



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Jamey Tesler, Secretary & CEO



September 9, 2022

Bethany A. Card, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Andover – 3000 Minuteman Road
(EEA #16587)

ATTN: MEPA Unit
Jennifer Hughes

Dear Secretary Card:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Expanded Environmental Notification Form filed for 3000 Minuteman Road in Andover 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

cc: Jonathan Gulliver, Administrator, Highway Division
Carrie Lavalley, P.E., Chief Engineer, Highway Division
Paul Stedman, District 4 Highway Director
James Danila, P.E., State Traffic Engineer
Merrimack Valley Planning Commission (MVPC)
Planning Board, Town of Andover



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MEMORANDUM

TO: David J. Mohler, Executive Director
Office of Transportation Planning

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

DATE: September 9, 2022

RE: Andover – 3000 Minuteman Road
(EEA #16587)

The Public/Private Development Unit (PPDU) has reviewed the Expanded Environmental Notification Form (EENF) submitted for 3000 Minuteman Road (the “Project”) in Andover as submitted by SMMA on behalf of Alexandria Real Estate Equities, Inc. (the “Proponent”).

The Project site is a 118.29-acre parcel which is currently fully developed as a corporate campus with four total office buildings totaling 726,000 square feet (sf) as well as site infrastructure including an internal circulatory drive, surface parking, an approximately 2-acre ground-mounted solar array, baseball field, and areas of preserved wetlands and forest landcover. The Project proposes to renovate the existing buildings on site and construct two additional buildings to bring the total area to 1,126,000 sf to operate as a research, development, and pharmaceutical manufacturing campus. The Project additionally proposes to increase the total impervious area of the Project site from 41.46 acres to 51.94 acres in order to support an additional 353 surface parking spaces. Access to the site will remain unchanged from the present configuration, with two curb cuts on Minuteman Road for a one-lane exit-only driveway and one-lane enter-only driveway divided by a planted median which in turn connect to an internal circulatory drive providing access to distinct buildings and associated parking.

The Project surpasses MEPA thresholds for review of an Environmental Notification Form (ENF) due to impacts on wastewater per 301 CMR 11.03(5) and transportation per 301 CMR 11.03(6). The Project requires an Environmental Impact Report (EIR) due to impacts on land per 301 CMR 11.03(1) as it creates more than 10 acres of new impervious surface. Additionally, the Project requires an EIR per 301 CMR 11.06(7)(b) as a project within the Designated Geographic Area surrounding an Environmental Justice Population. The Project requires a Vehicular Access Permit from MassDOT as Project-generated trips will impact I-93 and state jurisdictional sections of River Road adjacent to the Project site. The Proponent provides additional information necessary for a comprehensive Project review in support of

the waiver request to prepare a Single Environmental Impact Report (SEIR) rather than Draft and Final EIRs.

The EENF includes a Transportation Impact Analysis (TIA) prepared by Vanasse and Associates, Inc. in accordance with the *EEA/MassDOT Transportation Impact Assessment (TIA) Guidelines*. The TIA includes an analysis of study area that addresses intersection operations, safety, and bicycle, pedestrian, and transit modes.

Study Area

Based on anticipated Project trip generation, the Proponent includes the following intersections in the study area for traffic analysis:

- River Road at 1776 Drive;
- River Road at Minuteman Road/Shattuck Road;
- River Road at I-93 southbound ramps;
- River Road at I-93 northbound ramps, and;
- River Road/Old River Road/Federal Street.

The TIA includes a network analysis which provides the anticipated distribution of Project-generated trips within this study area based on regional population densities, existing traffic patterns, and roadway conditions. The Proponent estimates that Project-generated trips will be distributed such that 70% of site-generated inbound and outbound trips will travel via I-93 northbound and southbound, with a further 15% traveling via River Road eastbound and 20% westbound.

The TIA additionally includes traffic impacts anticipated to result from future development within the Project study area, including the development of a neighboring pharmaceutical/manufacturing facility at 300 Minuteman Road. The Proponent should communicate with MassDOT District 4 to identify if MassDOT Project #608620 includes any physical design changes to the I-93/River Road interchange which could impact site access.

Trip Generation

In order to provide the most conservative analysis for Project impacts, the TIA utilizes Land Use Codes (LUC) 140: Manufacturing and LUC: 760: Research and Development as provided in the Institute of Transportation Engineers' (ITE) *Trip Generation Manual (11th Ed.)* to estimate total trip generation associated with Project development. In order to establish a baseline trip generation associated with existing site uses, the TIA summarizes the extant campus uses using LUC 140: Manufacturing, LUC 710: General Office Building, and LUC 760: Research and Development.

With this approach, the Proponent estimates that the Project will generate a total of 7,268 daily vehicle trips, representing an increase of 1,668 trips over the existing uses. The peak morning hour is anticipated to represent 77 total trips over existing conditions and the peak evening hour is anticipated to represent 175 trips. The Proponent additionally submitted a memorandum on September 8, 2022 estimating that Project trip generation will include 162 daily truck trips to and from the site, with 18 trips during the morning and evening peak hours.

Traffic Operations

The TIA includes an analysis of peak hour traffic operations at study area intersections under current conditions, a 2029 No-Build Scenario, and a 2029 Build Scenario.

