



SMART GROWTH AND REGIONAL COLLABORATION

December 22, 2023

Secretary Rebecca Tepper
Executive Office of Energy & Environmental Affairs
Attention: Eva Vaughan, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: The Park at Beaver Brook, Single Environmental Impact Report, EEA No.16745

Dear Secretary Tepper:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroCommon 2050*, MAPC's regional land use and policy plan, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the recommendations of *MetroCommon 2050*, including *reducing vehicle miles traveled and the need for single-occupant vehicle travel through increased development in transit-oriented areas and walkable centers*¹, and *improving accessibility and regional connectivity*². Furthermore, the Commonwealth has a statutory obligation to reduce greenhouse gas (GHG) emissions by at least 50% by 2030, 75% by 2040, and 85% from 1990 levels by 2050 to achieve net zero emissions by 2050.

Campanelli Trigate Boxborough Sub, LLC, the Proponent, has submitted a Single Environmental Impact Report (SEIR) for a research and development campus (the Project). Presently, there are four existing buildings at the 350-acre site on Beaver Brook Road in Boxborough and Harvard, totaling about 426,974 square feet of development. The Proponent proposes to add five new buildings, collectively amounting to 746,500 square feet. When complete, the Project will comprise nine buildings, constituting an estimated 1.17 million square feet. Additionally, the Proponent proposes to increase the parking capacity by adding 670 new spaces, supplementing the existing 2,200 spaces, resulting in 2,890 parking spaces.

MAPC recognizes that the Proponent commits to many laudable measures to reduce the negative environmental impacts of this project and improve public safety and access, including new shared use paths and sidewalks, tree plantings, EV charging facilities, and green infrastructure. However, **our primary concern remains the significant number of vehicle trips that are forecast to be generated by this project - 12,900 vehicle trips per day. Additionally, we are concerned about the predicted motor vehicle CO₂ emissions of 430.8 tons/year.**³ Without a strong and compelling transportation demand management (TDM) program, the vast

¹ <https://metrocommon.mapc.org/announcements/recommendations/2>

² <https://metrocommon.mapc.org/announcements/recommendations/1>

³ The Park at Beaver Brook, Expanded Environmental Notification Form, Technical Appendix 2 – Greenhouse Gas Analysis, Table 1, Page 5.
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majority of these vehicle trips will almost certainly be made by single occupants, adding to already congested local and regional highways and roadways and challenging the State's efforts to meet its climate goals.

While the Proponent does commit to a TDM program staffed by an on-site Transportation Coordinator, along with preferential parking for carpools and vanpools, EV charging stations, pre-tax transit passes, bike facilities and car share service, it should be noted that **the abundance of free, convenient on-site parking will mitigate against the likely success of these services**. As long as the 2,890 parking spaces⁴ are made available to employees at no cost and the alternatives to driving (namely the Fitchburg Line of the MBTA Commuter Rail) are costly and inconvenient, the TDM program will largely be rendered moot and employees will choose to drive (mostly in SOVs).

MAPC respectfully recommends the following actions be undertaken by the Proponent as a means of reducing the significant climate impacts of this project and ensuring that the TDM program is successful:

Invest in Public Facilities to Support a Local Bus Service Connection between the Commuter Rail and Project Site

The Town of Boxborough is working with the Montachusett Regional Transit Authority (MART) to initiate a new bus line connecting Beaver Brook Road with the South Acton Commuter Rail Station by way of Route 111. Funded through a three-year Boston MPO Community Connections Grant, this bus service will make the project site transit accessible, while also serving several neighborhoods and community destinations in Boxborough, Littleton, and Acton. The Town of Boxborough is leading the hiring process for operators of the new bus route, which will offer service primarily between 7 and 9 AM and 4 and 6 PM. **In order to make this bus service appealing not only to local residents but also to employees commuting to the Project site, we recommend that the Proponent invest in the installation of public facilities along Route 111 that will improve the quality and appeal of the bus service.** These public facilities include covered bus stops with signage, seating, and real-time arrival boards, as well as safe, designated walkways between the stops and the entrances of the buildings at the project site. We understand that the Town of Boxborough welcomes this opportunity to partner with the Proponent in bringing these transit improvements to fruition.

⁴ We recognize that the Proponent is proposing both fewer parking spaces than were originally permitted and 2001 and half the amount that are currently required by local zoning.

Incentivize Transit and Non-SOV Trips

In addition, MAPC strongly recommends that the Proponent prioritize financial incentives for transit within their TDM program. In particular, **MAPC recommends the Proponent cover the cost of fares on the new MART bus service for employees at the Park at Beaver Brook as part of a commuter benefits package. Furthermore, the Proponent should partially subsidize the cost of monthly Commuter Rail passes for employees.** Combined with complementary ride matching programs/services, preferential parking for carpools (and other carpool benefits such as fuel reimbursements), and improved bicycle and pedestrian infrastructure, this investment in transit access and non-SOV commuting will add muscle to an otherwise weak TDM program and provide a financial incentive to choose transit (or carpooling) over SOV commuting.


Support Re-Launch of Crosstown Connect TMA

MAPC advises the Proponent to support the re-launch of the Crosstown Connect Transportation Management Association (TMA), which is currently inactive, and become a member once (and if) it is re-established. By participating in the TMA, the Proponent can be part of the collaborative efforts aimed at enhancing sustainable transportation options and addressing the commuting needs of employees in the area. It should also be noted that there will be opportunity for the TMA to take over operations of the new bus service upon expiration of the current three-year service contract or to launch a supplementary commuter shuttle providing direct access to the Project.

We hope that these comments and recommendations are helpful to the Proponent in developing a strong TDM program that both improves the appeal of commuting to the Project site while reducing its negative environmental impacts. With the modifications included in this letter, we can ensure that this project does not put us further behind in meeting our climate and transportation goals.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc Draisen
Executive Director

cc: Alexander Wade, Town of Boxborough
Frank O'Connor, Town of Harvard
Jennifer Raitt, NMCOG
David Mohler, MassDOT