The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs

100 Cambridge Street, Suite 900, Boston, MA 02114
www.Mass.gov/EEA | **Tel:** (617) 626-1000 | **Fax:** (617) 626-1081

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

November 28, 2025

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME	: King Street Common
PROJECT MUNICIPALITY	: Littleton
PROJECT WATERSHED	: Merrimack & Concord
EEA NUMBER	: 16921
PROJECT PROPONENT	: Lupoli Development
DATE NOTICED IN MONITOR	: October 22, 2025

Pursuant to the Massachusetts Environmental Policy Act (MEPA; M.G.L. c. 30, ss. 61-62L) and Section 11.08 of the MEPA regulations (301 CMR 11.00), I have reviewed the Final Environmental Impact Report (FEIR) and hereby determine that it **adequately and properly complies** with MEPA and its implementing regulations.

Project Description

As described in the FEIR, the project consists of the construction of 19 buildings having 1,089 residential units, 115,500 square feet (sf) of retail, 19,000 sf of office, 545,520 sf of light industrial use (which includes the two large former IBM buildings), and a 111,000 sf hotel (150-rooms). According to the filing, ten percent of the units will be affordable.[1] A total of 3,010 parking spaces are proposed, of which 1,446 will be in structured parking (garages, decks, parking under podiums) and the remainder at grade.

[1] A minimum of 40 of the affordable units will be "deeply affordable" ranging from 30% to 60% of average median income (AMI). The remaining affordable units will 80% of AMI or lower. In addition, as required by a condition in a Special Permit received on June 18, 2024 from the Town, affordable units will be constructed, leased and occupied on a schedule proportional to market rate units.

The development will be divided into an east and a west site. The east site will consist of the following:

- BUILDING A: commercial
- BUILDING B: commercial
- BUILDING C: residential (168 units)
- BUILDING D: residential (168 units)
- Building E: residential (155 units) and retail
- BUILDING F: residential (155 units)
- BUILDING G: hotel (150 rooms) and a food service/bar
- BUILDING H: retail
- BUILDING I: residential (9 units) and retail
- BUILDING J: residential (11 units) and retail
- BUILDING K: residential (42 units) and retail
- BUILDING L: residential (11 units) and retail
- BUILDING M: office
- BUILDING N: residential (9 units) and retail
- BUILDING O: residential (12 units) and retail
- BUILDING Q: retail
- BUILDING R: residential (65 units)

The west site will consist of the following:

- BUILDING S: residential (285 units)

Changes Since the DEIR

According to the FEIR, the proposed hotel, Building G, was redesigned to conform to zoning height requirements. The hotel is now proposed to be four stories (previously proposed to be 5 stories). The project was able to accommodate the proposed 150 rooms by building out the upper stories of the hotel, which were previously stepped down to King Street.[2]

In addition, the project has undergone several layout changes resulting in impervious area being reduced by 17,167 sf (0.4 acres). The project has made several internal adjustments, which resulted in 8,000 sf of retail being eliminated from Building E and added to Building K, five residential units being removed from Buildings C and D and six and 4 residential units added to buildings E and F, respectively. The project has made several modifications to its traffic mitigation, which are described in detail below.

Project Site

The approximately 47.4-acre site is located within the Town of Littleton (Town). The project site consists of two sections (east site (550 King Street) and west site (410 Great Road)).

[2] Comments from the Town of Littleton note that remaining issues regarding the zoning compliance will be addressed during local permitting.

The east site is bounded by Interstate 495 to the north, Shea Street to the East, King Street (Route 110) to the south, and Great Road (Route 119) to the west. This portion of the site is a former IBM office campus that is now vacant. Under existing conditions, the east site is comprised of buildings, paved parking areas, landscaped areas, and related ancillary facilities. The undeveloped areas within the east site include an area of deciduous trees around the northern border that buffers it from I-495.

The smaller west site is bounded by a commercial lumber yard to the north, Great Road to the east, commercial development along King Street to the south, and a residential area off of White Street and Hillside Road to the west. The west site is currently developed with a commercial complex of attached buildings, housing a variety of small businesses, and a surface parking lot.

Bordering Vegetated Wetlands (BVW) are located in the southwest corner of the east site. There is an Isolated Vegetated Wetland (IVW) on the east site that extends onto 584 King Street. According to the Massachusetts Natural Heritage and Endangered Species Program (NHESP) Atlas (15th Edition), the site is not located within Priority or Estimated Habitat of Rare Species. The site is also not located within an Area of Critical Environmental Concern (ACEC). The project site is located within the Littleton Common (LIT.44), an area included in the Massachusetts Historical Commission's (MHC) Inventory of Historic and Archaeological Assets of the Commonwealth. The site includes the Conant Houghton and Company building, 410 Great Road (LIT.44) and the Captain Thomas Nye House (the Simon Tuttle House), 534 King Street (LIT.25), which are historic resources included within the Littleton Common area. The Simon Tuttle House will be preserved and maintained. The Conant Houghton and Company building will be razed to facilitate the construction of the project.

The project site is not located within a Designated Geographic Area (one mile) of any Environmental Justice (EJ) Populations.[3] The site is located within five miles of ten EJ populations designated as Minority in Acton, Ayer, Boxborough, Chelmsford and Westford.

Environmental Impacts and Mitigation

Potential environmental impacts include alteration of 44.2 acres of land (includes 43.5 acres of already altered/developed land and 0.7 acres of new alternation), creation of approximately 1.9 acres of new impervious area (26.5 acres total on site when including existing structures and uses);[4] generation of 13,338 New average daily trips (adt) (20,328 adt total when including existing uses); construction of 1,060 new parking spaces (3,010 total on site); generation of approximately 212,000 gallons per day (gpd) of water use and wastewater (total of 286,000 gpd on site); construction of 0.23 miles of new water mains; construction of 0.49 miles of sewer mains; and greenhouse gas (GHG) emissions associated with on-site energy use and transportation.

[3] The EEA EJ Mapper is available at: https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts.
[4] The project has reduced impervious surface by 0.4 acres since the DEIR.

Measures to avoid, minimize and mitigate these impacts include implementation of a Transportation Demand Management (TDM) plan to reduce single-occupancy vehicles trips and installation of a stormwater management system consistent with the Stormwater Management Standards (SMS). The project will incorporate mitigation measures to reduce the projects GHG emissions and improve the resiliency of the project to address future climate conditions.

Jurisdiction and Permitting

The project is subject to the preparation of a Mandatory EIR pursuant to 301 CMR 11.03(6)(a)(6) because it requires Agency Action and will generate 3,000 or more New adt on roadways providing access to a single location, and 301 CMR 11.03(6)(a)(7) construction of 1,000 or more New parking spaces at a single location. The project also exceeds the ENF thresholds under 301 CMR 11.03(6)(b)(13) generation of 2,000 or more New adt on roadways providing access to a single location; 301 CMR 11.03(6)(b)(14) generation of 1,000 or more New adt on roadways providing access to a single location and construction of 150 or more New parking spaces at a single location; 301 CMR 11.03(6)(b)(15) construction of 300 or more New parking spaces at a single location; 301 CMR 11.03(1)(b)(1) for the direct alteration of 25 or more acres of land; and 301 CMR 11.03(5)(b)(4)(a) for the New discharge or expansion in discharge to a sewer system of 100,000 or more gpd of sewage, industrial waste water or untreated stormwater.

The project requires a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT). The project also requires a WP68 Permit for sewer main extensions from the Massachusetts Department of Environmental Protection (MassDEP). The project is subject to review under the May 2010 MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol ("the GHG Policy").

The project will require an Order of Conditions (OOCs) from the Littleton Conservation Commission (or in the case of an appeal, a Superseding Order of Conditions (SOC) from MassDEP). The project also requires a National Pollutant Discharge Elimination System (NPDES) Stormwater General Permit from the Environmental Protection Agency (EPA).

The project is not seeking Financial Assistance from an Agency. Therefore, MEPA jurisdiction is limited to those aspects of the project that are within the subject matter of any required or potentially required Agency Actions and that may cause Damage to the Environment, as defined in the MEPA regulations.

Review of the FEIR

The FEIR was responsive to the Scope issued on the DEIR. It includes an updated description of required permitting for the project, a response to comments received on the DEIR, and draft Section 61 Findings.

As further discussed below, the FEIR confirmed, in response to the Scope, that the project intends to treat wastewater through the Littleton Wastewater Treatment Plant (WWTP), in

lieu of on-site groundwater discharge. I note comments from MassDEP that note that the WWTP currently lacks sufficient capacity to treat the project's wastewater generation at full build. Comments note the need for additional permitting for expanded capacity at the WWTP (currently pending through an application submitted by the Town to MassDEP), as well as for groundwater discharge if the Littleton WWTP cannot be permitted to accommodate the full project. I note that the Town recently completed MEPA review (EEA #16537) for construction of the WWTP; given the expansion of at least 136,000 gallons per day (gpd) required to accommodate this project at full build, it is anticipated that the Town will need to file a Notice of Project Change (NPC) to review the impacts of the proposed expansion. The Proponent should consult with the MEPA Office to determine the need for additional review of this project, in the event the project undergoes material changes during subsequent permitting, for instance, if it ultimately is required to discharge wastewater to another location other than the Littleton WWTP.

