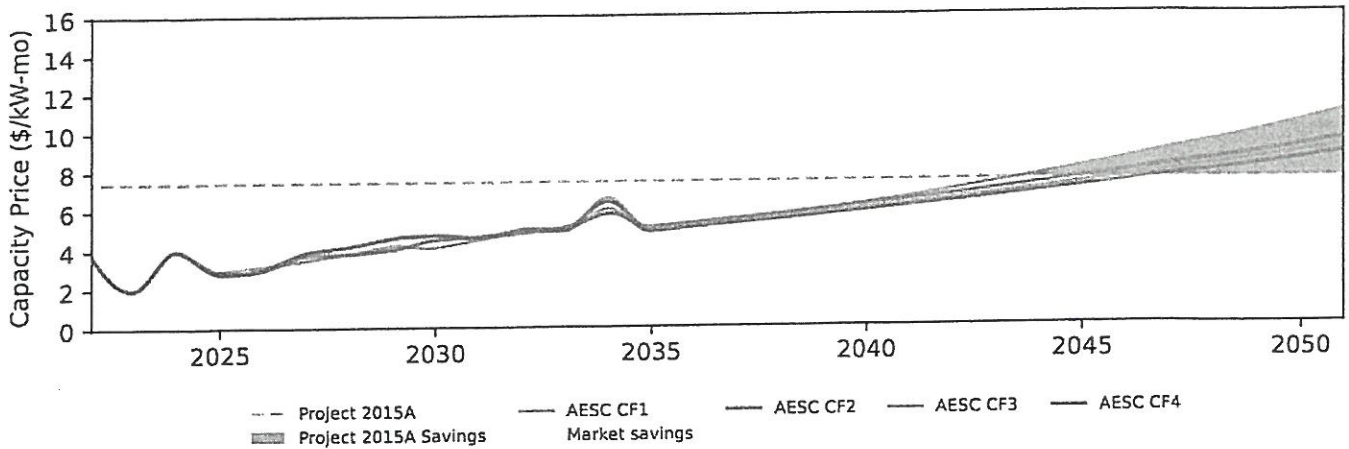
Based on capacity prices of counterfactual #1, which represents a future in which program administrators install no new energy efficiency, building electrification, or active demand management (demand response and energy storage) resources in 2021 or later years (and as such is the counterfactual with the highest capacity prices), MLPs would significantly benefit from withdrawing from Project 2015A. Specifically, capacity prices under counterfactual #1 result in potential savings approximately equal to the project's termination fees within the next 20 years. Savings are very similar under all counterfactuals.

¹¹ Project 2015A [Frequently Asked Questions](#), Slide 17

¹² For example, the projected \$84 million cost financed through 30-years 4-5% bonds (DPU 21-29, [Information Request DPU 1-13](#)) with equal annual principal amounts would result in undiscounted costs of over \$140 million (an estimate close to the cost outlined by MMWEC in the graph). This estimate does not include any operating and maintenance, incremental capital, or other costs, and as such cannot be used to inform a cost comparison when revenues are included.

¹³ [Avoided Energy Supply Components in New England: 2021 Report](#)

Figure 5: Project 2015A cost versus AAESC counterfactuals



Since those futures do not account for portions of the expected demand-side resources, actual capacity prices could be lower. Consequently, savings from buying from the market (versus constructing 2015A) could be even higher.

Conclusion

In a June 2021 report, Assessment of Potential Energy Storage Alternatives for Project 2015A in Peabody, Massachusetts, Project 2015A was compared against the alternative of energy storage and was found to be more expensive and environmentally harmful. In this addendum, we compare the cost of constructing the unit with buying capacity from the market. We find that participating MLPs stand to benefit from significant cost savings if they withdrew from the Project and purchased capacity from the market.

May 13, 2022

South Hadley Planning Board
Town Hall
116 Main Street
South Hadley, MA 01075

Reference: EInk, 7 Gaylord Street, Special Permit

Dear Chair Hutchison:

Please accept this letter of support from the South Hadley Redevelopment Authority for EInk's Special Permit application for the expansion of their manufacturing facility located at 7 Gaylord Street. In 2019, the South Hadley Falls Urban Redevelopment and Renewal Plan (URRP) was adopted by the Town of South Hadley and approved by the Massachusetts Department of Housing and Community Development. The purpose of the plan is to set goals, objectives and actions to achieve a vibrant Falls neighborhood. Within the plan, numerous public and privately owned properties are identified and recognized for their current condition and in relevance to their preferred redevelopment and/or future use as it relates to the stated redevelopment goals for focus areas with the Falls neighborhood.

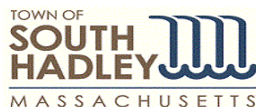
EInk's property and existing manufacturing facility are recognized throughout the plan, and specifically within the Gaylord Area focus area. The URRP identifies the site as a proposed area for office/industrial rehabilitation, within the Industrial B zoning district, and an area recommend for future land uses to remain as industrial. In addition, the URRP calls for retention of office and industrial users on Gaylord Street.

