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May 29, 2015

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE

PROJECT NAME : Kendall Square Urban Renewal Project (KSURP) -
Amendment #10
PROJECT MUNICIPALITY : Cambridge (Kendall Square)
PROJECT WATERSHED : Boston Harbor (Charles River)
EEA NUMBER : 1891
PROJECT PROPONENT : Cambridge Redevelopment Authority
DATE NOTICED IN MONITOR : April 22, 2015

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G. L. c. 30, ss. 61-62I) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I have reviewed the Notice of Project Change (NPC) and hereby determine that this project **requires** a Mandatory Environmental Impact Report (EIR). The project proposes significant redevelopment, consisting of a mix of residential, office and retail uses, in a dense urban area in proximity to transit. The Cambridge Redevelopment Authority (CRA, "the Proponent") submitted an extensive and detailed Notice of Project Change (NPC) that included a comprehensive transportation analysis, a Greenhouse Gas (GHG) emissions analysis, mesoscale air quality analysis and identification of baseline environmental conditions in support of the request for a SEIR. Comment letters from the Massachusetts Department of Transportation (MassDOT) and the City of Cambridge note the constructive consultation that has occurred to date on traffic and transportation issues. Based on a review of the EENF, consultation with State Agencies and review of the EENF, I hereby determine that the Proponent may file a Single EIR.

I anticipate that the Proponent will continue to work closely with MassDOT, the Massachusetts Bay Transportation Authority (MBTA), the City of Cambridge, and other stakeholders to provide a comprehensive SEIR that addresses the Scope included in this Certificate. In addition, the SEIR should clearly identify the subsequent process for addressing outstanding issues, including identification of specific mitigation to address impacts on transit service and capacity, that may not be fully developed during the MEPA review process. If the SEIR does not adequately address the Scope and substantive issues remain to be addressed, I may require the Proponent to file a Final EIR (301 CMR 11.08 (8)(d)(2)).

Original Project Description and Procedural History

The Kendall Square Urban Renewal Project (KSURP) was created by the Proponent in 1965. The KSURP regulates the level of development through a cap on aggregate Gross Floor Area (GFA) of all land uses in the KSURP area. The level of development is further restricted through land use controls, including identification of Floor Area Ratios (FAR). The KSURP initially consisted of construction of up to 14 buildings totaling approximately 2.77 million gross square feet, three parking garages, open space, and other public improvements. The project was the subject of previous review under MEPA beginning with an Environmental Notification Form (ENF) in 1975, and followed by Draft and Final EIRs in 1977 and 1978 respectively, both of which were found to be adequate. Five NPCs were filed since 1978. The NPCs adjusted the permitted mix of uses within the area, increased the maximum allowed GFA within the area, and extended the term of the KSURP. None of the NPCs required further MEPA review.

Project Site

The NPC identifies redevelopment within 24 acres of the 43-acre KSURP area. The 24-acre project site is coincident with the boundaries of the Cambridge Center Mixed-Use Development (MXD) Zoning District. The project site is generally bounded by Galileo Galilei Way to the west, Binney Street to the north, Loughrey Walkway and Broadway to the east, and Main Street to the south. The commercial and residential development is primarily proposed at the following three parcels within the existing Cambridge Center complex:

- Cambridge Center North Garage
- Eleven Cambridge Center
- Three Cambridge Center

The Cambridge Center North Garage is a six-story 92,000 square foot (sf) parking facility located at 121 Broadway and 280 Binney Street. Access to the garage is provided via roadways on either side that connect to Binney Street to the north and Broadway to the south. The Eleven Cambridge Center site consists of approximately 37,682 sf of land with an approximately 76,600 sf commercial office building located at the corner of Broadway and Galileo Galilei Way. Three Cambridge Center consists of approximately 28,822 sf of land with an approximately 105,100 sf office building located at 247 Main Street. An entrance to the Massachusetts Bay Transit Authority (MBTA) Red Line Kendall Square/MIT station is located south of the site and a full access headhouse is located in the adjacent courtyard area.

The NPC also describes minor redevelopment and expansion at the Whitehead Institute and Broad Institute sites. The Whitehead Institute is an existing approximately 20,000 sf commercial building with research and development uses located at Nine Cambridge Center at the corner of Main Street and Galileo Galilei Way. The Broad Institute Building is approximately 246,000 sf and is located at 75 Ames Street.

Project Change Description and Impacts

As described in the NPC, the primary change to the project is the addition of 1,034,000 sf of net new commercial and residential development to the KSURP area. The proposed amendment to the KSURP includes exemptions to the GFA cap intended to incentivize ground floor retail, require innovation space, and balance commercial and residential uses. According to the NPC, the analysis of environmental impacts is based on a total of 4,341,600 sf of development and includes increases in development beyond the GFA cap¹ that would be allowed based on proposed exemptions. As such, the analysis of environmental impacts is presented based on the maximum amount of development that could be permitted in the KSURP area under the GFA cap. The NPC also extends the completion date for the full build-out of the KSURP from 2020 to 2030.

Specifically, the project change consists of the following project components:

- **Cambridge Center North Garage:** Proposed commercial office (546,000 sf), innovation space (39,000 sf) and retail space (5,000 sf) over the existing Cambridge Center North Garage.
- **Eleven Cambridge Center:** Demolition of existing structure. Proposed 22-story residential building (up to 294 units) and ground floor retail space (25,000 sf).
- **Three Cambridge Center:** Demolition of existing structure. Proposed mixed-use building consisting of a 19-story building with commercial office space (106,200 sf) on the lower floors, up to 266 residential units on the upper floors, and approximately 20,000 sf of ground-floor retail.

The project change also includes a 60,000sf commercial office addition at the existing Whitehead Institute building at Nine Cambridge Center and the conversion of 15,100 sf of mechanical space into commercial office space at the Broad Institute at 75 Ames Street.

As described in the NPC, the project will be constructed in two key phases. Phase 1 will be split into two sub-phases (Phase 1A and 1B). Phase 1A will consist of the redevelopment of the Cambridge Center North Garage and Phase 1B will include demolition of the existing Eleven Cambridge Center building and construction of the new residential building with ground-floor retail space and below-grade parking. Phase 2 will include demolition of the existing Three Cambridge Center commercial office building and construction of a new mixed-use building with commercial office space, ground-floor retail space, and residential units.

