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CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: Proposed Mixed-Use Development
PROJECT MUNICIPALITY	: Bridgewater
PROJECT WATERSHED	: Taunton River
EEA NUMBER	: 16819
PROJECT PROPONENT	: Edgewood Development Company, LLC
DATE NOTICED IN MONITOR	: December 11, 2024

Pursuant to the Massachusetts Environmental Protection Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08(8) of the MEPA regulations (301 CMR 11.00), I have reviewed the Draft Environmental Impact Report (DEIR) and determined that it **adequately and properly** complies with MEPA and its implementing regulations. The Proponent may prepare and submit a FEIR for review. As noted, the DEIR did not provide GHG or air quality analysis related to the stationary sources and traffic impacts of the project. This and other further analysis should be provided in the FEIR, in accordance with the Scope. I reserve my discretion to require a Supplemental FEIR if sufficient analysis is not provided to assess impacts on surrounding EJ populations, or for other deficiencies.

Project Description

As described in the DEIR, the project consists of demolition of existing buildings and redevelopment of the site into a mixed-use commercial/residential project located in Bridgewater, Massachusetts (the "Town"). The project proposes demolition of three existing industrial buildings, one existing office building (related to the industrial use), and three residential buildings located on adjacent parcels. The proposed development will consist of three mixed-use buildings including 150 residential units, approximately 20,500± square feet (sf) of

commercial space including office, café, and restaurant space, 360± surface parking spaces, pedestrian areas, landscaping, associated utilities, and stormwater management features. The project proposes to modify the existing site access to include new curb cuts along Broad Street, which is a public roadway under the jurisdiction of the Massachusetts Department of Transportation (MassDOT). The project will connect to the existing water main in Broad Street. Sewer flows generated by the project will connect to an existing sewer main traversing the site between Broad Street and the Massachusetts Bay Transportation Authority (MBTA) railway property to the west of the site.

According to the DEIR, the primary goal of the project is to develop the site with three mixed-use buildings, associated parking, driveways, stormwater management features, pedestrian walkways, amenity spaces, public walkways, public boat launch, bike storage, traffic and pedestrian improvements, and utility upgrades. The proposed mixed-use development is described in the DEIR as aligning closely with the economic and development goals of the Town as noted in the Comprehensive Master Plan.

Changes since Environmental Notification Form (ENF)

The DEIR identifies one change from the ENF: modified site development plans indicating that residential and non-restaurant commercial buildings will no longer be serviced by natural gas for heating, cooling, and hot water but will instead utilize electricity, including electric heat pumps. The Proponent will retain the option to use natural gas for cooking in commercial spaces, particularly for restaurants.

The Proponent has confirmed the following commitments for building energy efficiency, which are consistent with recommendations provided by the Department of Energy Resources (DOER):

- Residential: Passive House compliance, electric heat pump space heating, electric water heating, and electric cooking.
- Commercial: Lower air infiltration (Option 8, C406), air source heat pump space heating, air source heat pump water heating, with natural gas limited to cooking.

Project Site

The 13.2-acre, triangular-shaped site includes four parcels and is located on the western side of Broad Street (Route 18). The site is bounded by Town River and associated wetlands to the north, Broad Street, and commercial properties to the east, and the MBTA railway to the west. The property is in the Central Business District / Mixed-Use Overlay District (CBD).

An iron castings company (The Henry Perkins Company) has occupied the 180 Broad Street property since the mid-1800's and consists of three industrial-style buildings, one office building, and multiple smaller shed-sized buildings. The remaining portion of the property contains paved parking areas and driveways, dirt/gravel roads, and undisturbed woodlands bordering Town River. Two large stockpiles of foundry sands, previously used in casting operations, are located along the northern boundary of the site. The site also includes residential properties located at 168, 232, and 240 Broad Street which consist of single-family homes with paved driveways, landscaping, and some wooded areas. Nearby properties include various

commercial land uses including food establishments, healthcare services, personal care services, storage facilities, and a post office. The existing municipal sewer main traverses the site via an easement from Broad Street to the MBTA property in the northerly portion of the site.

According to the most recent Flood Insurance Rate Map (FIRM) Panel 23023C0301J, effective on 7/17/2012 and prepared by the Federal Emergency Management Agency (FEMA), a portion of the site to the north is in mapped flood zone AE with a Base Flood Elevation (BFE) of 32 NAVD88. Bordering Vegetated Wetlands (BVW) extend across the northerly portion of the site along the Town River. According to the Massachusetts Natural Heritage Atlas, 15th edition, the site is not located within priority or endangered species habitat as mapped by the Natural Heritage and Endangered Species Program (NHESP). As noted above, the project site is the location of the Henry Perkins Company, an iron castings company, which dates to the mid-1800's. The existing buildings associated with the Henry Perkins Company have been inventoried and are listed on the Massachusetts Historical Commission (MACRIS) Online Database.

The project site is located within one mile of two Environmental Justice (EJ) populations[1] characterized by Minority and Minority and Income. The site is located within five miles of twelve EJ populations designated as Minority, Minority and Income, Minority and English Isolation, and Minority Income and English Isolation.

Environmental Impacts and Mitigation

Potential environmental impacts associated with the project include 0.37 acres of land alteration (4.59± of which is associated with redevelopment of already altered areas) and the creation of 1.8 acres of impervious surface (6.38± acres total impervious area when including existing conditions). The project includes alteration of approximately 129,005 sf of Riverfront Area, 49 lf of Bank, and 220 sf of Bordering Land Subject to Flooding (BLSF). The project proposes an anticipated increase in water use of 32,500 gallons per day and an equivalent wastewater generation of 32,500 gpd.[2] The project is anticipated to generate a total of 2,724 average daily vehicular trips (adt) and increase of 2,584 adt from the existing 140 adt.

Measures to avoid, minimize, and mitigate environmental impacts include 1:1 Riverfront Area replication (14,627 sf total); the use of erosion and sedimentation controls during construction; the construction of a stormwater management system to collect and treat stormwater runoff through a combination of Best Management Practices (BMPs). Traffic improvement measures including traffic signage and pavement markings are proposed by the project, as well as improved safety measures for pedestrian and bicyclists. The proposed site plan depicts tree planting around proposed parking and adjacent to stormwater management features. Additionally, the development proposes to provide public access to trails, a canoe launch, pocket parks, and community gardens. As noted, the DEIR indicated a new commitment to building energy efficiency measures for residential and non-restaurant commercial spaces, including Passive House design and all-electric heating and cooling systems. Additional sustainability

[1] "Environmental Justice Population" is defined in M.G.L. c. 30, § 62 under four categories: Minority, Income, English Isolation, and a combined category of Minority and Income.
[2] Based on 310 CMR 15.203, Title 5

measures include efficient water fixtures, solar-ready roofs, EV-ready parking for 8 EVs, and high-performance building envelopes.

Jurisdiction and Permitting

This project is subject to MEPA review because it requires Agency Action and exceeds the ENF threshold pursuant to 301 CMR 11.03(6)(b)(13), generation of 2,000 or more new ADT on roadways providing access to a single location; 301 CMR 11.03(6)(b)(14), generation of 1,000 or more New ADT on roadways providing access to a single location and construction of 150 or more new parking spaces at a single location; 301 CMR 11.03(6)(b)(15), construction of 300 or more new parking spaces at a single location. The project requires the preparation of an EIR pursuant to 301 CMR 11.06(7)(b) because it is located within a DGA (1 mile) around one or more EJ populations. The project will require an Access Permit from MassDOT. The Massachusetts Department of Environmental Protection (MassDEP) previously issued permit approvals (BWP SW36 Post-Closure Use Permit, BWP SW 23 Comprehensive Site Assessment, and a BWP SW 24 Corrective Actions Alternative Analysis) on November 28, 2023 (Authorization No. 22-SW23-0000010) to facilitate the closure of the Spent Foundry Sand (SFS) Landfill and support this proposed mixed-use development as part of the Post-Closure Use of the SFS Landfill. The project is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol (GHG Policy).

The Bridgewater Planning Board issued a Certificate of Approval for the Major Site Plan Review and Special Permit Application on February 14, 2024. The Bridgewater Conservation Commission issued an Order of Conditions on September 5, 2024 (DEP file No. 116-1543). The project requires an EPA National Pollutant Discharge Elimination System Permit (NPDES).

The project is not receiving Financial Assistance from an Agency. Therefore, MEPA jurisdiction is limited to those aspects of the project that are within the subject matter of any required or potentially required Agency Actions and that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the DEIR

The DEIR is largely responsive to the Scope outlined in the Certificate on the ENF, and includes a description of existing site conditions, a project description, conceptual plans of proposed conditions, exterior and interior photographs of existing structures, an updated Traffic Impact Study (TIS), a review of climate risks and resiliency measures, and draft Section 61 Findings. I note that the DEIR does not provide the stationary or mobile source GHG or air quality analysis as required in the Scope. This and other further analysis should be provided in the FEIR, consistent with the Scope below. I reserve my discretion to require a Supplemental FEIR if sufficient analysis is not provided to assess impacts on surrounding EJ populations, or for other deficiencies.

Environmental Justice / Public Health

As noted above, the project site is located within one mile of two EJ populations characterized by Minority and Minority and Income. The site is located within five miles of

twelve EJ populations designated as Minority, Minority and Income, Minority and English Isolation, and Minority Income and English Isolation. No languages were identified as being spoken by 5% or more of Limited English Proficiency ("LEP") residents within one mile of the project site. The ENF previously identified the "Designated Geographic Area" (DGA, as defined in 301 CMR 11.02) for the project as one mile.

