



SMART GROWTH AND REGIONAL COLLABORATION

October 13, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Purvi Patel, MEPA #15233
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Center 128, MEPA #15233

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 proposed Center 128 development ("Center 128") includes approximately 40.93 acres within Needham Crossing (formerly known as the New England Business Center), a commercial zone, roughly bounded by Highland Avenue to the north, Kendrick Street to the south, 2nd Avenue and 4th Avenue to the east, and I-95/Route 128 to the west. In total, Center 128 proposes four new office buildings and two renovated office buildings totaling approximately 1.16 million square feet; two 128-room hotels; 19,000 square feet of retail space; and 390 residential units. A total of 4,879 parking spaces will be provided among three garages having 4,101 spaces and 778 surface spaces. The Proponent (see below) expects that Center 128 will result in a net increase of 7,445 daily vehicle trips on weekdays, of which 696 will occur during the morning peak hour and 752 will occur during the afternoon peak hour. On Saturday, Center 128 will generate 6,558 new daily vehicle trips of which 664 will occur during the midday peak hour.

The Center 128 development comprises three distinct components designated as Center 128 West, Center 128 East, and the 2nd Avenue Residences. The Center 128 West component will be developed by Normandy Gap V Development Needham, LLC, and the Center 128 East component will be developed by Needham Nine Owner, LLC (together, "the Proponent"). It is anticipated that the site for the 2nd Avenue Residences will be sold to and developed by a third party housing developer. The three components of the overall Center 128 development are further described as follows:

Center 128 West

Center 128 West has previously undergone MEPA review. On December 31, 2014, the Secretary issued a Certificate on its Single EIR, finding that it adequately and properly complied with MEPA. Center 128 West comprises the following elements which are being constructed in four sub-phases, some of which are already completed:

- Phase Zero – A Marriott Residence Inn was constructed adjacent to B Street in the southeast corner of the project site. The approximately 90,000 square foot, 128 room hotel opened in August 2013.
- Phase 1 – A 288,346 square-foot office building was built at the corner of 1st Avenue and B Street and is currently occupied by Trip Advisor. Approximately one-third of a parking garage (Garage 380R) has been constructed. The built portion provides 1,077 parking spaces.
- Phase 2 – This phase will include the remaining two-thirds of Garage 380R, which will add 1,518 parking spaces for a total of 2,565 spaces.
- Phase 3 – This phase will include three additional office buildings, totaling approximately 452,000 square feet. Phase 3 also includes a second parking garage with 925 spaces (Garage 400R).

Center 128 East

The Center 128 East site is currently developed with 514,922 square feet of office space and is occupied by General Dynamics. The site will be redeveloped with 420,429 square feet of office space, 19,000 square feet of retail space, and a 128-room hotel. Approximately 1,509 parking spaces are allocated for the Center 128 East component of the project (857 spaces from Garage 380R on the Center 128 West site and 652 surface parking spaces).

2nd Avenue Residences

This component comprises an approximately 458,000 square-foot, 390-unit, housing development. Of the 390 units, 98 will be “income restricted.” Also proposed is a parking garage with 576 spaces.

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 an auto dependent development with significant new vehicle trips, this project will make achieving these goals more difficult. This underscores the need for robust mitigation measures, as the attached comments describe.

Following review of the Supplemental Draft Environmental Impact Report (SDEIR), MAPC is of the opinion that the SDEIR does not adequately and properly comply with MEPA guidelines. Specifically, the Proponent has failed to respond to the directives in the Certificate’s Notice of Project Change (NPC) dated May 15, 2015 regarding parking, mode share goals, and shuttle service. Therefore, we request that the Secretary find that the SDEIR does not adequately and properly comply with MEPA and that the Proponent be required to prepare a Second Supplemental Environmental Impact Report (SSEIR) prior to submitting a Final Environmental Impact Report (FEIR). Otherwise, there is a risk that the Proponent will continue to be non-responsive in the FEIR, and the public will lose its opportunity to assure appropriate mitigation of the negative impacts of the project.