¹ The proposed GFA cap associated with this NPC is 4,302,100 square feet of development. This excludes the exempted 19,500 sf of Innovation Space and 20,000 sf of ground floor retail space; though this development is included in the analysis of environmental impact presented in the NPC.

According to the NPC, the project includes the following components and associated potential environmental impacts:

	Previously Reviewed	Net Change	Total
Housing Units	Up to 185 units	±560 units	745 units
Vehicle Trips Per Day (unadjusted)	26,845	10,512	37,357
Vehicle Trip Per Day (adjusted)	13,714	3,638	17,352
Parking Spaces	±3,545 spaces ²	No Change ³	No Change ³
Water Use	±1.24 million gallons per day (mgd)	±118,740 gallons per day (gpd)	±1.35 mgd
Wastewater Generation	±0.93 mgd	±107,945 gpd	±1.04 mgd

Permitting and Jurisdiction

The project as previously reviewed was subject to a mandatory EIR pursuant to Sections 11.03(1)(a)(2) and 11.03(6)(a)(6) of the MEPA regulations because it required State Agency Action(s), and it was expected to create more than 10 acres of new impervious surface, and generate more than 3,000 new average daily vehicle trips.

The project, as currently proposed and described in the NPC, is subject to a mandatory EIR as a stand-alone project pursuant to Section 11.03(6)(a)(6) of the MEPA regulations because it requires a State Agency Action and, on its own, will generate greater than 3,000 new average daily trips (adt) on roadways providing access to a single location. Traffic generation will exceed the EIR threshold even when adjusted to account for mode share. The project requires an approval of an Urban Renewal Plan Amendment from the Massachusetts Department of Housing and Community Development. The project may also require an Air Quality Permit from the Massachusetts Department of Environmental Protection (MassDEP). The Urban Renewal Plan Amendment also requires approval by the CRA and Cambridge City Council. Components of the project will also require review and Special Permit Project Review Approval by the Cambridge Planning Board. The project is subject to review under the May 2010 MEPA GHG Emissions Policy and Protocol (“the Policy”).

Because the project is not seeking Financial Assistance from the Commonwealth, MEPA jurisdiction is limited to those aspects of the project that are within the subject matter of required, or potentially required, State Agency Actions and that may cause Damage to the Environment as defined in the MEPA regulations. However, the subject matter of the Urban Renewal Plan

² KSURP Amendment No.3 reduced the maximum off-street parking supply from 4,300 spaces to 3,545 spaces.

³ The project does not propose to increase the maximum number of parking spaces as approved via KSURP Amendment No. 3. The approximately 740 spaces proposed as part of this project to support the additional development would be in addition to the 2,667 existing as-built spaces for a potential future total of 3,407 spaces, which is under the previously approved maximum off-street parking.

implementing regulations (760 CMR 12.00) is sufficiently broad to confer the equivalent of broad scope jurisdiction over the potential environmental impacts of the project. Therefore, MEPA jurisdiction is broad in scope and extends to all aspects of a project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations.

Review of the NPC

The NPC includes descriptions of the original project and the currently proposed project and project plans, describes potential environmental impacts, and provides a discussion of proposed mitigation measures. The NPC provided a greenhouse gas analysis, mesoscale analysis, and a Traffic Impact Assessment. It describes the planning process and proposed revisions to zoning that provides context for the proposed amendments to the KSURP. The planning process has included analysis of alternative development scenarios.

The projects identified in the NPC consist of redevelopment within a dense urban area with excellent access to transit. As a transit-oriented redevelopment, associated impacts, including traffic generation, land alteration, creation of impervious areas, are minimized compared to greenfield development or alternatives with reduced density. Impacts associated with the NPC are within the envelope of impacts identified in the most recent MEPA filing. The project is consistent with the Commonwealth's Sustainable Development Principles. In addition, I note that neither State Agencies nor the City of Cambridge have requested additional analysis of alternatives.

Traffic and Transportation

The NPC includes a Transportation Scoping Letter to MassDOT that confirmed the basic analytical approach, technical assumptions, and key transportation issues to be addressed in the Transportation Impact Assessment (TIA), as well as the TIA itself, prepared in accordance with the EEA/MassDOT Guidelines. The TIA evaluated the transportation impacts of the project based on trip generation estimates and future transportation demand. The Proponent has committed to implement a Transportation Demand Management (TDM) program to minimize single occupant vehicle use and to expand the existing monitoring program (described below) to the current program.

The Preferred Plan, as originally evaluated in the 1977 FEIR, projected traffic generation at full build-out to be 19,300 average daily trips (adt). The Secretary's Certificate for KSURP Amendment No. 3 (issued September 15, 1993) required that the Proponent provide an annual update of KSURP traffic counts, collect and analyze parking data, and review KSURP tenant surveys to compare traffic estimates with results of actual observations and to adjust the impact and mitigation analysis if significant discrepancies occur. The NPC provided a summary of this data and demonstrated that actual trip generation in Kendall Square is consistently lower than projections based on trip generation rates in the Institute of Transportation Engineers (ITE) Trip Generational Manual due to area-specific mode splits and vehicle occupancy rates.

According to the NPC, the proposed project change will generate approximately 10,512 unadjusted adt or 3,638 adjusted adt. The adjusted trip generation calculations reflect credits

allowed for pass-by trips and mode share based on rates derived from the Proponent's existing traffic monitoring program. When the adjusted trips are added to the expected future traffic as projected in 2010 when the project was last reviewed under MEPA (Amendment No.8), traffic generation is estimated at 17,352 adt, which is less than the originally projected 19,300 vehicle trips.

The TIA provided a comprehensive safety analysis and crash rates for all intersections within the study area and compared the average rates to the appropriate district and statewide average. According to the NPC, the following signalized intersections exceed the MassDOT Average Crash Rate:

- Cambridge Street/First Street
- Main Street at Galileo Galilei Way/Vasser Street
- Massachusetts Avenue/Vassar Street
- Massachusetts Avenue/Memorial Drive On-/Off-Ramps

Additionally, the intersection of Massachusetts Avenue at Vassar Street and the intersections of Massachusetts Avenue/Memorial Drive Westbound on/Off-Ramps and Massachusetts Avenue/memorial Drive Eastbound On/Off-Ramps have a calculated crash rate above the MassDOT District 6 average.