For these reasons, the Redevelopment Authority believes that EInk's proposed redevelopment of the former Rexam Graphics blighted admin building with an expanded manufacturing facility is consistent with the URRP. Currently, the project anticipates the creation of 16 new jobs and possibly more over time. EInk's investment in this property has been an overall positive impact on the neighborhood and community through removal of blight, improvement in the streetscape, creation of jobs, and contribution to tax revenues in South Hadley. The Redevelopment Authority therefore, supports this Special Permit application.

Sincerely,

A handwritten signature in blue ink, which appears to read "Diane LaRoche".

Frank DeToma, Chair
Diane LaRoche
Tony Judge
Helen Fantini
Michelle Theroux



Anne Capra <acapra@southhadleyma.gov>

E Ink - Harvey Hollway's personal perspective

1 message

Mary Hollway <peteynyg@gmail.com>
To: acapra@southhadleyma.gov

Fri, May 13, 2022 at 2:08 PM

To Whom it May Concern,

I am Harvey L. Hollway. My wife and I have been South Hadley residents for many years and currently reside on Bardwell Street. I recently retired from E Ink in December of 2021 and would like share my perspective of what a great company they are to be part of the team.

I was born in Holyoke and moved to South Hadley in 1977 and prior to retiring worked for the many companies, in my 45 year working career, that have worked out of the Gaylord Street property.

The first company was the crossover from Plastic Coating to Scotts Graphics where I was a coating machine operator. James River took over and Intelecoat was the next company that employed me. The three company's were good to work for and they were decent to their employees. Then there was GTI and then investment groups took over the company at which point the success of the company seemed to decline. This new company did not invest back into the company and it began to show as different divisions of the complex started shutting down.

I got into the research and development complex next to the administration building. We had some interesting technologies pursue our help for their products. One technology was for phone towers where we coated pure silver.

Then came this company from eastern Mass and we worked together at R&D to see if we could coat this crazy technology, electric ink. We worked together for about a year and then E Inks R&D personnel were walking around with smiles on their faces. They said we succeeded and they were going to stay. They hired me in 2009 and the company started to grow. I worked for E Ink for 13 years and retired in December of 2021. E Ink was the best company I have worked for in my life. They are very devoted to their employees and the surrounding community. Safety is #1 at E Ink. They put nobody in harms way and their record speaks for itself.

Being a local resident of the same neighborhood where E Ink is located, I always enjoyed walking to work with a smile on my face until I turned 70 and thought it was time to retire. I still feel I am part of the E Ink family because they include me in their major functions (i.e. picnics and company functions).

With E Ink's plan to expand within their South Hadley facility this will open up more jobs for the community. Having worked for this company for 13 years, I believe their safety standards and requirements will not be compromised with this growth. E Ink has a very safe atmosphere and the new employees will be taken care of .

I hope that my perspective will be taken into consideration and if you should need to discuss this further please feel free to email me.

Thank you,
Harvey Hollway

Re: Planning board

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Wed, May 18, 2022 at 10:21 AM

Dear Ms. Sampson,

I will add this email to the Planning Board correspondence however this is a matter for the Board of Health and the Building Commissioner. Both are copied on this email and I recommend you contact them directly.

Best,
Anne Capra

On Mon, May 16, 2022 at 8:35 PM Sharon Sampson <buddyfortreats@yahoo.com> wrote:

Thank you for your response. I live at 6 Los Angeles St in South Hadley. I have been dealing with mice infestation since January. I've had 2 exterminators come to my home and both said it's coming from the abandoned house behind me which is located at 17 Hollywood St. This morning I sent the bills to the Board of Health and the Town Manager. I'm thinking of sending it to the owner of the house Bonnie Ben Yee-Wae. The exterminator company from Agawam will be coming to my home for the next 15 months. 17 Hollywood St has has been abandoned for 2 years. Please put this on the agenda for the next meeting, I would appreciate a response about this stressful situation that I'm dealing with.

Thank You,
Sharon Sampson

Sent from my iPad

--
Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
(413) 538-5017 x6128
acapra@southhadleyma.gov

Fwd: FW: E Ink Expansion

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Wed, May 18, 2022 at 10:22 AM

From: outlook_E31ABDC2EEE62A61@outlook.com
Sent: Tuesday, May 10, 2022 7:50 AM
To: delphkenne
Subject: E Ink Expansion

Dear Anne,

I am a former E Ink employee for 10 years and employee of the previous a owners for 30, I am also a resident of South Hadley for as long. E Ink Safety is a high priority and has a excellent safety program. The employees there have been working with solvents on a daily basis, many of them for as many year as me and are very knowledgeable. E Ink is a excellent company with great paying jobs and a real plus for the town. This is great addition to the company and needed for E Ink to grow. I have reviewed the plans which have been approved by the state and the fire dept. and have no concerns with this new building and tank farm giving them my full support in moving forward with this project.