Community Engagement

In accordance with the Scope, the DEIR, or a summary thereof, was distributed to all Community-Based Organizations (CBOs) and tribes/indigenous organizations prepared based on an updated EJ Reference List provided by the MEPA Office. The DEIR provided a list of public involvement efforts that the project conducted following the ENF review, including updating all the publicly available resources and providing project notifications.[3]

According to the DEIR, the Proponent will continue community engagement efforts throughout the remainder of the MEPA review and subsequent permitting. Specifically, the Proponent will continue to provide updates to the community via the following methods:

- Ongoing project updates posted to the project website (180Broad.com).[4]
- Ongoing postings to the "Bridgewater 02323" and "Bridgewater Residents" Facebook group pages.
- Posting of flyers at the Bridgewater Town Hall, Library, Senior Center, and Bridgewater State University Student Union.
- As requested, schedule a public meeting with the Town of Bridgewater where members of the public and EJ populations will be able to provide comments or request additional information.

The Proponent indicates that it will establish a dedicated link on the project website to facilitate the tracking and responses to public comments or concerns. No requests for additional meetings were requested at the time of the preparation of the DEIR.

Baseline Assessment and Project Impacts

The DEIR included a separate section on EJ and provided an initial baseline assessment of existing unfair or inequitable Environmental Burden and related public health consequences impacting EJ Populations. Specifically, the DEIR and attached EJ Screening Form indicate that the surrounding Town of Bridgewater and Census Tracts 25, 023, 525, and 101 within the DGA meet the "vulnerable health EJ criteria" in the DPH EJ Tool; this term is defined in the DPH EJ Tool to include any one of four environmentally related health indicators that are measured to be 110% above statewide rates based on a five-year rolling average.[5] The DEIR did not specify

[3] Supplemental community outreach information from Caroline Clark, Bohler to Matthew Sokop, MEPA Analyst, received 1/17/2025.
[4] https://edgewood-development.com/news/edgewood-proposes-mixed-use-project-near-downtown-bridg
[5] See https://matracking.ehs.state.ma.us/Environmental-Data/ej-vulnerable-health/environmental-justice.html. Four vulnerable health EJ criteria are tracked at the municipal level in the DPH EJ Viewer (heart attack hospitalization, childhood asthma, childhood blood lead, and low birth weight); of these, two (childhood blood lead and low birth weight) are also available at the census tract level.

which of the four vulnerable health EJ criteria are implicated, and did not provide information on potential sources of pollution using the mapping layers in the DPH EJ Tool. This information should be provided in the FEIR.

The DEIR identified land alteration and new impervious areas associated with the project and proposed mitigation measures for stormwater flooding and heat effects. Specifically, the DEIR outlined mitigation measures to address potential heat effects—such as incorporating sidewalks, patios, community gardens, recreational open spaces, and landscaping with pervious surfaces or light-colored materials to reduce the urban heat island effect. Regarding flooding risks, the DEIR described how the proposed stormwater management system would address these risks, noting anticipated reductions in peak runoff rates from the project site compared to pre-development conditions for the 2-, 10-, 25-, and 100-year, 24-hour storm events. The DEIR also stated that the project would result in minimal flow directed toward Broad Street and no additional strain on the Town's municipal drainage system (MS4 system).

As noted, the DEIR failed to provide the required air quality analysis using the MOVES model, as outlined in the MassDEP *Guidelines for Performing Mesoscale Analysis of Indirect Sources,* for the study area analyzed in the traffic study for the project. Specifically, the DEIR did not include data on NOx, PM2.5, PM10, and DPM to the extent such data are available. Furthermore, the DEIR did not provide a comparison of GHG emissions and air pollutants under Existing (current) conditions, future No Build, future Build, and future Build with Mitigation scenarios, as required. The FEIR should provide this information as further discussed below in the Scope to ensure compliance with MEPA requirements.

The DEIR notes that the Broad Street and Spring Street intersection, which is adjacent to the closest EJ population, is not anticipated to have changes to the peak hour delay between the 2031 No Build and 2031 Build conditions, as documented in the traffic study. The FEIR should provide the required air quality analysis and further assessment to document any anticipated changes in air quality within EJ populations, in accordance with the Scope.

Wetlands

The DEIR, in accordance with the Scope, explains that the proposed grading at the lower end of the river access path, resulting in approximately 220 square feet of impact to BLSF at elevation 32.4 ft NAVD88 within Zone AE floodplain and outside the regulatory floodway of the Town River, will result in a net cut within BLSF. The Proponent states that this net cut will result in a minor increase in flood storage volume and that no compensatory flood storage is required under 310 CMR 10.57(4)(a). The DEIR notes that this was acknowledged at the initial public hearing for the Notice of Intent (NOI) with the Bridgewater Conservation Commission. As noted, the Bridgewater Conservation Commission issued an Order of Conditions on September 5, 2024 (DEP file No. 116-1543). Comments from MassDEP's indicate that comments on the ENF have been addressed by the Bridgewater Conservation Commission Order and the DEIR.

Traffic and Transportation

The DEIR included an updated Traffic Impact Study (TIS), consistent with the Scope and MassDOT's comment letter on the ENF. In coordination with MassDOT and to comply with the

latest MassDOT Engineering Directive (E-22-003), updated traffic data was collected in June 2024 to establish the current traffic conditions for 2024. It provided capacity analyses and an evaluation of mobility to and from the project site for existing conditions, future No-Build conditions, and future Build conditions within the study area, which was updated to 2031 to align with the updated traffic data collection. The future Build conditions included an analysis of operations without any improvements given that according to the TIS the project will not have a noticeable impact on the safety and operations of the area roadways. Broad Street (Route 18) at Spring Street, which is closest to the southernmost project access drive is not anticipated to have changes to the peak hour Level of Service (LOS) between the 2031 No Build and 2031 Build conditions.

Study Area

According to MassDOT's comments on the ENF from MassDOT, and in accordance with the Scope, the DEIR included the intersection of Route 18 at Main Street/Central Sq/Broad Street into the study area. Additionally, according to the DEIR, based on the distribution of new trips, all intersections anticipated to experience peak hour traffic volume increased over 100 vehicles per hour (vph) or five percent have been included in the updated study area presented in the DEIR and updated TIS (November 2024).

Trip Generation and Distribution

Per comments on the ENF from MassDOT, and per the Scope, the trip generation has been updated to include both LUC 220 and LUC 221 to most accurately represent the number of proposed floors for each residential use on site. This update resulted in a slightly revised total of 256 weekday morning peak period trips and 147 weekday afternoon peak period trips, compared to the initial estimates of 244 and 157 trips, respectively, as determined in the ENF. Based on this updated trip generation analysis, the project is still anticipated to generate approximately 2,724 average daily vehicular trips (adt).

Additionally, according to supplemental information provided by the Proponent, the anticipated trip generation for LUCs used in the TIS did not materially change between the Environmental Notification Form (ENF) and the Draft Environmental Impact Report (DEIR). The daily trip generation presented in the DEIR does not account for reductions from mode split or internal capture. Without these reductions, the proposed project is anticipated to generate approximately 3,328 daily vehicle trips. However, accounting for mode split and internal capture, the project is expected to generate approximately 2,724 daily vehicle trips, consistent with the estimates presented in the ENF. Given the mix of land uses on the site and U.S. Census data indicating that 9.5% of trips in Bridgewater are multimodal (i.e., walking, biking, or using transit), the Proponent concluded that internal and multimodal trips will occur, resulting in daily trip generation estimates consistent with those initially presented in the ENF.[6]

[6] Supplemental trip generation information from Caroline Clark, Bohler to Matthew Sokop, MEPA Analyst, received 1/17/2025.

The trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation Manual (11th Edition) were reassessed from those provide in the ENF to more appropriately estimate daily vehicle trips using the land use categories for the project:

- Land Use Code (LUC) 220 - Multifamily Housing (Low-Rise - Not Close to Rail Transit);
- LUC 221 - Multifamily Housing (Mid-Rise- Not Close to Rail Transit);
- LUC 712 - Small Office Building;
- LUC 912 - Drive-in Bank;
- LUC 932 - High-Turnover Sit-Down Restaurant; and
- LUC 937 - Coffee/Donut Shop with Drive-Through Window.

Traffic Operations

According to the DEIR, and as shown in the Table 1 below, the signalized intersection of Broad Street (Route 18) at Spring Street is shown to currently operate at an overall LOS B during the weekday morning and weekday afternoon peak hours. Under 2031 No Build and Build conditions, which incorporates the above updated trip generation numbers, the intersection is shown to continue to operate at an overall LOS B during the same peak time periods. Additionally, the signalized intersection of Broad Street (Route 18) at Summer Street/ Main Street/ Central Square, which was added to the TIS since the ENF, is shown to operate at an overall LOS C during the weekday morning and weekday afternoon peak hours. Under 2031 No Build and Build conditions, the intersection is shown to continue to operate at an overall LOS C during the weekly morning peak hour and at an overall LOS D during the weekday afternoon peak hour.

Table 1: Signalized Intersection Overall Level-of-Service [Table 2 in the DEIR].

	Peak	2024 Existing			2031 No Build			2031 Build		
Intersection	Hour	LOS[1]	Delay[2]	ICU[3]	LOS	Delay	ICU	LOS	Delay	ICU
Broad Street (Route 18) at	AM	B	10.7	0.41	B	10.8	0.43	B	11.5	0.55
Spring Street	PM	B	12.3	0.53	B	12.6	0.58	B	13.2	0.60
Broad Street (Route 18) at	AM	C	27.5	0.78	C	29.8	0.83	C	34.2	0.87
Summer Street/ Main Street/ Central Square	PM	C	34.2	0.80	D	44.5	0.88	D	52.1	0.90

(1) Level-of-Service
(2) Average vehicle delay, in seconds
(3) Intersection capacity utilization ratio

According to the DEIR, each of stop-controlled site driveways, at the intersection of Broad Street (Route 18) are projected to operate at a LOS D or better during both the weekday morning and weekday afternoon peak hours under the 2031 Build Conditions (Table 2). Additionally, the DEIR states that all approaches to the three site driveway intersections are projected to operate under capacity and that based on a capacity analysis, no significant impacts to vehicular traffic traveling along Broad Street (Route 18) are anticipated.

