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December 22, 2006

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

PROJECT NAME:	The Shoppes at Bellingham
PROJECT MUNICIPALITY:	Bellingham
PROJECT WATERSHED:	Charles
EOEA NUMBER:	13914
PROJECT PROPONENT:	W/S Development Associates, LLC
DATE NOTICED IN MONITOR:	November 22, 2006

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.03 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **requires** the preparation of an Environmental Impact Report (EIR).

Project Description

As described in the Environmental Notification Form (ENF), the project consists of a two-phase mixed use development on an approximately 200-acre site in Bellingham, MA. The project site is located south of the intersection of Hartford Avenue/Route 126 and Interstate 495. Phase 1 of the project, the Shoppes at Bellingham, will include 548,593 square feet (sf) of retail and restaurant, with parking. Phase 2 will consist of 599,046 sf of office space and associated parking. Access to both Phase 1 and 2 will be provided by way of a proposed by-pass road from North Main Street. The projects will be serviced by municipal water and a proposed on-site treatment plant for wastewater disposal.

Much of the site has been previously mined for sand and gravel, while the northwestern portion of the site contains a large area of contiguous wetland. The project site is located within the upper Charles River basin, which is one of the most heavily stressed watershed systems in the

Commonwealth. In addition, the project site is located in close proximity to three Town of Bellingham municipal water supply wells. Portions of the Phase 2 site include the Zone I protective area for the Bellingham Water Division Well No. 12. Both phases of the project are wholly within the Zone II recharge areas for Bellingham Wells 7, 8 and 12. Portions of the project site are considered to be archaeologically sensitive, potentially containing archaeological sites associated with ancient and historical occupation of the Bellingham area.

The proposed by-pass road will connect to proposed improvements at the Route 126/I-495 Interchange, a Massachusetts Highway Department (MHD) project that will undergo separate MEPA review. While the interchange improvements will be reviewed separately, the proponent for the Shoppes at Bellingham project proposes to fund the design of the improvements as mitigation for traffic impacts from the retail and office development. The proponent states in the ENF that activities resulting in impacts to wetland resources associated with both phases of the currently proposed project *and* the interchange improvements will be permitted as a single and complete project under Section 404/401 of the Clean Water Act. Therefore, the wetland impacts of the interchange improvements project will also be reviewed by MEPA during the review of the Shoppes at Bellingham project.

One previous project on this site has undergone MEPA review. In September 1999 an ENF was filed for the Bellingham Corporate Park (EOEA #12035), a development consisting of office/research and development space; four hotels; three restaurants; a health club; and a day care facility. The November 22, 1999 Certificate on the ENF set forth the Scope for the DEIR for the Bellingham Corporate Park. No DEIR was filed for the project. In October 2001 an expanded Notice of Project Change (NPC) was filed for the project that proposed to separate 20.3 acres from the original 240-acre site and construct 300 units of rental apartments in place of the health club and day care facility. In the NPC, the proponent also requested a Phase 1 Waiver for permission to construct the rental apartments prior to completion of MEPA review for the entire project. Subsequently, the proponent withdrew the NPC based on guidance from the MEPA office that the housing component of the project be reviewed separately from the Bellingham Corporate Park. An ENF was filed for the Jefferson at Bellingham Apartment Community (EOEA #12746) in April of 2002. A Certificate on the ENF was issued on May 17, 2002 stating that the project did not require further MEPA review. The JPI Apartment Complex that was part of this filing has been constructed and has an on-site 55,000 gallons per day (gpd) wastewater treatment facility. No further MEPA filings for the Bellingham Corporate Park have been submitted.

Jurisdiction and Permitting

The project is undergoing MEPA review and requires the preparation of an EIR pursuant to Section 11.03(1)(a)(1) and 11.03(1)(a)(2) of the MEPA regulations, because it will result in the direct alteration of more than 50 acres of land and the creation of more than 10 acres of new impervious surface; and Section 11.03(6)(a)(6) and 11.03(6)(a)(7), because the project will result in more than 3,000 new average daily trips (adt) and require the construction of more than 1,000 new parking spaces. The project also exceeds the following ENF review thresholds: Section 11.03(3)(b)(1)(f) because the project will result in the alteration of greater than ½ an acre of "any

other wetlands"; Section 11.03(5)(b)(1) because the project requires the construction of a new wastewater treatment facility with a capacity of 100,000 gpd or more; and Section 11.03(6)(b)(1)(a) because the project requires the construction of a new roadway greater than ¼ miles in length.