Thank You,

Kenneth Delphia

46 Bolton St.

South Hadley, Ma.

01075

--
Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
(413) 538-5017 x6128
acapra@southhadleyma.gov

Fwd: E Ink S.H. Facility Expansion

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Wed, May 18, 2022 at 10:23 AM

----- Forwarded message -----

From: **Edward Clare** <chocoec@aol.com>
Date: Mon, May 16, 2022 at 7:45 PM
Subject: E Ink S.H. Facility Expansion
To: acapra@southhadleyma.gov <acapra@southhadleyma.gov>

Good Evening Ann,

My name is Edward Clare. I have lived, and worked in South Hadley my entire life. My wife JoAnn, and her family have also lived, and worked here their entire lives. Our children were raised and educated in our public schools, and I am hopeful they too will also live long healthy lives in South Hadley. I am trying to convey that this is our home, As such we should look out for what is ours, and embrace all resources that improve our homes, and our towns future.

In reference to the EInk Corporation plans to expand their S.H. facility, and the associated special-permitting, I would like to offer some insight to consider ahead of any decisions, or votes. My occupation as a Chemical Process Technician, with decades of practical experience, should be considered at this time. Over the span of my career (40yrs.) I have had relationships with many major corporations dealing with dangerous chemicals in a safe manner. Many of these companies were at the Fortune - 500 level, and larger entities than E Ink. However, not one of these corporate giants were more aware, or in tune with "Safety" than E Ink!

Currently I am employed by E Ink at the South Hadley facility. This company is fantastic in so many ways, and is hard to compare with others I have been associated with. E Ink is laser-focused on safety for the people on site, the environment, and the neighborhood and residents. The safety training programs are extensive, comprehensive, documented, and finally verified. The "on-line" monthly topics are assigned, then verified monthly by the Safety Professionals. Specific (8) hour training courses around Emergency Response, & Chemical Handling are Certified by outside experts in the field, (Tighe & Bond). The E Ink safety dept., along with Dept. managers also hold monthly employee safety meetings with an agenda of topics for discussion, or review. Any issue that arises concerning safety is handled immediately, at the point of notification. There are written plans in place for any possible emergency, whether it be accidental, or of a natural origin. These plans are available on-site, for quick reference.

I would like to state that in all my observations, interactions, and decades of process experiences, never seen a more conscientious, and safety orientated operation. "The Emphasis on Safety is Constant". E Ink has a mind-set on Safety that starts at the top of the organization and is deliberately distributed to everyone that interacts with this organization. Their are protocols for every aspect of the business. Visitors, deliveries, services, etc. are all greeted by a highly professional security group, and vetted. Any concern for safety with E Ink operations, or the dedication to a safe South Hadley community are UNFOUNDED. They have and continue to do their "due diligence", as should we (S.H.), and the state of Mass.. Any failure to fully understand, and appreciate the expansion plan E Ink has brought forward to you, will come at a significant loss to our South Hadley.

Certainly all previous efforts to date, along with associated costs to improve the general area, have already benefitted the neighborhood, and South Hadley. Drive by the E Ink facility on Gaylord and see for yourself the type of organization E Ink is !!! "DO JUDGE THIS BOOK BY THE COVER". The manufacturing plant, and warehouse areas are as organized, and pristine on the inside, as the company's external appearance. Once again, this makes the operation more safe.

Allowing the proposed expansion, and required "special permitting" to move forward, will also help revitalize the area between Gaylord, and Lamb Sts.. part of the Big-Picture for the Falls area.

In summary, the underlying theme of this Email communication is that E Ink Corp. excels in all aspects of their business. They do not plan to fail by overlooking safety regulations, or under funding their projects. The truth is : Employees are treated as family, the Operations are Certified by a World Class Standards (ISO 9001), the product lines are cutting-edge technology originated in Cambridge at Mass Inst. Technology (M.I.T.). E Ink has a progressive dedication to the environment, and is a very forward looking company.

The future of E Ink cannot be over-estimated, and South Hadley should want to continue to reap all the benefits associated with that FACT. This community partnership should be nurtured.

Thank you for your time, and consideration, is it possible that this could be read into the meeting minutes?

Edward V. Clare

Resident Feedback - E Ink Expansion

Matt McLaughlin <mattmc1013@gmail.com>
To: SHPlanBoard@southhadleyma.gov

Tue, May 17, 2022 at 9:01 PM

Good Evening,

I recently discovered through the town facebook page that there was some discussion on E Ink expanding in SH, including some concern from different folks on the storage of Toluene.

I have always been fascinated that a tech company like E Ink, something you'd expect to be in California with the likes of Apple, is located right here in South Hadley. I feel like many residents don't even realize that every Kindle out there in the world originated in South Hadley, and as a Manufacturing Engineer always interested in the latest tech, I think we're really fortunate to have them located here.