Table 2: Unsignalized Intersection Levels-of-Service [Table 3 in the DEIR]

Intersection	Critical Movement		Peak Period	2031 Build LOS[1]	2031 Build Delay[2]	2031 Build V/C[3]
Broad Street (Route 18) at	EB	L	AM	C	24.1	0.14
South Site Driveway	EB	L	PM	D	28.6	0.05
Broad Street (Route 18) at	EB	LR	AM	C	18.5	0.21
Central Site Driveway	EB	LR	PM	B	11.5	0.05
Broad Street (Route 18) at	EB	LTR	AM	C	19.8	0.23
North Site Driveway/	EB	LTR	PM	D	28.1	0.27
Campus Plaza North Driveway						

(1) Level-of-Service
(2) Average vehicle delay, in seconds
(3) Volume to capacity ratio

Safety

The DEIR included a TIS that included a safety analysis for all intersections and roadway segments within the study area. Crash rate worksheets were included that identify intersections and segments with crash rates that exceed the Statewide and MassDOT District 5 averages. Crash rates were be documented, and additional mitigation considered at locations exceeding the State and/or District averages. Intersections identified that exceeded the State and/or District averages include the Broad Street (Route 18) at Summer Street/Main Street/Central Square, within the Town Common, with an average of 68 total crashes over a five-year period (2017 to 2021) and a segment of Broad Street (Route 18) between Spring Street and the Campus Plaza North Driveway with an average of 45 crashes over the same five-year period. The Proponent determined that there no study area intersections listed in the Highway Safety Improvement Program (HSIP). The Proponent noted that a Road Safety Audit (RSA) was completed for the intersections within and along each end of the Town Common. According to the DEIR, the Town of Bridgewater is currently pursuing a roadway improvement project at the Town Common to address the findings of the RSA. The RSA examined the potential reconstruction of the intersections within and along each end of the Town Common, including modifications to traffic control, and enhancements to existing parking, bicycle facilities, and pedestrian accommodations. Specifically, at the Central Square North intersection (Broad Street (Route 18) at Summer Street/ Main Street/ Central Square), which is a study area intersection included in the TIS at the request of MassDOT, the following enhancements were recommended:

- Implement advanced warning signage, lane guidance signage, and street signage.
- Trim vegetation to improve visibility.
- Relocate signal heads to optimize visibility.
- Coordinating signal with Broad Street (Route 18) at Summer Street (Route 104) signal.
- Remove parking to increase visibility of pedestrian crossing.

- Implement ADA-compliant pedestrian facilities.
- Consider exclusive pedestrian phasing or leading pedestrian intervals.
- Consider installing No Turn on Red signage.
- Consider consolidating curb cuts or Do Not Block the Box signage and pavement markings.
- Evaluate signal phasing and lane arrangement at eastbound approach.
- Evaluate need for northbound right-turn lane at intersection.

To address the Broad Street (Route 18) between Spring Street and the Campus Plaza North Driveway, the Proponent proposes to install an RRFB at the existing marked mid-block crosswalk on Broad Street (Route 18) adjacent to the project site to improve pedestrian safety and connectivity to the site.

The DEIR analyzed the project's impacts on traffic at the study area intersections and proposed mitigation measures to ensure safe operations at the three proposed site driveways along Broad Street. Stopping sight distance (SSD) analyses, conducted by the Proponent, confirmed compliance with safety standards, and the Proponent committed to enhancing sightlines by removing vegetation and maintaining plant heights within visibility areas.

A crash analysis identified no study area intersections as high-crash locations, and the project is not expected to result in operational impacts at intersections. The intersection of Broad Street and Spring Street, adjacent to an EJ population, is anticipated to maintain consistent LOS between No Build and Build scenarios. Additionally, the above referenced an RSA for the Bridgewater Town Common intersection, which includes the intersection of Route 18 at Main Street/Central Sq/Broad Street that was incorporated into the study area, where the Town is pursuing an independent improvement project.

Transit

The DEIR evaluated public transportation access and proposed measures to enhance connectivity and reduce single-occupancy vehicle trips. To improve pedestrian safety and connectivity, the proponent proposes installing a RRFB at the existing marked mid-block crosswalk on Broad Street (Route 18). The proponent has also initiated discussions with Bridgewater State University (BSU) Transit to explore extending the BSU Blue Line to Broad Street to provide direct transit service to the project site. Coordination with BSU Transit and further development of these improvements will continue throughout the EIR process.

Comments from the MBTA identify concerns related to the project's proximity to the MBTA Right of Way (ROW). Key issues include potential safety and infrastructure impacts, such as site drainage, dust, and the need for barriers between the project site and the ROW. The MBTA noted that the project may fall under its Zone of Influence licensing process, requiring review of design and construction plans, coordination of activities, and flagging support during construction, with associated costs to be borne by the proponent through a force account agreement. Additionally, the MBTA identified the need for coordination with Keolis Commuter Services and raised safety requirements for the use of cranes, hoists, or aerial lifts near the ROW, which will require review and approval of detailed work plans. The FEIR should address the MBTA's comments as further described in the Scope below.

Parking

The ENF Certificate noted that the parking requirements in the Town of Bridgewater Zoning Bylaws (Section 6.1.6) would require a total of 400 parking spaces for the project, which is less than the 413 proposed spaces. The Scope required further assessment of measures to minimize parking needs for the project and increase commitments to EV charging. The DEIR indicates that shared parking has been incorporated into the site design to optimize space usage in consideration of the proposed mix of uses. However, no further information was provided to show that efforts were taken to reduce parking needs, and thereby disincentivize single occupancy vehicle trips. As discussed below, the DEIR indicates that a Transportation Demand Management (TDM) program will be implemented to encourage alternative modes of travel.

Mitigation

The DEIR describes the Proponent's approach to Transportation Demand Management (TDM), addressing the scoping requirement to consider multimodal transportation and reduce single-occupancy vehicle (SOV) trips. The proposed TDM program includes the following elements designed to reduce SOV trips:

- Establishing an on-site transportation coordinator.
- Incentivizing alternative transportation modes and carpooling.
- Providing transit schedules for MBTA and BAT services.
- Coordinating with BAT for a potential on-site bus stop and with BSU Transit to extend the BSU Blue Line to Broad Street.
- Installing on-site bicycle racks and enhancing pedestrian infrastructure, such as sidewalks and crosswalks.

To monitor and mitigate traffic impacts post-occupancy, the Proponent will implement a Traffic Monitoring Program (TMP) for five years, beginning six months after site opening. The TMP includes:

- Conducting manual turning movement counts (MTMCs) during peak periods at site driveway intersections.
- Collecting 48-hour automatic traffic recorder data to assess daily vehicle volumes.
- Performing operational analyses at driveway intersections.
- Administering user surveys to evaluate commuting patterns and mode choices.

To enhance multimodal infrastructure, the DEIR discusses existing pedestrian and bicycle facilities within the study area. These include five-foot-wide sidewalks along Broad Street (Route 18) and Spring Street and a mid-block crosswalk on Broad Street near the site. The Proponent proposes improvements to the mid-block crosswalk, including the addition of a RRFB with ladder-style crosswalk pavement markings and evaluating crosswalk ramps for accessibility compliance. The Proponent determined that enhancements to the existing mid-block crosswalk would more effectively serve the pedestrian network. While dedicated bicycle lanes are not currently available along Broad Street, the roadway shoulders provide informal space for bicycle travel, and the Proponent has committed to providing on-site bicycle racks to encourage cycling.

Comments from MassDOT express concerns regarding access management at the project site, citing the close proximity of three neighboring businesses—Midas, Alix Automotive Parts, and KFC—as a contributing factor to potential safety issues. In particular, the location of the drive-through lane for the coffee shop in Building 2, near the southernmost driveway exit, raises concerns as safety hazard. Vehicles exiting the drive-through and bypass lanes are required to maneuver over a short distance to enter dedicated turn lanes immediately downstream, increasing the likelihood of conflicts and creating a hazard for site egress. MassDOT recommends that the Proponent develop an alternative drive-through circulation plan to eliminate these weaving maneuvers and improve overall safety. The FEIR should address this comment and provide a preferred design that resolves the identified safety concerns. This analysis should consider operational impacts, queuing, and the proximity of adjacent businesses to ensure safe and efficient site access and egress.

MassDOT supports the Proponent's commitment to install a RRFB and related pedestrian safety improvements at the mid-block crosswalk on Broad Street. MassDOT also notes that recently reconstructed pedestrian ramps will be reviewed for ADA compliance. The FEIR should address MassDOT's comments regarding extending a continuous, accessible sidewalk on the eastern side of Broad Street north of Spring Street, connecting to existing pedestrian infrastructure. Additionally, the FEIR should further evaluate and propose measures to enhance bicycle accommodations along Broad Street, as recommended by MassDOT, to support multimodal connectivity.

Water and Wastewater

The DEIR responds to MassDEP's comments regarding the anticipated increase in water use from 12,170 gallons per day to 32,500 gallons per day by confirming with the Bridgewater Water and Sewer Departments that sufficient capacity is available to accommodate the project's projected water demand. The Proponent further addresses MassDEP's request for conservation measures by committing to the implementation of specific Best Management Practices (BMPs), including the installation of low-flow plumbing fixtures, water-efficient irrigation systems, and drought-resistant landscaping. Additionally, the Proponent proposes to install watertight sewer mains to reduce infiltration into the sewer system.

Solid Waste and Hazardous Materials

The DEIR addressed the Scope by providing an update on the MCP cleanup process and clarifying the applicability of 310 CMR 40.0114 conditions. The DEIR confirmed that, based on the analysis of soil, groundwater, sediment, and surface water samples, as documented in the "Comprehensive Site Assessment, Corrective Action Alternative Analysis Permit Application and Post-Closure Use Permit" report, no release of oil or hazardous materials has been identified on the subject property. Consequently, the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) cleanup process is not anticipated to be required for this project. According to the DEIR, based on the existing site conditions and proposed development, no additional MassDEP approvals related to the MCP process are anticipated.

