



SMART GROWTH AND REGIONAL COLLABORATION

December 13, 2016

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strysky, MEPA #15614
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: North Quincy Station Redevelopment Project, MEPA #15614

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 North Quincy Station Redevelopment Project (the Project) proposes to construct a mixed-use development consisting of approximately 615 residential units, approximately 50,000 square feet of retail space, and 1,700 parking spaces adjacent to North Quincy Station. North Quincy Partners LLC (the Proponent) proposes that of the 1,700 parking spaces, 871 will be replacement spaces for the MBTA. The remaining 829 spaces will be allocated to the Project. This Project is anticipated to generate is 6,188 daily vehicle trips. These trips are in addition to the 4,000 existing trips at the Project site.

MAPC applauds the Proponent for advancing a mixed-use Transit Oriented Development that includes a substantial commitment to expanding the housing supply in Quincy, and thereby, in the region. However, preliminary review of the recently adopted zoning for the North Quincy "transit-oriented district" shows that the amount of parking spaces could be reduced. Reducing the amount of parking is also consistent with *MBTA's Draft TOD Guidelines and Policies*¹ which "supports reduced parking ratios for TOD, particularly within the station area core" (p. 27). Specifically, the MBTA guidelines specify ranges between 0.5 and 1.0 spaces per residential unit, and 1.0 to 2.0 spaces per 1,000 square feet of retail. 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).

¹ Draft revised June 22, 2016.

The *Perfect-Fit Parking Initiative: Phase 1 Report* now being completed by MAPC, and expected to be released by early January, has studied 80 multifamily developments in 5 urbanized communities north of Boston, demonstrating 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.

On another matter, we expect the Environmental Impact Report (EIR) will indicate the number of affordable housing units, the level of affordability, and the bedroom distribution of both affordable and market-rate units. 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*², "people of color, low-income households and renters are all more likely to use transit than the average American" (p. 2).

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 clearly indicate the proposed number of parking spaces for each project element. In addition to implementing a shared parking program, the number of parking spaces should be reduced to the fullest possible extent. A reduced parking supply will reinforce the success of this Project as a Transit Oriented Development.

The intent of these 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 defining the scope of the project's EIR.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: James J. Fatseas, City of Quincy
David Mohler, MassDOT

² Prepared by the Dukakis Center for Urban and Regional Policy; Stephanie Pollack, Barry Bluestone, Chase Billingham; October 2010.
<http://www.northeastern.edu/dukakiscenter/transportation/transit-oriented-development/maintaining-diversity-in-americas-transit-rich-neighborhoods>