



SMART GROWTH AND REGIONAL COLLABORATION

June 5, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Rick Bourre, MEPA # 13755
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Beacon-North, MEPA #13755

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, the GreenDOT initiative, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

The project site encompasses approximately 79.9 acres of land bound by Route 20 to the north, Ames Street to the southwest, and Glen Street to the southeast in Marlborough. The site has been identified as a regional, statewide, and local Priority Development Area (PDA) as part of the *495/MetroWest Development Compact*. Regional access to the area is provided via the Route 20 and Interstate 495 interchange located approximately one mile to the east of the site.

The Marlborough/Northborough Land Realty Trust (the Proponent) has proposed a Preferred Alternative which consists of a mixed-use development that includes three restaurants, two office buildings, and two hotels. Specifically, the proposed land uses for the Preferred Alternative include approximately:

- 3,000 square foot, 90-seat café/fast food restaurant with a drive through window
- 5,000 square foot, 150-seat, fast food restaurant
- 7,000 square foot, 275-seat, high-turnover restaurant
- 60,000 square foot, 105-room business hotel
- 80,000 square foot, 105-room comfort hotel
- 240,000 square foot office space in two 120,000 square foot office buildings

Of the 79.9 acres, 6.6 acres have previously been developed under a Phase 1 Waiver, and a separate 18-acre parcel has been approved for the Preserve at Ames, a 40B residential development. The remaining 45.3 acres comprises the Beacon-North Project Site. The proposed building program will comprise approximately 395,000 square feet of new development and 1,268 parking spaces. At full build, the Beacon-North project will generate approximately 7,170 new vehicle trips per day. The weekday morning and evening peak hour traffic generation is estimated at 725 and 690 new vehicle trips respectively.

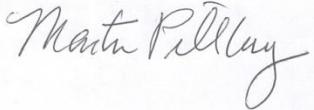
MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the goals of *MetroFuture*. The Commonwealth also has established a mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking by 2030. Additionally, the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. As currently proposed, the Beacon-North project is likely to make all of these goals more difficult to achieve.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and our recommendations primarily address reducing the number of parking spaces, developing mode share goals and a monitoring program, and adding complete street design components to Route 20. The intent of these recommendations is to encourage a greater shift of auto trips to transit, bicycling, or walking. MAPC respectfully requests that the Secretary incorporate these recommendations intended to minimize the adverse impacts of this project in order to keep the Commonwealth on track in meeting its regulatory and statutory goals.

For the next step in the MEPA review process, MAPC respectfully requests that you require the Proponent to address these issues in the forthcoming Final Environmental Impact Report (FEIR) and Section 61 findings.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink that reads "Martin Pillsbury".

Martin Pillsbury
Environmental Planning Director

cc: Tim Cummings, Marlborough Economic Development Corporation
David Mohler, MassDOT

Metropolitan Area Planning Council (MAPC) Comments on Beacon-North DEIR - MEPA #13755

The following comments address the impacts and mitigation needed to address the Preferred Alternative as it is presented in the DEIR.

Overall Parking Demand – Parking Reserves

MAPC strongly encourages the Proponent to investigate further measures to reduce the overall number of parking spaces to deter Single Occupancy Vehicle (SOV) trips through parking reserves. A reduction in the number of parking spaces would contribute towards an overall reduction of automotive traffic and trips to and from the project. It is important to note that the application of parking reserves is permitted in Marlborough's zoning ordinance. Moreover, the Secretary's Certificate¹ previously advised the Proponent to "consider banking of some of these spaces until and unless they are determined to be necessary based on monitoring (p. 5)." and the Massachusetts Department of Transportation (MassDOT) recommended applying parking reserves².

Specifically, MAPC recommends that the parking spaces in the southernmost area of the Preferred Alternative's office development be placed in reserve parking. These parking spaces are closest to wetlands on the project site. Without the initial construction of these parking spaces, there is a greater assurance that an effective stormwater management system will be implemented.

Mode Share Goals and Monitoring Program

While MAPC is pleased the Proponent has agreed to provide approximately \$1 million towards roadway and pedestrian improvements geared towards addressing the project's impacts, we are concerned that the DEIR does not outline mode share goals and a comprehensive monitoring program. The Proponent needs to clearly define mode share goals (vehicular, bus, bicycling and walking) and commit to conducting regular monitoring and reporting of transportation mode shares and adjust the project's Transportation Demand Management (TDM) program as necessary.

Mode Share Goals

Although the Proponent has stated that the transportation analysis was prepared in accordance with the *EOEEA/MassDOT Guidelines for Traffic Impact Assessments (TIAs)*, there is no discussion of mode share goals. Developing and monitoring mode share goals is a central component of TIA preparation. The TIA Guidelines state:

The TIA should include an assessment of the mode split assumptions, as well as the Proponent's plan to maximize travel choice, promote non-SOV modes, and achieve the assumed mode shares. (p. 17)

¹ Notice of Project Change Certificate dated March 28, 2014.

² Massachusetts Department of Transportation comment letter dated March 18, 2014.

MassDOT's TIA Guidelines mention that transportation impact assessments should include an assessment of mode split assumptions, as well as the proponent's plan to maximize travel choice, promote non-SOV modes, and achieve the assumed mode shares. Consistent with these guidelines, the Secretary's Certificate for this project states that the TDM program "should include specific, defined mode share goals that target high rates of transit, bicycle, and pedestrian use. Data and analysis of existing modes (including public transportation, walking, and bicycling), future demand and origin-destination patterns of employees and patrons, should be employed to identify proposed physical improvements and supporting programs to increase these modes (p. 5)."