Comments from MassDEP BWSC finds the Proponent's responses acceptable and confirms that no additional releases have been reported in the vicinity of the project area since the submittal of the ENF.

Historic Resources

The DEIR addresses the Scope by including current color photographs of all buildings on the property, as requested by the MHC. Multiple photographs from different vantage points are provided for each building, to provide a comprehensive visual record. The photographs are numbered and keyed to an existing site plan, meeting the specifications outlined in MHC's comments.

Comments from MHC note that MHC staff have concluded that the property does not meet the criteria of eligibility for listing in the National Register of Historic Places. Additionally, MHC review of the project has determined that this project is unlikely to affect significant historical or archaeological resources. The Bridgewater Historical Commission determined by vote on March 21, 2024, that the buildings have no historical significance.

Climate Change

Adaptation and Resiliency

The DEIR addresses the Scope by evaluating the project's resilience to future flooding under climate change scenarios. The stormwater management system is designed to attenuate peak flows from the current 100-year storm event (8.77 inches), which is comparable to the 2070 25-year storm condition (8.3 inches) as recommended by the MA Resilience Design Tool. As previously noted in the ENF Certificate, project activities are proposed outside of the current 100-year floodplain, but the site was still flagged as "High" risk for riverine flooding associated with future climate conditions. The DEIR indicates that the stormwater system is designed to handle discharges at an elevation above the 100-year BFE of the Town River and provides an additional 2.7 feet of elevation before surcharge. The DEIR did not discuss the elevation of proposed structures in comparison to established BFEs in or near the site. This information should be provided in the FEIR.

The DEIR outlined measures to enhance site resilience to extreme heat. Proposed improvements include retaining mature trees within the Town River's 25-foot no-activity zone (except for boat launch areas) and creating 14,627 square feet of riverfront replication. Permeable surfaces will be revitalized with landscaping, and open space is allocated for recreation, including walking paths and community gardening. Additionally, light-colored hardscape materials will be included to further increase resilience to extreme heat.

Greenhouse Gas Emissions (GHG)

Stationary Sources

The DEIR, as noted above, partially addresses the Scope by demonstrating compliance with the Massachusetts DOER recommendations through the Proponent's commitment to Passive

House design and construction standards for all buildings. This approach inherently meets the high energy efficiency and sustainability goals outlined in DOER's comments.

As noted, the Proponent has confirmed the following commitments for building energy efficiency:

- Residential: Passive House compliance, electric heat pump space heating, electric water heating, and electric cooking.
- Commercial: Lower air infiltration (Option 8, C406), air source heat pump space heating, air source heat pump water heating, with natural gas limited to cooking.

The FEIR should provide a GHG analysis for stationary sources, consistent with the Massachusetts MEPA Greenhouse Gas (GHG) Policy as further described in the Scope below.

Comments from DOER commended the project for its responsiveness to their recommendations, particularly the incorporation of Passive House standards and efficient electrification for the residential portions of the development. DOER recommends that all proposed gas connections be removed and that any proposed gas space and hot water heating systems be replaced with electric heat pump systems in the non-residential portions of the project. This change would ensure the buildings remain eligible for MassSave incentives, including more than $0.56 million in funding for Passive House. If efficient electrification and Passive House commitments are incorporated in the project, DOER has indicated that they would have no further comments or recommendations on the project.

Mobile Sources

As noted, the DEIR did not evaluate potential GHG emissions or increase in air pollutants associated with the project's mobile sources (traffic). While the Proponent has committed to implementing Passive House design standards, this does not negate the need for a comprehensive GHG analysis for mobile source emissions, as outlined in the 2010 MEPA GHG Policy. Specifically, the DEIR lacks an evaluation of mobile emissions for Existing Conditions, No Build and Build Conditions, and Build Conditions with Mitigation. The analysis should document reductions in GHG emissions associated with TDM measures and roadway improvements. The FEIR should continue to consider measures to reduce single-occupancy vehicle trips and minimize air emissions from vehicle traffic, including by considering additional reductions to parking spaces and consideration of additional transit and multi-modal accommodations.

Construction Period

The DEIR described how construction activities will be managed in accordance with applicable MassDEP regulations regarding Air Pollution Control (310 CMR 7.01, 7.09-7.10) and Solid Waste Facilities (310 CMR 16.00 and 310 CMR 19.00, including the waste ban provision at 310 CMR 19.017). The project includes series of provisions to minimize construction-related impacts, including the implementation of erosion and sedimentation controls, soil stabilization measures, anti-tracking controls, dust suppression, and proper maintenance of construction equipment. The DEIR also states that construction activities will adhere to best management

practices, minimizing land disturbance to avoid environmental impacts. Additionally, the Proponent acknowledges the requirement for a NPDES Construction General Permit (CGP) and commits to utilizing a Stormwater Pollution Prevention Plan (SWPPP) to reduce construction-related impacts on stormwater quality.

To mitigate noise impacts during construction, the Proponent outlines several measures, including maintaining construction equipment exhaust mufflers, turning off unused equipment, locating noise-generating equipment away from sensitive receptors, and keeping engine housing panels closed. Contracts will include requirements for proper equipment maintenance, and backup alarms on vehicles and equipment will be adjusted to minimize noise without compromising safety. The Proponent also commits to utilizing electricity from the grid as soon as feasible to replace portable generators, further reducing noise and emissions associated with construction activities.

To address air quality impacts, the Proponent commits to encouraging contractors to use construction equipment fitted with either diesel oxidation catalysts (DOC) or diesel particulate filters (DPF) to reduce emissions. Additionally, the DEIR confirms that warming up of construction vehicles and equipment will be restricted to permitted hours to minimize disruption. Efforts to minimize dirt, mud, and dust generation are proposed, including anti-tracking controls, dust suppression measures, and erosion and sedimentation controls.

The DEIR outlines compliance with federal, state, and local requirements for the handling, recycling, and disposal of construction and demolition (C&D) debris. The Proponent plans to segregate demolition materials onsite for reuse or recycling where feasible, with recyclable materials transported to appropriate facilities. Solid waste will be managed by a licensed contractor, and hazardous materials will be handled and disposed of in accordance with applicable regulations and best practices.

The DEIR outlines the stormwater management measures that will be implemented during construction in compliance with the NPDES CGP. A SWPPP will be prepared prior to the commencement of earthmoving activities, submitted to the Town, and made available to site workers. Erosion and sedimentation controls, including sediment basins, silt fences, and dust suppression measures, will be implemented and inspected regularly throughout the construction period, with immediate corrective actions taken when necessary. The DEIR also describes construction-period dewatering activities, prohibiting discharges unless managed by appropriate controls. Measures include using stabilized sump pits, sediment filter bags, and adherence to state and local permitting requirements.

The DEIR addresses the Scope's requirement for a spills contingency plan by outlining measures to prevent and manage potential releases of oil and hazardous materials during construction and post-construction activities. The plan includes secure storage of hazardous substances, maintaining minimal on-site quantities, and providing spill control kits. It also details response procedures for both minor and major spills, including required notifications to regulatory agencies when applicable. These measures are included in the project’s Operation and Maintenance section of the Drainage Report, which will be appended to the SWPPP.

SCOPE

General

The FEIR should follow Section 11.07 of the MEPA regulations for outline and content and provide the information and analyses required in this Scope. It should clearly demonstrate that the Proponent has sought to avoid, minimize, and mitigate Damage to the Environment to the maximum extent feasible.

Project Description and Permitting

The FEIR should include any updated site plans for existing and post-development conditions at a legible scale, and should identify any changes since the filing of the DEIR. The FEIR should identify and describe State, federal and local permitting and review requirements associated with the project, provide an update on the status of each of these pending actions, analyze applicable statutory and regulatory standards and requirements, and provide a discussion of the project's consistency with those standards.

The information and analyses identified in this Scope should be addressed within the main body of the FEIR and not in appendices. In general, appendices should be used only to provide raw data, such as wetland delineations, drainage calculations, capacity analyses and energy modelling, that is otherwise adequately summarized with text, tables and figures within the main body of the FEIR. Information provided in appendices should be indexed with page numbers and separated by tabs, or, if provided in electronic format, include links to individual sections. Any references in the FEIR to materials provided in an appendix should include specific page numbers to facilitate review.

Environmental Justice Populations / Public Health

The Proponent should continue community engagement efforts throughout the remainder of MEPA review, and include a summary in the FEIR of additional engagement activities conducted after the DEIR and any additional efforts the project intends to follow for the remainder of the MEPA review process and subsequent permitting. The FEIR, or a summary thereof, should be distributed to all CBOs and tribes included in the "EJ Distribution List," which should be updated as needed if changes have been made. The FEIR should include a copy of any documentation of public comments/concerns received as part of community engagement activities or the dedicated section of the project website, and indicate what measures the Proponent took to address those comments.

The FEIR should supplement the baseline conditions assessment by specifying the particular "vulnerable health EJ criteria" implicated for the Town of Bridgwater and the census tracts identified. The FEIR should survey additional mapping layers in the DPH EJ Tool to identify potential sources of pollution within the DGA. The FEIR should consult the guidance provided in the MEPA Interim Protocol for Analysis of Project Impacts on EJ Populations and the MEPA website, and should provide the information in a centralized location in the FEIR and not dispersed in multiple locations. The FEIR should identify whether the project site is within

500 feet of a "hot spot" as identified in the RMAT climate dashboard, and whether any of the identified EJ populations around the site are located in any such hot spots.[7] If so, mitigation should be proposed to mitigate any heat effects due to the addition of impervious area or removal of trees proposed by the project..

