

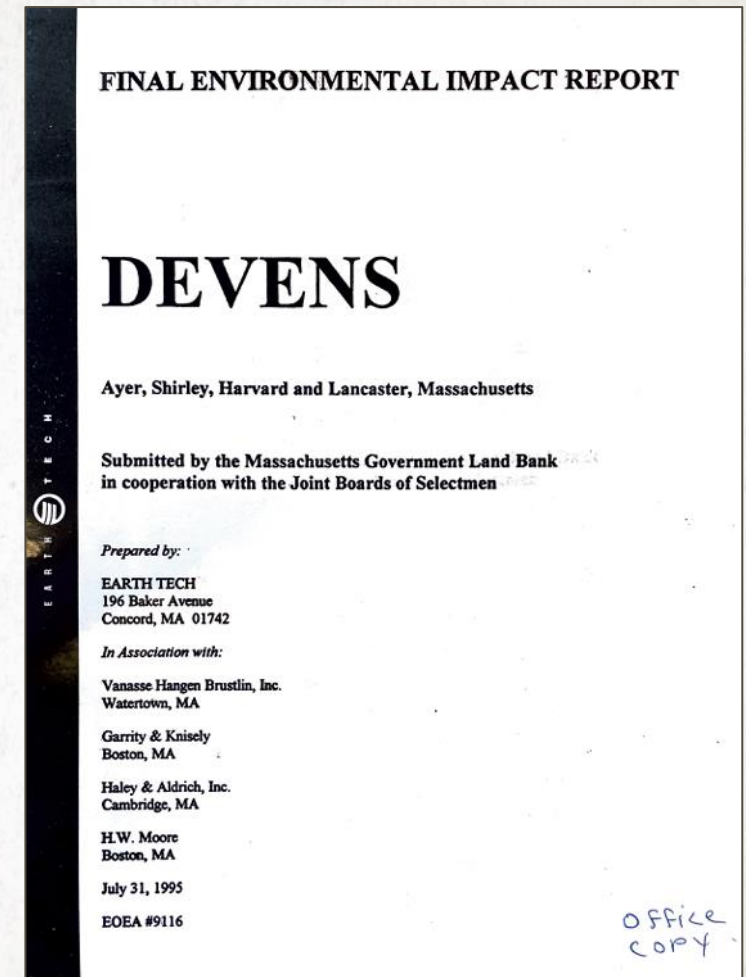


APPROACHING THE DEVENS COMMERCIAL DEVELOPMENT CAP

BRINGING THE BYLAWS INTO ALIGNMENT WITH THE 2008 MEPA NOTICE OF PROJECT CHANGE

DEVENS BY-LAWS IX.D.2

- The maximum number of square feet of building space to be developed and/or used at Devens under the Reuse Plan and By-Laws shall not exceed eight million five hundred thousand **(8,500,000)**. It is recognized, however, that in order to exceed seven million seven hundred thousand **(7,700,000)** square feet of building space, as identified in the Draft Environmental Impact Report for Fort Devens, additional approvals under the Massachusetts Environmental Policy Act may be necessary.

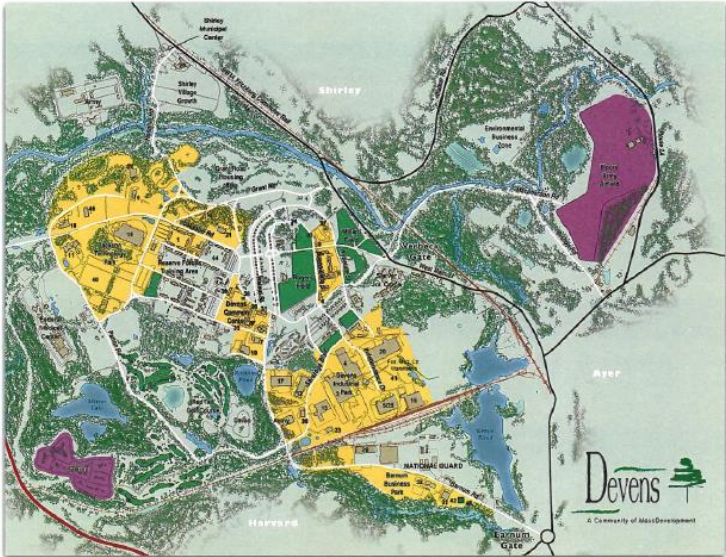


2008 NOTICE OF PROJECT CHANGE:

- The approval to exceed 7,700,000 sq.ft. was received from MEPA in MassDevelopment's 2008 Notice of Project Change.
- The 8,500,000 and 7,700,000 sq.ft. numbers came from the FEIR (Final Environmental Impact Report) and were based on the projected impacts of a range of the allowed uses within the different zoning districts using typical early 1990s industrial park uses as a model.
- The MEPA Notice of Project Change eliminated this square footage cap to focus on measuring the actual environmental impacts that development produces, rather than projections.