The TIA anticipates that the overall Level of Service (LOS) at the intersection of River Road with Minuteman Road and Shattuck Road will decline from C (22.6 seconds' average delay) to D (50.7 seconds' average delay) under the 2029 No-Build Scenario and to LOS E under the 2029 Build scenario (67.0 seconds' average delay), with a substantial increase in vehicle trips and associated delays as this intersection represents the primary means of access for trips generated by the Project site and the planned abutting research and development facility at 300 Minuteman Road. Otherwise, no decline in overall LOS is anticipated at intersections within the study area.

To offset these impacts, the Proponent proposes mitigation including a coordinated traffic signal system for the River Road corridor as further outlined in the "Mitigation" section below.

Safety

The TIA includes a summary of crash rates derived from the MassDOT crash portal for the five-year period between 2015 and 2019. None of the unsignalized intersections within the study area represent crash clusters nor crash rates higher than the District 4 unsignalized intersection average of crashes per million vehicles. In addition, no intersection within the study area has been identified as an HSIP crash cluster by MassDOT.

Transit Operations

The TIA identifies that the Project site is served by the bus route 37 operated by the Merrimack Valley Regional Transit Authority (MVRTA), with a stop at the Springhill Marriot directly adjacent to the Project site. As noted under the Transportation Demand Management (TDM) section of this comment letter, the Proponent commits to coordination with the MVRTA to identify opportunities for bus stops and increased bus service in the Project area.

Pedestrian and Bicycle Access

The TIA includes a comprehensive field inventory of existing conditions at study area roadways and intersections. River Road includes bicycle lanes west of Minuteman Road and sidewalks for its length on either approach, while Minuteman Road includes sidewalks but lacks bicycle infrastructure. The TIA includes observed traffic volumes from June 2022, which include observation of limited bicycle or pedestrian travel within the study area.

Transportation Demand Management (TDM)

The Proponent proposes to instate a Transportation Demand Management (TDM) program with the goal of reducing vehicle trips to the Project site. This program, briefly summarized, includes:

- Provision of on-site bicycle parking and pedestrian accommodations;
- Provision of information, maps, and schedules for local transit services;
- Provision of a shuttle service from the Project site to the Andover MBTA Commuter Rail station with a minimum of four round-trips per day;
- Provision of an on-site transportation coordinator to oversee the TDM program;
- Provision of on-site amenities to reduce the need for employee trips off-site;
- Creation of a rideshare matching program, and;
- Incentives for carpooling to the Project site.

MassDOT finds that the proposed TDM measures have potential to reduce single-occupancy-vehicle trips to the Project site but acknowledges that the success of this program will be evaluated in part under the Transportation Monitoring Program (TMP) outlined below.

Transportation Monitoring Program

The Proponent commits to the implementation of a Transportation Monitoring Program (TMP) to begin six months after the issuance of a Certificate of Occupancy for the Project and to run for five years, with annual reporting to MassDOT and the Town of Andover. In accordance with MassDOT/EEA standards, the TMP will include:

- Obtaining traffic-volume information over a continuous seven-day, weeklong period on the driveway serving the Project site along Minuteman Road and 1776 Drive;
- Performing manual turning movement and vehicle classification counts at the Project site driveway intersections with Minuteman Road and 1776 Drive, and at the intersections of River Road at Minuteman Road and Shattuck Road and River Road at 1776 Drive during the weekday morning (7:00 to 9:00 AM) and weekday evening (4:00 to 6:00 PM) peak periods;
- Evaluating motor vehicle crash data at the intersections of River Road at Minuteman Road and Shattuck Road and River Road at 1776 Drive, and;
- Updating the effectiveness of TDM program.

Mitigation

As part of the TIA, the Proponent proposes off-site mitigation measures in addition to the above-listed TDM proposals and TMP intended to offset the impacts of Project-generated vehicle traffic.

The TIA identifies that Project development as well as the development of 300 Minuteman Road will result in sharply increased traffic volumes on Minuteman and River Roads. The Proponent therefore commits to the design and implementation of a coordinated traffic signal system that would include the River Road's intersections with the I-93 Ramps, Minuteman Road and Shattuck Road, and Old River Road and Federal Street, with phasing and coordination planning to ensure that no approach operates over capacity. Under the resulting 2029 Build-Mitigated condition, this system would result in an overall LOS improvement from the 2029 No Build condition from E to D during the weekday PM peak hour at the intersection of River Road with Minuteman and Shattuck Road and from B to A at the intersection of River Road with the I-93 Northbound ramps. With this proposed mitigation in place, there are no anticipated declines in overall LOS at any study area intersections on River Road.

The Proponent additionally commits to the reconstruction of pedestrian infrastructure, including ramps, crosswalks, and pushbuttons, at River Road's intersections with the I-93 Ramps, Minuteman Road and Shattuck Road, and Old River Road and Federal Street.

Section 61 Finding

The EENF includes a Draft Section 61 Finding outlining the mitigation measures the Proponent has committed to implementing in conjunction with this Project.

In light of the limited traffic impacts likely to result from Project development as well as the mitigation and TDM measures proposed to offset Project impacts, MassDOT supports the Proponent's request for an SEIR.

The Proponent should continue consultation with MassDOT during the drafting of the SEIR for this Project and coordinate with MassDOT District 4 and appropriate MassDOT sections during construction to limit impacts on I-93 and to carry out mitigation on this corridor. If you have any questions regarding these comments, please contact *Curtis.B.Wiemann@dot.state.ma.us*.