Included, as an attachment to this letter are MAPC’s recommendations that address strengthening mode share goals, implementing a shared parking program and parking bank, as well as providing an effective shuttle program. 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 in his findings, and into any future Certificates and Section 61 Findings that may be adopted pursuant to additional MEPA review.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Maurice Handel, Town of Needham
James Freas, City of Newton
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on
Center 128 SDEIR, MEPA # 15233**

Parking

The Secretary's Certificate on the Notice of Project Change¹ clearly states that "The DSEIR should describe the amount and location of existing and proposed surface and structured parking, explain the methodology used to determine the total amount of parking and parking usage by different uses, identify the projected parking demand based upon time of day and estimated parking duration. The DSEIR should also discuss opportunities for shared parking, how a shared parking program will be implemented and managed, consider banking of parking until warranted by demand, and anticipated parking policies regarding pricing and preferential parking." (page 10)

Regrettably, the Proponent has not adequately responded to the Secretary's requests as discussed below:

➤ Amount and Location of Existing and Proposed Surface and Structured Parking

MAPC is disappointed that the Proponent has not made a concerted effort to reduce the number of parking spaces, which – including all three components of the project -- total 4,879 (4,101 structured and 778 surface). The Proponent even acknowledges that, based on local zoning requirements, the parking provided for Center 128 West and Center 128 East exceed Needham's zoning requirements by 79 parking spaces. Providing this number of parking spaces will create a large area of impervious surface, while encouraging auto travel and discouraging alternative modes. MAPC feels there are many steps the Proponent could take to reduce the number of parking spaces, and several of these ideas are explained below.

On a related point, although the Proponent provides information on the distribution and number of structured and surface parking spaces for each component of Center 128 (Center 128 West, Center 128 East, and 2nd Avenue Residences), the amount of structured and surface parking allocated for each building needs to be presented.

➤ Identification of Projected Parking Demand Based upon Time of Day and Estimated Parking Duration

Unfortunately, the Proponent has not responded to the Secretary's request to identify the projected parking demand based upon time of day and estimated parking duration. This should be addressed in the subsequent MEPA filing.

➤ Shared Parking

Although the Proponent mentions they anticipate that separate owners of the Center 128 components will reach an agreement to allow shared parking, the details of such a shared parking program are not addressed. In order to minimize the amount of parking on the project site, MAPC recommended in its comment letter dated August 21, 2014 (addressing the Expanded Environmental Notification Form) that the Proponent conduct a shared parking analysis. The shared parking analysis should look at the feasibility of sharing parking spaces between the project's offices and hotels. MAPC also strongly encouraged the Proponent to collaborate with owners of neighboring facilities to develop shared parking agreements. If parking spaces can be successfully shared, then landscaping and greenspace throughout the project site can be maximized, benefiting office employees, hotel patrons, and residents, as well as reducing impervious surface. MassDOT also recommended that the Proponent develop a shared parking arrangement to reduce the number of on-site parking spaces "given that the revised land uses may have different peaks" (MassDOT comment letter dated May 5, 2015, page 4).

The Proponent should address these issues as part of the development process, rather than leaving the responsibility to future owners on the site.

➤ Provision of Parking Banks

In spite of previous requests from MAPC and MassDOT, the feasibility of establishing parking banks is not even mentioned in the SDEIR. MAPC had previously recommended that the Proponent establish parking banks (landscape reserves). Parking banks would serve as greenspaces if it is determined that parking may not be

¹ Dated May 15, 2015.

utilized subsequent to full occupancy at the project site.² Parking banks would be converted to parking only if the need is clearly demonstrated. As long as additional parking is not needed, the land should remain landscaped. Specifically, a parking bank could be established between the 156B Street Hotel, 77 A Street Office, and 189 B Street Office. MassDOT also asked the Proponent to “investigate land banking of parking spaces until and unless needed, based on monitoring conducted at a future date” (MassDOT comment letter dated May 5, 2015, page 4).

The Proponent’s responses on the parking issues described above are inadequate, and non-responsive to the Secretary’s prior Certificate. As mentioned earlier, MAPC respectfully requests that the Proponent be required to respond more fully on these issues

Mode Share Goals

While MAPC acknowledges that the Proponent has outlined mode share goals in the SDEIR, they differ only nominally from existing conditions. The Proponent has proposed mode share goals of 82.5% and 80.5% for drive-alone vehicles for office and residential uses respectively. Based on data derived from U.S. Census for the Town of Needham, the Proponent suggests a 4.5% reduction in drive-alone vehicles and a 4.5% increase in public transit use for employees. No changes in mode share are proposed for residents of the proposed housing development. The tables below highlight the nominal difference in mode share goals compared to U.S. Census data.

Proponent’s Mode Share Goals

	Drive Alone	Carpool	Public Transit	Bus	Bicycle	Walk	Other
Residential	80.5%	4.8%	9.9%	0.0%	0.7%	3.8%	0.3%
Office	82.0%	8.5%	6.2%	0.6%	0.1%	2.0%	0.6%

2010 American Community Survey (ACS) – Mode Share

	Drive Alone	Carpool	Public Transit	Bus	Bicycle	Walk	Other
Residential (Employees Who Live in Needham)	80.5%	4.8%	9.9%	0.0%	0.7%	3.8%	0.3%
Office (Employees Who Work in Needham)	86.5%	8.5%	1.7%	0.6%	0.1%	2.0%	0.6%