Land Alteration and Impervious Area

As required by the Scope, the FEIR states that the project has established a tree planting care and maintenance program to ensure the successful establishment of all replanted trees. Specifically, the project will include regular watering, seasonal inspections, mulching, pruning as needed, and the replacement of any trees that fail to establish during the designated establishment period. The FEIR states that maintenance activities will be conducted in accordance with local guidelines to promote healthy growth and long-term viability.[5] The filing notes that a comprehensive planting plan will be prepared by a licensed landscape architect and incorporated into the plan set for each project phase, detailing species selection, quantities, sizes, and planting locations to ensure appropriate and cohesive plantings are established throughout the development. The filing states that these plans will also identify maintenance responsibilities and outline the duration and scope of the establishment period.

According to the FEIR, the project has committed to increase tree plantings to at least a 1:1 ratio as compared to trees removed, and, accordingly, will plant approximately 302 trees.[6] According to the filing, if on-site conditions limit the feasibility of achieving a full 1:1 tree replacement ratio, the Proponent will explore opportunities for off-site planting in coordination with local officials. These efforts will prioritize areas within the community identified as having limited tree canopy coverage or heightened vulnerability to extreme heat impacts.

According to the filing, since the filing of the DEIR, the project has undergone several layout changes, including reducing the footprint of Buildings E and F resulting in impervious area being reduced by 17,167 sf (0.4 acres). In addition, the FEIR notes that the majority of existing trees on-site are being preserved, and much of the proposed land alteration is concentrated in previously disturbed areas associated with the former IBM development. The filing notes that parking will be phased to match demand.

[5] Tree Protection and Guidelines | Littleton, MA

[6] The DEIR had previously committed to planting 100 trees as mitigation for the proposed 302 tree proposed to be removed.

Traffic and Transportation

Site Access

According to the FEIR, the Proponent has revised the site access plan based on MassDOT's recommendations. Specifically, the project has reduced the number of driveways on King Street from five to four by removing the easterly Building Q driveway. In addition, the Proponent has committed to prohibiting left-turn exits from both the Site Driveway West (Auman Street/former IBM West Driveway) and the 410 Great Road driveway, with restrictions enforced through signage, pavement markings, and geometric channelization.

Additionally, per MassDOT's recommendation, the Proponent is working to consolidate the Tuttle House driveway, which provides access to Building G (Hotel) with the existing two curb cut(s) at the adjacent multitenant commercial / residential property to the immediate south (510 King Street).[7] This would potentially close the two driveways at 510 King Street and provide access to the 510 King Street project through the Tuttle House driveway at the project site. According to the FEIR, if consolidation with 510 King Street is not agreed upon with the 510 King Street property owner, one of the four remaining King Street driveways at the project site will be removed, likely the middle driveway between Buildings L and N. Comments from MassDOT acknowledge this commitment and state that the final decision regarding project site access should be determined during the permitting process. Comments from MassDOT state that if the Proponent is unable to consolidate driveways with the 510 King Street property and the number of site access points at the project site changes, a new capacity analysis of the affected study-area intersections is required to verify that there are no new significant impacts. If the updated analysis shows substantial operational changes, further mitigation measures must be evaluated. As noted above, the Proponent should consult with the MEPA Office in the event material changes to project design become necessary during subsequent permitting.

Mitigation

In response to comments received on the DEIR and in coordination with MassDOT, the FEIR provided the following updates to the project's proposed traffic mitigation:

- Removal of the previously proposed pedestrian crossing across Great Road (Route 119) to the west of the Site Driveway West, including the proposed accessible pedestrian curb ramps to connect the site to the existing sidewalk along the southerly side of Great Road with appropriate warning signage. According to the FEIR, this location posed a sight-distance challenge and, upon further evaluation, did not present an acceptable pedestrian connection.
- Instead of the above-mentioned pedestrian crossing, the Proponent will construct a new 580-foot sidewalk connection with vertical granite curbing along the northerly side of Great Road from the Site Driveway West to the Interstate 495 (I-495) NB Ramps. This improvement includes the following:

[7] The 510 King Street property is a different site from this project. The Proponent is currently negotiating with the owner of the 510 King Street property to allow for the consolidation of driveways.

  - The 5-foot sidewalk will be constructed to maintain a consistent 2-foot shoulder present between King Street and a point 200-feet west of the Site Driveway West so not to impact a culvert headwall and culvert pipe for the stormwater swale present along the northerly side of Great Road adjacent to the Great Road channelized right turn lane to I-495 NB. Both the guardrail and stormwater swale will be modified / reset, where needed, at the back of sidewalk.
  - Slight realignment of the Great Road channelized right-turn lane to I-495 NB to accommodate the above-mentioned sidewalk location and provide an unsignalized crosswalk across with appropriate traffic signs across the Great Road channelized right-turn lane to I-495 NB. Install a Rectangular Rapid Flashing Beacon (RRFB) for this uncontrolled pedestrian crossing.
  - Construct a new signalized pedestrian crossing across Great Road on the easterly side of the I-495 NB Ramp approach with accessible pedestrian curb ramps, pedestrian traffic signal housings, and pedestrian push buttons.
- The DEIR previously indicated that the Proponent would seek membership in the Middlesex 3 Transportation Management Association (TMA) which is utilized in neighboring Westford and communities to the northeast of Littleton. Addressing comments made by Metropolitan Area Planning Council (MAPC) on the DEIR, the Proponent will alter its commitment to seek membership in the reformed Crosstown Connect TMA.[8]
- The Proponent will support pedestrian upgrades related to the "Littleton Loop" consistent with the 2023 Littleton Bicycle and Pedestrian Master Plan.[9] This includes the following pedestrian and bicycle accommodation:
  - Provide direct site connectivity for pedestrians and bicycles from the project to the existing King Street sidewalk and bicycle network.
  - Provide direct connectivity for pedestrians along Great Road, including the construction of new sidewalk between the Site Driveway West and I-495 NB Ramps to allow ease of access to The Point Shopping Center. Further accommodation may be explored by MassDOT as part of MassDOT Project 613111 (Deck Replacement – State Route 119 over I-495) which is currently on the FY2029 State Transportation Improvement Program (TIP).
  - Reconstruct existing accommodations in and around Littleton Common to enhance safety and accessibility.
  - Modify the King Street cross-section to continue the existing bicycle lanes from their northerly terminus near Site Driveway South to Site Driveway North (extension of 850-feet).
  - Construction of a shared-use path (SUP) along the site frontage from the Tuttle House Driveway to Site Driveway North (1,450-feet).
- At the request of MassDOT, the Proponent has removed all proposed on-street parallel parking stalls along the west side of King Street adjacent to the Proponent's property frontage.
- The project will include wayfinding signs to direct residents, patrons, and other visitors to the appropriate driveway and access to pedestrian, public transportation, and bicycle facilities.

[8] https://www.crosstownconnect.org/
[9] Bicycle and Pedestrian Master Plan | Littleton, MA

- At the request of MassDOT, the Proponent will commit to construct up to three pedestrian crossing locations across King Street between Meetinghouse Road and Site Driveway North where sufficient right-of-way exists. These locations would include, at a minimum, high-visibility crosswalks, pedestrian curb ramps, far-side level landings areas to allow for formal pedestrian areas on the easterly side of the roadway, and fluorescent yellow-green pedestrian warning and advance warning signage.
- The Proponent will commit to minor box widening, where needed, along King Street to maintain and/or expand a Complete Streets cross-section between the Tuttle House and Site Driveway North (site frontage) to accommodate 11-foot travel lanes and a 5-foot bicycle lane along King Street.

In addition, the FEIR states that the Proponent has committed to perform field fine-tuning of traffic signal timing, coordination, and phasing at several key Great Road intersections—including Russell Street/Constitution Avenue and the I-495 southbound ramps—during initial, 80%, and 100% site occupancy, in collaboration with MassDOT. Additional improvements include installing new pedestrian signals, curb ramps, and crosswalks at the I-495 northbound ramps, realigning the channelized right-turn lane, and optimizing signal timing. At the Great Road/Site Driveway West, planned enhancements include reconstructing the driveway approach to add a channelized right-turn lane, widening Great Road westbound to two lanes near the driveway, and restriping the eastbound approach to create a dedicated left-turn lane aligned with King Street.

The project is proposing signal, accessibility, and safety upgrades for Great Road/King Street, including partial traffic signal reconstruction, installation of modern detection systems and APS push buttons, pedestrian-accessible curb ramps, resurfacing, and updated pavement markings and signage. Similar ADA-compliant curb ramp reconstruction, high-visibility crosswalks, and pedestrian sign upgrades will be implemented at Great Road/Stevens Street/Adams Street/Meetinghouse Road and at King Street/Goldsmith Street/Stevens Street/476 King Street Driveway, where curb extensions will also be added to shorten pedestrian crossings. Additional pedestrian infrastructure upgrades, including ramps, crosswalks, and signage, will be completed at multiple driveways and intersections along Great Road and King Street.

According to the FEIR, the Proponent proposes to implement these improvements based on the following phased timeline conditions:

- Condition A, which requires certain upgrades to be completed before the first building is occupied;
- Condition B, permitting early phase uses as long as total trips do not surpass documented No-Build traffic levels, thus offering flexibility and a balanced traffic flow during initial occupancy;
- Condition C, aligning King Street cross-section and streetscape improvements with the occupancy of adjacent retail and restaurant buildings to prevent construction-related damage to new infrastructure;
- Condition D, coordinating Great Road sidewalk improvements with the occupancy of the 410 Great Road buildings to avoid premature wear; and

- Condition E, requiring traffic signal timing adjustments and coordination at initial occupancy, 80% occupancy, and full build-out, with corresponding updates to MassDOT Traffic Signal Regulations at each stage.