The TIA presents a capacity analysis and a summary of average and 95th percentile vehicle queues for each intersection within the study area. Based on this data, there are approximately five of intersections within the study area that are expected to operate at or close to Level-of-Service (LOS) F during the weekday morning and afternoon peak hours. The majority of the impacted intersections are within the jurisdiction of the City of Cambridge, with the exception of those along the Route 28 (Monsignor O'Brien Highway) Corridor. The NPC identified potential improvements to mitigate traffic impacts at these intersections, including traffic signal timing and phasing improvements. I refer the Proponent to MassDOT's comments and expect the Proponent will coordinate with MassDOT and the City of Cambridge to ensure that improvements associated with relocation of the MBTA's Lechmere Station are in place as the project evolves.

The NPC proposes a comprehensive TDM Program to minimize new trip generation. In addition to its existing TDM Program, the Proponent has committed to a host of TDM measures that could include: a car sharing program, MBTA transit pass subsidy, free rides on some existing shuttle routes, parking pricing, Hubway pass subsidy, transportation coordinator, and provision of "real-time" transportation information in all new and renovated lobbies and at select public plazas on the project site. In addition, the Proponent will continue to participate in the Charles River Transportation Management Association.

The Proponent has also committed to developing an Expanded Transportation Mitigation Program (ETMP) in consultation with the MBTA, MassDOT, and the City that is intended to preserve the favorable mode share balance in Kendall Square and provide additional measures to minimize trip generation from the project. The ETMP is intended to supplement the proposed transportation mitigation measures outlined in the NPC. The NPC identifies a range of issues and potential improvements considered for inclusion in the ETMP. It indicates that the ETMP

will focus on transit and transit-related improvements, including both capital and operational investments that would result in service level improvements and capacity expansion in Kendall Square. The NPC indicates that the ETMP would be supported by immediate and long-term funding commitments facilitated by the Proponent in connection with the approvals for the Project but does not provide additional information regarding how to determine the amount of funding or a pathway to identify projects that could be funded.

The TIA provided detailed parking calculations based on the proposed development program and described the methodology and assumptions used to estimate parking demand. Based on this information, the project will add 740 parking spaces to the area. When added to the existing 2,667 parking spaces that have been built-out, this results in a total of 3,407 parking spaces. This is below the total maximum off-street parking (3,545 parking spaces) reviewed during KSURP Amendment No. 3. The project does not propose to increase the maximum number of parking spaces. All new parking will be located in parking structures and will be shared parking for all project components.

The TIA included a comprehensive analysis of existing service provided by the MBTA Red Line and the various MBTA bus routes within the KSURP area. Based on the project's mode split, the project change will increase activity at the MBTA Kendall Square Station by 15 percent inbound and six percent outbound during the morning peak hour and eight percent inbound and 15 percent outbound during the evening peak hour. The project is not anticipated to adversely impact the inbound and outbound volume-to-capacity (V/C) ratio. MassDOT comments indicate that the overall increase in ridership will be negligible. According to the TIA, the bus routes within the study are experiencing high V/C ratios and are currently operating at or near full capacity; the additional ridership generated by the project will impact several routes and cause them to operate over capacity. The NPC did not provide a specific plan to mitigate the impact of these additional trips on the MBTA bus system nor did it estimate impacts to bus travel times. Comments from MassDOT request additional analysis and identification of potential mitigation in the SEIR.

The KSURP is located within an area that is well served by pedestrian accommodations, including sidewalks and crosswalks at all study area intersections. The TIA provided a comprehensive inventory of all existing, planned, and proposed services, facilities, and routes for accessing the site on foot. The TIA also included a detailed inventory of the bicycle network, including on-street bike lanes, cycle tracks, and multi-use pathways. The Proponent has committed to continue working with the City to identify additional pedestrian and bicycle improvements. The NPC identified potential measures to improve bicycle and pedestrian safety and access.

Water Supply and Wastewater

According to the NPC, the project will require approximately 118,740 gpd of net new potable water demand. Domestic water and fire protection services will be supplied by local water mains to each of the project components. Based on information provided in the NPC, the City has indicated that capacity exists to serve the proposed project, though booster pumps may be required to provide sufficient pressure to the proposed buildings.

The NPC includes a discussion of the existing and projected wastewater flows for the project. The NPC indicates the Proponent will continue to evaluate the use of low-flow plumbing fixtures, efficient air conditioning systems, landscape irrigation practices, and possible use of grey water or rainwater harvesting systems, though it is unclear if the Proponent has committed to implement these measures. According to the NPC, there is sufficient capacity in the existing collection system to accommodate the estimated increase of 107,945 gpd of sanitary sewage to be generated by the project. With this additional flow, the total wastewater flow from the KSURP area will be approximately 1.04 million gallons per day (mgd). Wastewater flows from the project will travel northeasterly by gravity flow to the Massachusetts Water Resources Authority (MWRA) system located in Cardinal Medeiros Avenue (Cambridge Branch Sewer). The NPC indicates that individual service connections to the wastewater infrastructure will be designed in conjunction with the City as each project component moves forward.

The project will not require a Sewer Connection Permit from MassDEP. However, under the terms of the new Sewer System Extension and Connection Regulations (314 CMR 12.00), MassDEP requires that sewer authorities with permitted combined sewer overflows (CSOs), including Cambridge, require the removal of four gallons of infiltration and inflow (I/I) for each gallon of new wastewater flows generated by any new connection that would generate greater than 15,000 gpd. According to the NPC, the project will be required to remove approximately 431,780 gpd of (I/I) from the sewer system. The NPC indicates that this requirement will be addressed by coordinating with the City to either correct I/I issues within the KSURP area or by funding other I/I reduction projects. The City also requires that the project provide on-site sanitary holding capacity equivalent to 24 hours of sanitary flows (approximately 107,945 gallons of storage) to address significant combined sewer capacity issues that occur during large storms. The NPC indicates that this will be addressed by coordinating with the City and may include improvements to the sanitary sewer system in lieu of providing on-site storage capacity for sanitary flows.

Stormwater

According to the NPC, approximately 20 acres of the 24-acre project site are impervious and the project change will create an additional 0.27 acres of new impervious area. The NPC notes that the project will comply with the City's Low Impact Design (LID) standards but does not provide an explanation of the requirements nor identify specific LID measures that will be implemented.