The FEIR should provide an air quality analysis using the EPA MOVES model, consistent with the MassDEP Guidelines for Performing Mesoscale Analysis of Indirect Sources, for the study area used for the traffic study performed for the project. Data on NOx, PM2.5, PM10, and DPM should be provided to the extent they are available. The FEIR should provide a comparison of GHG emissions and air pollutants from Existing (current) conditions to future No Build, future Build, and future Build with Mitigation conditions. The FEIR should confirm that any impacted intersections within the traffic study area (where LOS was shown to degrade from No Build to Build conditions) and adjacent to EJ populations will be adequately mitigated. The FEIR should indicate whether total air emissions will exceed 1 ton per year (tpy) from No Build to Build conditions for any individual air pollutant, and should also report on whether emissions will increase from Existing to future Build conditions. In either case, the project should consider additional mitigation measures beyond the traffic mitigation already reported. Potential mitigation measures include tree planting in impacted EJ neighborhoods, air quality monitoring, and monetary contributions to local public health centers or organizations servicing the surrounding EJ populations.

Traffic and Transportation

According to the DEIR, the TIS dated February 2023, initially prepared and submitted as part of the ENF for this project, was revised following comments received and coordination with MassDOT. The updated TIS, dated November 2024, was included in the submittal. The FEIR should confirm that the average daily trip generation anticipated in the February 2023 TIS is consistent with the updated November 2024 TIS and that no additional MEPA transportation thresholds, as outlined in 301 CMR 11.03, are exceeded.

The Proponent should continue consultation with the Town and MassDOT to identify mitigation strategies for traffic related impacts during the preparation of the FEIR for the project. The FEIR should confirm the Proponent's plans to enhance sightlines at the proposed driveways and provide details on the installation and timeline of the RRFB at the Broad Street mid-block crosswalk. The FEIR should also evaluate how these measures will improve pedestrian safety and traffic operations while addressing potential safety concerns at the site and surrounding areas.

As discussed, MassDOT recommends that the Proponent develop an alternative drive-through circulation plan to eliminate these weaving maneuvers and improve overall safety. The FEIR should address this comment and provide a preferred design that resolves the identified safety concerns. This analysis should consider operational impacts, queuing, and the proximity of adjacent businesses to ensure safe and efficient site access and egress. The FEIR should address MassDOT's comments regarding extending a continuous, accessible sidewalk on the eastern side of Broad Street north of Spring Street, connecting to existing pedestrian

[7] https://resilientma-mapcenter-mass-eoeea.hub.arcgis.com/

infrastructure. Additionally, the FEIR should further evaluate and propose measures to enhance bicycle accommodations along Broad Street, as recommended by MassDOT, to support multimodal connectivity

The FEIR should detail ongoing coordination with BAT to improve transit services to the project site, including actions such as route extensions, new bus stops, and the installation of transit shelters or similar facilities. The FEIR should clearly specify the transit-related measures the Proponent commits to implementing, outline efforts to enhance connectivity and reduce single-occupancy vehicle trips and provide a framework for continued evaluation and updates on the effectiveness of these transit service improvements. The FEIR should describe any additional initiatives to be undertaken to improve transit services to the project.

The FEIR should continue to evaluate measures to optimize parking facilities within the project area, including strategies to eliminate or limit parking supply and prioritize spaces for EV and zero-emission vehicles. It should also detail plans for installing additional public EV charging stations, specifying the number and type of EV spaces proposed, and outline how these measures will support sustainable transportation goals and demand.

The FEIR should include a framework for monitoring the effectiveness of the TDM program, including specific metrics for evaluating mode share goals, commuter behavior, and program participation rates. Adaptive management strategies should be detailed to outline how the TDM program will be adjusted based on monitoring results to enhance its effectiveness continually. Adjustments could include increasing incentives for non-single-occupancy vehicle modes, expanding access to transit services, enhancing pedestrian and bicycle infrastructure, or introducing stronger disincentives for single-occupancy vehicle use, such as parking restrictions or pricing strategies.

The FEIR should address the MBTA's concerns, discussed above, by including a detailed description of how the proponent will comply with the Zone of Influence policy, including measures to mitigate potential impacts to the ROW. The FEIR should outline coordination efforts with the MBTA and Keolis, provide draft work plans for the use of any cranes, hoists, or aerial lifts near the ROW, and detail funding commitments for necessary safety measures, such as flagging or other operational support. Additionally, the FEIR should describe how site drainage, dust control, and physical barriers between the project site and the ROW will be managed to prevent adverse impacts to MBTA infrastructure and operations.

Climate Change

Adaptation and Resiliency

As stated in the prior Scope, the FEIR should evaluate whether the elevation of the proposed buildings and other structures are anticipated to be resilient to flood elevations under 2070 25-year and 50-year storm conditions. Future elevations can be determined either through use of the Tier 2/3 methodologies provided by the MA Resilience Design Tool, or reasonably estimated through comparison with any base flood elevations (BFEs) that have been established for the site or adjacent areas. Flood insurance studies performed by FEMA can also be consulted

as a resource (with higher storm events chosen as a proxy for future climate conditions).[8] As noted, the FEIR should identify any "hot spots" adjacent to the project site, and indicate whether new impervious area or tree removal will occur at those locations. If so, mitigation should be considered.

The FEIR should continue to evaluate ways to maximize the use of LID strategies for stormwater management, including rain gardens, bioretention areas, tree box filters, water quality swales, and green roofs.

Greenhouse Gas Emissions (GHG)

The FEIR should include a GHG analysis for stationary sources consistent with the Massachusetts MEPA Greenhouse Gas (GHG) Policy and Protocol. As the project complies with project specific DOER recommendations, additional building energy modeling is not required. The FEIR should confirm compliance with the applicable Stretch Energy Code in Bridgewater and provide a qualitative assessment of emissions from stationary sources, including the proposed use of gas in commercial spaces. This assessment should demonstrate alignment with the GHG Policy's requirements for quantifying emissions, evaluating mitigation measures, and supporting the Commonwealth's emissions reduction goals.

The GHG analysis should include an evaluation of potential GHG emissions associated with the project's mobile source emissions. Consistent with the mesoscale air quality analysis, the FEIR should determine mobile source GHG emissions for Existing Conditions, No Build and Build Conditions, and Build Conditions with Mitigation. The FEIR should demonstrate that all feasible means will be used to reduce GHG emissions for the project. The Proponent should thoroughly explore means to reduce overall single occupancy vehicle trips and to minimize air emissions from diesel vehicle traffic. The FEIR should also review measures to promote the use of low-emissions vehicles, including installing electric vehicle (EV) charging stations and providing and identifying designated parking spaces for these vehicles to the maximum extent practicable with the balance of spaces being EV ready for future installation. The Build with Mitigation model should incorporate TDM measures, and any roadway improvements implemented by the project, and document the associated reductions in GHG emissions. The FEIR should explain how TDM measures will be monitored and adjusted over time and provide a methodology for quantifying emission reductions impacts rather than an assumed percentage reduction.

Construction Period

The FEIR should confirm whether contractors will be required to use ultra-low sulfur diesel fuel (ULSD), Tier 4 engines, or retrofit emissions control devices to reduce air quality impacts and that all construction activities will comply with State and local permit conditions.

The FEIR should include further detail on the management of traffic impacts, particularly construction vehicle trips through residential areas to ensure comprehensive mitigation of potential community disruptions.

[8] https://msc.fema.gov/portal/advanceSearch

Mitigation/Draft Section 61 Findings

The FEIR should include a separate chapter summarizing all proposed mitigation measures including construction-period measures. This chapter should also include a comprehensive list of all commitments made by the Proponent to avoid, minimize and mitigate the impacts of the project, and should include a separate section outlining mitigation commitments relative to EJ populations. The FEIR should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The list of commitments should be provided in a tabular format organized by subject matter (traffic, wetlands, stormwater, water/wastewater, GHG, EJ, etc.) and identify the Agency Action or Permit associated with each category of impact. Draft Section 61 Findings should be separately included for each Agency Action to be taken on the project.

The FEIR should include a commitment to provide a GHG self-certification to the MEPA Office upon construction of the project. It should be signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the GHG mitigation measures, or equivalent measures that are designed to collectively achieve identified reductions in stationary source GHG emission and transportation-related measures, have been incorporated into the project. If equivalent measures are adopted, the project is encouraged to commit to achieving the same level of GHG emissions (i.e., "carbon footprint") identified in the Preferred Alternative expressed as a volumetric measure (tpy) in addition to a percentage GHG reduction from Base Case. The commitment to provide this self-certification in the manner outlined above should be incorporated into the draft Section 61 Findings included in the FEIR. In the event material changes are made to any mitigation commitments set forth in the FEIR and this Certificate, a Notice of Project Change (NPC) filing and amended Section 61 Findings may be required.

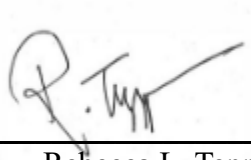
Response to Comments

The FEIR should contain a copy of this Certificate, and a copy of each comment letter received. The FEIR should contain a direct response to the scope items in this Certificate. To ensure that the issues raised by commenters are addressed, the FEIR should also include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the FEIR beyond what has been expressly identified in this certificate.

Circulation

The Proponent should circulate the FEIR to each Person or Agency who previously commented on the ENF or DEIR, each Agency from which the project will seek Permits, Land Transfers or Financial Assistance, and to any other Agency or Person identified in the Scope. The Proponent may circulate copies of the FEIR to commenters other than Agencies in a digital format (e.g., CD-ROM, USB drive) or post to an online website. However, the Proponent should make available a reasonable number of hard copies to accommodate those without convenient

access to a computer to be distributed upon request on a first come, first served basis. A copy of the FEIR should be made available for review in the Bridgewater Public Libraries.



