



SMART GROWTH AND REGIONAL COLLABORATION

April 5, 2019

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Page Czepiga, MEPA #15995
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Allston Yards, MEPA #15995

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.

The Stop & Shop Supermarket Company LLC with New England Development (together, the Proponent) proposes to redevelop the existing retail center located at 60 Everett Street in the Allston neighborhood of Boston. Allston Yards (the Project) lies within the Allston neighborhood just south of the Massachusetts Turnpike and is bounded by the Everett Street bridge to the east, Arthur Street to the west, and the Boston Volvo Village dealership and a mix of other uses that front on North Beacon Street to the south. The Boston Landing redevelopment project lies to the west. The Project is located adjacent to the MBTA Boston Landing commuter rail station.

The Project site currently houses approximately 100,000 square feet (sf) of retail space, including a 65,000 sf foot Stop & Shop constructed with smaller ancillary retailers in a one-story building with a 450-space surface parking lot. The Proponent proposes to redevelop the 10.6-acre Project site with a mixed-use, transit-oriented development comprising approximately:

- 375,000 sf of office space;
- 895 residential units;
- 117,000 sf of retail space, including a 67,000-square foot grocery store; and
- Public open space comprising one acre.

The total building area is approximately 1.26 million sf. At full-build, the Project is expected to generate an estimated 8,170 adjusted trips per day¹ and will include up to 1,400 parking spaces.

The Expanded Environmental Notification Form (EENF) is being filed jointly with the Draft Project Impact Report (DPIR) to continue the Large Project Review process in accordance with Article 80B of the Boston Zoning Code. Given previous study of potential environmental and community impacts, and ongoing public review and agency coordination, the Proponent is requesting that the Secretary allow the filing of a Single EIR (SEIR) in lieu of the two-stage Draft and Final EIR process. The filing of a SEIR will be determined as part of the EENF Certificate.

¹ Unadjusted daily trips are 18,670.

MAPC has reviewed the EENF/DPIR and has concerns that primarily address providing a phased development strategy, reducing the number of proposed parking spaces, and developing a robust Transportation Demand Management (TDM) program. These issues, proposed recommendations, and questions are detailed as an attachment to this letter. MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance and the forthcoming Section 61 Findings.

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: Vineet Gupta, City of Boston, Boston Transportation Department
Tad Read, Boston Planning and Development Agency
Steve Woelfel, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on Allston Yards
Expanded Environmental Notification Form/Draft Project Impact Report, MEPA #15995**

Development Program

Located on four parcels, the proposed Project has been designed to accommodate a variety of phasing scenarios. The Project can be advanced through individual buildings, each of which can be developed together or independently of the others in response to market conditions. The proposed Project is intended to be developed through a long-term, multi-phased approach over several years.

It is important to note that the Boston Planning and Development Authority's (BPDA) Scoping Determination² asked that the DPIR "include a more definitive explanation of the Proposed Project's overall phasing strategy." Specifically, the Scoping Determination requested the Proponent to "provide diagrams to show when the different elements of the project will be delivered and how the parcels will be programmed/managed before they are developed." The EENF/DPIR did not provide this information, despite the BPDA's request. Accordingly, MAPC asks the Secretary to require the Proponent to include this requested information, which must include the total number and allocation of proposed parking spaces by land use type, in the next MEPA submission.

Parking

Parking Ratios

At full-build, the Project will include up to 1,400 parking spaces. An overall residential parking ratio of 0.5 spaces per residential unit and 2.0 spaces per 1,000 sf of office parking is proposed. The Stop & Shop store and retail space for Phase 1 will be constructed with a parking ratio of approximately 2.7-spaces per 1,000 sf of grocery/retail space. The BPDA's Scoping Determination³ stated that "The proponent should use a more aggressive parking ratio than stated for the office space usage for this project. Currently, it is listed as 2.0 spaces per 1,000 square feet, while the district-based goal for Allston/Brighton is 0.5 spaces per 1,000 square feet." MAPC supports the BPDA's Scoping Determination recommendation and respectfully requests the Secretary to require or encourage the Proponent to reduce the number of office parking spaces.