The existing drainage system for the project site ultimately discharges to the City's drainage system and the Charles River through a 54-inch outfall at Broad Canal Way. Comments from MassDEP and the Charles River Watershed Association (CRWA) indicate that this portion of the Charles River is subject to water quality standards established in the applicable Total Maximum Daily Loads (TMDL). The NPC did not provide information on how the project will comply with these reduction targets within the Charles River. According to the NPC, stormwater management infrastructure for each project component will be designed in accordance with City and MassDEP stormwater standards as design for each project component progresses. The City's stormwater regulations require that the project mitigate stormwater effluent from the post-development 25-year design storm to the rates of the pre-development two-year design storm, as

well as reduce Total Suspended Solids (TSS) by 80 percent from the pre-development condition. The NPC did not provide a comprehensive discussion of drainage or runoff calculations for the project area.

Air Quality

In accordance with the State Implementation Plan (SIP) for ozone attainment, the NPC includes a mesoscale analysis for 2014 existing conditions, 2024 No-Build, and 2024 Build conditions. The analysis indicates that emissions of volatile organic compounds (VOCs) and nitrogen oxides (NO_x) for the 2024 Build scenario would be greater than the 2024 No-Build scenario. Because the project will increase emissions of VOCs, transportation mitigation is required, including a TDM program. Under the 2024 No-Build condition, VOC emissions are approximately 7,507.71 kilograms per day (kg/day) and NO_x emissions are approximately 9,257.12 kg/day. Under the 2024 Build condition, VOC emissions are 7,507.82 kg/day and the NO_x emissions are approximately 9,257.75 kg/day. The project is estimated to generate 0.11 kg of VOC and 0.63 kg of NO_x per day. The proposed mitigation, as previously described, will reduce VOCs by 0.04 kilograms per day (kg/day) and NO_x emissions by 0.08 kg/day under the 2024 Build scenario.

Greenhouse Gas Emissions

Because the project change requires an EIR, it is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol (“the Policy”). The original project completed MEPA review prior to promulgation of the MEPA GHG Policy and thus did not require a GHG assessment. The NPC included an analysis of GHG emissions and mitigation measures in accordance with the standard requirements of the MEPA GHG Policy. The Policy requires projects to quantify carbon dioxide (CO₂) emissions and identify measures to avoid, minimize or mitigate such emissions. The analysis quantifies the direct and indirect CO₂ emissions associated with the project's energy use (stationary sources) and transportation-related emissions (mobile sources). The GHG analysis evaluated CO₂ emissions for two alternatives as required by the Policy including 1) a Base Case and 2) a Preferred Alternative. The analysis used the eQUEST, version 3.64, modeling software to perform the GHG analysis and included modeling assumptions and emissions rates (Appendix D).

At the time of the filing of this NPC, the building code is the Massachusetts Building Code 8th Edition; however, I note that the City of Cambridge is a designated Green Community. As such, the City has adopted the Commonwealth of Massachusetts' Stretch Energy Code (“Stretch Code”). The current Stretch Code requires energy efficiencies of 20 percent better than American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2007 and requires modeling of base and proposed cases based on the methodology as is defined in ASHRAE 90.1-2007 (Appendix G). Based on this, ASHRAE 90.1-2007 was applied to define the Base Case. The Preferred Alternative consists of a project that is expected to meet the current Stretch Energy Code.

I note that revisions to the Stretch Energy Code are being contemplated and would likely require energy use in new large buildings to be 12 to 15 percent below the baseline of IECC

2012 (ASHRAE 90.1-2010). The NPC voluntarily presented building improvement measures to demonstrate how the project would comply with ASHRAE 90.1-2010 and the future revised Stretch Energy Code.

Mobile GHG emissions were estimated using the standard methodology in the EEA/MassDOT Guidelines for EIR/EIS Traffic Impact Assessments and EPA's MOVES2014 emission factors. Potential project-related mobile GHG emissions were compared between the 2014 Existing Condition, the 2024 No-Build Condition, and the 2024 Build Condition (with physical and operational upgrades). Stationary GHG emissions were determined via modeling the energy usage for the project based on proposed building geometry, HVAC system type, usage, occupancy schedule, and ventilation rates for each of the following project components: Cambridge Center North Garage, Eleven Cambridge Center, Three Cambridge Center, and Whitehead Office Addition⁴. The NPC noted exceptions to the modeling for certain building elements whose design has yet to advance sufficiently for inclusion in the model. The analysis quantifies the direct and indirect GHG emissions associated with the project's energy use and transportation-related emissions. The analysis indicates that the Base Case for the entire project will generate approximately 9,368 tons per year (tpy) of GHG emissions, consisting of 8,322 tpy of stationary source emissions and 1,046 tpy of mobile source emissions. The Preferred Alternative will reduce stationary source emissions by 1,432 tpy, an approximate 17 percent reduction, and will reduce mobile source emissions by 102 tpd, a 10 percent reduction. Overall emissions will be reduced by 1,537 tpy for an approximate 16 percent reduction.

Measures to avoid, minimize, and mitigate GHG impacts are identified for the overall project and for specific uses (commercial office, residential, laboratory, and retail). The NPC identifies the following measures for the project as a whole:

- Creation of the ETMP in conjunction with MassDOT's Kendall Square Mobility Task Force, MBTA, and MassDOT;
- Provision of 800 long-term and 142 short-term bicycle spaces and implementation of a TDM program to minimize single occupancy vehicle trips;
- Creation of *Tenant Design and Construction Guidelines* to assist office and retail tenants in evaluating and incorporating energy efficiency and other sustainability measures;
- Constructing all new buildings to be "solar ready"; and
- Consideration of building orientation in designing exterior envelope and facades of buildings.

The following measures were proposed for evaluation in the GHG analysis to establish a reasonable Preferred Alternative: improved glazing properties, improved roof and exterior wall insulation, low-flow water fixtures, high-efficiency domestic water heater, variable volume condensing and chilled and hot water pumping, high-efficiency centrifugal chillers, variable frequency drive (VFD) on cooling tower fans, high-efficiency condensing hot water boilers,

⁴ The proposed conversion of 15,100 sf of mechanical space into office space at the Broad Institute was not modeled given the de minimus energy usage and stationary source GHG emissions that would result from the change in use.

high-efficiency water source heat pumps, high-efficiency energy recovery ventilator (ERV), differential CO₂ based demand control ventilation for offices, and CO control and VFD for underground garage fans.