The project requires the following permits and/or review: a National Pollutant Discharge and Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA); review from the U.S. Army Corps of Engineers (ACOE) pursuant to Section 404 of the Clean Water Act; a Groundwater Discharge Permit, a 401 Water Quality Certificate, a possible Distribution System Modification Permit (BRP WS 32), and air quality review from the Department of Environmental Protection (MassDEP); an Access Permit from the Massachusetts Highway Department (MHD); and review from the Massachusetts Historical Commission (MHC). At the local level, the project requires Development Plan Review and a Definitive Subdivision Plan from the Bellingham Planning Board; a Major Business Complex Special Permit and possibly a Water Resource District Special Permit from the Bellingham Zoning Board of Appeals (ZBA); and an Order of Conditions from the Bellingham Conservation Commission.

Because the proponent is not seeking financial assistance from the Commonwealth for the project, MEPA jurisdiction extends to those aspects of the project that may cause significant Damage to the Environment and that are within the subject matter of required or potentially required state permits. In this case, MEPA jurisdiction extends to land alteration, stormwater, wetlands, wastewater, transportation, air quality and historic resources.

SCOPE

General

As modified by this Certificate, the proponent should prepare the Draft EIR (DEIR) in accordance with the general guidelines for outline and content found in Section 11.07 of the MEPA regulations. The DEIR should include a copy of this Certificate and of each comment received, which should be addressed in the DEIR as they are relevant to this Scope. The proponent should circulate the DEIR in accordance with Section 11.01(1) of the MEPA regulations; to those who commented on the ENF; to municipal officials in the Town of Bellingham; and to any state and federal agencies from which the proponent will potentially seek permits or approvals. In addition, copies of the DEIR should be made available at the Bellingham public library.

The DEIR should provide a history of the project site and prior MEPA submissions. The DEIR should identify and describe any project phasing. The DEIR should include existing and proposed site plans. Plans submitted with the ENF should be revised to correctly show property lines on the Phase 2 parcel. According to the Town of Bellingham and MassDEP, land that is owned by the Town to protect the Zone I of drinking water supply well #12 is missing. The DEIR

should provide information on any Conservation Restrictions (CR) currently in place on the site and should discuss whether any will be proposed as mitigation for the current project.

Permitting and Consistency

The DEIR should include a brief description of each state permit or agency action required or potentially required, and should demonstrate that the project will meet applicable performance standards. In accordance with Executive Order No. 385, "Planning for Growth" and Section 11.03(3)(a) of the MEPA regulations, the DEIR should discuss the consistency of the project with local and regional growth management plans and with the Town of Bellingham's Open Space and Recreation Plan (OSRP). The DEIR should also discuss the consistency of project design with any applicable state policies. The proponent should also provide an update on the local permitting process for the project.

Alternatives

The DEIR requires a comprehensive alternatives analysis in order to ascertain which site layout minimizes overall environmental impacts and reduces the amount of impervious surface on site. The alternatives analysis should clearly demonstrate consistency with the objectives of MEPA review, one of which is to document the means by which the proponent plans to avoid, minimize or mitigate Damage to the Environment to the maximum extent feasible. In addition to the No-Build Alternative and the Preferred Alternative, the DEIR should discuss alternative building configurations and a reduced build alternative that might result in fewer impacts, particularly related to the creation of impervious surface, parking, wetlands, groundwater and traffic. The DEIR should consider the use of structured or underground parking and maximize planted areas to reduce impervious surfaces. The DEIR should fully explain any trade-offs inherent in the alternatives analysis, such as increased impacts on some resources to avoid impacts to other resources. The DEIR should also incorporate any alternatives analysis that may be required if the project needs a 401 Water Quality Certificate, and any other alternatives analysis required for state permitting purposes.

Land Alteration/Drainage

The project will result in the creation of 62.13 new acres of impervious surface on the project site. The proponent proposes to construct approximately 4,721 surface parking spaces for the project. The DEIR should explain how the number of parking spaces needed was determined. The proponent should break out intra-project vehicle trips and parking between the two phases of the project. If the parking supply is greater than the amount required under local zoning, the DEIR should explain why, and should examine the feasibility of an alternative with fewer spaces. Parking demand management should be a key component of the overall mitigation analysis. The proponent should commit to continuous shuttle service between the project's two phases to reduce intra-project trips.