Comments from MassDOT express support for the project's mitigation program identified in the FEIR. Comments note that the Proponent should work with MassDOT during the permitting process to refine the phased implementation of the mitigation program.

Comments from the Town of Littleton Planning Board make several suggestions regarding site access, pedestrian and bicycle accommodations, signage and public transit. The Proponent should work with the Town to incorporate their suggestions into the project design during the permitting process.

Wastewater

As required by the Scope, the FEIR confirmed that the Town of Littleton has allocated 150,000 gpd of capacity at its wastewater treatment plant (WWTP) for the project. The project's anticipated 286,000 gpd of wastewater exceeds this amount approved by the Town and the MassDEP permitted limit for the groundwater discharge at the WWTP (as reviewed in EEA #16537). According to the FEIR, the project will occur in phases and currently approved discharge volume of 150,000 gpd at the Littleton WWTP will sustain the project for its first five years of construction. Specifically, the 150,000 gpd provides enough capacity for the construction of the following project components:

- BUILDING A: commercial
- BUILDING B: commercial
- Building E: residential (155 units) and retail
- BUILDING F: residential (155 units)
- BUILDING H: retail
- BUILDING I: residential (9 units) and retail
- BUILDING J: residential (11 units) and retail
- BUILDING K: residential (42 units) and retail
- BUILDING L: residential (11 units) and retail
- BUILDING S: residential (285 units)

The FEIR states that the Proponent is actively working with the Town to increase capacity at the Littleton WWTP to accommodate the projected flows from the proposed project. The FEIR notes that the Town completed an infiltration test and hydrological modeling, which showed that the WWTP can support additional capacity. The filing states that the Town has submitted a request to amend their discharge permit with MassDEP to increase the amount of discharge that could be treated at the Littleton WWTP to assist in accommodating the project's wastewater. The filing states that the project will not begin construction nor discharge wastewater for any phases of the development beyond the currently approved discharge volume of 150,000 gpd until sufficient expansion of the treatment system has occurred and the necessary permits acquired. In addition, as a condition in a Special Permit issued by the Town received on June 18, 2024, future phases of the project may not proceed unless there is sufficient available

capacity within the municipal sewer system to support that phase of the project.[10] As noted, given that this project at full build would require an expansion of at least 136,000 mgd, it is anticipated that the Town will file an NPC to EEA #16537 to disclose relevant impacts and mitigation.

Comments from MassDEP state that given that the Littleton WWTP does not currently have the required capacity to accommodate the project, it is possible the project may still need to use on-site systems to accommodate future phases of the project beyond the 150,000 gpd of approved wastewater capacity. Comments state that there is an existing on-site WWTP located at 550 King Street (this project site), which is currently not in use and is not proposed to accommodate any of the project's wastewater.[11] Comments state that if it becomes necessary to use the on-site system to accommodate any of the flows from the project, MassDEP will require an engineering evaluation of the WWTP and an application for a Groundwater Discharge Permit modification. If such permitting is needed or the project proceeds with another source for wastewater other than the Littleton WWTP, the Proponent may need to file a NPC.

MassDEP comments note that the Proponent requires a groundwater discharge permit for the existing wastewater flow of 10,412 gpd at the 410 Great Road property (also part of the project site) because this flow exceeds 10,000 gpd. The FEIR acknowledges that the 410 Great Road parcel failed inspection in 2022 prior to the Proponent purchasing the property. The FEIR states that the current uses at the 410 Great Road property are being vacated and the Title 5 septic system on site will be decommissioned. The filing states that wastewater generated by the 410 Great Road property, when incorporated into the project, will be treated by the Littleton WWTP. The 410 Great Road Property will be the site of Building S, which is planned for the initial phases of the project and thus is included in the 150,000 gpd of wastewater approved by the Town.

Climate Change

Adaptation and Resiliency

The FEIR evaluated further measures to address extreme heat risk, in accordance with the Scope. As noted above, the project is committed to planting approximately 302 trees providing a 1:1 mitigation for trees proposed to be removed. According to the filing, if on-site conditions limit the feasibility of achieving a full 1:1 tree replacement ratio, the Proponent will explore opportunities for off-site planting in coordination with local officials and agencies. These efforts will prioritize areas within the community identified as having limited tree canopy coverage or heightened vulnerability to extreme heat impacts. In addition, the landscape design incorporates native and adaptive plant species.

[10] https://www.littletonma.org/DocumentCenter/View/7920/FINAL-Decision-Amended-Master-Planned-Development---550-King-Street---61824

[11] The WWTF at the project site itself is permitted to treat 40,000 gpd.

GHG Emissions

Stationary Source

The FEIR states that the project is committed to the following GHG mitigation:

- All-electric domestic hot water for residential spaces;
- All-electric Air Source Heat Pump space heating and domestic hot water heating for retail and office spaces;
- Reduced air leakage per C406.9 for retail and office spaces;
- 40% PV solar ready roofs;
- High performance building envelopes;
- Light or reflective roofs;
- Reduced lighting power densities;
- High-efficiency HVAC equipment;
- High performance exterior lighting; and
- Low-flow fixtures.

Comments from the Massachusetts Department of Energy Resources (DOER) commend the Proponent for the above energy commitments. However, comments note that project commitments to thermal efficiency improvements beyond code mandates are limited. Comments also note that commitments to water heating could also be improved. Evaluations show that swapping from electric resistance water heating to heat pump water heating in the large residential buildings would significantly reduce emissions, operating costs, and impact to electric grid resources. Specifically, comments recommend the Proponent to further improve thermal performance of all residential buildings (reduce to HERs 40 from current HERs 44, or build to now-common Passive House standard) and utilize air source heat pump water heating for the large (>50 units) residential buildings (Buildings C, D, E, F, S R). The Proponent should strongly consider these recommendations stronger commitments to further improve the energy efficiency of the development.

Mobile sources/Air Quality

As previously noted in the Certificate on the DEIR, the project is committed to implementing a TDM program (see Section 61 Findings below) intended to reduce single-occupancy vehicle trips to the project site. In addition, the Proponent has committed to 20% of parking spaces being EV-ready and 40% PV solar ready roofs.

Mitigation & Section 61 Findings

The FEIR includes a separate chapter summarizing proposed mitigation measures and includes draft Section 61 Findings. It contains commitments to implement these mitigation measures, identifies the parties responsible for implementation, and includes a schedule for implementation. As described in the FEIR, the Proponent has committed to implement the following measures to avoid, minimize and mitigate Damage to the Environment:

Land Alteration and Stormwater

- The project will provide tree plantings at a 1:1 ratio compared to trees removed (planting 302 trees). The project will include regular watering, seasonal inspections, mulching, pruning as needed, and the replacement of any trees that fail to establish during the designated establishment period. The FEIR states that maintenance activities will be conducted in accordance with local guidelines to promote healthy growth and long-term viability.[12]
- Erosion and sedimentation controls will be implemented to prevent stormwater impacts during construction or land disturbance activities. A Construction Stormwater Pollution Prevention Plan (SWPPP) will be prepared by the contractor prior to the start of construction identifying temporary best management practices (BMPs) for erosion and sedimentation control.
- Development of a Stormwater Management Operation and Maintenance Plan, which notes that routine inspections will be conducted on a monthly basis and thorough investigations will be conducted twice a year. Tasks that are common to all systems include regular removal of accumulated sediments, floatables, and debris. Inspections will occur after every major storm event for the first six months after construction. Inspections will be conducted by a Professional Engineer registered in the Commonwealth of Massachusetts experienced in drainage design. Annual reports will be prepared detailing the status of the stormwater system and the maintenance performed.
- Development of a comprehensive stormwater management system that includes a combination of Best Management Practices (BMPs) and Low Impact Design (LID) strategies consisting of rain garden, subsurface infiltration basins, a subsurface detention basin, detention ponds, a wet pond, and proprietary water quality units.
- The stormwater management system has been designed to comply with the Stormwater Management Standards (SMS), including standard requirements for groundwater recharge, removal of at least 80 percent of the TSS from runoff and maintenance and reduction of pre-construction peak runoff rates under post-construction conditions for the present-day 2-, 10-, 25- and 100-year storms. The most current NOAA Atlas 14 precipitation data was used to evaluate peak runoff.
- The project includes 18 acres of open space, including new public greenspace for local events.