The NPC includes analysis of the viability of a roof-mounted solar PV system for the buildings. The Proponent has committed to constructing all new buildings to be “solar ready”. The NPC also evaluated the purchase of energy from the Veolia (f/k/a Dalkia) Cambridge Combined Heat and Power (CHP) district steam network in compliance with the draft *Guidance for the Application of the MEPA GHG Policy and Protocol to the Use of the Dalkia Cambridge CHP District Steam* document. The NPC indicates that additional analysis of this option is needed.

Other sustainable design measures that will reduce the project’s GHG emissions, but which are not modeled, are identified including commitments to replace inefficient lighting fixtures at the Cambridge Center North Garage, use of Energy Star appliances, water conservation measures to reduce water use and wastewater generation, consideration of independent building commissioning, consideration of LED lighting and/or efficient utility systems, and incorporation of green roofs/gardens. It is unclear as to whether the Proponent has committed to implement these measures or whether they will be evaluated as project design progresses.

Finally, the NPC includes a commitment that the Proponent will provide a self-certification to the MEPA Office at the completion of each building 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.

Climate Change Adaptation and Resiliency

The NPC noted the importance of planning for climate change impacts and resiliency associated with sea level rise, increased storm frequency and duration, and extreme temperature events. The NPC indicated that the City is working with MassDOT to extend the scope of MassDOT’s Advanced Circulation Model (“ADCIRC Model”) for the Central Artery to the project area. The results of this model, in conjunction with the Cambridge Climate Change Vulnerability Assessment, will be used to assess risks to the KSURP area from flooding from precipitation, storm surges, and sea level rise. The City of Cambridge comments indicate that the Interim Report on the Cambridge Climate Change Vulnerability Assessment is scheduled to be released within the next several weeks.

The NPC contained the results of an initial assessment based on FEMA Flood Insurance Study for the KSURP area and CZM sea level rise estimates. The Charles River Basin elevation is set by sluice gate operations at the Charles River Dam located at the Museum of Science and pumping from the New Charles River Dam located adjacent to the Zakim Bridge. The NPC indicated that the KSURP area as a whole is not susceptible to the 100- or 500-year storm from the Charles River Basin; however the Charles River Dam is susceptible to sluice gate flooding from the 100-year coastal event combined with sea level rise. The NPC also notes that the

project is potentially susceptible to flooding from the Mystic River and overland flow downstream of the Amelia Earhart Dam. The NPC also identifies the Kendall Square MBTA station as vulnerable to flooding. The NPC indicates that the following design measure will be explored to mitigate the effects of sea level rise as project design advances:

- Locating critical infrastructure above the first floor level (i.e. transformers, switchgear rooms, and mechanical rooms);
- Limiting basement areas;
- Infiltrating stormwater on-site where possible;
- Sanitary sewer and stormwater infrastructure improvements to address I/I and capacity issues in the CSO system;
- Incorporation of green roof/roof gardens and roofing membrane with High Solar Reflectance Index to reduce the heat island effect;
- Utilizing native species to minimize irrigation requirements and efficient irrigation systems; and
- Evaluating raised finish floor elevations.

Hazardous Materials & Solid Waste

The NPC identifies 14 Release Tracking Numbers (RTN) in the project area and identifies the status of each RTN in accordance with the Massachusetts Contingency Plan (MCP). The properties subject to this NPC have achieved regulatory closure under the MCP or were developed prior to the adoption of the MCP. The project will require characterization of the soil and groundwater conditions for management of contaminated soil during construction and to evaluate the residential use exposure scenario. The NPC includes a summary of the anticipated assessment and remedial activities for each project component.

Landlocked Tidelands

The EENF did not identify that the site includes areas of landlocked tidelands; information provided on May 27, 2015 identified work within landlocked tidelands as defined by the Waterways Regulations (310 CMR 9.00) and indicated that it is subject to the Public Benefit Determination regulations (301 CMR 13.00). Additional information is required regarding impacts on the public's right to access, use, and enjoy tidelands and measures to avoid, minimize, and mitigate impacts. The timing of the disclosure limited input on this issue.

Construction Period Impacts

The NPC identifies the construction period impacts of the project, including truck traffic, air quality (dust), noise, stormwater runoff, and construction waste. Mitigation measures identified in the NPC include development of Construction Management Plans (CMP) for each project component to address numerous temporary construction-related impacts, including mitigation measures, road closures, detours, and staging. Mitigation measures to be included in the CMP include: erosion and sedimentation control, identification of designated truck routes,

maintenance and protection of pedestrian and bicycle accommodations, dust suppression, covering trucks used for transportation of construction debris, daily cleaning of streets and sidewalks, construction noise mitigation measures. The NPC indicates that ultra-low-sulfur fuel will be used for construction vehicles to mitigate construction-related air pollution and commits to meeting the requirements of the MassDEP State Revolving Fund (SRF) for diesel construction equipment.

Conclusion

Based on a review of the NPC, consultation with State Agencies, and a review of comment letters, I have determined that the EENF meets the criteria for a SEIR (301 CMR 11.06 (8)). I note that one area that was not addressed in the EENF was the identification of landlocked tidelands and the provision of associated public benefits. The adequacy of the SEIR will be evaluated, in part, on the Proponent's ability to address the Scope for landlocked tidelands in a comprehensive manner and provide public benefits to support the public's right to access, use, and enjoy tidelands.

SCOPE

General

The SEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this Scope. I strongly urge the Proponent to work with the City, MassDOT, MBTA, and other stakeholder groups prior to the preparation of the SEIR to review and discuss both the content of their comments and potential mitigation measures. These collaborative efforts will assist the Proponent in identifying mitigation measures and presenting a project that meets applicable environmental performance standards. I note I have received numerous comments in support of the project and the Proponent's commitment to work with state agencies and stakeholders to maintain and improve transit service in Kendall Square.