Monitoring Program

A monitoring program helps to ensure that specifically defined mode share goals are accomplished. A monitoring program should evaluate the assumptions made in the transportation analysis, the adequacy of proposed transportation mitigation measures, as well as determine the effectiveness of the TDM program. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary.

We ask the Secretary to require that the Proponent work closely with the City of Marlborough and MassDOT to develop a comprehensive monitoring program for all modes and clearly define mode share goals. The project site should be monitored for a minimum period of five years, as outlined in *MassDOT's TIA Guidelines*, not for one year as the Proponent currently proposes.

At a minimum, the following locations need to be closely monitored and additional mitigation identified, if deemed necessary:

- *Route 20 at RK Center Driveway*
Forecast to operate at LOS E in the evening peak period under 2021 Build with Improvements and currently exceeds the MassDOT District 3 average accident rate.
- *Route 20 at Ames Street/Bronx Park Drive*
Forecast to operate at LOS E in the evening peak period under 2021 Build with Improvements.
- *Route 20 at Ames Street*
MassDOT has expressed concern regarding this intersection in their comment letter.
- *Queuing on the I-495 exit ramp onto Route 20 westbound*
MassDOT has expressed concern regarding this location in their comment letter for both current conditions as well as potential project impacts.

Route 20 at RK Center/Site Drive

MAPC recommends that the Proponent focus on channelizing traffic to the only signalized access to the site, Route 20 at RK Center/Site Drive. In order to reduce vehicle conflicts and provide additional flexibility for pedestrian amenities, the DEIR notes there may be plans to relocate the Wendy's and Bank of America site driveways to provide access through the interior of the Beacon-North site. The Proponent needs to clearly convey plans that propose relocations

of the site driveways. MAPC recommends that the redesign minimizes multiple curb cuts in close proximity to the main access road serving the project. Limiting curb cuts provides a safer environment for pedestrians and bicyclists since potential conflicts with vehicles are reduced and additional space for landscaping is available.

Complete Streets

While the Proponent proposes modifications along Route 20 aimed towards improving traffic flow, a Complete Streets component also needs to be included. Complete Streets is a transportation policy and design approach that requires streets to be planned, designed, operated, and maintained to enable safe, convenient and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation. At a minimum these enhancements should include providing a continuous sidewalk along the southerly edge of Route 20, the addition of a bicycle path, landscaping, and safe crossings for pedestrians.

Public Transit Access

Commuter Rail

The nearest MBTA commuter rail service is available from the towns of Southborough and Westborough, along the Framingham/Worcester Commuter Rail line that connects South Station in Boston to Worcester. The two stations are approximately seven to eight miles from the site. The Proponent has indicated they will “look into the possibility” of providing a shuttle service in conjunction with other offices in the area to the nearby MBTA commuter rail station in Southborough. Shuttle access to the Framingham/Worcester commuter rail line is a critical transit link and it is not adequate for the Proponent to simply “look into the possibility” of providing a shuttle service. MAPC respectfully requests that the Secretary require the Proponent to include the provision of a shuttle service to the MBTA commuter rail station in Southborough as part of its TDM program.

MetroWest Regional Transit Authority Bus

MAPC is pleased that the Proponent will coordinate with the MetroWest Regional Transit Authority (MWRTA) to locate a transit stop and route on-site to facilitate and promote transit use. MAPC encourages the Proponent to work closely with the City of Marlborough and MWRTA to locate this stop in a location that will maximize the usage of the MWRTA’s bus route 7C.

Transportation Demand Management (TDM) Program

MAPC is pleased that the Proponent has committed to include a TDM program that will have an on-site TDM Coordinator. However a development at a site like this one, located away from existing opportunities to use transit, needs to devote significant mitigation resources to overcome these site deficiencies. By working with the site’s future tenants, the Proponent should be required to implement the following TDM measures:

- Becoming a member of the MetroWest/495 Transportation Management Association (TMA).
- Committing to a transit subsidy program that supports MWRTA bus service to the project site.

- Subsidizing transit passes for employees;
- Offering parking cash-out incentives for employees;
- Providing ride-matching/carpooling for employees and residents; and
- Providing car-share vehicles and electric vehicle (EV) charging stations for use by employees and residents as demand warrants.

Site Connectivity for Pedestrians and Bicyclists

The site design should maximize pedestrian and bicycle connections within the site, as well as to adjacent sites along and across Route 20 to the fullest extent feasible. Successful design of connectivity for pedestrians and bicyclists within the site and external access to the site will help promote non-vehicular travel. While the Proponent proposes to implement pedestrian and bicycle accommodations, there are areas that need specific focus:

- The east-west trail that will provide a connection between the hotel/restaurant sites to the west and the office site to the east should be designed to accommodate both pedestrians and bicyclists.
- The east-west trail should provide a connection to “The Preserve at Ames” residential development.
- The Proponent should install sidewalks along the southerly side of Route 20 and the easterly side of Ames Street.
- The Proponent should install connections to adjacent residential and commercial land uses proximate to the Beacon-North site.
- All internal trail connections should be publically accessible and include clear signage promoting pedestrian and bicycle access.

Open Space

The undeveloped land internal to the project site should serve as a passive recreational feature for the proposed and surrounding developments. MAPC recommends that the land internal to the site remain undeveloped.