



SMART GROWTH AND REGIONAL COLLABORATION

February 19, 2016

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Anne Canaday, MEPA #15472  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Park Central, MEPA #15472

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 other impacts on the environment.

The Park Central project site is located on an approximately 101-acre parcel immediately northeast of the I-495/Route 9 Interchange in Southborough. The site is bordered by residential development to the north (Lovers Lane) and east (Blackthorn Road, Tara Road, and Flagg Road), commercial development along Route 9 to the south (Park Central Drive), and I-495 to the west.

Capital Group Properties, LLC (the Proponent) proposes a mixed-use project that will comprise 180 rental units (half the units will be 1-bedroom and half 2-bedroom) permitted under MGL Ch. 40B, and 140 single and duplex townhome condominium units (half the units will be 2-bedroom and half 3-bedroom). Approximately 10 acres are reserved for a future phase envisioned to include a 125 room hotel and a 150-unit (225 bedroom) assisted living facility.

A significant aspect of this development is that it will help to meet the Town's and region's burgeoning housing needs, especially through the creation of rental housing, which will include an affordable component. While this project addresses housing needs, we also recognize that it represents a significant increase to the Town's existing housing stock<sup>1</sup>. This underscores the need for transportation impacts to be thoroughly mitigated.

The project proposes a total of 936 parking spaces (676 for the current phase and 260 for the future phase). At full build, Park Central will generate approximately 3,322 new vehicle trips per day. The weekday morning and evening peak hour traffic generation is estimated at 182 and 122 new vehicle trips respectively.

The site is currently undeveloped and mostly wooded with some open areas. Of the 101 acres, 21.4 acres will be preserved open space. A new roadway is also proposed to serve the project from Flagg Road through the project site. This site has been identified as a Priority Development Area (PDA) locally as part of the 495/MetroWest Development Compact planning process, but it was not chosen as a regional priority by MAPC or as a state priority by the Executive Office of Housing & Economic Development.

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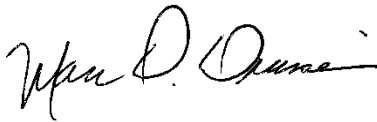
<sup>1</sup> According to Southborough's 2015 Housing Production Plan, there are 3,473 existing housing units. Park Central proposes a total of 320 housing units (not including assisted living), a 9.2 percent increase from the Town's existing housing stock.

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. Despite the positive aspect of housing production, a largely auto-dependent development on a large “greenfield” site will make it more difficult to attain these goals, and is very difficult to reconcile with smart growth principles.

MAPC has reviewed the Expanded Environmental Notification Form (EENF) and our recommendations primarily address providing shuttle and bus access as part of the mitigation commitments, reducing the number of parking spaces, and developing mode share goals. Our intent is to encourage a greater shift of auto trips to transit, bicycling, and walking, which will reduce the adverse impacts of this project. MAPC respectfully requests that the Secretary incorporate these recommendations into the Certificate defining the scope of the project’s EIR (Environmental Impact Report) submission to MEPA.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Marc D. Draisen  
Executive Director

cc: Don Morris, Southborough Planning Board Chair  
David Mohler, MassDOT

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### **Public Transit Access**

Several key intersections are projected to deteriorate even with the Proponent's proposed mitigation program. These intersections include:

- Route 9/Flagg Road - Flagg Road Southbound Right Turn
- Route 9/Park Central Drive - Park Central Drive Southbound Right Turn
- Route 9/Crystal Pond Road – Overall Intersection
- Main Street (Route 30)/Deerfoot Road - Deerfoot Road northbound left turn/right turn

In an effort to reduce vehicular trips further, MAPC strongly urges the Proponent to provide a shuttle service and collaborate with the MWRA (MetroWest Regional Transportation Authority) to provide bus service, as described below.

#### Shuttle Service to MBTA Commuter Rail

MAPC recommends that the Proponent provide a shuttle service for all residents, not just for assisted living residents as currently proposed. At a minimum, the shuttle service should provide access to and from Southborough Station, which is the nearest MBTA Commuter Rail Station for the Framingham/Worcester rail line. The Framingham/Worcester rail line provides access to connections between Boston and Worcester.

#### MWRTA Bus Service

The Proponent should also collaborate with the MWRTA to provide bus access to and from the project, specifically extending Bus Route 7. The closest Bus Route 7 stop to the project site is downtown Southborough, approximately 2.5 from the proposed project site. Bus Route 7 provides access to Framingham, Ashland, Southborough, and Marlborough. If MWRTA deems that extending service is feasible, MAPC strongly recommends that the Proponent cover the operating costs of extending this service as part of its mitigation program.

### **Pedestrian and Bicycle Access**

#### Sidewalks

To encourage walking and improve accessibility on-site, the EENF states that the proponent is committed to providing a network of sidewalks throughout the site, including a connection to Flagg Road. The Proponent should clarify whether sidewalks will be provided on Flagg Road. In addition, sidewalks need to be provided on both sides of John Boland Road, not just the west side as the EENF indicates.

Although the Proponent has stated that the project's internal roadways will include sidewalks and shoulders for safe pedestrian and bicycle travel, they need to be clearly depicted in a site plan. Roadway, sidewalk, and shoulder widths all need to be shown.

#### Bicycle Racks

While MAPC is pleased that the Proponent mentions bicycle racks will be provided in close proximity to entranceways to allow residents to utilize bicycles for recreation and travel, the EIR (Environmental Impact Report) should clearly indicate the location and number of bicycle racks.