Project Description and Permitting

The SEIR should provide a comprehensive description of project components, including potential off-site mitigation measures. The SEIR should identify, describe, and assess the environmental impacts of any changes in the project that have occurred between the reviews of the NPC and the SEIR provide an update on what development has occurred to date within the KSURP. The SEIR should include a table compares the the maximum permitted development within the KSURP to the existing development and adds the development proposed in this NPC. The table should address GFA, number of housing units, vehicle trips, parking spaces, and water and wastewater use. The SEIR should include updated conceptual plans for existing and post-development conditions. The SEIR should provide a brief description and analysis of applicable statutory and regulatory standard and requirements, and describe how the project will meet those standards. The SEIR should include a list of required State Agency Permits, Financial Assistance, and other State approvals, if applicable, and provide an updated status on each of these pending actions.

MassDOT has requested that the Proponent develop a MOU to address transportation and transit mitigation. The SEIR should include a draft MOU for review and comment.

Traffic and Transportation

The SEIR should explicitly note which transportation mitigation measures the Proponent has committed to implementing and those which have been accounted for in the traffic impact analysis. If the traffic impact analysis includes mitigation measures that the Proponent has not committed to, the SEIR should identify alternative methods to demonstrate a similar LOS improvement. The SEIR should provide tables that indicate the v/c, delay, LOS, and queues for all study area intersections under the Existing, 2024 No-Build, and 2024 Build Conditions. The SEIR should include a commitment for a long-term parking monitoring plan to evaluate strategies to increase efficient use of parking to minimize trip generation. I refer the Proponent to comments from the City and note the SEIR should identify access points for the structured parking and incorporate this into the trip generation figures. The SEIR should address the City's comments regarding the provision of the minimum amount of parking, the proposed number of spaces per dwelling unit, and shared parking. Based on comments from MassDOT, the SEIR should include a roadway segment analysis for the Binney Street and Broadway corridors based on the latest methodology of the Highway Capacity manual or appropriate traffic software. This analysis should be performed on corridors currently utilized by some transit services in order to evaluate the impact of the project on transit travel times and help to identify mitigation measures to lessen the impacts of the project.

The SEIR should clarify whether any of the locations with crash rates above district average are considered Highway Safety Improvement Program (HSIP) clusters, and if so, a Road Safety Audit (RSA) should be prepared to help identify appropriate safety improvements that would be completed by the Proponent or by others. The NPC indicated the Proponent has committed to working with the City to identify areas for pedestrian access improvements and listed a number of measures that could be implemented. The SEIR should provide a more detailed level of commitment and explain how these measures would improve the pedestrian experience and encourage walking. The SEIR should address the City's comment regarding the proposed pedestrian crossing at Broadway. I encourage the Proponent to work with the City to gain a better understanding of bicycle parking demand and availability and to provide an update on this issue in the SEIR. The SEIR should include a more detailed analysis of the project's impacts on bicycle travel within the KSURP and provide additional detail on the existing and proposed bicycle facilities. The analysis should provide measures of effectiveness for the No-Build and Future Build conditions and should clearly identify potential improvements where conditions may be negatively impacted based on vehicular travel or additional bicycle travel.

I applaud the Proponent's commitment to work with stakeholders to maintain and improve the transit system. Additionally, comments received from the City, MassDOT, and others acknowledge the systemic benefit that improving the transit system and mode shift provides to the region and the importance of a comprehensive capacity analysis of the transit system. I refer the Proponent to comments from MassDOT, the City, and others, and note the SEIR should provide an analysis more consistent with the methodology of the MBTA Service Planning Department based on the most recent and most relevant ridership and operational

statistics for the Red Line. The Proponent should consult with the MBTA regarding the scope and protocol for the analysis. I encourage the Proponent to coordinate this analysis with the City in addition to MassDOT and the MBTA. The SEIR should also explain how the project will mitigate its impacts on the MBTA bus network as the additional ridership from the KSURP will likely result in several routes operating over capacity. The SEIR should also evaluate the project's likely impacts on MBTA bus travel times and the impacts of the proposed highway, pedestrian, and bicycle improvements to the bus system and routes. Specifically, as noted in MassDOT's comment letter, the SEIR should provide, in a tabular format, an assessment of which intersections are utilized by MBTA buses and how their timing or turning movements may be affected by the increased traffic and/or proposed roadway and pedestrian changes to be generated by the project.

The Proponent should work with the MBTA, MassDOT, and the City to develop the potential transit improvements to be included in the ETMP and to identify the appropriate mechanism for ensuring enforceable commitments for these improvements and incorporating the program elements into the transportation planning processes at the City and State levels. The SEIR should provide an update on these discussions and include an implementation schedule or MOU to guide the implementation of mitigation that is not specifically identified in the SEIR. Comments from MassDOT indicate that they will continue to coordinate with the Proponent to ensure that a clear commitment and implementation schedule are in place prior to the project site occupancy.

Water Supply and Wastewater

The NPC notes that the Proponent will explore the viability of alternate water sources such as water reuse systems, rainwater harvesting, and xeriscaping. The SEIR should provide an update on this evaluation and contain a discussion of water conservation measures that the Proponent will commit to implementing in project design. The SEIR should provide an update on discussions with the City, MWRA, and/or MassDEP with respect to I/I mitigation and how the City's requirement to store 24 hours of wastewater flow on-site will be addressed. I encourage the Proponent to provide a detailed update (including a breakdown for each component) regarding how the project will provide requisite I/I mitigation to offset project flows at the 4:1 removal ratio as required by the City of Cambridge. I refer the Proponent to comments from the MWRA which indicate that the project's wastewater flows should be fully offset via I/I removal or sewer separation to ensure that the additional wastewater flows from the project do not result in discharges of untreated CSO to the Charles River Basin at Cambridge Outfall CAM017 during large storms. The SEIR should also address MWRA comments regarding compliance with MWRA's Toxic Reduction and Control (TRAC) Discharge permitting.

Stormwater

The SEIR should include a stormwater analysis that evaluates and compares proposed storm-event peak flow rates and volumes to existing conditions based upon conceptual designs for the project. The SEIR should include a description of and implementation schedule for LID measures the Proponent will commit to in order to encourage groundwater recharge and reduce the local heat island effect.

The NPC indicates that minor flooding occurs during severe, but unspecified, storm events at the stormwater outfall on Broad Canal Way. The SEIR should describe the extent of past flooding and consider the potential for increased flooding due to more frequent extreme storms resulting from climate change. The NPC indicates that the Proponent may upgrade the stormwater system to address flooding, in lieu of complying with the City's stormwater management standards. The SEIR should provide more information on the potential advantages and disadvantages of this option, discuss whether it can be permitted, and evaluate the potential impacts on water quality if only flooding is controlled.