January 17, 2025
Date

Rebecca L. Tepper

Comments received:

01/10/2025 Massachusetts Department of Environmental Protection (MassDEP)
01/10/2025 Massachusetts Historical Commission (MHC)
01/10/2025 Massachusetts Department of Transportation (MassDOT)
01/10/2025 Massachusetts Bay Area Transit Authority (MBTA)
01/16/2025 Massachusetts Department of Energy Resources (DOER)

RLT/MJS/mjs

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

January 10, 2025

Rebecca L. Tepper
Secretary of Energy and Environment
Executive Office of Energy &
Environmental Affairs
100 Cambridge Street, Suite 900,

ATTN: MEPA Office,
Boston, MA 02114

RE: DEIR Review EOEEA #16819
BRIDGEWATER. Proposed Mixed-Use Development at 168, 180, 232, 240 Broad Street

Dear Secretary Tepper,

The Southeast Regional Office of the Department of Environmental Protection (MassDEP) has reviewed the Draft Environmental Impact Report (DEIR) for the Proposed Mixed-Use Development at 168, 180, 232, 240 Broad Street, Bridgewater, Massachusetts (EOEEA # 16819). The Project Proponent provides the following information for the Project:

Since the filing of the ENF, the Project has received approval from the Town of Bridgewater Conservation Commission. Minor clarifications were made in response to peer review comments, none of which impacted the Project program.

The Proponent acknowledges and proposes minor modifications to the Project in response to the comments provided in the ENF Certificate. See below for Project changes since the ENF filing:

- **Residential & non-restaurant commercial buildings no longer serviced by gas but rather electric.**

The "Site Development Plans" have been modified accordingly and are provided in Appendix C. There are no changes to the Preferred Master Plan

As discussed in the ENF filing, the Preferred Master Plan (hereinafter referred to as the "Master Plan" or "the Project") proposes to demolish the three (3) industrial buildings and one (1) office building related to the current industrial use. Three (3) residential buildings located on adjacent parcels will also be demolished. The Master Plan proposes to re-develop the Site for mixed-use consisting of:

- **Three (3) mixed-use buildings, including retail, commercial, residential, and restaurant;**
- **Approximately 361± standard parking spaces;**

- **Associated driveways for access and circulation;**
- **Residential amenity spaces;**
- **Public amenity spaces including pedestrian pathways, public boat launch with associated parking, and green space;**
- **Community gardens;**
- **Pedestrian sidewalks;**
- **Bike storage;**
- **Associated stormwater management features; and • Associated utilities**

Bureau of Water Resources (BWR) Comments

Wetlands: DEP-SERO Wetlands Program has reviewed the Draft Environmental Impact Report (DEIR) for the proposed construction of a mixed-use redevelopment, including residential and commercial units, associated parking, utilities, stormwater, grading, and landscaping, in Bridgewater, Massachusetts.

The Wetlands Program notes that the Bridgewater Conservation Commission (BCC) issued an Order of Conditions (SE 116-1543) for the Project on September 5, 2024, received by the Department on September 10, 2024. The Order was not appealed. The BCC's Order includes the following special conditions relevant to the DEP's comments in the file number issuance and on the ENF:

- Demonstrate compliance with 310 CMR 10.57(4)(a)1. by providing a cut and fill table. "Compensatory storage shall be provided for all flood storage volume that will be lost as a result of a proposed Project within Bordering Land Subject to Flooding, when in the judgement of the issuing authority said loss will cause an increase or will contribute incrementally to an increase in the horizontal extent and level of flood waters during peak flows. Compensatory storage shall mean a volume not previously used for flood storage and shall be INCREMENTALLY EQUAL to the theoretical volume of flood water at EACH ELEVATION, up to and including the 100-year flood elevation, which would be displaced by the proposed Project. Such compensatory volume shall have an unrestricted hydraulic connection to the same waterway or water body. Further, with respect to waterways, such compensatory volume shall be provided within the same reach of the river, stream or creek."

- Per 310 CMR 10.58(5)(h), the issuing authority shall include a continuing condition in the Certificate of Compliance for projects under 310 CMR 10.58(5)(f) or (g) prohibiting further alteration within the restoration or mitigation area, except as may be required to maintain the area in its restored or mitigated condition. Prior to requesting the issuance of the Certificate of Compliance, the applicant shall demonstrate the restoration, or mitigation has been successfully completed for at least two growing seasons.

Wetlands Program comments on the ENF have been addressed by the BCC's Order and the DEIR.

Waterways: Pursuant to the Department's internal review, no work appears within a geographic area subject to jurisdiction pursuant to Chapter 91 and its regulations at 310 CMR 9.00, therefore, no Chapter 91 Authorization is required.

Bureau of Waste Site Cleanup (BWSC) Comments

Based upon the information provided, the Bureau of Waste Site Cleanup (BWSC) searched its databases for disposal sites and release notifications that have occurred at or might impact the proposed Project area. A disposal site is a location where there has been a release to the environment of oil and/or hazardous material that is regulated under M.G.L. c. 21E, and the Massachusetts Contingency Plan [MCP – 310 CMR 40.0000].

BWSC finds the Project Proponent's responses to BWSC's comments accurate and acceptable. No additional releases have been reported in the vicinity of the Project area since the submittal of the ENF.

An inspection report for asbestos-containing materials, lead-based paint, polychlorinated biphenyls, mercury containing components and miscellaneous hazardous materials was completed by Smith & Wessel Associates and included in Appendix C of the DEIR. The inspection report noted that fifteen transformers were observed at the Site; however, the report did not mention if the transformers contained PCBs or the condition of the transformers. Photos taken at the Site depict two pad-mounted transformers that appear to be in poor condition. The report also noted the presence of 120 solvents/cleaners, seven 55-gallon drums, 30 50-gallon oil/lubricant drums, 70 5-gallon oil/lubricant containers and 3 abandoned cars/trucks. The report did not note the condition of these containers. DEP recommends that the transformers, drums, containers and vehicles be inspected to determine if any releases of oil or hazardous material have occurred or if any threats of release are present. If a release has occurred or a threat of a release is present, the Proponent must adhere to the MCP reporting regulations at 310 CMR 40.0300.

Interested parties may view a map showing the location of BWSC disposal sites using the MassGIS data viewer at MassMapper. Under the Available Data Layers listed on the right sidebar, select "Regulated Areas", and then "DEP Tier Classified 21E Sites". MCP reports and the compliance status of specific disposal sites may be viewed using the BWSC Waste Sites/Reportable Release Lookup at: https://eeaonline.eea.state.ma.us/portal/dep/wastesite/

The Project Proponent is advised that if oil and/or hazardous material are identified during the implementation of this Project, notification pursuant to the Massachusetts Contingency Plan (310 CMR 40.0000) must be made to MassDEP, if necessary. A Licensed Site Professional (LSP) should be retained to determine if notification is required and, if need be, to render appropriate opinions. The LSP may evaluate whether risk reduction measures are necessary if contamination is present. The BWSC may be contacted for guidance if questions arise regarding cleanup.

Bureau of Air and Waste (BAW) Comments

Air Quality: The Project Proponent has adequately addressed the Department's ENF comments

Solid Waste Management: The objective of this Project is the construction of a mixed use-development which will include constructing three (3) buildings, one of which will be used for residential housing. The proposed work will include the re-use of spent foundry sands (SFS) from the existing SFS Landfill located within the northern portion of the 180 Broad Street parcel. Work

will also include the demolition of the existing Henry Perkins Foundry building (180 Broad Street) and several smaller sheds.

The Project Proponent has responded that they acknowledge the Solid Waste Management Section's comments on the Environmental Notification Form and refers the Solid Waste Management Section to Appendices "C" and "I" of the Draft Environmental Impact Report for the "Evaluation of Site Slope Stability" and "Construction Management Plan", respectively. However, per Condition #2 of MassDEP's approval of the combined Corrective Action Design (CAD) and Post Closure Use (Major) permit (Authorization No. SW-25-0000017), a number of items are required to be submitted directly to MassDEP's Solid Waste Management Section for review and approval thirty (30) days prior to commencing construction of the final cover system/Post-Closure construction. To-date the Solid Waste Management Section has not received any of these documents and MassDEP provides the following **reminder to submit the below listed documents directly to MassDEP's Solid Waste Management Section thirty (30) days prior to commencement of construction of the final cover system:**

a. A copy of the Notice of Intent to the Town of Bridgewater that describes any proposed activity within the Riverfront Resource Area;
b. A Deed Notice recorded with the Plymouth County Registry of Deeds, which includes the final locations of the SFS/Green Sands;
c. A slope stability and settlement analysis, signed and stamped by a Massachusetts Registered Professional Engineer. The analysis shall include calculated slope stability factor of safety, based upon anticipated materials and maximum slopes.
d. A final grading plan, as applicable, signed and stamped by a Massachusetts Registered Professional Engineer.
e. A post closure environmental monitoring program shall be submitted for MassDEP review and approval.

If you have any questions regarding the Solid Waste Management Section comments, please contact Elza Bystrom at Elza.Bystrom@mass.gov or Mark Dakers at Mark.Dakers@mass.gov.

Asbestos: The Project Proponent has adequately addressed the Department's ENF comments

Other Comments/Guidance

The MassDEP Southeast Regional Office appreciates the opportunity to comment on this DEIR. If you have any questions regarding these comments, please contact George Zoto at George.Zoto@mass.gov or Jonathon Hobill at Jonathan.Hobill@mass.gov.

Very truly yours,

Jonathan E. Hobill,
Regional Engineer,
Bureau of Water Resources

JH/GZ

Cc: DEP/SERO

ATTN: Gerard Martin, Regional Director
John Handrahan, Deputy Regional Director, BWSC
Seth Pickering, Deputy Regional Director, BAW
Jennifer Viveiros, Deputy Regional Director, ADMIN
Maissoun Reda, Chief, Wetlands, BWR
Brendan Mullaney, Chief, Waterways, BAW
Carlos Fragata, Waterways, BAW
Joe Cerutti, Underground Injection Control, BWR/Boston
Duane LeVangie, Chief, Water Management, BWR/Boston
Shi Chen, Water Management, BWR/Boston
Mark Dakers, Chief, Solid Waste, BAW
Jeffifer Wharff, Solid Waste, BAW
Jeffrey Hunter, Solid Waste, BAW
Colleen Ferguson, Chief, Asbestos, BAW
Angela Gallagher, Chief, Site Management, BWSC
Amanda Cantara, Site Management, BWSC

Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Monica Tibbits-Nutt, Secretary & CEO

massDOT
Massachusetts Department of Transportation

January 10, 2025

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Bridgewater – Proposed Mixed-Use Development – DEIR
(EEA #16819)

ATTN: MEPA Unit
Eva Vaughn

Dear Secretary Tepper:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Draft Environmental Impact Report for the Proposed Mixed-Use Development in Bridgewater as prepared by the Office of Transportation Planning. If you have any questions regarding these comments, please contact J. Lionel Lucien, P.E., Manager of the Public/Private Development Unit, at (857) 368-8862.

