



September 9, 2025

Alexander Wade, Boxborough Town Planner
Members of the Boxborough Planning Board
29 Middle Road
Boxborough, Massachusetts 01719

Re: The Park at Beaver Brook – Applicant Response to Planning Board Letter to SEIR (EEA No. 16745) and Additional Commentary

Dear Alec and Members of the Planning Board,

During the August 18, 2025 Planning Board hearing, a member of the board asked Campanelli to review and respond to the Planning Board letter submitted on 12/19/2023 to Eva Vaughan with the MEPA Office. Please see Campanelli's responses below.

Energy:

1. *Planning Board Ask:* Explore subsidizing energy efficiency measures of the EJ community residents at nearby apartments and condominiums.

Applicant Response: As this is not a requirement of the Town's OSCD Bylaw, the MEPA regulations or the MEPA Certificate issued on the SEIR, we will not be pursuing this suggestion. We do, however, believe that the Project will provide other environmental benefits to the EJ community, including a reduction in the number of vehicle trips – and, in turn, a reduction in air quality impacts - compared with the originally approved project, and a significant increase in the amount of preserved open space.

2. *Planning Board Ask:* Commitment to more solar capacity to help meet state goals.

Applicant Response: As the Board is aware, individual buildings within the Park will come before the Board for site plan approval. When those buildings are designed and their end users are identified, we will be in a position to discuss future solar commitments, which are heavily dependent on future occupants and their premises.

3. *Planning Board Ask:* Commitment to more EV charging stations available for public use.



Applicant Response: Future EV Charging Stations will be installed per Mass building code requirements and can be reviewed by the Board at the time of the site plan approval process.

4. *Planning Board Ask:* Commit to working with Littleton Light and Electric Department (LELD), our Municipal Light Plant, to allow an increase in solar energy generated at the site to be cost effective for the Proponent and potentially for the Town of Boxborough as a whole.

Applicant Response: Campanelli has spoken with LELD (several times) regarding placing solar energy back into the regional grid and has determined that at this time, it is infeasible. Most significantly, the cost of the portal equipment required by LELD to transfer energy from Campanelli to LELD is prohibitive. In addition, the quoted return per Kwh is so low that the return on the investment is well over 25 years.

Air Quality:

1. *Planning Board Ask:* Consider planting additional trees to offset the increases in CO₂ (1,392.3 tons per year) emitted by the project.

Applicant Response: As the Board is aware, individual buildings within the Park – including their landscape design – will come before the Board for site plan approval. When those buildings and their sites are designed, we will present landscaping and tree planting plans to the Board. While we are not currently in a position to commit to a tree-planting plan, we note that in our recent TUV project, there was a net increase of 15 trees and anticipate that there will be additional trees planted in connection with future development.

2. *Planning Board Ask:* Provide mitigation for additional diesel trucks above the 75 currently estimated and provide a way to account for truck trips over the life of project, as tenants and uses may change.

Applicant Response: As this is not a requirement of the Town's OSCD Bylaw, the MEPA regulations or the MEPA Certificate issued on the SEIR, we will not be pursuing this suggestion.

3. *Planning Board Ask:* Include Greenhouse Gas (GHG) reporting to the town periodically throughout project life, notwithstanding that the Proponent intends to self-certify.

Applicant Response: This is not a requirement of the Town's OSCD Bylaw. However, as part of the SEIR requirements the following GHG mitigation measures were incorporated into the TUV project, including but not limited to the following: 10% of all parking spaces will be EV-ready, Low-TEDI (Thermal Energy Demand Intensity) design for the building envelope, An all-electric design using VRF Air Source Heat Pumps (ASHPs) capable of simultaneous heating and



cooling, Energy Recovery Ventilation (ERV) achieving $\geq 50\%$ heat recovery, High efficiency electric storage tank hot water systems, Inside and exterior lighting systems LED with a lower light power density than Code, One electric vehicle (EV) installed space and 10% EV-ready spaces at each of the new buildings, Solar-ready space equal to 80% of flat building roofs.

4. *Planning Board Ask:* Demonstrate that the 2030 EPA emissions standards are implemented and are measureable (as identified in the SEIR Appendix 5) by reporting to the town.

Applicant Response: As this is not a requirement of the Town's OSCD Bylaw, the MEPA regulations or the MEPA Certificate issued on the SEIR, we will not be pursuing this suggestion.

5. *Planning Board Ask:* Collaborate with town as additional energy saving technologies and efficiencies become available.

Applicant Response: Individual buildings within the Park will come before the Board for site plan approval. When those buildings are designed and their end users are identified, we will be in a position to discuss implementation of energy saving technologies and the like. The Board may recall that the TUV project incorporated the following energy saving measures: LED light fixtures, Low-flow water fixtures, white membrane roof, electric heat pump system, additional roof insulation R 36ci, and drought tolerant plantings.

Transportation:

1. *Planning Board Ask:* Provide mitigation for truck traffic volumes based on the most intensive Land Use Code(s) for the entire project site.

Applicant Response: As the Certificate on the SEIR noted, 75 average daily truck trips is a "conservative estimate". We will implement the full transportation mitigation program as required by the Mass DOT Finding Pursuant to M.G.L. Chapter 30, Section 61, issued May 24, 2024.