We would like to point out the Project's proximity to public transportation (bus and rail) and the Proponent's own recognition that alternate means of travel, such as taxi and ride-hailing services "should continue to reduce the parking needs for this area (pp 5-55-5-56)." A program that does not overbuild parking encourages and reinforces the use of available alternative modes of transportation to access the Project (bus, commuter rail, walking and bicycling), whereas abundant and inexpensive parking almost always encourages people to access the site by car.

Shared Parking

MAPC was pleased to read that the Proponent mentions there may be opportunities for some parking spaces to be shared between residents and employees. We look forward to reviewing a more comprehensive parking analysis that quantifies how shared parking will be developed in the EENF/DPIR. We note that Table 5-14, Project Parking Demand Estimate, uses an "internal shared" percent of 3.5 percent. MAPC asks the Proponent to outline the basis for this percentage, and how it was determined.

We respectfully ask the Secretary to require the Proponent to outline specific plans and goals for shared parking in their next submission, rather than simply saying that shared parking might be possible. For example, designating parking for residents in the evening and while using the same parking spaces for office use during the day is an effective shared parking opportunity.

Parking Management Strategies

MAPC applauds the Proponent for unbundling the residential parking from the leasing or purchase of an individual unit. This strategy discourages auto use for the residential development by uncoupling the parking from the housing unit lease or sale and charging the tenant a monthly or annual fee to park a vehicle at the site. We encourage the Proponent to consider other strategies that reduce and manage the supply of parking, such as offering parking cash-out incentives for employees.

² Dated August 3, 2018.

³ Dated August 3, 2018.

Structured Parking

Plans for future adaptability of structured parking should be explored for potential productive reuse of the space, should parking demand decrease in the future due to changes in automotive technology or other causes.

Public Transportation

Service Improvements

The Project is located in an area rich with access to public transportation. Eight bus routes - 51, 57/57A, 64, 66, 70/70A, 86, 501, and 503 - all operate within a half mile of the Project site. The Project is located adjacent to the MBTA Boston Landing commuter rail station and approximately a three-quarter mile walking distance from the MBTA Green Line "B" route. The Proponent should partner with the MBTA by contributing to service improvements, particularly for MBTA Route 64⁴, in an amount that is reasonably related to the Project's additional demand. It is important to underscore that this recommendation was also made in the BPDA's Scoping Recommendation⁵.

Transportation Improvements

While the proposed transportation improvements have been designed to accommodate the Project's full build-out, they will all be provided as part of Phase 1. MAPC applauds the Proponent for making a commitment of approximately \$20 million for up-front infrastructure/mitigation commitments that include:

- Street extensions;
- Signal timing modifications;
- Enhanced intersection accommodations for pedestrians, bicycles, and vehicular traffic;
- Extension and expansion of the street grid with widened sidewalks through the Project site and connecting to the existing neighborhood;
- Direct access to the commuter rail station including a drop-off/pick-up area for ride-share, shuttle buses, and taxis; and
- Improved pedestrian and bicycle connections.

The draft Section 61 Findings in the next MEPA submittal need to include a schedule that clearly indicates how these funds will be allocated for each mitigation commitment along with a schedule for implementation. The next MEPA submittal should also address the Proponent's plans for the long-term maintenance and upkeep of the infrastructure/mitigation commitments.

Transportation Demand Management (TDM)

MAPC is pleased that the Proponent has committed to TDM measures that include membership in the "A Better City" Transportation Management Association, providing an on-site transportation coordinator, including car-sharing, providing exterior and enclosed bicycle storage, and including a bike share station, if desired by the City. However, the TDM program needs to be more robust and included in the Section 61 Findings. The TDM components that should be addressed are:

Transit Pass Subsidies

While MAPC recognizes that Stop & Shop will provide a 50-percent subsidy for MBTA transit passes for its employees, the Proponent should commit to promote future employer/resident incentives such as employer/resident subsidized transit passes (e.g., through tenant lease arrangements).

⁴ The Proponent plans to work with the MBTA to reroute the Route 64 bus from Arthur Street to run along Guest Street Extension to Everett Street and North Beacon Street, and designate new bus stops on both sides of Guest Street Extension near the midpoint of the Project site.

⁵ Dated August 3, 2018.