Given my background in manufacturing, I felt as though I could give some relevant feedback on this expansion. I've worked in various manufacturing companies for the last 10 years, and have worked with and encountered plenty of hazardous chemicals on a daily basis. Modern manufacturing companies undergo a massive amount of evaluation on safety issues with risk analysis and Process Failure Modes and Effects Analysis (PFMEA) There are also countless options available today for safeguarding workers, the environment, and the surrounding areas. Some of these include automated actuating safety valves, high sensitivity sensors, and communication systems with these sensors to alert operators immediately to system issues. I feel that many people who do not work in manufacturing can easily get stuck in the "big scary chemicals" discussion, and are not aware that not only are there many state and federal regulations in place for the handling and storage of chemicals safely, but often there are redundant safeties in place in addition to primary safety in case it fails. These types of safety systems are extremely robust and well thought out, and the chance of a serious system failure that would affect the surrounding area is exceedingly rare.

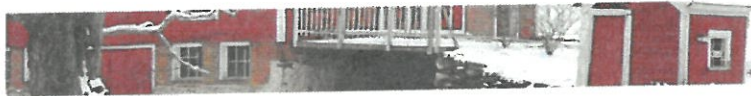
Given the fact that a core part of E Ink's business model involves offering a sustainable alternative to paper, I'd imagine they definitely have a vested interest in ensuring they are protecting the environment during their operation, and taking these safety measures very seriously.

So, if E Ink is willing to work with the town to put all the necessary safeguards in place to protect both the environment and the surrounding area, I see no logical reason to deny the request. I am in favor of this expansion, and hope E Ink continues to grow, hire, and innovate in our town!

Matt McLaughlin
18 Ridge Rd. South Hadley, MA

PS, I have also attached some of the discussion that was on the town facebook group. I'm not sure if you can use that or not, but quite a few people don't seem to have an issue with it, and are likely not taking the time to call or write in. If anyone on the board is part of this group, they can also find these discussions and look for themselves by searching "Toluene" within the group search.

 **SH Facebook Community Page - Toluene.pdf**
699K



South Hadley & Granby Community Page
Private group · 51k members

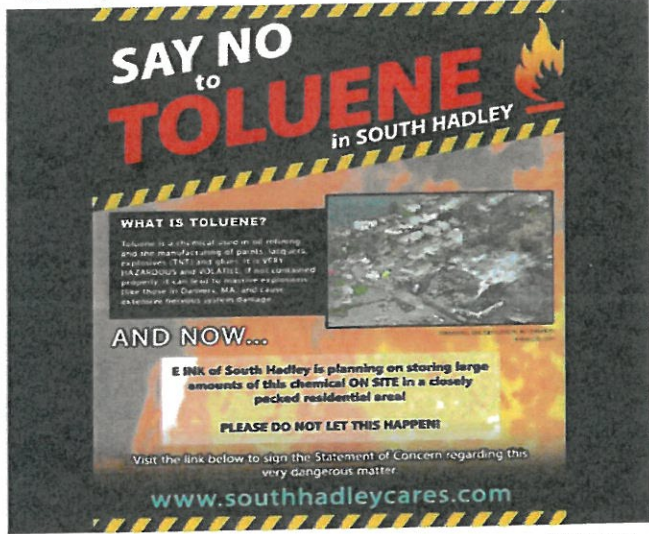
About Discussion Features Topics Members Events News Film Groups

April 8 at 1:48 AM

Not sure if anyone knows about this?

www.southhadleycares.com

<https://www.gazettetenet.com/E-ink-details-expansion-plans...>



20

82 Comments



I've worked as a chemist in the coatings and plating industries for the last 7 years. Solvents such as toluene are essential for manufacturing and producing many important products that people use on a daily basis. I've worked with hazardous chemicals for my entire career and fully understand the occupational and environmental risks associated with them. To completely dismiss a potential business opportunity because of "bad scary chemicals" is absolutely silly. I'm not saying toluene isn't hazardous, but with all of the governmental regulations regarding the usage and storage of solvents, any company worth their salt will be more than appropriately prepared to handle and use such materials. OSHA and the EPA closely monitor and regulate the amounts of these chemicals released into the environment, and if E-INK has approval from these agencies, everything will be fine. People need to relax and stop being terrified of whatever the news or Facebook tells them to be. Do your research.

17

Like Reply 3w



we know you're just into the idea of protecting the status quo

Like Reply 3w Edited

and the status quo is perfectly reasonable as it stands. These chemicals are safe to use when the proper precautions are taken

Like Reply 3w

6



the real chemical I would be concerned with is dihydrogen monoxide. 100% of the people exposed to that chemical die

Like Reply 3w

3



yeah. I know all about chemicals and neurotoxic agents. Some kill you flat out and some only give you a slow painful cancerous death. The point is, neither are safe. And disasters caused by mankind happen on a far too frequent basis these days

Like Reply 3w Edited

4



I've heard scary reports that sometimes if there's too much dihydrogen monoxide in the atmosphere it can accumulate and actually fall from the sky!

