



SMART GROWTH AND REGIONAL COLLABORATION

August 30, 2016

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Erin Flaherty, MEPA #9131
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: South Station Air Rights, MEPA #9131

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 South Station Air Rights project proposes to develop an approximate 8.3 acre site bounded generally by Atlantic Avenue to the west and the United States Postal Service to the east in Boston. Specifically, South Station Phase I Owner LLC (the Proponent) originally proposed to construct a mixed-use development comprising three phases:

Phase 1 - 920,000 square foot (SF) tower with two options: 1) office-only building or 2) 620,000 SF of office space and 300,000 SF of residential space

Phase 2 - 390,000 SF building with a 200-room hotel and 170,000 SF of residential space

Phase 3 - 455,000 SF office building

In addition, the South Station Bus Terminal was to be expanded by approximately 106,000 SF, increasing bus gate capacity by an estimated 50%. New connections among the different travel modes served by South Station would also be provided.

This project, if it proceeds, will provide more convenient passenger connections between the bus station and the commuter rail, Amtrak, and subway lines and will place a high density of jobs and housing at a multi-modal transportation terminal. Additionally, the expansion of the bus station and improved pedestrian connections would provide significant public benefits for the region.

The Notice of Project Change (NPC) proposes two key project changes to the previously proposed project described above: 1) it would modify the use of Phase 2 to include all-residential or all-hotel as *alternatives*, rather than the mixed-use hotel and residential program developed together; and 2) it would add 140 parking spaces to the project, although it should be noted that the NPC does not specify at which Phase (or Phases) the 140 spaces will be added. Modifications to the proposed land use will add approximately 110,000 square feet of new office, residential, or hotel space to both Phases 1 and 2, increasing the total size of this project to approximately 2.52 million square feet¹. The estimated number of daily vehicle trips for the entire project will be 3,072². The addition of the 140 parking spaces will increase the total amount of parking spaces to 1,043. Of these spaces, 895 will serve the project and 188 spaces will be reserved for MBTA use.

¹ The 2.52 million square feet includes the three phases, the parking garage expansion, and a more refined approach to calculating gross floor area consistent with Article 2A of the Zoning Code.

² Adjusted vehicle trips. The estimated number of unadjusted daily vehicle trips is 12,284.

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.

As a high density Transit Oriented Development (TOD), the South Station Air Rights project has the potential to advance these transportation and greenhouse gas goals. However, as currently proposed, the increased number of parking spaces and overall parking program is likely to make all of these goals more difficult to achieve.

MAPC has reviewed the NPC and our recommendations address the need to reduce the number of proposed parking spaces and develop a shared parking program, as well as our preference for mixed-use development that expands the housing supply.

On the matter of parking, the intent of our recommendations is to encourage a greater shift of single occupant vehicle (SOV) auto trips to shared auto trips, transit, bicycling, or walking. The ability to access the site via transit is what makes a project of this size viable at a dense urban location, not the high level of parking.

It is important to emphasize that the Secretary's Certificate for the Final Environmental Impact Report (FEIR)³ "strongly encourages the proponent to further reduce its parking supply" and states that the parking "does not account for the project's location over a major transit hub or the ability to provide shared use spaces because of the mixed use nature of this development (p 5)." By increasing rather than decreasing the number of parking spaces, the Proponent has plainly discounted the FEIR Certificate.

It is critical to point out that The Boston Garden (80 Causeway Street), a proposed mixed-use project adjacent to North Station and of comparable scale to the South Station Air Rights project, is calling for the construction of a 1.87 million square foot development with 800 parking spaces⁴. Of the 800 parking spaces, 450 will be allocated for public parking and 350 will serve the new development. Clearly, the parking program for The Boston Garden project has been designed to allow the flexibility to provide shared parking among different uses, as well as to accommodate public parking for access to the TD Garden, other destinations in the City of Boston, and the regional transportation system.

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 reduce the number of parking spaces and implement a shared parking program, comparable to what is proposed for The Boston Garden project, as part of the forthcoming Section 61 Findings and permitting process. A reduced parking supply will encourage and reinforce the use of the many available alternative modes of transportation to and from South Station, including MBTA Commuter Rail, subway and bus service, as well as walking and bicycling.

³ Dated April 14, 2006.

⁴ The Boston Garden is a proposed 1,870,000 SF development with 497 residential units, 306 hotel rooms, 668,000 SF of office space, 142,000 SF of flex office, 235,000 SF of retail/restaurant, and a 40,000 SF expansion of the TD Garden - Expanded Notification Form dated September 6, 2013.

In regard to the change of use in Phase 2, we generally feel that mixed-use development is most beneficial for high-growth, transit-oriented urban environments. We need additional hotel rooms in Boston, and we desperately need to expand the supply of housing, especially rental units that are affordable to low and moderate-income households. The original proposal included both hotel and residential uses, but the NPC indicates they will be alternatives. This raises a concern that the residential component could be eliminated or reduced, or that the hotel space could be cancelled. Our concern is compounded by the fact that residential is already only an alternative in Phase 1, generating the possibility that no housing will be created in the entire project across all three phases. We recommend that the mixed-use character of the original project be maintained and that the project continue to include a substantial commitment to expanding the housing supply in Boston, and thereby, in the region.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: John Barros, Chief of Economic Development, MAPC Representative
Andrew Grace, MAPC Alternate Representative
Brian Golden, BRA
Gina Fiandaca, BTM
David Mohler, MassDOT