Traffic

- The Proponent proposes to implement these improvements based on the following phased timeline conditions:
    - Condition A, which requires certain upgrades to be completed before the first building is occupied;
    - Condition B, permitting early phase uses as long as total trips do not surpass documented No-Build traffic levels, thus offering flexibility and a balanced traffic flow during initial occupancy;

[12] Tree Protection and Guidelines | Littleton, MA

  - Condition C, aligning King Street cross-section and streetscape improvements with the occupancy of adjacent retail and restaurant buildings to prevent construction-related damage to new infrastructure;
  - Condition D, coordinating Great Road sidewalk improvements with the occupancy of the 410 Great Road buildings to avoid premature wear; and
  - Condition E, requiring traffic signal timing adjustments and coordination at initial occupancy, 80% occupancy, and full build-out, with corresponding updates to MassDOT Traffic Signal Regulations at each stage.
- Great Road (Route 119) / Russell Street / Constitution Avenue: modifications to the traffic signal timings at this location are proposed as part of the project's off-site mitigation at initial occupancy, the 80%, and 100% occupancy milestone intervals (Condition E) and will be completed in coordination with MassDOT.
- Great Road (Route 119) / Interstate 495 SB Ramps: modifications to the traffic signal timings at this location are proposed as part of the project's off-site mitigation at initial occupancy, the 80%, and 100% occupancy milestone intervals (Condition E) and will be completed in coordination with MassDOT.
- Great Road (Route 119) / Interstate 495 NB Ramps:
  - The Proponent will implement an exclusive pedestrian traffic signal phase at this intersection in conjunction with the installation of a new crosswalk across Great Road east of the I-495 NB Ramp to be completed as part of Condition B.
  - The Proponent will construct an uncontrolled pedestrian crossing with Rectangular Rapid Flashing Beacon (RRFB) across the Great Road WB channelized right-turn lane to I-495 NB with appropriate traffic signs and pavement markings.
  - The Proponent will slightly modify the orientation of the Great Road WB channelized right-turn lane to I-495 NB in conjunction with sidewalk construction along the northerly side of Great Road.
  - Modifications to the traffic signal timings at this location are proposed as part of the project's off-site mitigation at initial occupancy, the 80%, and 100% occupancy milestone intervals (Condition E) and will be completed in coordination with MassDOT.
- Great Road (Route 119) / Site Driveway West:
  - The Proponent will implement a left-turn prohibition along the Site Driveway West southbound approach.
  - The Proponent will reconstruct the Site Driveway West southbound approach as a channelized exclusive right-turn lane to further deter left-turn egress.
  - The Proponent will slightly reset the curb line along the northerly side of Great Road at this intersection to formalize Great Road westbound as two (2) lanes in conjunction with the driveway, as opposed to this occurring just west of the driveway.
  - The Proponent will restripe the inside travel lane along Great Road eastbound to be an exclusive left-turn lane (operates as de facto left-turn lane) directly in line with the downstream exclusive left turn lane at King Street.
  - Infrastructure improvements at this intersection will be completed as part of Condition A.
- Great Road (Route 119) / 410 Great Road Driveway (Site Driveway):

  - The Proponent will implement a left-turn prohibition along the 410 Great Road Site Driveway northbound approach.
  - The Proponent will implement pavement markings and traffic signs to deter left-turn egress.
  - Infrastructure improvements related to this driveway will be completed as part of Condition D.
- Great Road (Route 2A / 119) / King Street (Route 2A / 110):
  - The Proponent will reconstruct components of the existing traffic signal infrastructure such as a new Advance Transportation Controller (ATC), emergency vehicle preemption, pedestrian countdown signal heads, Accessible Pedestrian Signal (APS) push buttons, etc.
  - The Proponent will reconstruct sidewalks and pedestrian curb ramps for the intersection, as necessary, to support the new traffic signal infrastructure.
  - The Proponent will resurface pavement along each intersection approach to match new accessibility accommodations.
  - The Proponent will provide all necessary pavement markings and traffic signs to support the identified improvements at the intersection.
  - Infrastructure improvements at this intersection will be completed as part of Condition B.
  - Modifications to the traffic signal timings at this location are proposed as part of the project's off-site mitigation at initial occupancy, the 80%, and 100% occupancy milestone intervals (Condition E) and will be completed in coordination with MassDOT.
- Great Road (Route 2A / 119) / Stevens Street / Adams Street / Meetinghouse Road:
  - The Proponent will reconstruct, as necessary, all pedestrian curb ramps at the intersection to provide ADA / AAB / PROWAG compliance and reapply high-visibility crosswalk markings between each ramp pair.
  - The Proponent will replace out-of-date pedestrian crossing traffic signs along Great Road for each crosswalk with new florescent yellow-green pedestrian crossing signage signs and advance pedestrian crossing traffic signs upstream.
  - Infrastructure improvements at this intersection will be completed as part of Condition B.
- King Street (Route 2A / 110) / Goldsmith Street / Stevens Street / 476 King Street Driveway:
  - The Proponent will reconstruct the intersection's southwest corner between King Street and Goldsmith Street to provide a new curb line in conjunction with a curb extension to shorten pedestrian crossing distance and remove excess pavement area.
  - The Proponent will construct a curb extension along the easterly side of Stevens Street, north of Goldsmith Street, to shorten pedestrian crossing distance and remove excess pavement area.
  - The Proponent will reconstruct, as necessary, all pedestrian curb ramps at the intersection to provide ADA / AAB / PROWAG compliance and reapply high-visibility crosswalk markings between each ramp pair.

  - The Proponent will replace out-of-date pedestrian crossing traffic signs along Great Road with new florescent yellow-green pedestrian crossing signage signs and advance pedestrian crossing traffic signs upstream.
  - Infrastructure improvements at this intersection will be completed as part of Condition B.
- The Proponent will additionally reconstruct accessible pedestrian ramps and crosswalks with appropriate pedestrian crossing signage signs and advance pedestrian crossing traffic signs upstream, as needed, at the following locations prior to the following phasing conditions:
  - Great Road (Route 119) / 410 Great Road Driveway (as part of Condition D)
  - King Street (Route 2A / 119) / 410 Great Road Driveway (as part of Condition D)
  - King Street (Route 110) / Meetinghouse Road (as part of Condition C)
  - King Street (Route 110) / Tuttle House Driveway (as part of Condition C)
  - King Street (Route 110) / Site Driveway South (as part of Condition C)
  - King Street (Route 110) / Site Driveway Middle (as part of Condition C)
  - King Street (Route 110) / Site Driveway North (as part of Condition C)
- The Proponent has committed to the following improvements along the Great Road corridor as part of Condition B, unless otherwise noted:
  - The Proponent will reconstruct ±400 feet of existing sidewalk along the southerly side of Great Road along the site frontage of 410 Great Road with 6-inch vertical granite curbing to provide separation between vehicle and pedestrian traffic as part of Condition D.
  - The Proponent will construct a new ±580-foot sidewalk connection with vertical granite curbing along the northerly side of Great Road from the Site Driveway West to the I-495 NB Ramps. This improvement includes the following:
    - The 5-foot sidewalk will be constructed to maintain a consistent 2-foot shoulder present between King Street and a point 200-feet west of the Site Driveway West so not to impact a culvert headwall and culvert present below the I495 NB Ramps at the west end of the guardrail adjacent to the Great Road channelized right-turn lane to I-495 NB. The guardrail will be replaced, where needed, at the back of sidewalk.
    - Slight realignment of the Great Road channelized right-turn lane to I-495 NB to accommodate the sidewalk location and provide an unsignalized crosswalk across with appropriate traffic signs across the Great Road channelized right-turn lane to I-495 NB.
    - A minor modification in the stormwater swale along the northerly side of Great Road east of the Great Road channelized right-turn lane to I-495 NB between the drainage headwall to the east and the culvert headwall to the west.
- The Proponent has committed the following improvements along the King Street corridor as part of Condition C, unless otherwise noted:
  - The Proponent will reconstruct ±1,450 feet of existing sidewalk along the westerly side of King Street along the site frontage between the Tuttle House Driveway and Site Driveway North as a 10-foot shared-use path (SUP) with 2-foot hardscape buffer and 6-inch vertical granite curbing to provide separation

between vehicle and pedestrian traffic. The SUP will provide site connectivity on each driveway into the site.
    - The Proponent will construct ±250 feet of new 8-foot wide (narrower) SUP along the westerly side of King Street along the Site frontage between Site Driveway north and the north end of Building Q.
    - The Proponent will commit to constructing up to three pedestrian crossing locations across King Street between Meetinghouse Road and Site Driveway North where sufficient right-of-way exists. These locations would include, at a minimum, high-visibility crosswalks, pedestrian curb ramps, farside level landings areas to allow for formal pedestrian areas on the easterly side of the roadway, and fluorescent yellow-green pedestrian warning and advance warning signage. One of these crossings will be located near the northerly extent of the project (Building Q) at the request of MassDOT in order to facilitate transitions from roadway to SUP and bicycle lanes.
    - The Proponent will hold the easterly edge of pavement along King Street and box widen, where needed, along the westerly edge of pavement to provide a cross-section along the King Street site frontage between the Tuttle House Driveway and Site Driveway North to include an 11-foot travel (11-foot two-way left-turn lane south of Village Street) and 5-foot bicycle (minimum) in each direction or travel.
- The Proponent will develop and conduct TDM measures aimed at reducing site trip generation. These TDM measures shall include, but not be limited to:
    - Preferential Parking - Provide preferential parking for rideshare, carpool, and hybrid vehicles at locations throughout the site's parking areas in close proximity to major entranceways.
    - Electric Vehicle Stations – Electric vehicle (EV) charging stations will be provided at locations throughout the site's parking areas in close proximity to major entranceways.
    - Reduced Parking Supply – The Proponent is committed to reducing the parking supply by providing minimal number of parking spaces to a level of the demand need only.
    - Sidewalk Connectivity – The site will provide connectivity of sidewalk infrastructure along King Street and Great Road and internal to the site to each building within the construction limits for both the 410 Great Road and 550 King Street locations.
    - Bicycle Accommodations – The site will include bicycle accommodation through the main drive aisle of the site with connectivity to bicycle infrastructure along King Street.
    - Bicycle Racks – The Proponent will provide secure, weather protected, long-term bicycle parking for employees and residents at designated locations within the site. The site plan will also provide bicycle racks for short-term users at several locations on-site.
    - Public Bicycle Vendor – The Proponent is exploring opportunities to implement a public bicycle vendor, such as Blue Bikes, on-site.
    - Employee Shower Facilities - Coordinate with commercial tenants to provide showers for employees who commute by walking or biking.

