



Northern Middlesex Council of Governments

A Multi-Disciplinary Regional Planning Agency Serving:
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January 16, 2025

Rebecca Tepper, Secretary
Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Amina Miliani: EOEEA #16904
100 Cambridge Street, Suite 900
Boston, MA 02114-2509

Re: EOEEA MEPA #16904 37 Powers Road– Westford, Environmental Notification Form (ENF)

Dear Secretary Tepper,

The Northern Middlesex Council of Governments (NMCOG) regularly evaluates MEPA proposals to determine those that may have a regional impact. As a regional planning agency, our role is to review projects for alignment with the *Regional Strategic Plan for Greater Lowell*, Northern Middlesex's regional policy plan, and other relevant state and local plans.

The proposed 37 Powers Road development on a 35.55-acre site in Westford straddles the Town's MBTA Communities Multi-family Housing Overlay District (MCMOD) and Industrial Highway Zoning District. The project would fill critical housing gaps in Westford and the region by creating 530 housing units, including 53 affordable units, while also advancing one of the first projects in the new MBTA Communities district. The proposed development will also apply Passive House standards and include installation of electric vehicle charging stations, which help advance building and transportation goals outlined in the Town's *Roadmap to Net Zero*.

In our review of the ENF, NMCOG recommends that the proponent address the following issues in relation to site remediation, climate resiliency and environmental conditions, and transportation considerations in subsequent MEPA filings.

Regarding site remediation, the proponent should address any potential contamination given the site's historical use as a gravel pit and proximity to heavily used dirt roadways. Based on the ENF filing, we recommend that any findings of contaminants, including residual diesel or other pollutants from past industrial activities, be mitigated following the soil testing that will occur.

Regarding climate resiliency and environmental conditions, the proponent noted the results of the ResilientMass Climate Resilience Design Standards Tool which anticipates that the site may be affected by extreme precipitation (urban flooding and riverine flooding) and extreme heat. The proposed design aims to reduce many of these currently projected impacts. Although the property is not currently in a FEMA floodplain, future risks should be proactively addressed. NMCOG recommends that the proponent increase stormwater mitigation measures, including incorporating permeable pavers, rain gardens, and

underground chambers, and provide a revised Climate Resilience Design Standards Tool Project Report. Given the high-water table, subsequent filings should also provide greater detail on wastewater treatment, particularly the projected discharge of 89,000 gallons per day. More detailed site plans should also delineate wetlands, design snow storage options to successfully contain runoff during thaw periods and include native plants in the landscaping design to reduce the need for irrigation and support water conservation efforts. The above measures would enhance the site's ability to mitigate climate risks and improve environmental outcomes while minimizing strain on local water resources.

NMCOG also recommends reducing the impervious parking surface to the minimum parking requirement allowed in the MCMOD. The proposed site plan provides 795 surface parking spaces or 1.5 spaces per unit for 530 units. The plan currently includes 72 garage parking spaces; however, replacing 72 surface spaces with garage parking could significantly reduce the overall impervious parking area, meeting minimum zoning requirements and minimizing environmental impact.

Regarding transportation considerations, transportation infrastructure is a key area of focus for this project. NMCOG was pleased to learn of the proponent's intention to explore the integration of pedestrian and bicycle infrastructure that will connect the development to nearby neighborhoods and amenities. NMCOG also commends the proponent's intent to coordinate with the Lowell Regional Transit Authority to expand public transit options. NMCOG recommends that the proponent prioritize complete streets principles, ensuring safe and accessible multi-modal transportation options for residents and visitors.

In conclusion, NMCOG commends this first proposal for moving forward in the MCMOD and supports the proposed 37 Powers Road development, given its potential to increase housing availability and meet multiple regional goals. We appreciate the opportunity to provide input on this project and respectfully request that future filings address the recommendations outlined above to ensure the project is sustainable and valuable asset to the community and the region.

Should you have any questions regarding these comments, please contact Meghan Tenhoff, Sustainability Planner II, at mtenhoff@nmcog.org.

Sincerely,

Jennifer Raitt
Executive Director

cc: Kristen Las, Town Manager