Sincerely,

David J. Mohler
Executive Director
Office of Transportation Planning

DJM/jll

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

cc: Jonathan Gulliver, Administrator, Highway Division
Carrie Lavallee, P.E., Chief Engineer, Highway Division
Mary Joe Perry, District 5 Highway Director
James Danila, P.E., State Traffic Engineer
Old Colony Planning Council (OCPC)
Planning Board, Town of Bridgewater

Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Monica Tibbits-Nutt, Secretary & CEO

massDOT
Massachusetts Department of Transportation

MEMORANDUM

TO: David Mohler, Executive Director
Office of Transportation Planning

FROM: J. Lionel Lucien, P.E, Manager
Public/Private Development Unit

DATE: January 10, 2025

RE: Bridgewater – Proposed Mixed-Use Development – DEIR
(EEA #16819)

The Public/Private Development Unit (PPDU) has reviewed the Draft Environmental Impact Report (DEIR) for the Proposed Mixed-Use Development in Bridgewater (the "Project") submitted by Bohler Engineering MA, LLC on behalf of Edgewood Development Company, LLC (the "Proponent"). The Project site consists of three industrial-style buildings, one office building, and multiple smaller shed-sized buildings on approximately 13.2 acres of land. The Site is bounded by Town River and associated wetlands to the north, Broad Street and commercial properties to the east, and the MBTA railway to the west.

The Project proposes to construct three mixed-use buildings, which will include 150 residential units, approximately 20,500 square feet of commercial space consisting of office space, café, and restaurant, 360 surface parking spaces, pedestrian areas, landscaping, associated utilities, and stormwater management features. Access to the site will be provided by existing and new curb cuts along Broad Street (Route 18).

The Project previously submitted an Environmental Notification Form (ENF) on April 10, 2024, for which the Secretary of Energy and Environmental Affairs issued a Certificate on May 24, 2024, requiring the Proponent to prepare a DEIR.

The DEIR includes a TIA prepared by Bowman in accordance with the EEA/MassDOT *Transportation Impact Assessment (TIA) Guidelines*. The TIA includes an analysis of the study area that addresses the Project's impacts on intersection operations, safety, and bicycle, pedestrian, and transit modes. The TIA is generally responsive to MassDOT's commentary regarding the ENF.

Trip Generation

The trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation Manual (11th Edition) were used to estimate daily vehicle trips for the following land use categories:

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

- Land Use Code (LUC) 220 - Multifamily Housing (Low-Rise - Not Close to Rail Transit);
- LUC 221 - Multifamily Housing (Mid-Rise- Not Close to Rail Transit);
- LUC 712 - Small Office Building;
- LUC 912 - Drive-in Bank;
- LUC 932 - High-Turnover Sit-Down Restaurant; and
- LUC 937 - Coffee/Donut Shop with Drive-Through Window.

Using this methodology, the Project is estimated to generate 3,328 new daily vehicle trips.

The Town of Bridgewater's 2017-2021 census data shows that about 9.5% of trips are multimodal (walking, biking, or transit). The project site is near Bridgewater State University, the MBTA Middleborough/Lakeville Commuter Rail Line, and Campus Plaza, suggesting some multimodal trips between the site and nearby destinations. However, for a conservative analysis, no reduction was made for non-vehicle trips.

Not all vehicle trips to the project site will be new; many will be "pass-by" trips, meaning vehicles already traveling nearby will stop at the drive-in bank, restaurant, or coffee shop. The percentage of these pass-by trips was based on published data from the Institute of Transportation Engineers (ITE).

Additionally, some trips on the site will be "internal capture" trips, where customers or employees move between different uses on the same site. After applying credit assumptions for internal capture and pass-by trips, the Project is expected to generate about 256 new vehicle trips during the morning peak hour (119 entering and 137 exiting) and 147 new vehicle trips during the afternoon peak hour (87 entering and 60 exiting).

Study Area

The study area includes the following intersections:

- Route 18 at Spring Street;
- Route 18 at Summer Street/Main Street/Central Square;
- Route 18 at South Site Driveway;
- Route 18 at Central Site Driveway; and
- Route 18 at North Site Driveway/Campus Plaza North Driveway.

The traffic estimated to be generated by the Project was distributed onto the study area roadways and intersections based on existing travel patterns, logical travel routes, and using Journey-to-Work methodology based on a review of 2011-2015 Census Commuting and Employment data for the Town of Bridgewater.

Safety

Crash data for the study area was obtained from MassDOT for the years 2017-2021, which includes yearly summaries for crashes at intersections and roadway segments. The MassDOT Crash Rate Worksheet was used to calculate crash rates for these locations, comparing them to statewide and district averages. The rates are expressed in crashes per million entering vehicles (MEV) for intersections and per million vehicle miles traveled (MVMT) for roadway segments. The analysis found that the signalized intersection of Route 18 at Spring Street had a crash rate of 0.62, which is lower than the statewide and District 5 average for signalized intersections. Meanwhile, the signalized intersection at Route 18 at Summer Street/Main Street/Central Square had a crash rate of 1.36, higher than both averages. Other intersections, such as Route 18 at Campus Plaza North Driveway, had lower crash rates, and the segment of Route 18 between Spring Street and the proposed North Site Driveway had a notably higher crash rate of 9.00.

In addition to the crash data, a Road Safety Audit (RSA) for Bridgewater Town Common, conducted in February 2020, identified safety issues and recommended potential enhancements for the intersections. Suggested improvements included advanced warning signage, improved visibility through vegetation trimming, optimizing signal head placement, and adding pedestrian facilities such as ADA-compliant sidewalks and exclusive pedestrian phasing. The RSA also recommended further evaluation of signal phasing and lane arrangements, especially at the Central Square North intersection, which is part of the study area. An ongoing project for roadway and pedestrian improvements in the Central Square area, still in its preliminary stages, may incorporate these recommendations into the final design.

Planned Roadway Improvements

Planned roadway improvement projects can influence travel patterns and future traffic flow. The Town of Bridgewater is currently working on enhancements to roads and pedestrian areas in Central Square, including the intersection of Route 18 with Summer Street/Main Street. This project aims to improve the intersection and overall circulation in Central Square, addressing safety issues identified in the February 2020 RSA. However, the project is still in the early stages, with no formal design yet, so it is not included in the 2031 future traffic projections.

Traffic Operations

The intersection of Route 18 at Spring Street currently operates at Level of Service (LOS) B during both the morning and afternoon peak hours on weekdays. This condition is expected to remain the same under both the 2031 No Build and Build scenarios.

Meanwhile, the intersection of Route 18 at Summer Street/Main Street/Central Square operates at LOS C during both the morning and afternoon peak hours. By 2031, under both

the No Build and Build scenarios, it will continue to function at LOS C during the morning peak hours but will decline to LOS D during the afternoon peak hours.

Site Access

The proposed project consists of three mixed-use buildings located on the west, south, and north portions of the site. Access to the site would be provided via three driveways on the west side of Route 18, with the South Site Driveway operating as an exit-only with left and right turn lanes, and the Central and North Site Driveways functioning as full-access points. The North Site Driveway would align with the Campus Plaza North Driveway. This layout is designed to improve traffic circulation and allow for convenient vehicle access and egress. Additionally, pedestrian connectivity would be ensured through internal sidewalks and crosswalks, as well as connections to the existing sidewalk network in the surrounding area.

MassDOT has raised concerns regarding access management due to the close proximity of three neighboring businesses: Midas, Alix Automotive Parts, and KFC. Additionally, the location of the drive-through lane for the coffee shop in Building 2, which is situated near the southernmost driveway exit, may lead to safety issues. Vehicles using the drive-through and bypass lanes would need to maneuver over a short distance to turn left or right, as there are dedicated turn lanes immediately downstream. This situation poses a potential hazard for vehicles exiting the site. MassDOT recommends that an alternative drive-through circulation plan be developed to eliminate the need for these weaving maneuvers and enhance overall safety.

Off-Site Mitigation

To improve pedestrian access between the project site and nearby locations such as Campus Plaza, BSU, and the MBTA station, the Traffic Impact Analysis (TIA) has evaluated enhancements to the existing mid-block crosswalk on Route 18. This evaluation was carried out in collaboration with MassDOT and was informed by guidance from the Federal Highway Administration (FHWA.

The recommended improvements for the crosswalk include high-visibility markings, warning signs, an in-street pedestrian crossing sign, curb extensions, a pedestrian refuge island, and a Rectangular Rapid-Flashing Beacon (RRFB). A Pedestrian Hybrid Beacon (PHB) was determined to be unsuitable due to its proximity to curb cuts. The Proponent has committed to installing the RRFB and pedestrian warning signage as part of mitigation for the Project. The recently reconstructed pedestrian ramps will be reviewed for compliance with ADA standards.

MassDOT supports the installation of the RRFB at the mid-block crosswalk on Broad Street near the site. However, there is no sidewalk on the eastern side of Broad Street south of the Spring Street intersection. To enhance pedestrian safety and accessibility at the RRFB, please consider adding a continuous and accessible sidewalk section in front of Dunkin'

Donuts and the Post Office that connects to the existing sidewalk on Broad Street. Additionally, please explore measures to accommodate bicycles along Broad Street near the site.