According to the ENF, the project's stormwater management system will be designed in accordance with DEP's Stormwater Management Policy. The DEIR should include a detailed

drainage plan that provides drainage calculations, pre- and post-construction run off rates and a detailed description of Best Management Practices. Details concerning the assumptions used in designing the stormwater system and sufficient information to demonstrate that the system meets DEP's Stormwater Management Policy should be included in the DEIR.

The project site is located within a Zone II Aquifer Protection District for the Town of Bellingham Municipal Wells No. 7, 8, and 12 and a portion of the site is within the 400-foot Zone I protective radius for Well No. 12. The location of the proposed project in a Zone I and II requires that extraordinary care be taken to avoid introducing contaminants to the aquifer. The DEIR should describe how the project will comply with Town of Bellingham Zoning Bylaws related to this water protection district. The proponent should note comments from the Town of Bellingham regarding the location of another viable public water supply well on the Phase 1 portion of the property.

The proponent must ensure that its proposed stormwater system meets or exceeds DEP's stormwater guidelines, and the DEIR should address what additional precautions will be taken to avoid the release of pollutants into surface water discharged from the site. The DEIR should identify if any operations conducted on the project site pose any dangers to groundwater or are a prohibited land use in a Zone II. The DEIR should identify potential short- or long-tem impacts to groundwater quality. The proponent should discuss whether groundwater quality and quantity monitoring wells are proposed.

Stormwater is proposed to be directed under parking lots into underground detention basins. Since these detention basins will be in the Zone II and some on the periphery of a Zone I, the proponent should detail how the basins will be cleaned and maintained to make sure that grease, oils and salt does not get into groundwater. The proponent should commit to the use of a salt-substitute for winter use and should address how snow will be managed and stored on site.

The DEIR should include an analysis of opportunities for recharge of runoff from impervious areas both from rooftops and other areas; improved source control of runoff throughout the site; and better control of pollutants of concern (especially sediments, nutrients, metals and petroleum-based pollutants). The proponent should commit to using porous pavement in lower use parking area, as well as to creating rain gardens in parking lot islands and at lot edges for stormwater management and infiltration.

The DEIR should also describe the operations and maintenance program for the drainage system to ensure its effectiveness including a schedule for maintenance and identification of responsible parties. The maintenance program should outline the actual maintenance operations, sweeping schedule, snow removal and de-icing policies, responsible parties, and back-up systems.

I encourage the proponent to consider Low Impact Development (LID) techniques in site design and storm water management plans. LID techniques incorporate stormwater best management practices (BMPs) and can reduce impacts to land and water resources by conserving natural systems and hydrologic functions. The primary tools of LID are landscaping features and

naturally vegetated areas, which encourage detention, infiltration and filtration of stormwater on-site. Other tools include water conservation and use of pervious surfaces. Clustering of buildings is an example of how LID can preserve open space and minimize land disturbance. LID can also protect natural resources by incorporating wetlands, stream buffers, and mature forests as project design features. For more information on LID, visit http://www.mass.gov/envir/lid/. Other LID resources include the national LID manual (Low Impact Development Design Strategies: An Integrated Design Approach), which can be found on the EPA website at: http://www.epa.gov/owow/nps/lid/. The DEIR should include a discussion of any LID measures that the proponent could incorporate into project design.

Wetlands

The DEIR should include plans that clearly delineate all applicable resource area boundaries on the project site. The proponent should address the significance of wetland resources on the site, including water supply, flood control, flows to intermittent and perennial streams, storm damage prevention and habitat prevention. According to the ENF, a total of 80,549 square feet (sf) of Isolated Vegetated Wetland (IVW) and 4,925 sf of Bordering Vegetated Wetland (BVW) are proposed to be filled for Phases 1 and 2. The anticipated wetland impacts disclosed in the ENF do not include any impacts from the proposed highway interchange improvements and relocation. However, the proponent states in the ENF that for the purposes of MEPA review and state permitting, both phases of the Shoppes at Bellingham and the interchange improvements proposed as mitigation for the Shoppes project will be permitted as a single and complete project for the 404/401 Water Quality Certification.

The DEIR should quantify impacts to jurisdictional resource area that will result from both phases of the project and from the proposed interchange improvements. It should describe the nature of all likely impacts that cannot be avoided, including crossings, grading, overstory clearing and construction-related disturbances and whether they are temporary or permanent in nature. The proponent should explain how the project would comply with the performance standards in the wetlands regulations and demonstrate that the alteration of resource areas has been avoided and minimized. The proponent should respond to concerns related to the permitting of the project and the interchange improvements under the requirements of the Wetlands Protection Act. The DEIR should demonstrate that the project will comply with the requirements of the 401 Water Quality Certificate program (314 CMR 9.00).