- LRTA Bus Service –The Proponent will relocate the existing Lowell Regional Transit Authority (LRTA) bus stop location to a new location within the site and provide a second bus stop location; each along the main drive aisle in the southbound direction. Each bus stop location will contain a pavement turnout, bus shelter, trash receptacle, bike rack, and sufficient hardscape area to accommodate full accessibility and bus ramp access.
- Public Transportation Shuttle Service – The Proponent is committed to provide access to the Littleton / I-495 Commuter Rail Station located 2.5 miles south of the project site along Foster Street. The shuttle will be funded by the Proponent and be scheduled to coincide with train boarding / alighting schedules for the Massachusetts Bay Transportation Authority (MBTA) Fitchburg Line.
- Maps / Schedules - Public transportation schedules with transit maps for LRTA Bus Route 15 and the MBTA Commuter Rail, as well as for all nearby connecting routes will be provided to each resident upon move-in and employees upon employment. Maps and schedules will also be posted on each floor of the residential buildings. Schedules and maps will also be provided in the lobby and near doorways in all other on-site buildings.
- Employee Transportation Coordinator (ETC) – An ETC will be provided on-site to oversee, implement, monitor, and evaluate TDM measures, employed or funded by the Proponent.
- Transportation Management Association (TMA) – The Proponent will seek membership in the reformed Crosstown Connect TMA. The Proponent will look at opportunities to assist in the reformation of this TMA.
- Wayfinding – The Proponent will provide wayfinding signs within the project site to direct residents, patrons, and other visitors to the appropriate driveway and access to pedestrian, public transportation, and bicycle facilities.
- Marketing of Transportation Options and Benefits - A welcome packet for all tenants and employees will be distributed at movein or employment which includes information for all transportation related benefits, promotions, and local transportation options.
- Vanpool and Carpool – The Proponent, and the ETC, will encourage vanpool and carpooling participation through marketing, events, and vanpool formation meetings. The ETC will implement a ride-matching program to assist employees and residents in finding appropriate carpool matches.
- Guaranteed Ride Home Program – The ETC will be responsible for providing all employees who carpool, bicycle, or walk to work with an emergency ride home.
- On-Site Laundry Services - The Proponent will provide laundry services on-site to allow for the reduction of trips to/from the site of nearby laundromats.
- Flex Hours – The Proponent will encourage tenants within the mixed-use development to provide flexible hours to employees.
- Direct Deposit for Employees - The Proponent will encourage tenants within the mixed-use development to provide direct deposit to reduce employee trips to/from the site.
- Site Amenities – As a mixed-use development, the site includes several on-site amenities, such as restaurants, retail, open space, and resident-specific amenities within the residential component of the site. This location will assist in reducing

vehicular demand and increase multi-use trips, which include parking capacity sized to meet minimum local requirements without providing excessive parking.
    - Promotional Events and Activities – The ETC will be responsible for organizing promotional events and activities to encourage rideshare and alternative transportation means. In addition, the ETC will distribute brochures to all new employees and residents during, and post posters and bulletins on various subjects from carpooling to the Guaranteed Ride Home program throughout the site.
- The Proponent will conduct a traffic monitoring program beginning six (6) months after issuance of the first occupancy permit and continuing for five years following full occupancy of the project. The monitoring program will include the following:
    - Collect manual Turning Movement Counts (TMCs) during the weekday morning (7:00 AM to 9:00 AM), weekday evening (4:00 to 6:00 PM), and Saturday midday (11:00 AM to 2:00 PM) peak periods at study area intersections
    - Collect ATR data for a continuous 7-day week-long period along Great Road, King Street, and each of the Site Driveway locations.
    - Collect parking demand counts during the peak parking demand periods for the specific land use areas, including:
        - Residential and Hotel - 5:00 AM to 9:00 AM
        - Retail, Restaurants, R&D, Office, and Industrial - 10:00 AM to 5:00 PM
    - Collect motor vehicle crash reports from the Town of Littleton Police Department and MassDOT for the most recent one-year period to ascertain changes in crash frequency, crash trends, and severity at the monitored locations.
    - Complete an employee and resident travel survey to gage employee and resident travel patterns and mode share.
    - Compare the TMCs collected above with those projected within the TIAPS for the project to determine whether the total vehicles entering each intersection exceeds the volumes projected.
    - Perform a capacity and queuing analysis using Synchro / Sidra analysis software to evaluate the traffic operations at each of the intersections listed above and compare to the operations projected in the TIAPS prepared for the project.
    - Assess whether additional mitigation is necessary at any of the study intersections and identify measures to improve operations and/or reduce vehicular traffic volumes. The need or evaluation for further mitigation will be conditioned upon:
        - The measured site generated traffic volumes for the project exceeded the projected site generated traffic volumes established in this TIAPS, or subsequent revisions as presented to the Town of Littleton, by more than 10 percent (i.e., 110 percent of the projected site generated traffic volumes.
        - One or more of the movements at the monitored intersections is identified to be operating at or over capacity (defined as a V/C ratio equal to or exceeds 1.00) in consultation with MassDOT or the Town of Littleton.
        - There is a pronounced increase in the frequency of occurrence of motor vehicle crashes at a monitored location and the calculated motor vehicle crash rate excess the MassDOT average crash rate for similar locations.
    - Corrective actions to reduce the unmitigated impact of the project should be proposed and implemented based on the thresholds listed above. The corrective

actions should be documented in the TMP, approved and coordinated with the Town and/or MassDOT if desired by the agencies, and be undertaken by the Proponent subject to receipt of all necessary rights, permits, and approvals.
    - Assess whether the constructed parking supply is adequate for the parking demand as observed.
    - Prepare a memorandum summarizing the results of the TMCs, ATRs, parking demand counts, traffic impact analysis for submission to MassDOT District 3 and the Town of Littleton.
- The Proponent has reduced the number of driveways on King Street from five to four by removing the easterly Building Q driveway. In addition, the Proponent has committed to prohibiting left-turn exits from both the Site Driveway West (Auman Street/former IBM West Driveway) and the 410 Great Road driveway, with restrictions enforced through signage, pavement markings, and geometric channelization. Additionally, the Proponent is currently negotiating with the owner of the adjacent 510 King Street property to consolidate the Tuttle House driveway, which provides access to Building G (Hotel) with the existing two curb cut(s) at 510 King Street. The final decision regarding project site access should be determined during the permitting process.

Water and Wastewater

- The project is committed to minimizing irrigation, utilizing native and drought resistant landscaping, and implementing water demand management programs.
- Water fixtures and systems will be low flow, high efficiency fixtures and systems to minimize water usage.
- The project will not begin construction nor discharge wastewater for any phases of the development beyond the currently approved discharge volume of 150,000 gpd until sufficient expansion of the treatment system has occurred and the necessary permits acquired.

Climate Change Adaptation and Resiliency

- The proposed stormwater infrastructure is designed to achieve peak attenuation for up to the 100-year, 24-hour storm event (10.4 inches) projected for the year 2070.
- The stormwater management system is designed to allow for future upgrades to adapt to climate change.
- The project will plant 302 trees. The project will include regular watering, seasonal inspections, mulching, pruning as needed, and the replacement of any trees that fail to establish during the designated establishment period. The FEIR states that maintenance activities will be conducted in accordance with local guidelines to promote healthy growth and long-term viability.[13]
- The landscape design incorporates native and adaptive plant species.

[13] Tree Protection and Guidelines | Littleton, MA

GHG Emissions

- The Proponent is committed to the following mitigation elements for building energy efficiency:
    - All-electric domestic hot water for residential spaces;
    - All-electric Air Source Heat Pump space heating and domestic hot water heating for retail and office spaces;
    - Reduced air leakage per C406.9 for retail and office spaces;
    - 40% PV solar ready roofs;
    - High performance building envelopes;
    - Light or reflective roofs;
    - Reduced lighting power densities;
    - High-efficiency HVAC equipment;
    - High performance exterior lighting;
    - Low-flow fixtures.
- Upon completion of the project, the Proponent will submit a self certification to the MEPA Office, prepared in accordance with the GHG Policy. This certification will identify the GHG mitigation measures incorporated into the building and will illustrate the degree of GHG reduction from a Baseline case and how such reductions are achieved.[14]

Construction Period

- Construction methodologies that ensure public safety and protect the immediate surrounding area will be employed. Techniques such as barricades and signage will be used. Construction management and scheduling will minimize impacts on the surrounding environment and will include plans for construction worker commuting and parking, routing plans for trucking and deliveries, and the control of noise and dust, as applicable.
- "No Idling" signs will be included at the loading, delivery, pick-up and drop-off areas.
- Plans for controlling fugitive dust during excavation and construction include mechanical street sweeping, wetting portions of the site during periods of high wind, and careful removal of debris by covered trucks.
- Every reasonable effort will be made to minimize the noise impact of construction activities.

[14] Littleton is a Stretch code community, following the IECC 2021 with the 225 CMR Chapter 23 amendments.

Conclusion

Based on a review of the FEIR and consultation with Agencies, I find that the FEIR adequately and properly complies with MEPA and its implementing regulations. The project may proceed to permitting. Participating Agencies should forward copies of the final Section 61 Findings to the MEPA Office for publication in accordance with 301 CMR 11.12.

