



SMART GROWTH AND REGIONAL COLLABORATION

April 18, 2017

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Alex Strycky, MEPA #15502  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Back Bay/South End Gateway Project, MEPA #15502

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, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

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. In May 2016, the Massachusetts Supreme Judicial Court released a unanimous decision in *Kain vs. Massachusetts Department of Protection (DEP)* ordering the state's DEP to take additional measures to implement the 2008 Global Warming Solutions Act. Specifically, the Court held that DEP must impose volumetric limits on the aggregate greenhouse gas emissions from certain types of sources and that these limits must decline on an annual basis. This recent ruling reasserts the state's obligation to meet these goals.

BP Hancock LLC (the Proponent) is proposing a mixed-use transit-oriented development (TOD), which includes four distinct air-rights parcels. When fully complete, the Back Bay/South End Gateway Project (the Project) will comprise up to approximately 1.26 million square feet (sf) of development, including a new office building (approximately 592,000 sf) with ground floor retail, two new residential buildings (approximately 600 units), and a retail expansion (approximately 62,000 sf) of the existing MBTA Back Bay/South End Station. No new parking is proposed as part of the Project as the existing 100 Clarendon Street Parking Garage capacity of 2,013 spaces is expected to meet demand.

The approximately 5.2-acre Project site is located primarily over active transportation infrastructure, including the I-90 Extension of the Massachusetts Turnpike, and the track and concourse levels of Back Bay Station. The Project is roughly bounded by Dartmouth Street to the west, Stuart Street and Trinity Place to the north, Trinity Place and Clarendon Street to the east, and the southern property line of Back Bay Station to the south. The Project is expected to generate just over 3,600 daily vehicle trips, with slightly over 380 and 370 vehicle trips being made during the morning and evening peak hours, respectively. A total of 6,097 daily transit trips, 603 of which will occur in the morning peak hour and 632 in the evening peak hour are projected.

This Project exemplifies the best aspects of TOD by developing high density housing, retail and office uses above and adjacent to a multi-modal transit hub served by multiple public transportation services, including MBTA Commuter Rail lines, the Orange Line, local bus routes, and AMTRAK. The Project's mix of residential, commercial and retail uses will benefit from excellent transit accessibility, resulting in a high proportion of transit-trips rather than vehicle-trips. We recognize that the projected preliminary trip generation estimates for this project include transit mode-shares of 51% for both office and retail related trips and 31% for residential trips.

#### Mitigation

The Proponent has provided a strong commitment to implement integrated multimodal mitigation measures to improve vehicular traffic operations and accommodate walking, bicycling and transit use by employees, residents, and visitors to the site. The Proponent also proposes creating a public realm that is friendly for pedestrians and bicyclists, in accordance with Complete Streets design approaches.

While the Proponent has assumed management responsibility for and committed to renovating the concourse of Back Bay Station, MAPC respectfully requests that the Proponent also consider commitments to improving MBTA services. These improvements could include a contribution to the purchase of new Orange Line cars, improved signalization along the Orange Line, or maintenance of the Southwest Corridor Park which culminates at the Project site. For example, a mitigation fund could be established by the Commonwealth and the City of Boston to support these types of improvements. There is precedent for such a transportation mitigation fee established through the MEPA process. One such precedent is the Wynn Casino's commitment to improving Orange Line service. Another is the recent Memorandum of Understanding under which Boston Properties will contribute a transit improvement fee to support MBTA service improvements for the Kendall Square Urban Renewal Project.

#### Parking

All vehicular parking for the Project will be accommodated on-site in the redeveloped garage at 100 Clarendon Street. The garage will provide up to the existing permitted capacity of 2,013 spaces, with up to 576 spaces permitted for public use. The Project will provide 0.4 spaces per residential unit, or up to 240 residential parking spaces (based on up to 600 units). MAPC applauds the Proponent for proposing no net new parking as part of the Project, as this will encourage the use of non-vehicular modes of transportation. However, it remains unclear to what extent the Project will displace current parkers at this facility and whether the Proponent will mitigate these impacts. We suggest these issues be addressed in the Final Environmental Impact Report/Final Project Impact Report (FEIR/FPIR).

#### I-90 On-Ramp

Located beneath the garage, the Project site contains a westbound on-ramp to I-90 which is accessed from Clarendon Street. The Draft Environmental Impact Report/Draft Project Impact Report (DEIR/DPIR) indicates that the Proponent is considering the elimination of this existing I-90 ramp. The closing of the I-90 ramp could have far reaching impacts on traffic distribution, both locally and regionally, as one of the primary purposes of ramps is to remove regional traffic from local streets. The Proponent should conduct a thorough alternatives analysis and continue their collaboration with MassDOT and the Boston Transportation Department (BTD) regarding the future plans for this ramp. Due to the regional impacts of such a decision, MAPC asks to be kept up-to-date on this planning process, as we may have valuable input regarding the final outcome.

### Transportation Demand Management (TDM) Program

MAPC is pleased that the Proponent has committed to include a robust Transportation Demand Management (TDM) program that includes a variety of measures to minimize automobile usage, parking demand, and project-related traffic impacts. These strategies include designating an on-site TDM Coordinator, joining A Better City Transportation Management Association (TMA), maintaining the existing electric vehicle charging stations, and agreeing to provide future stations if demand warrants, and working with car sharing services (e.g., ZipCar, Maven, Enterprise CarShare) to locate vehicles within the garage.

### Bicycle Accommodations

MAPC is pleased the Proponent has developed a bicycle parking program that will incorporate long and short-term bicycle accommodations within the garage and elsewhere within the Project site for employees, residents and visitors. Short-term, outdoor bicycle parking will be provided throughout the site, focused on locations near Back Bay Station and retail entrances. A new Hubway station is proposed on the Clarendon Street plaza near the station's entrance – this is very welcome given the intensive use of the Hubway station across Dartmouth Street from Back Bay Station. Long-term, covered and secure bicycle parking will be provided in four bike rooms located throughout the site. The four secure rooms will provide up to approximately 484 spaces for employees and residents of the Project.

### Affordable Housing

While MAPC is pleased that this Project proposes to develop a significant amount of housing, the Proponent needs to clearly identify the affordable housing component for the estimated 600 residential units, and whether these units will be rental, homeownership, or a combination. We do recognize that the Proponent states that the housing will be in compliance with the applicable Inclusionary Development Policy of the City of Boston, but this needs to be further explained. This is not simply a residential issue; it will also have a direct environmental impact, as the residents of affordable units will own fewer cars and are likely to take more transit trips than market-rate residents.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen  
Executive Director

cc: Brian Golden, Boston Planning and Development Agency  
Vineet Gupta, Boston Transportation Department  
David Mohler, MassDOT