The proponent is awaiting a determination from the ACOE regarding their jurisdiction over the IVW. The DEIR should report on the results of this determination and discuss any permitting requirements under Section 404 of the Clean Water Act. The proponent should discuss whether any of the isolated wetlands on site function as vernal pools. The proponent has received an Order of Resource Area Delineation (ORAD) from the Bellingham Conservation Commission for the Phase 1 portion of the site and intends to file an Abbreviated Notice of Resource Area Delineation (ANRAD) for the Phase 2 resource areas.

The proponent should discuss its plans to provide wetlands replication to mitigate for impacts to BVW. Typically, MassDEP recommends wetlands replication at a ratio of 2:1. A

detailed wetlands replication plan should be provided which, at a minimum, should include: replication location(s); elevations; typical cross sections; test pits or soil boring logs; groundwater elevations; the hydrology of areas to be altered and replicated; list of wetlands plant species of areas to be altered and the proposed wetland replication species; planned construction sequence; and a discussion of the required performance standards and long-term monitoring.

Water and Wastewater

According to the ENF, the project will require 55,000 gpd of water in Phase 1 and 28,000 in Phase 2 for a total of 83,000 gpd. The project is anticipated to generate 100,000 gpd of wastewater in Phase 1 and 45,000 gpd in Phase 2, for a total of 145,000 gpd. The basis for the determination of 145,000 gpd of wastewater should be fully laid out and the discrepancy between this figure and the 85,000 gpd of projected water use should be explained. According to MassDEP, these estimates are less than Title 5 amounts.

Potable water for the project will be provided by municipal water supply. The DEIR should discuss the ability of the municipal water supply to meet this demand. The proponent should discuss whether it will need to submit a water supply permit application to MassDEP for a distribution system modification. The proponent should commit to a strong water conservation program. Water use is integral to wastewater issues since a reduction in water use will reduce the volume of wastewater. The DEIR should contain specific information on conservation measures that will be employed to reduce the project's water use. The proponent should note suggestions from the Charles River Watershed Association (CRWA) regarding water conservation measures.

As proposed, the project's wastewater would be treated at an on-site wastewater treatment facility. The DEIR should fully analyze wastewater issues for the project, including identification of location(s) for on-site wastewater treatment and leaching fields (including soil suitability) and treatment plant capacity. The proponent should discuss the phasing of the project as it relates to wastewater infrastructure. As a result of the project's proximity to drinking water wells, the effluent limits for the wastewater treatment plant will have to be very stringent and the proponent will be required to meet the most restrictive limits in MassDEP's reuse policy. The proponent should consider measures such as the reuse of grey water and dual plumbing to reduce wastewater capacity. The DEIR should outline how the project will meet the performance standards of the Groundwater Discharge Permit. The proponent should also discuss limits on phosphorus due to the close proximity of the project to the Charles River.

In their comments on the ENF, the Bellingham Department of Public Works indicates that the proponent had at one point considered connecting to the municipal sewer system on a short term basis for earlier parts of the development. The DEIR should address this comment.

Transportation

The project is anticipated to generate 24,800 new vehicle trips per day (20,600 in Phase 1 and 4,200 in Phase 2) and require 4,721 new parking spaces (2,306 in Phase 1 and 2,415 in Phase 2). The DEIR should include a transportation study prepared in conformance with the Executive

Office of Environmental Affairs/Executive Office of Transportation (EOEA/EOT) Guidelines for EIR/EIS Traffic Impact Assessments. The Traffic Impact and Access Study (TIAS) should present capacity analyses and a summary of average and 95th percentile vehicle queues for each intersection within the study area. In addition, the DEIR should present a merge and diverge analysis for each ramp junction at the I-495 ramps intersection with Route 126. Any proposed traffic signal must include a traffic signal warrant analysis according to the Manual of Uniform Traffic Control Devices (MUTCD) standards. At a minimum, the traffic study should analyze the following state highway and local roadway locations:

- the I-495/Route 126 interchange;
- the Route 126 Bypass Road/site drive intersections;
- the Route 126 Bypass Road/route 126 (North Main Street) intersection;
- the Route 126 (North Main Street)/Cedar Hill Road intersection;
- the Route 126/Maple Street intersection;
- the Route 126 (North Main Street)/Route 140 (Mendon Street) intersection;
- the Route 126 (North Main Street)/ Route 140 (Mechanic Street) intersection; and
- the Route 140/Hartford Avenue intersection in Hopedale/Mendon.

