



SMART GROWTH AND REGIONAL COLLABORATION

April 21, 2017

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Purvi Patel, MEPA #15441  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Lynn Gear Works Redevelopment Project, MEPA #15441

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.

The Lynn Gear Works Redevelopment (the Project) is an approximately 1.5 million square-foot transit-oriented development (TOD) located adjacent to the River Works MBTA commuter rail station and directly west of the Lynnway (Route 1A). The Project proposes approximately 1,260 residential units and 2,080 parking spaces to be built in five phases, with the final phase slated for completion in 2022. Lynnway Associates, LLC (the Proponent) anticipates the project will generate 5,842 new vehicle trips on an average weekday and 6,082 new vehicle trips on an average Saturday. All vehicular traffic will enter and exit from the Lynnway (Route 1A).

While MAPC is pleased that this Project will revitalize a significant waterfront parcel, invest in a Gateway Community, and redevelop a 65.5-acre brownfield site, we still have serious concerns regarding the number of proposed parking spaces and the absence of an affordable housing program.

## Parking Spaces

### *Number of Parking Spaces*

The Proponent proposes adding 2,080 parking spaces, an estimated parking ratio of 1.5 parking spaces per dwelling unit. While MAPC recognizes that the Proponent has committed to reassessing parking with the completion of each project phase and charging a parking fee for residents with more than one vehicle, it is our view that the amount of parking spaces should be significantly reduced.

We agree with MassDOT's DEIR comment letter<sup>1</sup>, which states that the agency "still finds the parking supply excessive for a transit oriented development and given that the supply is more than 10 percent higher than what is required by the City of Lynn or from calculations from the ITE Trip Generation Manual. A rate of 1.5 parking spaces per dwelling unit could undermine efforts to encourage alternative methods of transportation." MassDOT's comment letter requested that the FEIR provide more detailed information in the construction phasing and identify specific reduction targets. Subsequently, the DEIR Certificate<sup>2</sup> asked the Proponent to explore reducing parking ratios for residential buildings and to "provide more detailed information on parking supply associated with each construction phase and estimate the amount of parking that could potentially be avoided (p. 7)." While the number of parking spaces has been reduced by a scant 50 since the DEIR, the Proponent has not addressed the Secretary's requests to provide parking information associated with each construction phase and to identify specific reduction targets (e.g., based on public transportation usage, parking utilization, and vehicle ownership).

It is important to underscore that the City of Lynn recently revised their Zoning Ordinance to establish Waterfront Zoning Districts, which allow a reduced parking ratio of 1.0 spaces per unit for projects with more than 300 residential units. Applying this ratio to this Project results in a minimum requirement of 1,260 parking spaces.

Reducing the amount of parking is also consistent with MBTA's *Draft TOD Guidelines and Policies*<sup>3</sup> which "supports reduced parking ratios for TOD, particularly within the station area core" (p. 27). Specifically, the MBTA guidelines identify ranges between 0.5 and 1.0 spaces per residential unit. It should also be noted that the MBTA "encourage[s] shared parking among TOD uses, and between park-and-ride and TOD uses where feasible (p. 27)." The FEIR does not identify any shared parking.

MAPC's recently released *Perfect-Fit Parking Initiative: Phase 1 Report*<sup>4</sup>, studied 80 multifamily developments in 5 urbanized communities north of Boston, and found that 26% of spaces are vacant at night. Our conclusion is that parking at multifamily developments is routinely overbuilt, and that extra parking tends to generate more cars and increased traffic. We therefore routinely suggest that efforts be made to minimize parking at new multifamily developments.

In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that you require the Proponent to develop a stronger program to reduce the proposed number of parking spaces to the fullest possible extent. A reduced parking supply will reinforce the success of this Project as a TOD. The developer has discounted both the Secretary's Certificate and MassDOT's comments. It is MAPC's position that this project should not adequately and properly comply with MEPA until the issue of excess parking has been adequately resolved.

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<sup>1</sup> Dated November 23, 2016.

<sup>2</sup> Dated November 30, 2016.

<sup>3</sup> Draft revised June 22, 2016.

<sup>4</sup> <http://perfectfitparking.mapc.org/>

### *Renovation of River Works Commuter Rail Station*

The Proponent and the MBTA have developed a Memorandum of Understanding (MOU) for renovation of the River Works commuter rail station. The estimated cost of these improvements is \$9.4 million. While the FEIR indicates that “space for a drop-off area with a limited number of parking spaces will be set aside to allow for the future conversion of the stop from private to public (p. 2-23),” the exact number of parking spaces has not been identified. The FEIR has not indicated what criteria or thresholds will be applied to determine what will cause the River Works commuter rail station stop to change from a private to a full public access stop. The Proponent should be required to provide commuter rail parking information as well as criteria/thresholds to determine the conversion of the River Works commuter rail station stop from private to public.

### Absence of an Affordable Housing Program

MAPC applauds the Proponent for advancing a TOD that includes a substantial commitment to expanding the housing supply in Lynn, and thereby, in the region. Specifically, the Proponent proposes constructing a total of 1,260 residential units. Of these units, 40% (504 units) will be studio/one-bedroom and 60% (756 units) will be two-bedroom. Even though Lynn does meet the 10% target for subsidized units under MGL Ch. 40B, we remain concerned that the Project lacks an affordable housing component. This is an environmental as well as a housing issue, because there is strong evidence that lower-income households own fewer cars, use less parking, and generate less traffic. According to the study, *Maintaining Diversity in America’s Transit Rich Neighborhoods*<sup>5</sup>, “people of color, low-income households and renters are all more likely to use transit than the average American (p. 2).”

In 2016, the Lynn Housing Authority and Neighborhood Development (LHAND) commissioned RKG Associates to produce a study on the state of housing in Lynn. The *Lynn Housing Study* recommends that the City “[a]dopt an inclusionary housing policy that requires developers of new (or redeveloped) market-rate housing to include a mix of affordable units in their developments. This would create some opportunities to ‘de-concentrate’ low-income neighborhoods without subsidies from LHAND and also help the City’s lowest-income residents benefit directly from new housing investment in their community (p. 77).” As a result, it is MAPC’s perspective that the Proponent should incorporate an affordable housing component into this Project, and should indicate the number, bedroom distribution, and income qualifications of these units.

In summary, the intent of MAPC’s recommendations – including the affordable housing recommendations – is to encourage a greater shift of auto trips to transit, bicycling, and walking, which will minimize adverse impacts and help to keep the Commonwealth on track to meet its statutory and regulatory goals. MAPC respectfully requests that the Secretary incorporate these recommendations into the Certificate for the project’s FEIR.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen  
Executive Director

cc: James Marsh, City of Lynn  
David Mohler, MassDOT

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<sup>5</sup> Dukakis Center for Urban and Regional Policy, October 2010.