Like Reply 3w

2

Regardless of what other chemicals are being stored in residential areas without the general populous knowing, we KNOW about this BEFOREHAND and can do something about it! E Ink doesn't have to shut down. There are safer alternatives to this volatile chemical. All it takes is one person to be off their game for a split second or a faulty wire to spark and it's all over. Ive heard of Toluene catching fire just from the friction of being poured into a barrel. This just invites unneeded problems.

Like Reply 3w Edited

2

Also the key word is "planning." They haven't started storing the Toluene farm. As far as we know they have no experience with it. And it isn't just a barrel or two. A "farm" is going to be expansive.

Like Reply 3w

1

I agree with most of the comments already made here. I am all for environmental protection and public safety, but this seems to be a well run company who is definitely large enough not to be swimming under the radar of appropriate regulations. If their facility has to be located somewhere else, it will still be in someone else's backyard.

There is always an inherent risk involved with chemical storage that we have to accept as a part of most industrial and non industrial processes. This is just one of those risks. There are more out there than I believe most people realize.

Like Reply 3w Edited

6

They seem like a solid company. There is many business's that handle toxic chemicals safely and reliably near residential areas. My friend works as the environmental safety officer at his company and ensures all chemicals are stored and used properly.

Like Reply 3w

4

The folk at e-ink run a tight operation, and need this material for their innovative technology processes. It should be regulated by officials for sure, and contingency plans should be put in place. Otherwise, perhaps we should ship the jobs and tax...
[See more](#)

Like Reply 3w

16

people have no clue about the domino effect this will have on the towns economy. They just hear hazardous and make uninformed decisions.

Like Reply 3w

4

everyone runs a "tight operation" until something goes wrong.

Like Reply 3w

4

Does E Ink have a history of mishandling volatile and dangerous materials?

Pretty sure it's more risky to drive your car every day than it is to have this company house this substance.

Like Reply 3w

3

Your car wouldn't take out a quarter of the town if it broke down.

Like Reply 3w

you couldn't possibly know the extent of damage if there was an issue at the company.

You could cause an 80 car pile up, killing 6 people tho.

For reference, the Danvers explosion (the one being referenced) damaged buildings within 1/4 mile (90 total, ~25 a total loss), and there were no serious injuries or death.

Additionally, there was no risk of toxic fumes getting into the air afterwards and water levels tested normal.

I understand it is scary to think about, but the likelihood is so low. There are vast safety regulations for the storage of chemicals.

Like Reply 3w

2



So, what is the group assuming, that e ink is just gonna leave this chemical in unattended barrels out side?

Like Reply 3w

4



No. What at least I see is an invitation for large scale disaster in a very populated area. While regulations are all well and good, humans and containment equipment are not perfect. Companies have also been known to cut corners. Not saying they will BUT ... I know the few who stand against this will be labelled as worrywarts, but those who side with it or don't care are free to purchase a residence next door to E Ink if they feel safe.

This world doesn't need anymore disasters if they could have been prevented. Accidents can and do happen. But sometimes they get an open invitation. People don't always think ahead.

Not only is Toluene explosive, but it is a nerve agent that can cause permanent damage. This stuff gets airborne, the wind will take it for miles. You breathe it in you can get migraines, nausea, dizziness, seizures, loss of function in brain and body...and that can affect you for the rest of your life if exposed to enough. Anyone ever experienced a migraine or typical headache? Not fun. And that usually just last a day.

So people will get mad when they read this. What they should realize is that people are looking out for their neighbors.

Like Reply 3w



are you anti accident? Seems like you're fine with accidents as long as it's not in your town. Maybe the poor in Holyoke are a better fit, no?

Like Reply 3w

1



If I could tackle all the problems in the world, I would. But this is the issue at hand and who better to have a say than residents/ those affected? My input on an issue for another town or city would not be looked upon the same. However if ... See more

Like Reply 3w

1



by pressing growth you're starting the strangulation process of an existing business

Like Reply 3w



Wait til you find out where the gas at the pumps is stored

Like Reply 3w

11



What's the problem if it's being stored and handled properly?

Like Reply 3w

6



Does anyone have a problem with an organization with no one taking credit for its website?

Like Reply 3w

5



yup. Could very easily be a competitor trying to stir the pot among locals to get competitive advantage. It's plausible that this is corporate espionage.

Like Reply 3w

2



... See more



GAZETTENET.COM

E Ink Corp. details expansion plans in South Hadley

Like Reply 3w



Not doubting the fact of what they're doing. I'm not even saying it's a good idea. I'm skeptical websites with no one backing them.

Like Reply 3w



[Redacted]

There are the same if not worse in every household without any federal safety regulations but you are concerned when there are strict regulations, do you understand how insane that is...

...

Like Reply 3w



[Redacted]

Oh no! Not again. We had these problems with James River Graphics years ago.



Like Reply 3w



[Redacted]

I wonder why the website in the link above is owned by a finance guy out of south Windsor ct. Seems fishy.