I refer the Proponent to comments from CRWA and MassDEP regarding the established water quality standards in the applicable Charles River TMDLs. The SEIR should provide a detailed discussion of stormwater conveyance from the KSURP to the Charles River and other sufficient information to demonstrate that the stormwater management system will be designed to address the water quality impairments covered by these TMDLs, as well as flooding conditions.

Greenhouse Gas Emissions

I commend the Proponent's commitment to creating a sustainable Transit Oriented Development (TOD) and its efforts to address climate change impacts in coordination with the City and other stakeholder groups. The GHG analysis should be updated based on the evolution of the master plan and specific mitigation measure commitments. The SEIR should address MassDEP and DOER comments. The SEIR should clearly state modeling assumptions, explicitly note which GHG reduction measures have been modeled and which have been accounted for in the mobile GHG evaluation, and identify whether certain building design or operational GHG reduction measures will be mandated by the Proponent to future occupants or merely encouraged for adoption and implementation. For those components that will be encouraged by the Proponent, the SEIR should include a draft tenant manual that identifies specific strategies to encourage their adoption (e.g. design assistance, financial incentives, providing a list of approved fit-out material performance standards, etc.). The draft tenant manual should build upon the outline presented in the NPC and provide information to advance energy efficient practices and optimization of energy efficient systems. The SEIR should also identify components of the ETMP and the corresponding emission reductions expected. If the stationary and/or mobile source GHG evaluation includes mitigation measures that the Proponent has not committed to, the SEIR should identify alternative methods to ensure a similar GHG reduction. The SEIR should evaluate and revise the Phase 1B energy model or explain Eleven Cambridge Center's low Energy Use Intensity (EUI) when compared to benchmark buildings.

The purpose of the GHG analysis is to identify feasible mitigation measures and assess the relative impacts of the Preferred Alternative. The MassDEP and DOER comment letter provide additional guidance regarding mitigation measures that should be explored as part of the GHG analysis, as well as resources to assist in preparing the analysis. Comments from MassDEP and DOER indicate that utilizing CHP, including the Dalkia plant to address the project's heating and cooling loads may yield additional GHG reduction benefits that should be evaluated by the Proponent. The SEIR should include an updated analysis that evaluates this issue and explains, in reasonable detail, why the Dalkia Plant and other CHP alternative were not

selected – either because it is not applicable to the project or is considered technically or financially infeasible. I refer the Proponent to comments from DOER and encourage the Proponent to evaluate reducing the overall building envelope U-value by decreasing the window to wall area and/or by increasing the glazing performance and further reducing the lighting power density.

The NPC provided a preliminary evaluation of installing solar PV systems and noted that the capacity of PV arrays is lower than the average power draw of the proposed buildings. Based on this analysis, a rooftop solar PV array has the potential to offset an additional 605 tpy of GHG emissions. The NPC does not include a commitment to install the solar PV array. The SEIR should provide a feasibility analysis, including identification of payback periods, for installation of on-site PV systems. The analysis should consider Solar Carve-Out II / SREC II and rebate mechanisms. The EIR should also expand on the discussion of wind harvesting.

Comment letters from MassDEP and the City indicate that additional GHG reductions can be achieved through recycling and source reduction efforts and water conservation measures. I encourage the Proponent to participate in the EPA WaterSense certification program and EnergyStar ratings in the selection of plumbing fixtures and appliances. Additional information on the WaterSense certification program is available on the following website: http://www.epa.gov/watersense/docs/home_finalspec508.pdf. Additional GHG reductions can be achieved through effective materials management during the design, construction, and operations phases of the project. The SEIR should describe how the Proponent will incorporate recycling initiatives into proposed construction and demolition activities and comply with the goals of the Massachusetts Solid Waste Master Plan. I strongly encourage the Proponent to set solid waste recycling/reuse target percentage goals. These measures will be considered when evaluating whether the project can mitigate its GHG emission to the greatest extent practicable.

Adaptation and Resiliency

I refer the Proponent to comments from the City which indicates the Interim Report on the Cambridge Climate Change Vulnerability Assessment will be issued imminently. The Interim Report will address the impacts of heat vulnerability and precipitation driven flooding for 2030 and 2070, the risks of sea level rise, and storm surge flooding through 2030. The SEIR should include an updated evaluation of the area's susceptibility to these risks based on the results of the Interim Cambridge *Climate Change Vulnerability Assessment* and the City's and MassDOT's ADCIRC model (as available). This updated analysis should consider the ADCIRC model in conjunction with inland flooding and inundation to further refine probabilistic flooding scenarios.

The SEIR should include a specific focus on how the project has been designed to respond to projected sea level rise scenarios. Using the Office of Coastal Zone Management's (CZM) December 2013 report entitled, *Sea Level Rise: Understanding and Applying Trends and Future Scenarios for Analysis and Planning* in conjunction with the information identified above, and with consideration for the level of acceptable risk and the projected lifespan of the project, the Proponent should select a predicted sea level rise scenario and evaluate in the DEIR how the project may be directly or indirectly impacted. The SEIR should discuss why a specific

scenario (or scenarios) was selected for evaluation, describe resulting sea level rise and storm surge elevations, identify the extent of inundation areas on-site, and indicate how the project will be designed to mitigate this impact or to facilitate adaptation responses. I encourage the Proponent to consult with the MEPA Office for additional clarification prior to undertaking this task.

The SEIR should demonstrate that the project includes ecosystem-based adaptation measures and proactive site design with regard to impacts related to predicted sea level rise, particularly given that the Kendall Square MBTA station may be vulnerable to flooding, which would affect the accessibility of the project via transit. I encourage the Proponent to work with the MBTA to review existing station vulnerabilities and identify improvements that could be undertaken in conjunction with the project. The SEIR should report on the results of this analysis and meetings with the MBTA and discuss what types of design improvements can or will be made to prevent or reduce impacts from extreme storms.

