



SMART GROWTH AND REGIONAL COLLABORATION

May 22, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office - Purvi Patel, MEPA # 15269
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Woburn Landing, MEPA #15269

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.

Madison Woburn Holdings, LLC (the Proponent) proposes to develop an approximately 11.9-acre vacant parcel located at 369 Washington Street in Woburn. The proposed mixed-use project will consist of a limited service/extended stay 250-room hotel and three restaurants. Of the three restaurants, two will be full service with seating for 233 and 329 patrons. The third restaurant will be a 158-seat fast food facility with a drive-through window. The project site will comprise a total of 176,772 gross square feet in four separate buildings. The Project's program and general site layout are unchanged from what was presented in the Draft Environmental Impact Report (DEIR).

The project will generate an estimated 4,124 vehicle trips on an average weekday. The number of daily trips on a Saturday is projected to be higher at 5,178 vehicle trips. Primary access to the site will be provided via Tower Park Drive on the north side of the site from either Washington Street or the I-95 northbound ramps. A total of 536 parking spaces are proposed. The site, formerly owned by W.R. Grace and part of an EPA Superfund site, has been identified a local Priority Development Area (PDA) as part of MAPC's *North Suburban Planning Council Priority Mapping Project*, but it has not been identified as a PDA of either regional or statewide significance.

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. Although the proposed Transportation Demand Management (TDM) program includes joining the 128 Business Council Transportation Management Association (TMA), assigning an on-site Transportation Coordinator to oversee TDM policies, providing on-site electric vehicle charging stations, and promoting ridesharing through MassRIDES' NuRide program, the Proponent has not addressed two central recommendations which MAPC raised in prior comment letters; the provision of a hotel shuttle and a commitment to develop mode share goals. The intent of both 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 the final Certificate in order to minimize the adverse impacts of this project and help to keep the Commonwealth on track in meeting its regulatory and statutory goals. We provide more details on each of these issues below.

Mode Share Goals

In its March 16, 2015 DEIR comment letter, MAPC asked the Proponent to further develop mode share goals as part of a mitigation program, along with appropriate monitoring. Subsequently, the MEPA Certificate asked the Proponent to provide a detailed response to this comment. While the Proponent does mention its commitment to an annual transportation monitoring program over a five year period, there is no mention of their responsibility to address mode share goals. Transportation monitoring would be far more useful if performance can be compared with specific numerical mode share goals.

MAPC respectfully requests that, prior to the issuance of a Certificate, the Proponent commit to developing mode share goals. As previously mentioned in our DEIR comment letter, developing mode share goals is a central component delineated in the EOE/MassDOT Guidelines for Traffic Impact Assessments. MAPC also reminds the Proponent that the transportation monitoring program should include all modes of transportation (shuttle, bus, rail, bicycling, and walking), not just vehicles.

Hotel Shuttle

The Proponent indicates in the FEIR that they will “encourage” the hotel operator to provide shuttle service to and from local transit hubs. The hotel operator should be required, not encouraged, as part of its lease with the Proponent to provide a shuttle that will, at a minimum, provide access to and from Anderson Regional Transportation Center (RTC). The Lowell Commuter Rail, which provides a direct connection between downtown Boston and the City of Lowell, stops at this station.

Since the Proponent has already consulted with the MBTA and learned that the agency currently has no plans to extend bus service directly to the site, the importance of providing a shuttle is even more paramount. A hotel shuttle has the potential to reduce Single Occupancy Vehicle (SOV) trips. The Department of Environmental Protection made a similar comment in its March 13, 2015 DEIR comment letter; “Unless there is a convenient shuttle service to and from the site, the use of transit by employees and patrons of the business will not have a significant effect on vehicular use of the site. The FEIR should identify the pathway needed to establish a successful shuttle, including the proponent’s commitments and essential commitments needed from tenants such as transit subsidies.”

It should be noted that several proximate hotels currently provide free on-call shuttle service to Anderson RTC. These hotels include, but are not limited to, Residence Inn by Marriott Woburn (300 Presidential Way), Hilton Boston/Woburn (2 Forbes Road), and Courtyard Boston Woburn/Boston North (700 Unicorn Park Drive).

TDM Strategies

MAPC is pleased that the Proponent has committed to include TDM components such as joining the 128 Business Council and promoting ridesharing through MassRIDES’ NuRide program. However, MAPC asks the Secretary to require further that the Proponent adopt a program to subsidize transit passes for hotel employees, either directly or as a condition of owner or tenant leases. As previously mentioned in our DEIR comment letter, it is not adequate for the Proponent simply to “encourage” this TDM strategy. Furthermore, any such commitments by the Proponent should be binding on any subsequent owner. It should be noted that MassDEP’s DEIR comment letter raises the same issue by asking the proponent to “strengthen the commitments to transportation demand management (TDM) in the FEIR. Recognizing that implementation of the proponent’s commitments to TDM measures will be the responsibility of the tenants, the proponent’s efforts must be more persuasive than a commitment to encourage implementation of TDM.”

MAPC would like to bring to the Secretary’s attention that the Proponent did not respond to the agency’s recommendations of unbundling hotel guest parking from room charges and offering parking cash-out incentives for employees.

Washington Street Bridge

Several comment letters responding to the DEIR expressed concern about the ability of Washington Street Bridge to manage increases in traffic. The Proponent has indicated that MassDOT envisions the Bridge would be reconstructed as part of the I-93/I-95 Interchange Reconstruction Project, though the agency has initiated a stand-alone project for the Bridge anticipating it may be appropriate to complete this work prior to the full interchange reconstruction. Since the submittal of the FEIR, the Boston Metropolitan Planning Organization (MPO) has voted not to allocate funds for the I-93/I-95 Interchange Reconstruction Project. The Secretary should require the Proponent to coordinate with MassDOT to advance necessary work for the Washington Street Bridge independent of the I-93/I-95 Interchange Reconstruction Project.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Tina Cassidy, City of Woburn
David Mohler, MassDOT
John Viola, MassDEP