Like Reply 3w

Before the South Hadley Planning Board

Re: E Ink Corporation, Application for Special Permit

**Comments and References to Accompany Oral Presentation, Submitted by
Robert Pleasure, 10 Jewett Lane, South Hadley, MA 01075**

May 18, 2022

***PLEASE NOTE: HYPERLINKS MAY BE REACHED BY A SIMPLE CLICK OR BY A
CONTROL/CLICK COMMAND***

A. TWO REFERENCES FROM THE SOUTH HADLEY MASTER PLAN, 2020

1. "South Hadley Falls

- Preserve the existing character of the neighborhood core.
- Increase the number of small businesses such as retail shops, small grocery stores or farmer's market, ice cream shops, cafés, or restaurants near the neighborhood core.
- Provide opportunities for an art gallery and artist studios.
- Develop affordable mixed-use housing.
- Expand light industrial uses around the neighborhood periphery."

South Hadley Master Plan 2020, page 12.

2. OBJECTIVE 1-2: Focus on economic development that provides well-paying jobs and attracts companies (including light manufacturing) that value South Hadley as a place for their employees to live and work.

South Hadley Master Plan, 2020, page 28.

[2020-Master-Plan-Update---Adopted-March-28-2022 \(southhadley.org\)](#)

B. TWO REFERENCES ON HAZARDS OF THERMAL OXIDIZERS

1. [Thermal oxidiser fire and explosion hazard \(icheme.org\)](http://icheme.org)
2. [Flashbacks From Thermal Oxidizers and How Redesign Prevents Them \(rccostello.com\)](http://rccostello.com)

C. SEVERAL DEFINITIONS OF “LIGHT INDUSTRIAL”

[Light industrial Definition | Law Insider](#)

D. FEDERAL NOTICE ON LIMITATIONS ON THE DISTRIBUTION OF CERTAIN DATA AND ACCESS OPPORTUNITIES TO PUBLIC OFFICIALS AND THEIR AUTHORIZED REPRESENTATIVES

1. [40 CFR Part 1400 - DISTRIBUTION OF OFF-SITE CONSEQUENCE ANALYSIS INFORMATION | CFR | US Law | LII / Legal Information Institute \(cornell.edu\)](#)
2. [SECURITY NOTICE To Federal, State and Local Officials Receiving Access to the Risk Management Program's Off-site Consequence Analysis Information \(September 2016\) \(epa.gov\)](#)

E. FIVE REFERENCES CONCERNING ADJACENT FUEL OIL AND PROPANE FACILITY

1. [Regulating the Storage, Distribution and Use of Propane and Butane \(planning.org\)](http://planning.org)

The above link to an American Planning Association Paper, describes the regulatory challenges presented by bulk propane storage including that propane is more volatile than gasoline, and presents greater hazards in belowground storage than with aboveground storage.

2. Final South Hadley Urban Redevelopment and Renewal Plan, Section A.1. Media, quoting from BusinessWest (March 7, 2017)

“Business growth has also taken place in the Falls. Over the past 18 months, Mohawk Paper and E Ink Corp. moved there, and South Hadley Fuel scrapped its plans to move out and expanded in town instead. Sullivan explained that the decision came about in large part because Town Planner Richard Harris alerted South Hadley Fuel owner Steve Chase to an existing but unused underground tank farm near E Ink Inc., which he described as an “opportunity found.” “As a result, they have opened one of the largest propane storage and distribution facilities in Western Mass,” the town administrator said. “We do all we can to introduce businesses to opportunities that exist here. “

[South-Hadley-Urban-Redevelopment-and-Renewal-Plan---Final-DHCD-Approved \(southhadley.org\)](http://southhadley.org/South-Hadley-Urban-Redevelopment-and-Renewal-Plan---Final-DHCD-Approved)

3. Excerpt from Approved South Hadley Select Board Meeting Minutes for April 7, 2015

APRIL 7, 2015 SELECTBOARD MEETING ROOM – 7:00 P.M. MINUTES

.....