NOTICE OF PROJECT CHANGE

Redevelopment of Fort Devens



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May 15, 2008

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IMPACTS MEASURED: TRANSPORTATION

- **Transportation** is measured in terms of vehicles per day (VPD).
- MassDevelopment conducts 5 year traffic studies with counts to measure this metric. The last count was conducted in 2021 with adjustments made for COVID-19.
- 2008 MEPA Notice of Project Change and FEIR limit traffic to 50,585 VPD
- May 2021 Traffic Count was 20,562 VPD



IMPACTS MEASURED: WATER/WASTEWATER

IMPACT	FEIR	2008 NPC	ACTUAL
Gallons/day (GPD) of water use	3.0 mgd	3.0 mgd	0.76
GPD water withdrawal	3.0 mgd	3.0 mgd	0.84
GPD wastewater generation/treatment	3.0 mgd	4.65 mgd	1.17
Length of water mains (in miles)	145 miles	145 miles	74.1
Length of sewer mains (in miles)	65 miles	65 miles	44.5

IMPACTS MEASURED: LAND AREA

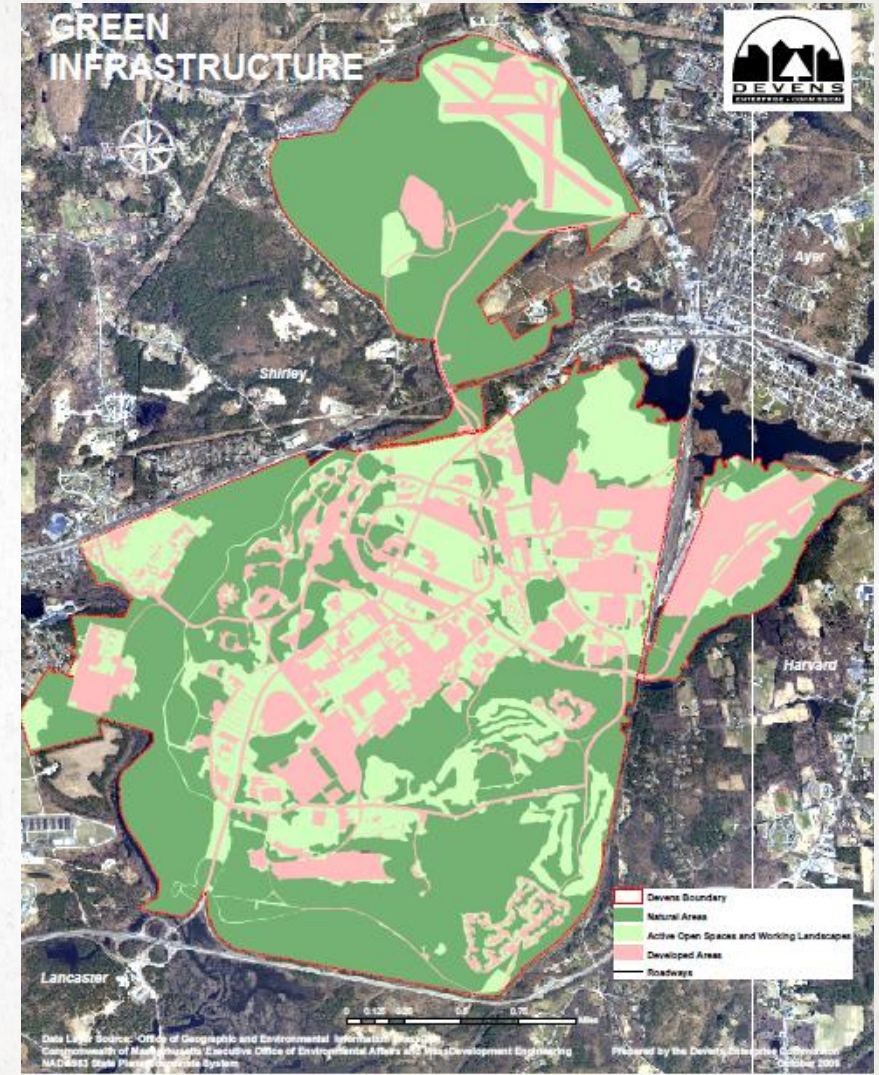
IMPACT	FEIR	2008 NPC	ACTUAL
Total Site Acreage	4,140	4,140	4,423
Acres of Altered Land	2,920	2,920	774
Acres of Impervious Area	984	984	808
Square feet of bordering vegetated wetlands alteration	Nominal	Nominal	Minimal
Square feet of other wetland alteration	Nominal	Nominal	None

