



SMART GROWTH AND REGIONAL COLLABORATION

November 28, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strycky, MEPA #11085R
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Union Point, MEPA #11085R

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*. Furthermore, the Commonwealth encourages an increased role for bicycling, transit and walking to meet our transportation needs while reducing traffic congestion and vehicle emissions. 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 reviewing this Notice of Project Change (NPC), MAPC's principal concern relates to how this submittal relates to already-pending changes to the project that were described in a previous NPC, which was submitted less than a year ago on February 28, 2017. In the prior NPC, LStar Southfield LLC (the Proponent) proposed an updated development plan for the former South Weymouth Naval Air Station (SWNAS), revising the original 2007 project. That revised plan is a mixed-use redevelopment project comprising 8 million square feet (sf) of commercial space, 3,855 housing units, and between 19,500 and 43,900 parking spaces. The February 2017 NPC forecast 79,900 vehicle trips per day for the revised project, compared to 34,300 for the original 2007 project. The Secretary's Certificate, issued on April 24, 2017 called for the Proponent to prepare a Supplemental Draft Environmental Impact Report (SDEIR) to address the impacts and mitigation of the revised Project. The Proponent has not yet submitted an SDEIR to MEPA.

However, on October 31, 2017, the Proponent filed the present NPC, which is intended to make the development process consistent with the current state legislation governing the redevelopment of the SWNAS site (Chapter 291 of the Act of 2014) as well as current zoning in the towns of Abington, Rockland, and Weymouth. This NPC proposes to eliminate the previous project phasing that linked the development of residential units with the development of commercial space. It also proposes to change the timing for the implementation of transportation-related mitigation measures, so that the timing is linked to project-related trip generation rather than to square footage of land uses constructed. This NPC does not propose changes to the building program.

This NPC outlines proposed changes to the timing of transportation-related mitigation measures that were required for the 2007 development plan, so it is unclear why this NPC was submitted in advance of the pending SDEIR for the revised development plan. It should be noted that the Secretary's Certificate on the February 28, 2017 NPC states that "As part of the SDEIR the Proponent should provide a clear commitment to implement the necessary mitigation measures based upon the proposed project phasing and attendant traffic generation¹." However the "proposed project phasing and attendant traffic generation" will certainly be significantly different for the revised Project in the pending SDEIR, given the significant changes to the development program and attendant increase in vehicle trips.

We are not opposed to the NPC's proposal to remove the linkage between residential and commercial development. However, changes to the phasing and timing of the transportation mitigation program should be done in the context of the new development plan, as the Certificate on the February 28, 2017 NPC requires. Therefore we do not support moving ahead with this NPC's proposed changes to the mitigation program in advance of the pending SDEIR.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: John Lucas, Town of Rockland
Robert Luongo, Town of Weymouth
Pat Ciaramella, Old Colony Planning Council
David Mohler, MassDOT

¹ Page 14.