“4. REQUEST TO AMEND FP-5 LICENSE FOR 27 GAYLORD STREET Stephan Chase, President and CEO of Fuel Services, informed members that, a few years ago, the company made the decision to move its operation from Westfield to South Hadley primarily because of the Town Planner, Richard Harris. (The business previously had a ‘For Sale’ sign in front of its building, he reminded.) Mr. Harris spent a lot of time talking to them about what South Hadley had to offer and why they should stay in town, including the fact that there was a terminal available that could be used for a propane business. When he looked at the terminal he was first amazed at the planning that had gone into the facility and then at the total lack of upkeep and maintenance and the amount of explosive material still in the ground, with tanks disconnected and monitoring equipment not in effect. The company spent about \$140,000 to get everything harmful out of there (he mentioned MKE, which is highly poisonous and highly explosive) and to re-connect the monitoring that I’ve made,’ adding that his 33 employees enjoy being part of the town and try to contribute to the town. The site currently has a permit that allows them to have 15,000 gallons of propane storage. He began the permit process to put in a new 30,000-gallon storage tank. He made the decision not to have an above-ground tank because, among other things, having a tank below ground removes the explosive potential. The only reason people ever have trouble with propane is really because of carelessness; either failure to train or failure to pay proper attention, he asserted. He sits on the board of directors for New England Propane Dealers, and the board put together a program to require that every employee be propane-trained. The Certified Employee Training Program (CETP) law went into effect January 1st and requires that “if you touch propane, you will be trained,” he advised. If a person dispenses propane into anything other than a 40-gallon cylinder, he or she must be state-trained, he clarified. The request is simply to increase the amount of propane storage from the 15,000 gallons that they currently have to an additional 30,000 gallons. At this point, they have approval from the Fire Department and the state and everybody involved, he assured. They need the approval of the Selectboard to increase the amount of storage in underground tanks on the property. Mr. Chase is also a former fire chief, Mr. Sullivan noted. Member asked questions and offered comments. SB Member DeToma asked what regulatory groups Mr. Chase had to go through to get approval for the additional propane storage. For an underground tank, everything is done locally, Mr. Chase said. For above-ground tanks, the state is heavily

involved. There is a permit process for installation of the tank, piping, etc., he confirmed. All permits are in place; the only thing they are waiting for is a concrete permit from the Building Commissioner. The building inspector is waiting for final plans to issue the concrete permit. The tank is a specially-constructed steel tank, he elaborated. With a propane tank, the only potential issue is with the piping. SB Member DeToma asked if the propane is in liquid form, and Mr. Chase said yes. The Selectboard is amending the existing FP-5 license to allow an additional tank, Mr. Sullivan confirmed. SB Member DeToma moved to approve a request to amend the current certificate of registration FP-5 land license for 27 Gaylord Street, South Hadley, MA. The amendment is to add one 30,000 propane storage tank in accordance with all Massachusetts fire regulations, CMR 531, subject to all necessary permits. SB Member Ishler seconded. The motion passed unanimously 5:0.”

4. National Oceanic and Atmospheric Administration, NOAA, Cameo Chemicals.

For MKE, (Methyl Propyl Ketone) to which Mr. Chase is reported in the foregoing minutes to have referenced (see minutes of Select Board Meeting above). <https://cameochemicals.noaa.gov/chemical/1130>

5. For Toluene [Report | CAMEO Chemicals | NOAA](#)

As stated above, it will be my intention to discuss these references and make brief comments during the hearing on May 23,2022. Thank you for giving me this opportunity to address the Board.

Respectfully Submitted,

Robert Pleasure

10 Jewett Lane

South Hadley, MA 01075

Email address Robertpleasure@comcast.net

Telephone (301) 503-8925

Fwd: E Ink

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Fri, May 20, 2022 at 10:00 AM

ccanning@southhadleyma.gov
----- Forwarded message -----
From: **M Mercier** <associatedfloor@hotmail.com>
Date: Wed, May 18, 2022 at 3:29 PM
Subject: E Ink
To: acapra@southhadleyma.gov <acapra@southhadleyma.gov>

Anne,

I'd like to take this opportunity to express my support for our neighbor, E Ink.

E Ink has proven to be a wonderful neighbor and reputable business. We have witnessed the much improved updates made to the building and property over the years along with the recent increase in job opportunities. Their multi-million dollar purchase of the property to expand their business shows their commitment to remain a viable business in South Hadley. The current expansion project is another effort to transform the neighborhood and bring much needed updates to an area that has been neglected for years before them. More importantly, it is necessary for their growth and continued long term community support to the people of South Hadley. Modernization of buildings coupled with moving the loading docks off of Gaylord Street will reduce noise and increase safety. I have no doubt that E Ink will go above and beyond whatever is required to make the expansion safe for everyone in the neighborhood and their employees. I strongly support their effort to proceed with this project.

Please feel free to contact me should you have any questions

Best,

Mitchell Mercier
Partner
Associated Flooring
48 Lamb Street
South Hadley MA
413 536 3665

--
Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
(413) 538-5017 x6128
acapra@southhadleyma.gov



Fwd: Toluene in South Hadley

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Fri, May 20, 2022 at 10:02 AM

----- Forwarded message -----

From: **Thomas Shea** <TShea@eink.com>
Date: Thu, May 19, 2022 at 8:18 AM
Subject: Toluene in South Hadley
To: acapra@southhadleyma.gov <acapra@southhadleyma.gov>

To Whom it May Concern,

My name is Thomas Shea, and I am a 24 year old resident of South Hadley. I've lived here my whole life, and in January of 2021, I started working at E Ink. I have worked there for a year and five months as a line engineer in the coating department there, and have come to meet some of the people involved in this effort to expand E Ink's capabilities, including the installation of a toluene tank.