The Proponent plans to enhance the Route 18 corridor by implementing various roadway, signage, and pedestrian improvements, pending necessary approvals. These improvements will include the construction of a sidewalk network that connects to existing sidewalks along Broad Street, upgrading crosswalks to meet MassDOT standards, and creating site access driveways that comply with these standards. Furthermore, bicycle accommodations will be added to promote alternative transportation, and electric vehicle (EV) charging stations will be installed on-site. Other proposed enhancements include walking trails, patios, community gardens, recreational spaces, and pedestrian crossings, all designed to reduce greenhouse gas emissions and improve walkability.

Transportation Demand Management

The Proponent is committed to implementing a Transportation Demand Management (TDM) program intended to reduce single-occupancy vehicle trips to the Project site. These measures may include:

- Establishing an on-site Transportation coordinator;
- Incentivizing the use of transportation modes other than a single-occupancy vehicle;
- Posting carpool brochures on-site and online;
- Posting MBTA and BAT transit schedules on site;
- Coordinating with BAT to potentially include a bus stop on-site; and
- Providing bicycle racks on site.

The Bridgewater State University (BSU) Transit Department was contacted to evaluate the possibility of extending the BSU Blue Line to Route 18 on Broad Street, in order to provide service to the project site. The Proponent will maintain this coordination throughout the MEPA process.

Transportation Monitoring Program

The Proponent will monitor traffic volumes and operations at the site driveway intersections for six months following initial occupancy/full build to determine compliance with projected trip levels and operations identified in the TIAS. The monitoring program will include:

- Collection of MTMCs at the three proposed site driveway intersections during the weekday morning (7:00 AM to 9:00 AM) and weekday afternoon (4:00 PM to 6:00 PM) peak periods to understand the Project impacts.

- Collection of 48-hour weekday ATR data at the site driveways to understand the total number of daily vehicles entering/exiting the site.
- Complete an operations analysis at the three proposed site driveway intersections during the weekday morning and weekday afternoon peak hours.
- Conduct a survey for patrons, residents, and employees at the site to identify mode choice and commuting patterns.

Based on the Proponent's responsiveness to MassDOT commentary on the Project ENF, MassDOT recommends the preparation of a FEIR. The Proponent should coordinate with appropriate MassDOT sections during the preparation of the FEIR. If you have any questions regarding these comments, please contact *William.M.Simon@dot.state.ma.us.*

January 10, 2025

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs (EEA)
100 Cambridge Street, Suite 900
Boston, MA 02114

Attention: MEPA Office
Matthew Sokop

RE: Proposed Mixed-Use Development at 180 Broad St, Bridegwater
EEA No. 16819

The MBTA offers the following response to the Proposed Mixed-Use Development at 180 Broad St, Bridgewater Draft Environmental Impact Report (DEIR) dated December 11, 2024. The DEIR envisions the redevelopment of a parcel along the MBTA Right of Way (ROW) into residential and commercial uses.

The MBTA has reviewed the 180 Broad St. project and offers the following comments made by the MBTA's Real Estate and Transit-Oriented Development teams. The MBTA appreciates the opportunity to provide comments on this project and looks forward to collaborating with the developer to mitigate construction impacts and increase ridership in supporting the successful implementation of this transit-oriented development.

MBTA Comments

Proximity to the ROW

The project's adjacency to the ROW is cause for concerns to the MBTA due to potential safety and infrastructure impacts. The MBTA has concerns related to site drainage, dust, and barriers between the site and ROW. The MBTA would like to meet with proponent to discuss these issues further.

Licensing Requirement

Due to the proximity of the Commuter Rail ROW, the Authority's Zone of Influence policy may apply and require review of activities and project areas during construction of the project. This may include reviewing design and construction plans, canvassing internal departments on potential impacts, coordination of project activities and working with the project team(s), and flagging support during construction when deemed necessary to maintain a safe work site and operations. All staffing costs will be borne by the project through the execution of a force account agreement. License applications and further information on the MBTA's policy may be obtained at mbtarealty.com/licenses.

Due to the proximity of the project and scope of work, the project may need to also coordinate with Keolis Commuter Services.

Crane, Hoists & Aerial Lift Use

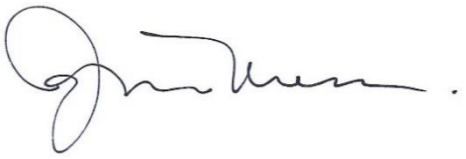
The project may require the support of a crane, hoists and/or aerial lifts, and placement of the equipment to prevent the fouling of the station and Railroad Right of Way (ROW) will be a requirement. The project will need to plan around these safety concerns accordingly, and so the MBTA will need to review and accept work plans for cranes, hoists, and aerial lifts that have the potential to foul before construction starts.

Moving Forward

The MBTA requests that it be included in any future transportation mitigation related discussions between the proponent and other state agencies, related to this transit-oriented development. The MBTA kindly requests that the project team schedule a follow up meeting to discuss the items outlined here in more detail should it obtain the needed entitlements and prior to construction commencement for each future phase of the project.

Continued partnership with MBTA communities is a key component in identifying opportunities to support an improved transit system that can serve Bridgewater as it continues to develop. If you have any questions regarding these issues, please feel free to contact Joe Blankenship, Director of TOD Planning at 718-749-3062 or by email at jblankenship@mbta.com.

Sincerely,



Jennifer Mecca
Deputy Chief, Transit-Oriented Development

cc: S. Bosworth, Chief of Transit-Oriented Development/Innovative Delivery
R. Mann, Senior Director of Real Estate
R. Duverge, Deputy Director of Permitting and Planning
A. DeDominicis, Senior Director of Commuter Rail Programs
J. Blankenship, Director of Transit-Oriented Development Planning
M. Folts, Senior Manager of Transit-Oriented Development Planning

The Commonwealth of Massachusetts

William Francis Galvin, Secretary of the Commonwealth
Massachusetts Historical Commission

January 10, 2025

Secretary Rebecca Tepper
Executive Office of Energy & Environmental Affairs
100 Cambridge Street, 10th Floor
Boston, MA 02114

ATTN: Matthew Sokop, MEPA Unit

RE: Proposed Mixed-Use Development, 180 Broad Street, Bridgewater, MA. MHC# RC.74818
EEA #16819

Dear Secretary Tepper:

Staff of the Massachusetts Historical Commission (MHC) have reviewed the Draft Environmental Notification Form (ENF) submitted, received at this office on December 6, 2024, for the project referenced above and have the following comments.

The proposed project consists of the demolition of the buildings located at 180 Broad Street in Bridgewater to accommodate the construction of a mixed-use development. The information provided indicates that the project will require state permits from the Massachusetts Department of Transportation (MADOT) and Massachusetts Department of Environmental Protection (DEP).

Review of the MHC's *Inventory of Historic and Archaeological Assets of the Commonwealth* indicates that the property at 180 Broad Street, historically known as the Henry Perkins and Company (BRD.L), is included in the Inventory. It is the opinion of MHC staff that the property does not meet the criteria of eligibility for listing in the National Register of Historic Places.

After review of the MHC's files and the materials submitted, it has been determined that this project is unlikely to affect significant historic or archaeological resources.

These comments are offered to assist in compliance with M.G.L. Chapter 9, Sections 26-27C (950 CMR 71.00) and MEPA (301 CMR 11). Please do not hesitate to contact me if you have any questions.

Sincerely,

Joshua Dorin
Preservation Planner
Massachusetts Historical Commission

xc: Tina Castelli, Bohler Engineering
Bridgewater Historical Commission

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COMMONWEALTH OF MASSACHUSETTS
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Maura Healey
Governor

Kim Driscoll
Lt. Governor

Rebecca Tepper
Secretary

Elizabeth Mahony
Commissioner

16 January 2025

Rebecca Tepper, Secretary
Executive Office of Energy & Environmental Affairs
100 Cambridge Street
Boston, Massachusetts 02114
Attn: MEPA Unit

RE: Proposed Mixed-Use Development, Bridgewater, MA, ENF #16819

cc: Jo Ann Bodemer, Director of Energy Efficiency, Department of Energy Resources
Elizabeth Mahony, Commissioner, Department of Energy Resources

Dear Secretary Tepper:

We've reviewed the Draft Environmental Impact Report (DEIR) for the proposed project. The proposed development consists of three mixed-use buildings:

- Building 1 is four stories, +/- 41,795 SF, with 116 residential units and 2,750 SF of commercial space;
- Building 2 is three stories, +/- 25,350 SF, with 16 residential units and 8,450 SF of commercial space;
- Building 3 is three stories, +/- 28,275 SF, with 18 residential units and 9,425 SF of commercial space.

This totals +/- 95,420 SF in building area and 150 residential units. The commercial portions of the buildings will be a mix of café, restaurant and office space. There will be +/- 360 parking spaces across the site.

Proposed Mixed-Use Development, EENF No. 16819
Bridgewater, Massachusetts

Review Comments

The project was very responsive to DOER's recommendations to incorporate Passivehouse and efficient electrification for the residential portions of the development.

However, the project is proposing to utilize gas for space and/or water heating within the non-residential portions of the development. This is **not recommended** as gas connections to new construction buildings will disqualify the buildings from being eligible for MassSave incentives, which includes more than **$0.56 million** for Passivehouse[1]. Space and water heating within the commercial spaces can be readily addressed with air source electric heat pumps. Further, this will eliminate the need to construct any gas utilities on the project, saving considerable costs.

For the next submission, we recommend the following:

- Remove all proposed gas connections from the project;
- Swap from gas space and hot water heating to electric heat pump space and hot water heating in the non-residential portions of the project.

If the above is incorporated, together with existing efficient electrification and Passivehouse commitments, the DOER would have no further recommendations or comments on the project.

Sincerely,
Massachusetts Department of Energy Resources

Becca Edson
Decarbonization Architect

Paul F. Ormond, P.E.
Energy Efficiency Engineer

[1] See the following for more information: https://www.masssave.com/business/programs-and-services/new-construction-and-major-renovations