The Proponent should also consider impacts on the proposed structures, building entry and exit points, public roadways that traverse the site (e.g., Broadway, Main Street, Galileo Galilei Way), public and private on-site utilities, and first floor uses. The SEIR should identify site elements that have been incorporated into project design to reduce the impact of extreme heat waves and limit the potential impact of more frequent and intense storm precipitation. The Proponent should consider how on-site renewable energy, a district energy network, or CHP systems may provide added resiliency during periods of power loss during storms. Storm response actions and resiliency measures should be incorporated into leasing agreements or Tenant Manuals and be considered part of guidance related to tenant fit-out of commercial space, particularly those located on the lower floors.

Air Quality

The SEIR should identify certification and/or permits that likely will be required for proposed on-site energy sources such as a cogeneration system, boilers, stationary turbines, emergency generators, etc. I remind the Proponent that, as advised by MassDEP, pre-installation approval from the MassDEP Division of Air Quality Control is required if the project will include the installation of any Fuel Utilization Facility that emits air contaminants (e.g., furnaces, fuel burning equipment, or certain boilers). Additional review by MassDEP may also be required if the building is to be equipped with emergency generators.

Hazardous Materials

Comments from MassDEP identify measures necessary to comply with the MCP. The SEIR should include the results of any subsequent subsurface investigations, soil and/or groundwater sampling and testing, or Environmental Site Assessments specific to the project site to assist in the characterization of hazardous materials on-site, potential remediation requirements, and construction period or operational mitigation measures or include a commitment to engage an environmental consulting firm to assist during project design and construction to ensure that the project conforms to MCP regulatory requirements for construction

of buildings in contaminated areas and that all required submittals will be provided to MassDEP. The SEIR should discuss the need for a vapor intrusion system and identify how it will be incorporated into design and whether it would result in design changes.

Landlocked Tidelands

The SEIR should describe nature and total area of work that is proposed to occur within the tidelands. The SEIR should provide a narrative that explains the project's impact on the public's right to access, use, and enjoy the landlocked tidelands and describes the avoidance, minimization, and mitigation measures proposed to address said impacts. The narrative should describe the public benefits of the project as required in the Public Benefit Determination regulations (301 CMR 13.00). Additionally, the SEIR should identify whether the project is located in an area of low groundwater and if so, should identify and commit to taking measures to avoid, minimize, or mitigate any adverse impacts on groundwater levels in accordance with 301 CMR 11.05(4)(b).

Construction Period

The project must comply with MassDEP's Solid Waste and Air Quality Control regulations, pursuant to M.G.L. Chapter 40, Section 54, during demolition and construction. Construction Management Plans (CMP) will be developed for each component of the project and will be reviewed and approved by the City. The NPC indicates that the Proponent has committed to complying with MassDEP requirements for diesel construction equipment including the use of construction equipment that meet Tier 3 or Tier 4 emissions standards for non-road construction equipment (rated 50 horsepower or greater) to reduce emissions of VOCs, carbon monoxide (CO) and particulate matter (PM) from diesel-powered equipment.

Mitigation/Draft Section 61 Findings

The SEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each State Agency that will issue permits for the project. The SEIR should contain clear commitments to implement these mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation (either funding design and construction or performing actual construction), and a schedule for implementation.

Given the integration of transit system improvements into the project, the SEIR must provide a concise description and commitment to construct transportation or transit system improvements necessary to adequately mitigate project-related transportation demand. These mitigation commitments may be tied to overall project square footage or traffic generation rates, and/or addressed through a MOU with MassDOT, the MBTA, and/or the City of Cambridge.

In order to ensure that all GHG emissions reduction measures adopted by the Proponent in the Preferred Alternative are actually constructed or performed by the Proponent, I require Proponents to provide a self-certification to the MEPA Office indicating that all of the required mitigation measures, or their equivalent, have been completed. I hereby request that the

Proponent affirm in the SEIR that, following completion of construction, the Proponent will provide a certification to the MEPA Office signed by an appropriate professional (e.g., engineer, architect, transportation planner, general contractor) indicating that all of the mitigation measures adopted by the Proponent as part of the Preferred Alternative have been implemented. Alternatively, this self-certification may confirm that equivalent emissions reduction measures that collectively are designed to reduce GHG emissions by the same percentage as the measures outlined in the Preferred Alternative, based on the same modeling assumptions, have been adopted. The certification should be supported by plans that clearly illustrate what type of GHG mitigation measures have been incorporated into the project. For those measures that are operational in nature (i.e. TDM, recycling, parking management) the Proponent should provide an updated plan identifying the measures, the schedule for implementation and how progress towards achieving the measures will be obtained. The commitment to provide this self-certification in the manner outlined above should be incorporated into the updated draft Section 61 Findings included in the SEIR.

Responses to Comments


The SEIR should contain a copy of this Certificate and a copy of each comment letter received on the NPC. In order to ensure that the issues raised by commenters are addressed, the SEIR should include direct responses to these 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 SEIR beyond what has been expressly identified in this certificate. I recommend that the Proponent employ an indexed response to comments format, supplemented as appropriate with direct narrative response.

Circulation

In accordance with Section 11.16 of the MEPA Regulations and as modified by this Certificate, the Proponent should circulate a hard copy of the SEIR to each State and City Agency from which the Proponent will seek permits. The Proponent must circulate a copy of the SEIR to all other parties that submitted individual written comments. Per 301 CMR 11.16(5), the Proponent may circulate copies of the SEIR to these other parties in CD-ROM format or by directing commenters to a project website address. However, the Proponent should make available a reasonable number of hard copies to accommodate those without convenient access to a computer and distribute these upon request on a first-come, first-served basis. The Proponent should send correspondence accompanying the CD-ROM or website address indicating that hard copies are available upon request, noting relevant comment deadlines, and appropriate addresses for submission of comments. A CD-ROM copy of the filing should also be provided to the MEPA Office. A copy of the SEIR should be made available for review at the Cambridge Public Library.

May 29, 2015

Date


Matthew A. Beaton

Comments received:

05/15/2015 Massachusetts Water Resources Authority
05/20/2015 Stephen H. Kaiser
05/22/2015 Charles River Watershed Association (CRWA)
05/22/2015 Massachusetts Department of Environmental Protection – Northeast Regional
Office
05/22/2015 Massachusetts Department of Energy Resources (DOER)
05/26/2015 Massachusetts Department of Transportation
05/27/2015 City of Cambridge

MAB/PC/pc