Having lived in the town my entire life, and with myself and whole family still living here, I have a great interest in making sure everything done in town is safe for all those involved, including South Hadley residents in the surrounding areas. I feel that allowing E Ink to go forward with this project will not put the town at risk. In my experience, E Ink has always been dedicated to ensuring safe operational practices for its employees, especially when working with flammable solvents. I don't see a situation like this being any different, and although I haven't been involved with the project myself, I have no doubt that the people ensuring the safe operation and maintenance of this tank have taken all the due diligence necessary to understand how to properly and safely utilize the tank.

From a community standpoint, E Ink has always strived to make efforts to enhance the South Hadley community. Although COVID required a brief pause, E Ink has recently restarted up their Ad Hoc Philanthropy Committee (ADPC), made to find ways to give back to the community. This committee raises money to give back to local charities and businesses, and demonstrates to me an interest in the surrounding area. This attitude towards bettering the community makes me believe that E Ink would not go forth with something that posed any kind of threat to the safety of nearby residents. This includes knowing that we will be fully capable of safe operation of the toluene tank, and understanding how to mitigate the risks that may be involved.

In conclusion, I do not feel that this expansion to E Ink's capabilities will pose a risk to the South Hadley community, and in helping them increase its capacity can only help them give back to the community even more going forward.

Best,

Thomas Shea

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Fwd: Endorsement of E Ink Expansion Plans

Colleen Canning <ccanning@southhadleyma.gov>
To: Colleen Canning <ccanning@southhadleyma.gov>

Fri, May 20, 2022 at 10:03 AM

----- Forwarded message -----

From: Diane LaRoche <PDLaRoche@msn.com>
Date: Thu, May 19, 2022 at 7:59 AM
Subject: Endorsement of E Ink Expansion Plans
To: Anne Capra <acapra@southhadleyma.gov>

Anne, please forward the following to the Planning Board. Thank you.
Diane LaRoche

To the South Hadley Planning Board:

We are homeowners at 16 Carew Street in South Hadley and want to express our support for the expansion plans proposed by E Ink. We have closely followed the public hearings and have reviewed all of the documents that have been made available. E Ink has been fully transparent about their proposal, they have responded to all concerns and have accommodated requests from all the involved departments. We have been impressed by the improvements that E Ink has made to their site since they came to South Hadley and anticipate that the proposed expansion will further improve that blighted industrial area. E Ink has been a wonderful community partner by improving the Gaylord Street area and by their impressive charitable contributions. This is the kind of industrial presence that should be encouraged in our community. The Gaylord Street site has suffered from a long history of misuse and corporate abandonment, but this history should not burden E Ink. Rather, they should be applauded for their investment in South Hadley and encouraged to move forward.

The Planning Board, Conservation Commission, Fire Department, Health Department, and other agencies have all diligently worked with E Ink to make sure that their plans provide for the health and safety of our community, and we believe that E Ink has responded appropriately. Our concerns as neighbors of the project in South Hadley Falls have been addressed to our satisfaction, and we strongly encourage the Planning Board to accept the plans. The Gaylord Street expansion will be very good for the future of South Hadley, and South Hadley Falls should be the proud home of a modern, well-managed industrial site. Sincerely,

Diane M. LaRoche
Philip L. LaRoche

--

Anne Capra, AICP
Director, Planning & Conservation
Town of South Hadley
116 Main Street | South Hadley, MA 01075
(413) 538-5017 x6128
acapra@southhadleyma.gov



May 20, 2022

South Hadley Planning Board
Town Hall
116 Main Street
South Hadley, MA 01075

Reference: Elnk, 7 Gaylord Street, Special Permit

Dear Chair Hutchison:

Please accept this letter of support from the South Hadley Granby Chamber of Commerce for Elnk's Special Permit application for the expansion of their manufacturing facility located at 7 Gaylord Street. Elnk has been a solid member of our business community and we believe that granting the special permit will allow this business to grow and continue to contribute to South Hadley.

South Hadley Falls has been a targeted region for the Chamber as well as other town entities to attract businesses to the area. Elnk has made positive contributions to the neighborhood and community. By granting this special permit, the Planning Board will be demonstrating its commitment to the Falls by supporting and retaining an existing business and promoting the addition of at least 16 additional jobs to the area.

Elnk's property and existing facilities are identified directly and indirectly in the town's Urban Redevelopment and Renewal Plan (URRP) and Master Plan. The special permit will allow the facility to be operated in accordance with the URRP as an industrial space. Elnk will be redeveloping a blighted building that would otherwise stay that way.

Elnk has been very transparent in this process with our town. They have fully satisfied and have even gone above and beyond several regulations and code as a sign of their investment in South Hadley. They have received the necessary approvals from South Hadley Fire District 1.

The South Hadley Granby Chamber of Commerce, therefore, supports this Special Permit application.

Sincerely,

Regina Zebrowski, President
Michele Lyman, Treasurer

Steven Laplante, Vice President
Courtney Huxley, Clerk

Board Members: Kelly Frazier, Jamie Fitzgibbon, Jennifer Marion, Sean Parent, Michelle Theroux, Darren Thomas, Karen Volpe