Real-Time Bus Arrival Signs

MAPC encourages the Proponent to install real-time bus arrival signs at the bus stops within a designated walking distance of the Project (e.g., one-quarter or half-mile distance), not just at the new bus stops as currently proposed.

Provide Infrastructure for Electric Vehicle Charging

The Proponent has mentioned that “some portion” of the parking spaces will be “EV ready” (p 4-12). It is important to point out that the City of Boston’s electric vehicle policy requires 5 percent of the parking be equipped with electric vehicle chargers and an additional 10 percent be EV-ready in new construction projects and projects that trigger Article 80. The next MEPA submission should address both the number of electric vehicle chargers and electric-vehicle readiness. As the Proponent may be aware, Massachusetts is party to a multistate Memorandum of Understanding for an action plan facilitating implementation of zero-emission vehicle (ZEV) programs. The goal is to ensure that there are 3.3 million ZEVs on the roads by 2025, which requires adequate infrastructure.

Tenancy Lease Agreements/Tenant Manual

The next MEPA submission should discuss how tenancy lease agreements or a Tenant Manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Public Realm Fund

The EENF/DPIR mentions that a Public Realm Fund will be available to the community to promote wellness, education, as well as public realm and transportation enhancements. The Public Realm Fund is proposed to be funded by each of the four principal buildings as part of the proposed Project and will be available initially for payment over a 10-year period, with payments to commence as buildings come online. MAPC looks forward to hearing more specificity about the Public Realm Fund (e.g., overall funding amounts, how funds will be allocated, and how the Fund will be administered).

Mode Share Goals

While the Proponent has committed to a monitoring program that will include vehicular data collection, there is no discussion of mode share goals. The Proponent should delineate a program that ensures defined mode share goals are accomplished over a specified time frame related to the phases of project development. Mode share goals should result in an increase of public transportation (bus and rail), walking, and bicycling, and a decrease for single-occupancy vehicle (SOV) use.

Developing and monitoring mode share goals is a central component of preparing a Traffic Impact Assessment (TIA), as outlined in the *EOEEA/MassDOT Guidelines for Traffic Impact Assessments*. Specifically, the TIA Guidelines state: “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).” The Proponent needs to define mode share goals clearly (vehicular, commuter rail, bus, bicycling and walking) for residents and employees as part of their commitment to conduct monitoring and reporting, and to adjust the project’s TDM program as necessary.

Monitoring and Reporting

MAPC is pleased that the Proponent will conduct annual post-opening data collection and surveys for five years starting six months after the occupancy of the full development. This will include 24-hour automatic traffic recorder counts at each site driveway and turning movement counts at mitigated intersections and site driveways. Updated transit ridership data also will be provided in conjunction with each count interval if available through the MBTA. Surveys of site employees also will be conducted through coordination with the “A Better City” TMA. This information will be summarized in reports to be submitted to MassDOT on an annual basis so that the results of this monitoring program can be compared to the analysis presented as part of this Project’s MEPA review process.

In addition to the above-mentioned steps, MAPC respectfully requests that the Proponent monitor parking usage. As the Proponent states, the Project will be developed on a phased basis over multiple years. According to the Proponent, “the future phase parking needs can be evaluated and, if necessary, the parking ratios can be adjusted accordingly to match market conditions at that time (p 5-56).” To do this, a parking monitoring program will be necessary.

The scope should require the Proponent to develop a monitoring program for all modes, including parking. The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The Proponent should provide annual updates, publicly sharing the results. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring program.

Affordable Housing

The approximately 895 housing units will be provided in a variety of sizes and price points, including affordable units and home ownership units. At full-build, approximately 110 for-sale units and 785 rental units are projected. In compliance with Boston's Inclusionary Development Policy, the proposed Project will provide 13 percent, or approximately 116 units, as affordable. Phase 1 proposes 176 rental units with 23 units as affordable. We encourage the Proponent to commit to increasing the total number of affordable units through the use of the linkage payments for the commercial space to be built, or by other means. MAPC feels that a higher goal of 15 or 20 percent is more appropriate for a development of this scale. In addition, we would like the Proponent to include information regarding the level of affordability and the bedroom distribution.

These issues are directly related to environmental concerns, since the residents of affordable units own fewer cars and utilize transit more intensively than higher-income residents.