November 28, 2025
Date

Rebecca L. Tepper

Comments received:

11/03/2025 Angel Lopez
11/04/2025 Anna Yeganov
11/09/2025 Linda Cahill
11/20/2025 Town of Littleton Planning Board
11/21/2025 Massachusetts Department of Environmental Protection (MassDEP)
11/24/2025 Massachusetts Department of Transportation (MassDOT)
11/26/2025 Massachusetts Department of Energy Resources (DOER)

RLT/NSP/nsp

Dear Secretary Tepper and Mr. Perry,

I am writing as a resident of Littleton to provide comments on the *Final Environmental Impact Report* for the **King Street Common** project. While I appreciate the comprehensive scope of the analysis and the potential benefits it outlines, I urge the Executive Office and MEPA to ensure that this project proceeds with full accountability, transparency, and infrastructure readiness.

First, I strongly encourage MEPA to require that all major **infrastructure upgrades be completed upfront**—including roadway and intersection improvements, wastewater capacity expansion, and stormwater management systems—before occupancy permits are granted. These elements are foundational to supporting the project's proposed growth safely and sustainably. Allowing construction to outpace infrastructure could impose serious strain on Littleton's existing systems and negatively impact current residents.

Second, I am concerned that the FEIR's mitigation and sustainability commitments rely heavily on **self-monitoring and voluntary compliance** by the developer. I respectfully request that MEPA establish **enforceable accountability measures**, such as milestone-based reviews, public progress reports, and specific penalties for noncompliance. A project of this magnitude requires clear mechanisms to ensure that mitigation promises are verifiable and maintained over time, not merely aspirational.

Finally, I urge MEPA to clarify how and when the project's **affordable (low-income) housing components** will be implemented. It is crucial that these units be developed concurrently with the other residential phases—not deferred to later stages that could be delayed or reduced. This project's public value depends on its equitable housing commitments being realized alongside, not after, market-rate development.

The King Street Common proposal represents a major transformation for Littleton. Many residents, myself included, support thoughtful, well-planned growth—but only when it comes with transparency, fairness, and genuine accountability. Ensuring these measures are in place now will protect both the town's character and the integrity of the Commonwealth's environmental review process.

Thank you for your time and your continued oversight of projects that shape the future of our communities.

Respectfully,
Angel E. Maldonado Lopez
130 King Street
Littleton, MA 01460
angel@angelemaldonado.com
617-276-6774

I am a resident of Littleton and am deeply concerned about this proposed development. The area where it will be located is already congested. We experience daily traffic backups in Littleton Common, and King Street is heavily used as a cut-through to avoid I-495 traffic between exits 79 and 80.

In addition, Goldsmith Street and Great Road—both connected to the same area—carry drivers heading toward Acton who want to avoid Route 2. These roads are already burdened, and this development would add **13,338 additional vehicle trips per day** to an area that currently sees about **17,000 daily trips**.

The impact report focuses mainly on King Street and Great Road, but this increase will directly affect nearby residential streets such as Baldwin Hill Road, Jennifer Street, Goldsmith Street, and Adam Street. These quiet neighborhood roads will turn into cut-through routes with traffic backups, safety concerns, and far more vehicles than they were ever designed to handle.

And traffic is only one concern. This development would also strain our schools, water, and sewage systems, and alter the small-town character that makes Littleton so special.

I strongly oppose this project and urge you to do the same. Please protect the safety, livability, and identity of our town.

Thank you,

Anna Yeganov

I understand this project is on it's way, however, has consideration been given to how large it is going to be? I've been a Littleton resident since 1991 and have, of course, concerns about the large use of WATER that will be used on the property as well as POWER and SEWAGE and how bad TRAFFIC will be in Littleton Commons! When there's an accident on Rte 495 which is fairly common, traffic on rte 2A/119 gets extremely congested and during the summer on a Thursday or Friday - it will be stopped traffic for over a mile.

Thank you for listening,

Linda Cahill

PLANNING BOARD
P.O. Box 1305
Littleton, Massachusetts 01460

November 20, 2025

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: King Street Common FINAL Environmental Impact Report, EEA NO. 16921

Dear Secretary Tepper and EOEEA Team:

The Littleton Planning Board offers the following comments on the King Street Common FIER, noting first that the proposed development plan moves forward the goals of the Town.

Access and Egress:
In the paragraph describing the summary of access management changes, The Proponent notes that the driveways at 410 Great Road and 550 King Street will have left turn restrictions. We believe that this is meant to be the driveways at 410 Great Road, and Site Driveway West (Formerly Great Road at Auman Road). Please confirm that the left turn restrictions will only apply to the driveways exiting on Great Road. Site Driveway West is proposed to have geometric changes to physically prohibit left turning vehicles. However, the site driveway at 410 Great Road has no geometric restrictions for left turning vehicles. We believe that there needs to be a physical obstruction such as an island for the left turn prohibition to be adhered to.

Under the current plans, both site driveways on Great Road will allow left turns to enter the site from Great Road. The proponent notes that the existing eastbound interior travel lane will be converted to an exclusive left turn lane for site access via the Site Driveway West. With only one lane in the westbound direction, we are concerned about the need for roadway widening or queues backing up to the signalized intersection approximately 200 feet from this driveway. We recommend the Proponent considers prohibiting left-turns into the driveway at 410 Great Road to prevent cars from backing up into the signalized intersection. For this to function, the driveway would need to be shifted to a location away from Site Driveway West so that an island may be added on Great Road that physically prohibits vehicles from turning left into the site, without obstructing access to Site Driveway West.

At the proposed intersection of Great Road and Site Driveway West, Great Road expands from a single lane to two lanes in the northbound direction. To provide safer access for vehicles turning left into the site, we recommend maintaining a single lane width in the northbound direction in front of the entering driveway. The right-turns exiting the site would then become an additional northbound lane with a dedicated receiving lane.

Pedestrian/Bike Accommodation:
As part of The Project, The Proponent indicated that they would be providing a signalized pedestrian crossing along Great Road. We recommend considering a HAWK beacon at this location as an alternative to a signalized pedestrian crossing.

Table 7.2 notes that the Proponent will implement an uncontrolled pedestrian crossing with a Rectangular Rapid Flashing Beacon (RRFB) across the Great Road channelized right turn lane onto I-495 North. Due to the high volume of vehicles on this roadway as well as the speed limit of the main road at this intersection (45 miles per hour), we recommend that the Proponent considers adding the Interstate 495 crossing to the already proposed signalized pedestrian crossing (or recommended HAWK Beacon) at this intersection for the crossing along Great Road.

The Project includes the construction of 580 feet of sidewalk from the northerly side of the intersection of Great Road and the Site Driveway West to the Interstate-495 ramps. We request that The Proponent extend the proposed sidewalk south to the intersection of Great Road and King Street for full connectivity to Littleton Common.

The proponent proposed reconstruction of the existing sidewalk along 410 Great Road as mitigation, however the existing sidewalk at that location is narrow and a critical link between Littleton Common and the northern half of Littleton, including The Point. The proponent should consider widening the sidewalk in this location to provide a more comfortable pedestrian experience adjacent to the busy roadway.

In the King Street section of section 3.3.1.2 (Corridor Improvements), the proponent mentions that an 8-foot-wide (narrow) shared use path will be constructed. However, the cross sections shown in Figures 3-4A and 3-4B show a 10' wide shared use path. Please clarify the location of the 8-foot-wide section.

The Proponent indicated that they would have a 10-foot-wide shared use path along the westerly side of King St south of Auman Street, as well as 5-foot bike lanes in each direction. Please confirm whether this is a 10-foot-wide shared use path (serving bikes and pedestrians), or a 10-foot-wide pedestrian path (only for pedestrians). The cross-sections indicate that the reconfiguration of King Street includes two 5-foot-wide bike lanes on either side of the roadway. Given the speed limit on King Street (40 miles per hour) and the increased volume of traffic due to the development we recommend that the Proponent considers adding buffers (2 foot minimum) between the bike lane and the travel lane on either side of the roadway.

Figure 1-3 shows the sidewalk on either side of Building K as disconnected between King Street and the Project Site. Please extend the sidewalks from King Street to connect to the sidewalks on either side of Building K, inviting pedestrians into the center of the site from King Street rather than simply providing access to the adjacent buildings.

Site Design/Zoning:
It is especially important that the pedestrian experience and character of the buildings immediately fronting King St are active. The plan implies that this is a very suburban and non-active edge with all of the activation in the walking plaza behind it, which would be a mistake from an urban design perspective. The project would better meet the zoning requirements and project goals if its relationship to King St included retail facing the street and sidewalks enhanced by seating, landscape, entry plazas, and other pedestrian amenities and features.

Public Transit:
Section 3.3.2.3 describes the public transportation methods that will be used for traffic mitigation on site. Under the paragraph describing maps and schedules the proponent states that maps and schedules will be provided on each floor of the residential buildings, as well as in the lobby and nearby doorways in all other buildings. We recommend providing transit maps and schedules inside the bus shelters at both the moving and newly proposed bus stops.

Traffic Study Area:
The proponent has indicated that they have not evaluated the operations of or improvements to the intersection of Russell Street and King Street as it is not part of the study area for this project. MassDOT TIA guidelines indicate that the study area should include locations that receive an increase from site traffic of 100 vehicles per hour, or 5% of existing traffic. This criterion (5% of existing traffic) appears to be met along King Street in the direction of the intersection of Russell Street. Please clarify why this intersection was excluded from the study area, considering the increase in traffic it will likely experience and its critical nature to the surrounding community.