2. *Planning Board Ask:* Explore the connectivity of a sidewalk along the remainder of Swanson Road to Massachusetts Avenue (state Highway Route 111) to the new Mass DOT bridge replacement pedestrian lane.

Applicant Response: We have taken a close look at this request and determined that it is not feasible for a variety of reasons. There is approximately 750 feet of new sidewalk that would need to be constructed between 107/ Swanson Road and Route 111; however, there would be no connectivity because there is no access for sidewalks at Route 111. Along Swanson Road, there is an existing bio swale that prohibits a sidewalk from being installed. At the corner of Swanson and 111, two large utility poles would interfere with installing a new sidewalk. Lastly, sidewalks along Route 111 are not physically feasible due to existing



retaining wall, ledge, and guardrails. Rather than dedicate financial resources to constructing a sidewalk with no connectivity, Campanelli believes that contributing toward the planning and design of a public amenity at Lot 100 would be a more publicly beneficial investment.

3. *Planning Board Ask:* Identify a variety of traffic calming measures along Swanson Road to improve safety to all residents, including pedestrians and cyclists.

Applicant Response: Two (2) radar speed indicators are being proposed on Swanson Road as part of our OSCD application.

4. *Planning Board Ask:* Make available to the town all data on traffic patterns and effectiveness of Transportation Demand Management efforts beyond the proposed 5-year period.

Applicant Response: We will implement the Transportation Demand Management program as required by the Mass DOT Finding Pursuant to M.G.L. Chapter 30, Section 61, issued May 24, 2024, for all future tenants of The Park.

Water Supply / Wastewater:

1. *Planning Board Ask:* Participate in determining the source of PFAS contamination. The Board notes that the highest PFAS levels in the Town of Boxborough are at the wells at this water supply location. The Proponent is proposing mitigation of PFAS with a Point of Entry system to ensure drinking water standards are met for water supply for the tenants at the site. However, the source(s) of PFAS at the property has not been determined.

Applicant Response: The Park is not the source of PFAS contamination, PFAS does not originate from our property; it originates in the groundwater of the region and country as a whole. As stated on the MassDEP website, "Contamination of drinking water is typically localized and associated with an industrial facility where the chemicals were produced or used or where firefighting foam was used. Contamination of drinking water may also be associated with municipal waste, and land application of certain waste (e.g., industrial compost facilities)." Campanelli has been the founding partner to both Littleton and Boxborough when agreeing to allow for close to 2 miles of water main to pass through the Park.

2. *Planning Board Ask:* Investigate wastewater limits for PFAS on the Groundwater Discharge Permit so that PFAS at the well source is not disturbed to the wastewater discharge area.

Applicant Response: Presently, the Groundwater Discharge Permit does not require monitoring for or establish limits for PFAS in the discharge. However, the facility is provided with a Granular Activated Carbon system for Total Organic



Carbon removal, which should simultaneously remove PFAS to some level from the discharge

3. *Planning Board Ask:* Expand Water Conservation measures and use of drought tolerant plants throughout the project site.

Applicant Response: Both water conservation measures and planting plans are highly dependent on individual building/site design and ultimate end user. We will provide this information to the Board *during* the site plan approval process for each building.

Public Engagement:

1. *Planning Board Ask:* Engage further with the town to determine desired benefits of any future proposal for the use of the remaining property. This could help identify more targeted benefits and meaningful mitigation to the community.

Applicant Response: As the Board is aware, we have offered to donate Lot 100 to the Town and to provide \$25,000 in seed money toward a planning and design effort. To date, this has been well received by Town departments and officials.

2. *Planning Board Ask:* Participate in the active advertising of the Special Permit amendment process, beyond the basic requirements set forth under Massachusetts General Law.

Applicant Response: No comment at this time.

At this time, Campanelli believes we have responded to all questions and requests by the Planning Board.

Additional Commentary

We look forward to the board's full support of our OSCD permit application, dated January 26, 2025.

Campanelli Investment to The Park

Campanelli has invested over \$8,000,000 in The Park since its acquisition in 2021, including but not limited to a Restaurant in the Park, Public Water Supply Improvements (well water), Public Water supply Improvements (West Boxborough Water Main), Land Conservation, PFAS mitigation, Waste Water Treatment Improvements and Upgrades, Amenity Maintenance, (pathways, scenic vistas) wildlife preservation and more. Campanelli's investment, noted above, excludes permitting, construction and financing expenses.



Building size similar to TUV

Throughout the public hearing process, Campanelli has stated the following: The new buildings are intended to be mostly Research & Development / Office in nature, similar in use and Class A lab space as provided for TUV. We have not stated that the buildings would be of similar size to TUV. We estimate the approximate size of the buildings will be Lot 600 – 112,500 SF+/-, Lot 700 – 105,000 SF +/-, Lot 800 a, b & c, max 450,000 SF +/-, as delineated in our submitted Master Plan.

Thank You

Sincerely,

A handwritten signature in red ink, which appears to read "Russell Dion". The signature is fluid and cursive, with a prominent initial "R" and a trailing flourish.

Russell Dion
Partner

Cc: Rob Demarco
Mike Kelly
Johanna Schneider
Jeff Wyman