Source: Table 2-29, Center 128 Supplemental Draft EIR

Once again, the Proponent has not followed the instructions outlined in the Secretary’s Certificate, which clearly state, “[T]he study should propose an integrated and adaptive multimodal mitigation package that aggressively targets the improvement of traffic operations while minimizing the use of single-occupancy vehicle (SOV) travel by employees, residents, and patrons.” (page 10)

This failure has occurred despite clear instructions in MassDOT’s *Transportation Impact Assessment (TIA) Guidelines* which mention that transportation impact assessments should include mode split assumptions, as well as the proponent’s plan to maximize travel choice, promote non-SOV modes, and achieve the assumed mode shares. Furthermore, *MassDOT’s Mode Shift Initiative* has established a statewide mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking. As currently proposed in the SDEIR, the Proponent’s mode shift goals do not significantly contribute towards *MassDOT’s Mode Shift Initiative*.

MAPC respectfully requests that the Secretary require the Proponent to develop more aggressive mode share goals and to demonstrate how they will be achieved as part of a Second SEIR.

² Comment letter dated August 21, 2014 addressing Expanded Environmental Notification Form.

Shuttle Services

While MAPC is pleased that the Proponent has joined the 128 Business Council and will participate in their shuttle bus service from the Center 128 site to the Newton Highland Green Line Station during peak commuting periods, more can be done to advance shuttle ridership. Currently, TripAdvisor operates a shuttle bus service from their new location within Center 128 West to Cambridge (Kendall and Central Squares) and to the Newton Highland Green Line station. TripAdvisor estimates that 23% of all employees currently use its shuttle bus service as part of their commute. The Proponent does not address the significant opportunity of working with TripAdvisor or Local Motion, the private bus company that provides service for TripAdvisor, to expand this shuttle service to other tenants at Center 128 East and Center 128 West.

In their SEIR comment letter dated May 5, 2015, MassDOT specifically “asked the Proponent to facilitate cooperation between the tenants in providing a seamless connection between the site and existing fixed route transit services. We again stress that the Proponent should work with all tenants to collectively provide multi-modal access, not just a shuttle devoted to a single tenant” (page 4). The Certificate addressing Center 128 SEIR also mentioned that the Proponent should “commit to work with the other tenants in the project to expand the service. Ideally, future tenants would partner with Trip Advisor to jointly operate a shuttle service of comparable or better quality and frequency connecting the site to regional transit” (page 3). Again, the Proponent did not address these issues in the SDEIR, and they should be required to do so.

MAPC previously suggested that the Proponent should consider providing a shuttle service from the Needham Heights Station on the Needham Commuter Rail Line, a station that is only about 1.5 miles from the project site. It should also be noted that the SDEIR makes no mention of providing a shuttle service for the 2nd Avenue Residences component of the project.

Monitoring

MAPC is pleased the Proponent proposes to implement a transportation monitoring program that will include the annual preparation of a technical memorandum that will summarize the monitoring results, including a comparison to the trip generation and mode share estimate for the project. The Secretary should require that monitoring of on-site parking and shuttle ridership be included in the annual reporting, and clarify that the monitoring will last for at least three years³. A scope and schedule of the Proponent’s mitigation responsibilities should be clearly outlined in the Section 61 Findings.

The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring program. We ask the Secretary to require that the Proponent respond to this request by preparing a transportation monitoring program that addresses the details of how the mode share goals will be attained, including steps that will be taken if goals are not met.

³ The MEPA Certificate for the Single EIR (December 31, 2014) requires a 3 year monitoring period.

Transportation Demand Management

MAPC is pleased that the Proponent plans to join the 128 Business Council and work with future building tenants to implement a Transportation Demand Management (TDM) program intended to reduce project-related vehicle trips and minimize potential impacts to the transportation system. The Proponent has outlined a TDM program which includes the following:

- Partnering with Zagster (a bicycle share company) to provide six bicycles on-site which would be available to all tenants.
- Installing approximately 287 spaces for bicycle parking, including interior and exterior bicycle storage.
- Constructing sidewalks within the vicinity of the site and along the interior roadways with a system of walkways connecting buildings and parking areas.
- Incorporating traffic calming measures such as pedestrian tables and marked crosswalks into the design of the site's driveway system.

In addition to the above-mentioned components, the Proponent should also include provisions for Zipcar parking and subsidized mass transit passes for employees as part of its TDM program.

2nd Avenue Residences

The existing and occupied apartment building, Charles River Landing, sited directly across from the proposed 2nd Avenue Residences, has done an exemplary job of connecting residents to the Charles River. The Proponent would do well, and possibly find it cost effective, to utilize the existing pathways and also use signage to direct recreational walkers to the river paths.