The TIAS should account for the improvements to the intersection of Route 140 and Hartford Avenue in Hopedale/Mendon that are currently under design as part of a MHD project. I also strongly encourage the proponent to analyze the project's traffic impacts on other areas of the Town such as Hartford Avenue from Medway west to the Mendon town line, Maple Street, High Street, and Taunton Street.

As indicated in the ENF, access to the project will be via a proposed by-pass road from North Main Street. The ENF should evaluate a number of roadway alternatives to the by-pass road that could also provide access to the development. A discussion of how regional and/or local traffic patterns will change should be included in the analysis for each roadway alternative. The DEIR should provide an explanation of the choice of one concept over another. The impacts of the by-pass road on the Wethersfield neighborhood in terms of safety and potential cut-through traffic should be discussed.

According to MHD, traffic operations at the I-495/Route 126 interchange are currently operating at unfavorable levels of service (LOS), and significant transportation improvements will be required to accommodate the additional traffic generated by this project. The DEIR should identify appropriate mitigation measures for areas where the project will have an impact on traffic operations. The proponent should provide a clear commitment to implement mitigation measures and should describe the timing of their implementation based on the phases of the project, if any.

The proponent states in the ENF that it will design improvements at the I-495/Route 126 interchange as mitigation for the project and that MHD will construct the improvements. The proposed interchange improvements include relocation of the existing I-495 southbound/Route 126 interchange to a point slightly south of Hartford Avenue; eliminating left turns between the ramps and Route 126; and constructing a new on-ramp from Route 126 southbound to I-495 northbound, which will eliminate a left turn onto the existing northbound ramp. In their

comments on the ENF, MHD states that it has not made a commitment to construct these improvements. The proponent should propose what improvements would be necessary to mitigate project generated traffic if the interchange improvements are not constructed by MHD and should demonstrate a commitment to mitigate all project-related traffic impacts in the event that MHD does not fund the interchange upgrade construction.

The proponent should note comments from MHD that proposed improvements at the I-495/Route 126 interchange may trigger a review by the Federal Highway Administration (FHWA) and could require the submission of an Environmental Assessment (EA) for National Environmental Policy Act (NEPA) review. The DEIR should include a full alternatives analysis for the interchange including an assessment of potential environmental impacts and mitigation. MHD recommends that the proponent prepare the DEIR so that the EIR can be rolled into an EA for NEPA review.

The DEIR should include conceptual plans for the proposed roadway improvements that should be of sufficient detail to verify the feasibility of constructing such improvements. The conceptual plans should clearly show proposed lane widths and offsets, layout lines and jurisdictions, and the land uses (including access drives) adjacent to areas where improvement are proposed. Any mitigation within the state highway layout must conform to MHD standards, including but not limited to, provisions for lane, median and shoulder widths, and bicycle lanes and sidewalks.

At the site visit for the project, the proponent indicated that improvements would also be made to access points and circulation at the Stallbrook Marketplace Plaza (EOEA #6664). The proponent should provide a discussion of these planned improvements, and should indicate if any additional permits from MHD will be required.

Transportation Demand Management

The DEIR should include a comprehensive Transportation Demand Management (TDM) program that investigates all feasible measures aimed at reducing site trip generation. The TDM program should identify measures and incentives to encourage the use of alternative modes such as transit, walking, and bicycling. The TDM plan should include specific measures that have been successful in reducing trip generation for retail establishments. The TDM plan should identify the existing modes along the corridor such as transit, walking and bicycling; analyze their existing and future conditions based on the project's impacts; and provide improvements to attract mode usage. The site plan should also accommodate transit and provide amenities to encourage transit usage such as bus shelters and bus turnouts as well as provide a pedestrian connection to existing land uses within close proximity to the project site. The proponent should provide clear commitment to implement and continuously fund any evaluated TDM measures deemed feasible to sustain and/or increase mode usage over time to ensure a balanced and functional transportation system along the corridor.

The DEIR should also discuss whether the project will require compliance with MassDEP's Ridesharing Regulation (310 CMR 7.16).