IMPACTS MEASURED: BUILDING

IMPACT	FEIR	2008 NPC	Current
Gross Square Footage	8,500,000*	Eliminated	6,454,310 ⁽¹⁾ 7,448,853 ⁽²⁾
			1. GSF Occupied as of May 2021 2. GSF Occupied, permitted or under construction
Number of Housing Units	282	No Change	260

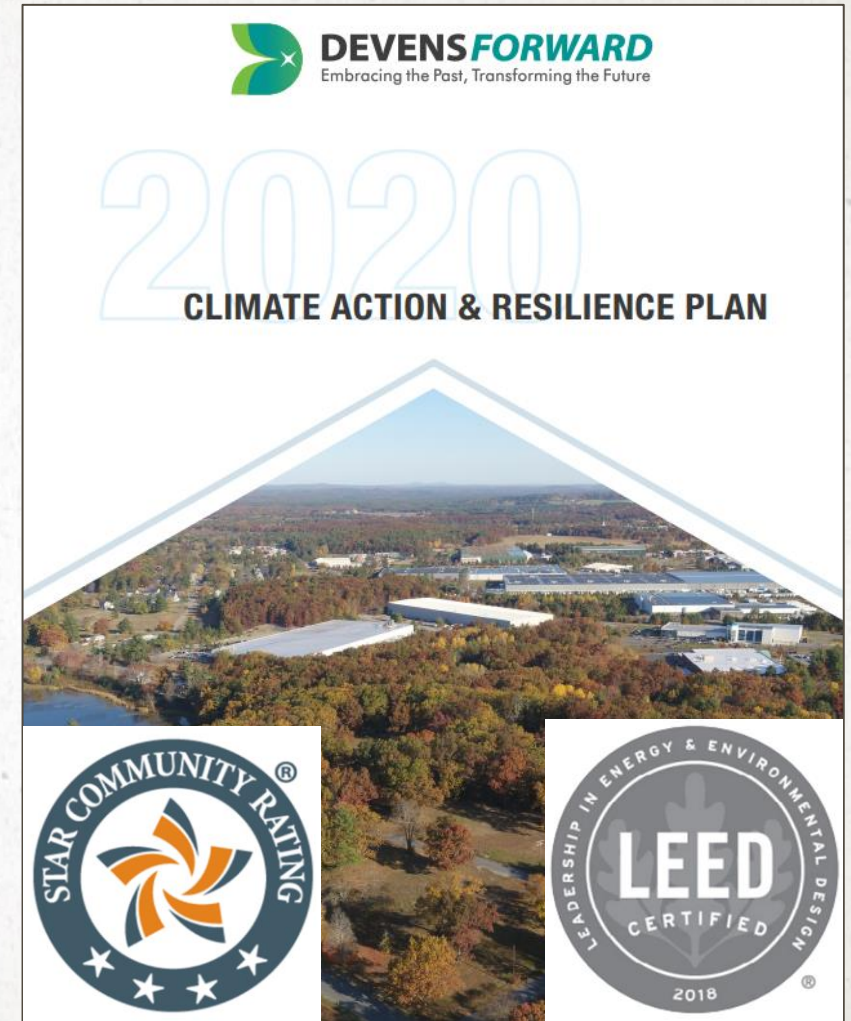
WHY IS DEVENS SO FAR UNDER THE IMPACT MEASURES IN THE FEIR?

- Devens Reuse Plan Goal: Sustainable redevelopment.
- DEC early adopter of LID, Green Building, and GHG regs have all facilitated development with a lower env. footprint (compact development directed to previously dev. areas), energy and water efficiency, TDM strategies, etc...
- Permanently protected over 1400 acres (<30%) of open space - preserving natural resources and connecting to a regional open space network. Surpassing Pres. Biden's goal of protecting 30% of community lands by 2030.
- Developments required to enhance and connect to this network through Green Infrastructure Guidelines, tree preservation and landscaping requirements (groundwater recharge, reduced impervious & UHI, improved AQ, habitat connectivity).



