



June 23, 2025

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

RE: Hartford Avenue Warehouse
Final Environmental Impact Report, EEA No. 16641

Dear Secretary Tepper:

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

MAPC has a long-term commitment to alleviate 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% from 1990 levels by 2030, 75% by 2040, and 85% by 2050 to achieve net zero emissions by 2050.

W/S Bellingham IV Associates LLC (the Proponent) proposes to construct an approximately 700,000 square-foot (sf) warehouse, lab, and office facility (the Project) on a 176-acre parcel south of Hartford Avenue (Route 126) and west of Interstate 495 in Bellingham. The proposed building program comprises 239,600 sf of lab, 160,400 of office, and 300,000 sf of warehouse space, with the possibility of adjustments to the design program. The Project is forecast to generate 3,240 weekday daily trips. Of these trips, 2,830 trips are vehicular trips and 410 are truck trips. The Proponent proposes 856 employee parking spaces, 175 truck loading spaces, and 144 parking spaces designated for truck queue management.

The Proponent has offered only limited responses to the Secretary's Transportation Demand Program (TDM) directives outlined in the Draft Environmental Impact Report (DEIR) Certificate dated February 7, 2025. While we appreciate the Proponent's acknowledgement of the possible need for additional TDM measures, MAPC needs to elevate our concern that these directives have not been included in the Section 61 Findings of the Final Environmental Impact Report (FEIR). The Proponent has still not created a mode shift goal for this project, which should be tracked through the TDM and the traffic monitoring programs to ensure these goals are being met.

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

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

**Metropolitan Area Planning Council (MAPC) comments on
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The TDM directives outlined in the DEIR include:

- Evaluating public transportation;
- Extending the shared-use path along Hartford Avenue into the project site;
- Implementing parking management strategies; and
- Monitoring of all transportation modes, not just vehicular traffic.

MAPC respectfully requests that the Proponent address these directives and create a mode shift goal, and include these measures as formal commitments in the Section 61 Findings rather than being treated as potential needs in Chapter 8 (MEPA Response to Comments) of the FEIR.

Thank you for the opportunity to comment on this project.

Sincerely,



Lizzi Weyant
Acting Executive Director

cc: Robert Lussier, Town of Bellingham
David Mohler, MassDOT