Air Quality

The projected vehicle trips from the project triggers MassDEP's requirement that the proponent conduct an air quality mesoscale analysis to determine if the proposed project will increase the amount of volatile organic compounds (VOCs) and nitrogen oxides (NOx) in the project area and to assess the project's consistency with the Massachusetts State Implementation Plan (SIP). The proponent should contact MassDEP's air quality program for guidelines on conducting the mesoscale analysis. If the analysis indicates an increase in VOC and NOx emissions, the proponent must develop mitigation measures to offset the increase. The results of the analysis and a description of any required mitigation should be submitted with the DEIR.

The proponent should also provide a discussion in the DEIR of how the project will comply with MassDEP's regulations for stationary source air quality, as outlined in their comments on the ENF.

Historic Resources

In their comments on the ENF, MHC states that the Phase 1 portion of the site contains one ancient Native American archaeological site (19-NF-584) listed in the Inventory of Historic Archaeological Assets of the Commonwealth. This site, designated the Charles View Site, was previously subject to an intensive (locational) archaeological survey. The project area is also contiguous to many other ancient sites (19-NF-295, -296, -297, -298, -579, -580, and -600). MHC has requested that an archaeological site examination (950 CMR 70) be conducted for the Charles View Site. The purpose of the site examination is to gather sufficient information to determine the exact horizontal and vertical boundaries of the site, its internal configuration, and data contents, so that a determination of significance can be made.

For the remaining portions of the site, which are described by MHC as very limited archaeologically sensitive, the proponent should conduct an intensive (locational) archaeological survey. The purpose of the survey is to locate and identify any other potentially significant historic or archaeological resources that may be affected by the project. The results of the survey will provide information to assist in consultation to avoid, minimize or mitigate any adverse impacts to significant archaeological resources. The DEIR should contain a summary of the results of this consultation, described in a manner that does not disclose any sensitive archaeological site locational information.

Sustainable Development

The proponent should evaluate sustainable design alternatives that can serve to avoid or minimize potential environmental impacts. Such alternatives may also reduce project development and long-term operational costs. The DEIR should discuss sustainable design alternatives evaluated by the proponent and describe measures proposed to avoid and minimize environmental impacts. Such measures may include:

- Leadership in Energy and Environmental Design (LEED) certification;
- water conservation and reuse of wastewater and stormwater;
- use of renewable energy;
- ecological landscaping;
- optimization of natural day lighting, passive solar gain, and natural cooling;
- an annual audit program for energy and water use, and waste generation;
- energy-efficient Heating, Ventilation and Air Conditioning (HVAC), lighting systems, and appliances, and use of solar preheating of makeup air;
- use of building supplies and materials that are non-toxic, made from recycled materials, and made with low embodied energy;
- incorporation of an easily accessible and user-friendly recycling system infrastructure into building design; and
- implementation of a solid waste minimization and recycling plan.

Construction Period Impacts

The DEIR should include a discussion of construction phasing, evaluate potential impacts associated with construction activities and propose feasible measures to avoid or eliminate these impacts. I encourage the proponent to consider participating in DEP's Clean Construction Equipment Initiative consisting of an engine retrofit program and/or use of low sulfur fuel to reduce exposure to diesel exhaust fumes and particulate emissions during construction.

Mitigation

The DEIR should contain a separate chapter on mitigation measures. It should include a Draft Section 61 Finding for all state permits and a Letter of Commitment for use by MHD that includes a clear commitment to mitigation, an estimate of the individual costs of the proposed mitigation, and the identification of the parties responsible for implementing the mitigation. The DEIR should provide a schedule for the implementation of the mitigation, based on the construction phases of the project.

Response to Comments

The DEIR should respond to comments received from state agencies, local officials and public citizens, in as much as the comments are within MEPA's jurisdiction. The proponent should use either an indexed response to comment format, or direct narrative response. The DEIR should present additional narrative and/or technical analysis as necessary to respond to the concerns raised.

December 22, 2006
Date

Robert W. Golledge, Jr.

Comments received:

11/11/2006	Town of Bellingham, Department of Public Works
12/1/2006	Massachusetts Historical Commission
12/6/2006	Elizabeth Haines
12/8/2006	Peter M. Morelli
12/9/2006	John Haines
12/11/2006	Rob Daley, Circle C.G. Farm, Inc.
12/11/2006	Town of Bellingham Conservation Commission
12/11/2006	Town of Bellingham Conservation Commission
12/12/2006	Jennifer Carlino
12/12/2006	Charles River Watershed Association
12/12/2006	Bellingham Planning Board
12/12/2006	Bellingham Alliance for Responsible Development (BARD)
12/12/2006	Department of Environmental Protection, Central Regional Office
12/14/2006	Executive Office of Transportation

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