WHY IS DEVENS SO FAR UNDER THE IMPACT MEASURES IN THE FEIR?

- Climate Action Plan, STAR Community and LEED for Cities and Communities Certification - third party recognition for Sustainable Development progress.
- Providing additional tools for monitoring and measuring Devens impacts.
- Internationally recognized eco-industrial park and Devens Eco-Efficiency Center (DEEC) - as we continue to grow, we continue to collaborate with surrounding communities:
 - Connecting open spaces, trail and bike networks
 - Regional MVP and Infrastructure grants
 - Regional services (HHW, E911, water, sewer extensions)



IMPACTS MEASURED

- Devens has outperformed the FEIR model, as it has been successful in redeveloping around the theme of Sustainable Development and incorporating eco-industrial park concepts while implementing the redevelopment or Devens Reuse Plan.
 - The result is we are 50-75% below the 1995 expected impacts associated with the 8,500,000 sf of development for traffic, water and wastewater, land altered.
 - This further justifies MEPA's switch from the use of absolute numbers (FEIR) to quantification of the actual impacts of development per the 2008 MEPA NPC (water, waste-water, traffic, impervious coverage, and open space).
-

APPROACHING THE COMMERCIAL DEVELOPMENT CAP

- Every Five Years the DEC conducts a progress review or district development review as required by the Devens By-Laws II.A.14. Our 2016-2020 District Development Analysis showed Devens approaching 6 million sq.ft. of commercial development.
- 2021 Annual Report showed additional 1 million sq.ft. during that calendar year.
- Today we are approaching 7.7msf of commercial development.
- We expect to reach the 8.5 msf commercial development cap sometime in late 2022 or early 2023 based on projects in the development pipeline.





2020



**1.7 million+ sf of new development added during pandemic
(all previously developed areas)**

2022

POSSIBLE IMPACTS OF LEAVING THE COMMERCIAL DEVELOPMENT CAP IN PLACE

- Salerno Circle, Shirley Village Growth, and the North Post's future redevelopment would be in jeopardy.
 - Some properties have existing master plans showing additional development, over 1.28 million square feet of which would be put at risk by the cap.
 - MassDevelopment has calculated that there is another 2 million plus square feet of development potential within the Devens Regional Enterprise Zone.
 - Devens role as an economic development destination for the Commonwealth would be at risk.
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POSITIVE IMPACTS OF DEVENS GROWTH: (UMASS DONAHUE INSTITUTE STUDY 2020):

- Over 6000 jobs created at Devens for people across the north central region and beyond
- Contributing to over 14,300 jobs in the Commonwealth
- \$3.8 billion contribution to the MA Economy
- Annual payroll of \$547 million
- Average annual wage of \$90,000
- 40% of Deven's jobs are manufacturing jobs

(Note: added over a million square feet of development after this report was produced in 2020).

<https://www.massdevelopment.com/assets/pdfs/Devens-Economic-Profile-and-Contribution-062020.pdf>

DEVENS ECONOMIC PROFILE AND CONTRIBUTIONS

AN ECONOMIC IMPACT STUDY OF BUSINESSES AND
ORGANIZATIONS LOCATED IN DEVENS, MASSACHUSETTS



A Report for MassDevelopment



UMASS DONAHUE INSTITUTE
Economic & Public
Policy Research

JUNE 2020

SIMPLE ADMINISTRATIVE CHANGE:

- 2008 MEPA NPC confirmed that building square footage cap was arbitrary.
 - By-laws IX.D.2 should have been updated at the same time to replace the absolute 8.5MSF with the environmental performance impacts set forth in the FEIR and MEPA Notice of Project Change.
 - All other existing thresholds and metrics from FEIR and MEPA NPC remain.
 - Ongoing tracking demonstrates that Devens development to date has had much less of an impact than anticipated (traffic, water, wastewater, impervious area, etc.)
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SUGGESTED ACTION:

- Signal support to the legislative delegation that the development cap be lifted by the end of the current legislative session by July 31, 2022.
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DEVENS SUCCESS = LOCAL, REGIONAL, & STATE SUCCESS

- Consistent with 2008 NPC (correcting a change that should have been made in 2008)
- Consistent with FEIR.
- Consistent with Devens Sustainable Redevelopment goal in the Devens Reuse Plan.
- Continue the economic, social, and environmental successes of Devens for the region and Commonwealth as a whole.
- Continue leading by example as a National and International model of successful and sustainable military base and community redevelopment.



<https://www.devensec.com/sustain/Devens and the UN SGDs 2020 final.pdf>