Littleton resident Amy Tarlow-Lewis asked that their DEIR comment regarding improvements at the intersection of Russell Street and King Street be added to the Town's comments on the FEIR: *"I am unsure why the improvements to the intersection of Russell Street and King Street was not part of the study area for this project, and I request clarification to why this intersection was excluded from the study area. I respectfully request that the Lupoli Development follow the complete street state guidance and install a stop light with an Emergency Vehicle Preemption (EVP) system, at their cost. With the new Shaker Lane School to be built, and the expected increase in the student population, the need for 3rd, 4th, 5th, 6th, 7th and 8th graders to be driven, walk and bike to school has become even more pressing. I am confident that the Lupoli Company would not want to be responsible for any student injury or death at the intersection as a result of their project."*

Signage:
As part of the project The Proponent will be providing wayfinding signage within the Project Site to direct residents, patrons, and other visitors to the appropriate driveway and access to pedestrian, public transit, and bicycle facilities. To improve the integration of The Project with the rest of Littleton Common, we recommend extending the wayfinding signage outside of the project site. The extended wayfinding signage should include other areas inside Littleton Common that exist outside the Project Site, including but not limited to; Littleton Common Park, I-495 access ramps, and parking areas).

Zoning/Hotel Building:
The Town does not wish to use the MEPA process to determine zoning compliance, but remains concerned that as reconfigured, the proposed hotel appears to exceed the maximum height requirement for the proposed location within the site. It seems appropriate to hold this conversation at the local zoning compliance level, outside of the MEPA process.

Sincerely,

Jeffrey Yates, Chair
Town of Littleton Planning Board

The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston, MA 02114
Phone: 617-292-5500

Maura T. Healey	Kim Driscoll	Rebecca Tepper	Bonnie Heiple
Governor	**Lieutenant Governor**	**Secretary**	**Commissioner**

November 21, 2025

Secretary Rebecca Tepper
Executive Office of Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Attention: MEPA Unit – Nicholas Perry

Re: Final Environmental Impact Report (FEIR)
King Street Common
Littleton
EEA #16921

Dear Secretary Tepper,

The Massachusetts Department of Environmental Protection's ("MassDEP") Central Regional Office has reviewed the FEIR for King Street Common Project (the "Project") located at 550 King Street (State Route 110) and 410 Great Road (State Route 119). Lupoli Companies LLC (the "Proponent") plans to construct 1,089 residential units, 115,500 square feet (sf) of retail space, 19,000 sf of office space, 545,520 sf of light industrial use, and a 150-room hotel on 47.4 acres. The Project site consists of a 43.19-acre parcel on the

east side of Great Road (550 King Street), formerly an IBM office campus, and a 4.16-acre parcel on the west side of Great Road (410 Great Road), which includes various commercial uses. According to the consultant for the Proponent, all the buildings at 410 Great Road will be demolished. The buildings at 550 King Street will be redeveloped. A total of 3,010 parking spaces are proposed, of which 1,446 will be in structured parking (garages, decks, parking under podiums) and the remainder at grade.

The Project is under MEPA review because it meets or exceeds the following review thresholds:

- 301 CMR 11.03 (6)(a)(6) - Generation of 3,000 or more New adt on roadways providing access to a single location;
- 301 CMR 11.03 (6)(a)(6) - Generation of 3,000 or more New adt on roadways providing access to a single location;
- 301 CMR 11.03 (6)(a)(7) - Construction of 1,000 or more New parking spaces at a single location;
- 301 CMR 11.03 (6)(b)(13) - Generation of 2,000 or more New adt on roadways providing access to a single location;
- 301 CMR 11.03 (6)(b)(14) - Generation of 1,000 or more New adt on roadways providing access to a single location and construction of 150 or more New parking spaces at a single location;
- 301 CMR 11.03 (6)(b)(15) - Construction of 300 or more New parking spaces at a single location.

The Project also appears to exceed the review threshold for a new discharge of more than 100,000 gallons per day (gpd) to a sewer system under 301 CMR 11.03(5)(b)(4). The FEIR did not address this issue.

The Project requires the following State Agency Permits:

- Massachusetts Department of Transportation – State Highway Access Permit.
- MassDEP - Industrial Wastewater Holding Tank Compliance Certification (WP 56) [if needed];
- MassDEP – Treatment Works Plan Approval (WP68) [Littleton wastewater treatment facility];
- MassDEP – Groundwater Discharge Permit (WP79 or WP83) [if on-site disposal necessary].

The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston, MA 02114
Phone: 617-292-5500

Changes in the Project since the DEIR include a decrease in the height of the hotel; an increase in gross square footage of Buildings E and F and their associated garages; a transfer of 8,000 sf of retail from Building E to Building K; and transfers of residential units from Buildings C and D to Buildings E and F. MassDEP offers the following comments:

Wastewater

In its comments on both the ENF and DEIR, MassDEP requested additional information concerning the lack of sufficient wastewater infrastructure at the Littleton wastewater treatment facility (WWTF) to accommodate the Project. The FEIR states that the estimated 286,000 gallons per day (gpd) of wastewater to be generated by the Project will be treated at the Littleton WWTF, which is only permitted to accept 243,000 gpd of flow. The FEIR acknowledges, however, that "there are currently no planned or underway infrastructure improvements, permit modifications, or timelines relevant to expanding treatment capacity." The FEIR does not provide any additional information from which to determine potential environmental impacts from wastewater generated by the Project or whether additional MassDEP permits will be required given the lack of disposal capacity.

MassDEP has attempted to reconcile the projected flows for the Littleton wastewater treatment facility (EEA#16537) with the projected flows from the Project to determine what wastewater volume from the Project remains unaccounted for. In the MEPA filings for the Littleton WWTF, 76,800 gpd was allocated to existing uses and 163,984 gpd was reserved for proposed development that was already in the local permitting process. The total volume estimated for the initial phase of Phase 1A was 244,784 (including an allowance for infiltration and inflow). The total volume for the WWTF at full build-out of only Phase 1A of that project was 504,790 gpd.

It is not clear whether the Project was part of the Phase 1A proposed development that was already in permitting, but the FEIR states that 150,000 gpd has been approved by the Littleton Electric Light and Water Department (LELWD). The projected flow from the Project (286,000 gpd) exceeds the amount allocated by LELWD and the amount authorized in MassDEP's groundwater discharge permit for the Littleton WWTF. MassDEP is currently reviewing a proposal to increase the amount of discharge that could be treated at the Littleton WWTF but it is unclear at this time, given the lack of information, how much of an

increase in capacity would be necessary to accommodate existing flows and the projected development from the LELWD of 504,790 gpd. From the information presented, MassDEP concludes that only 150,000 gpd of wastewater flow from the Project will be accepted at the WWTF. As noted in previous comments, because of the contingencies associated with relying on the Littleton WWTF to treat all of the projected flows from the Project, MassDEP suggests that the Proponent consider the feasibility of expanding the on-site wastewater treatment facility on the Project site.

The WWTF at the Project site itself is permitted to treat 40,000 gpd under a permit issued to 550 King St LLC (GWDP 79-7) on November 28, 2023. MassDEP has noted in previous comments that the Proponent is not the permittee for that permit, as incorrectly stated again in the FEIR. The FEIR states that the 63,577 gpd flow value described in the DEIR was calculated using a design flow rate that is not representative of current operating conditions. MassDEP notes that the on-site WWTF is not currently discharging wastewater and that the operator is hauling the wastewater off-site for treatment. If it becomes necessary to use the on-site system to accommodate any of the flows from the Project, MassDEP will require an engineering evaluation of the WWTF and an application for a permit modification at that time. The permit application, if required, should be submitted by the appropriate corporate entity.

In its comments on the DEIR, MassDEP noted that the Proponent requires a groundwater discharge permit for the existing wastewater flow of 10,412 gpd at the 410 Great Road property because this flow exceeds 10,000 gpd, The FEIR describes the Title 5 septic system at the 410 Great Road parcel as in failure but notes that the Proponent plans to demolish the buildings on that property and decommission the failed Title 5 system. The FEIR does not provide a schedule for the decommissioning of the septic system. The Proponent is currently discharging effluent to the groundwater without a valid permit and will continue to be in violation of the groundwater discharge regulations while discharging to the failed Title 5 system. MassDEP encourages the Proponent to contact the Central Regional Office to discuss how to address the ongoing noncompliance in light of the anticipated demolition.

The Commonwealth of Massachusetts
Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston, MA 02114
Phone: 617-292-5500

MassDEP appreciates the opportunity to comment on the Project. If you have any questions regarding these comments, please do not hesitate to contact JoAnne Kasper-Dunne, Central Regional Office MEPA Coordinator, at joanne.kasper-dunne@mass.gov.