### **Parking Supply**

MAPC strongly encourages the Proponent to investigate measures to reduce the overall number of parking spaces to deter Single Occupancy Vehicle (SOV) trips. As there is a critical relationship between parking

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supply and transportation behavior, reducing the amount of parking can contribute to an overall decrease in vehicular traffic and trips related to this project.

The consequences of overbuilding parking include increased housing costs that can get passed along to homeowners and renters, storm-water infiltration issues caused by the increased impervious surface, and less space for housing units on the site because of the parking requirements. Parking reserves, unbundling, and shared parking can facilitate the reduction of overall parking supply at this location.

### Parking Reserves

Consider banking some of the parking spaces until and unless they are determined to be necessary based on monitoring. A parking reserve would require reducing the number of parking spaces initially built, but land would be held in reserve to provide additional parking spaces if – and only if – they are needed in the future. As long as the additional parking is not needed, the land can be landscaped or used for other amenities such as playgrounds or parks. It should be noted that a “temporary reduction in the number of paved parking spaces”<sup>1</sup> is permitted in Southborough’s zoning. One area to consider banking parking spaces is the courtyard area of the apartment complex.

### Unbundling

The next MEPA filing should consider unbundling parking from space rent or sales price. Unbundling parking allows renters or owners to purchase only as much parking as they need. It would give residents the opportunity to save money by using fewer parking spaces, and this reduced demand would also enable the developer to save money on parking construction. By changing parking from a required purchase to an optional amenity, vehicle ownership and parking demand can be reduced.

### Shared Parking

The Proponent mentions that there will be shared parking between the hotel and the assisted living facility. This needs to be quantitatively described in the EIR.

In addition to applying these strategies, the Proponent should be required to accommodate car-share vehicles for use by residents as demand warrants. This TDM (Transportation Demand Management) measure can further reduce trip demand, which, in turn, is a rationale for reducing parking.

## **Mitigation**

### Transportation Demand Management (TDM) Program

MAPC applauds the Proponent for proposing a good TDM program that includes:

- Appointing a Transportation Coordinator on-site to oversee and implement the TDM program;
- Encouraging tenants to register employees and residents with NuRIDE to encourage ride-sharing and “green” trips;
- Providing sidewalks throughout the development;
- Providing bicycle racks throughout the site;
- Providing electric vehicle charging stations;
- Utilizing the MassRIDES program; and
- Subsidizing transit passes for commuter rail and bus service.

### Route 9 Improvements

The EENF states that the Proponent will make traffic and safety improvements on Route 9 but does not specify what these improvements are (pp. 1-4). The Proponent needs to clarify what specific traffic and safety improvements on Route 9 are proposed in the EIR.

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<sup>1</sup> § 174-12(E)(14) Parking and loading regulations.

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### **Monitoring Program**

#### Mode Share Goals

Although the Proponent states that appropriate goals for transit mode share, walking, biking, use of rideshare and carpool programs, and other TDM programs will be established (p. 2-29), nothing is specified. The Proponent should clearly define these mode share goals in the next MEPA filing and commit to conducting regular monitoring and reporting of transportation mode shares and adjust the project's TDM program as necessary. Developing and monitoring mode share goals is a central component of a Traffic Impact Assessment (TIA). The *EOEEA/MassDOT Guidelines for TIAs* states: "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)

*MassDOT's TIA Guidelines* mention that TIAs 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 TDM program should include specific, defined mode share goals that target the highest attainable rates of transit, bicycle, and pedestrian use. Data and analysis of existing modes (including public transportation, walking, and bicycling) should be employed to identify proposed physical improvements and supporting programs to increase these modes.

We ask the Secretary to require that the Proponent work closely with the Town of Southborough and MassDOT to define clearly the project's intended mode split, to deploy specific practices intended to achieve that goal, and to develop a comprehensive monitoring program for all modes.

#### Monitoring Program

MAPC applauds the Proponent for committing to a monitoring program that will compare turning movement counts to those projected within the EENF to determine whether the total number of vehicles entering each intersection exceeds the volumes projected. Specifically, the Proponent will monitor the traffic operations at the intersections of Route 9/Park Central Drive, Route 9/Flagg Road, and Route 9/Crystal Pond Road as well as the adequacy of the parking supply. The Proponent will also prepare a memorandum summarizing the results of the turning movement counts, automatic traffic recorders, and observations of signal operations to MassDOT and the Town of Southborough.

In addition, we believe the Proponent should period of at least five years, as outlined in *MassDOT's TIA Guidelines*, not three as the EENF indicates. It is important to note that a monitoring program can help to determine if the defined mode share goals are being achieved. A monitoring program should evaluate the assumptions originally made in the transportation analysis and 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.

### **Housing Building Program**

Since the income status and bedroom distribution of housing units can affect overall levels of car ownership and traffic generation, we would like the Proponent to indicate the number of affordable units in each portion of the development (rental, ownership, and assisted living), and the bedroom distribution of the affordable and market units. The term affordable should also be defined to indicate the maximum percentage of Area Median Income applicable to those units.

### **Open Space Access**

The EENF states that additional programmed open space will include walking trails. The EIR should clearly indicate the trails' connections to both the Project site and surrounding area.

### **Site Plan**

The site plan in the EIR should be clearly shown on one page and include Route 9 and I-495.