Very truly yours,

Mary Jude Pigsley
Regional Director

cc: Commissioner's Office, MassDEP

Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Phillip Eng, Interim MassDOT Secretary

massDOT
Massachusetts Department of Transportation

November 21, 2025

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114-2150

RE: Littleton – King Street Common – FEIR
(EEA #16921)

ATTN: MEPA Unit
Nicholas Perry

Dear Secretary Tepper:

On behalf of the Massachusetts Department of Transportation, I am submitting comments regarding the Final Environmental Impact Report (FEIR) for the proposed King Street Common development in Littleton, 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

Ten Park Plaza, Suite 4160, Boston, MA 02116
Tel: 857-368-4636, TTY: 857-368-0655
www.mass.gov/massdot

cc: Jonathan Gulliver, Administrator, Highway Division
Carrie Lavallee, P.E., Chief Engineer, Highway Division
Barry Lorion, P.E., District 3 Highway Director
James Danila, P.E., State Traffic Engineer
Metropolitan Area Planning Council (MAPC)
Planning Board, Town of Littleton

MEMORANDUM

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

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

DATE: November 21, 2025

RE: Littleton – King Street Common – FEIR
(EEA #16921)

The Public/Private Development Unit (PPDU) has reviewed the Final Environmental Impact Report (FEIR) for the proposed King Street Common development in Littleton (the "Project") submitted by Epsilon Associates, Inc., on behalf of Lupoli Development (the "Proponent"). The project site covers approximately 47.4 acres and is divided into two sections. The first section is located on the east side of Great Road (Route 119) and is bordered by Interstate 495 (I-495) to the north, Shea Street to the east, King Street (Route 110) to the south, and Route 119 to the west. This portion of the site was formerly an IBM office campus, which is now vacant. The second, smaller section of the project site is situated on the west side of Route 119. It is bordered by a commercial lumber yard to the north, Route 119 to the east, commercial development along King Street to the south, and a residential area near White Street and Hillside Road to the west.

The Project entails the construction of 19 buildings, including 1,089 residential units, 115,500 square feet (sf) of retail space, 19,000 sf of office space, and 545,520 sf designated for light industrial use. Additionally, a 104,000-sf hotel with 150 rooms is planned, along with a total of 3,010 parking spaces, including 1,446 structured parking and the remaining at ground level. Access to the Project will be provided via Auman Street, which runs along the northern side of Route 119. The site access includes maintaining two full-access driveways on Auman Street and one on Shea Street, all of which connect to Route 110. Additionally, a third access driveway will be added on Route 110. The existing driveway leading to the Tuttle House parking lot at 534 King Street will also be preserved within the Project area. The Project will be constructed in phases over the next 15 years.

The Project previously submitted an Environmental Notification Form (ENF) on February 7, 2025, for which the Secretary of Energy and Environmental Affairs (EEA) issued a Certificate on March 10, 2025, requiring the Proponent to prepare a Draft EIR. On September 11, 2025, the Proponent submitted a DEIR, for which the Secretary of EEA issued a Certificate on August 22, 2025, requiring the Proponent to prepare a FEIR.

Access Management

Based on MassDOT's recommendations, the Proponent has revised the Site access plan presented in the DEIR, reducing the number of King Street driveways from five to four by removing the easterly Building Q/Yangtze River Restaurant driveway and adding access-management measures acknowledged in the DEIR Certificate. These measures include prohibiting left-turn exits from both the Site Driveway West (Auman Street/former IBM West Driveway) and the 410 Great Road driveway, with restrictions enforced through signage, pavement markings, and geometric channelization. Additionally, the Proponent is working to consolidate the Tuttle House driveway with the nearby 510 King Street curb cuts, which would close the two driveways and reconfigure on-site parking. Final details will be determined during MassDOT's access permit process. If consolidation is not feasible, one of the four remaining King Street driveways will be removed, likely the middle driveway between Buildings L and N. However, the final decision will be made during the MassDOT permitting process and site-plan refinement.

The Proponent must clearly commit to removing additional site access if the Tuttle House access remains unchanged. If the number of site access points changes, a new capacity analysis of the affected study-area intersections is required to verify that there are no significant impacts. If the updated analysis shows substantial operational changes, further mitigation measures must be evaluated for feasibility.

Off-Site Mitigation Phasing

The Proponent proposes the implementation of a comprehensive mitigation program based on the following phased timeline conditions: Condition A, which requires certain upgrades to be completed before the first building is occupied; Condition B, permitting early-phase uses as long as total trips do not surpass documented No-Build traffic levels, thus offering flexibility and a balanced traffic flow during initial occupancy; Condition C, aligning King Street cross-section and streetscape improvements with the occupancy of adjacent retail and restaurant buildings to prevent construction-related damage to new infrastructure; Condition D, coordinating Great Road sidewalk improvements with the occupancy of the 410 Great Road buildings to avoid premature wear; and Condition E, requiring traffic signal timing adjustments and coordination at initial occupancy, 80% occupancy, and full build-out, with corresponding updates to MassDOT Traffic Signal Regulations at each stage.

Overall, MassDOT believes that the mitigation program identified in the FEIR would address the full build-out of the Project. However, the phased implementation, as outlined in the Draft Section 61 Finding, needs to be further evaluated and refined to ensure the timely implementation of associated mitigation measures, minimize construction impacts in the Project's study area, and provide the Proponent with the flexibility to move forward with development on the Site. The MassDOT state highway access permitting process would also provide additional opportunities to discuss some of the detailed construction phasing of the proposed improvements.

Intersection Improvements

The Proponent has committed to perform field fine-tuning of traffic signal timing, coordination, and phasing at several key Great Road intersections—including Russell Street/Constitution Avenue and the I-495 southbound ramps—during initial, 80%, and 100% site occupancy, in collaboration with MassDOT. Additional improvements include installing new pedestrian signals, curb ramps, and crosswalks at the I-495 northbound ramps, realigning the channelized right-turn lane, and optimizing signal timing. At the Great Road/Site Driveway West, planned enhancements include reconstructing the driveway approach to add a channelized right-turn lane, widening Great Road westbound to two lanes near the driveway, and restriping the eastbound approach to create a dedicated left-turn lane aligned with King Street.

Extensive signal, accessibility, and safety upgrades are also planned for Great Road/King Street, including partial traffic signal reconstruction, installation of modern detection systems and APS push buttons, pedestrian-accessible curb ramps, resurfacing, and updated pavement markings and signage. Similar ADA-compliant curb ramp reconstruction, high-visibility crosswalks, and pedestrian sign upgrades will be implemented at Great Road/Stevens Street/Adams Street/Meetinghouse Road and at King Street/Goldsmith Street/Stevens Street/476 King Street Driveway, where curb extensions will also be added to shorten pedestrian crossings. Additional pedestrian infrastructure upgrades, including ramps, crosswalks, and signage, will be completed at multiple driveways and intersections along Great Road and King Street.

Corridor Improvements

The Proponent will implement extensive pedestrian and roadway improvements along Great Road, including reconstructing approximately 400 feet of sidewalk on the south side near 410 Great Road with granite curbing and building a new 580-foot sidewalk with granite curbing on the north side from Site Driveway West to the I-495 northbound ramps.

Along King Street, the Proponent will reconstruct approximately 1,450 feet of existing sidewalk into a 10-foot shared-use path (SUP) between the Tuttle House Driveway and Site Driveway North, ensuring full site connectivity. An additional 250 feet of a narrower, 8-foot SUP will extend northward, near the former Yangtze Restaurant. Up to three new pedestrian crossings with high-visibility markings, ADA-compliant ramps, far-side landing areas, and fluorescent warning signage will be installed between Meetinghouse Road and Site Driveway North, including one near Building Q to facilitate safe crossings. To support multimodal travel, the King Street cross section will be widened on the westerly side to accommodate 11-foot travel lanes (and a two-way left-turn lane south of Village Street) and minimum 5-foot bicycle lanes in each direction, with minor centerline adjustments as needed.

As part of the FEIR, the previously proposed pedestrian crossing on Great Road has been removed from the Project's off-site mitigation. Instead, the Proponent proposed to

extend the sidewalk along the northerly side of Great Road up until the intersection of Great Road and the I-495 Northbound Ramps. The channelized right-turn lane onto I-495 Northbound will be realigned to accommodate the sidewalk, and an unsignalized pedestrian crossing with a Rectangular Rapid Flashing Beacon (RRFB) across the channelized right-turn lane will be provided. A new signalized pedestrian crossing across Great Road on the easterly side of the I-495 Northbound Ramp approach will also be provided.

Transportation Demand Management

The Proponent commits to a comprehensive, dynamic Transportation Demand Management (TDM) program designed to reduce vehicle trips to and from the Site. Key measures include offering preferential and EV-ready parking, lowering overall parking supply, and improving bicycle and pedestrian facilities with new sidewalks, bike lanes, racks, and potential bike-share stations. Access to public transit will be enhanced through upgraded LRTA bus stops, a shuttle to the Littleton/I-495 Commuter Rail Station, and widely distributed transit maps and schedules. An on-site Employee Transportation Coordinator will oversee rideshare programs, marketing, wayfinding, and participation in a Transportation Management Association. Additional strategies, such as carpooling incentives, guaranteed ride home services, on-site amenities, flexible work hours, and promotional events, further promote alternatives to driving and help reduce overall vehicle demand.

Transportation Monitoring Program

The Proponent has committed to a comprehensive Transportation Monitoring Program (TMP) to track traffic operations, parking demand, transit use, and pedestrian/bicycle activity after the Project is completed. The monitoring program will be conducted annually for five years following full site occupancy or as directed and agreed with MassDOT. If thresholds are exceeded, the Proponent will propose and coordinate corrective measures with the Town and MassDOT.

Considering the proposed measures to enhance safety and multimodal access, MassDOT recommends that no additional environmental review is necessary for transportation-related matters. The Proponent should coordinate with the PPDU to refine the phased implementation of the mitigation program prior to the issuance of the Section 61 Finding. For any questions regarding these comments, please contact William Simon at william.m.simon@dot.state.ma.us.