



SMART GROWTH AND REGIONAL COLLABORATION

May 17, 2019

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Purvi Patel, MEPA #15923
100 Cambridge Street, Suite 900
Boston, MA 02114
RE: The Vale, MEPA #15923

Dear Secretary Theoharides:

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.

Montvale Land LLC (the Proponent) proposes to demolish the Kraft Plant and redevelop the Project Site into a master-planned mixed-use development consisting of up to approximately 1.6 million square feet (sf) of office/lab/flex/R&D use, retail use, hotel use, institutional, and residential uses comprised of townhomes, multi-family, and senior housing (collectively, the Project). Specifically, the Project's conceptual master plan program on this 77-acre site will comprise:

- 895,000 sf of residential space (600 units);
- 879,200 sf of Office/Lab/Flex/R&D space;
- 150,000 sf of assisted living/extended care space (105 units);
- 83,200 sf of retail space; and
- 79,200 sf of hotel space (135 keys).

The land is located primarily in the City of Woburn along Interstate 93, with limited undeveloped portions of the land extending into the adjacent Towns of Stoneham and Winchester.

At full-build, the Project is expected to generate an estimated 16,688 adjusted trips per day¹ and will include 3,807 parking spaces.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and has concerns that primarily address traffic impacts and . 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,

Eric Bourassa
Transportation Director

cc: Mayor Scott Galvin, City of Woburn
Dennis J. Sheehan, Town Administrator, Town of Stoneham
Richard C. Howard, Town Manager, Town of Winchester
David Mohler, MassDOT

¹ Unadjusted daily trips are 20,030.

**Metropolitan Area Planning Council (MAPC) comments on The Vale
Draft Environmental Impact Report, MEPA #15923**

Overall Site Design

We encourage the Proponent to work with the City of Woburn to concentrate more of the redevelopment on the area of the parcel that has already experienced development. A smarter growth plan would have a smaller footprint on the site and leave at least some of the currently wooded land as a buffer between the proposed development and the existing residential areas in Winchester. This could also potentially lower impervious surface and make it easier to address storm-water issues.

Traffic and Transportation

The main access to the site will be from Hill Street on Montvale Ave. This is already a signalized intersection, but will need better coordination with traffic signals along Montvale Avenue, including the intersection with Washington Street, to ensure that left hand turns in and out of the site do not cause significant conflicts. Sidewalk widths in this area should be widened and pedestrian crossings improved.

Also, the Proponent should build the expansion of the Tri-community Bikeway along the Aberjona River, in addition to the section that runs across the northern edge of the site. The Proponent shows, but does not guarantee, a proposed bikeway along the western end of the site, which would connect to the Tri Community at the north, and which would end closer to Winchester center to the south. This could eliminate portions of the proposed bikeway that are on roads in Woburn, and could tie into the proposed off-road sections of the bikeway that start near where the river crosses Washington Street and proceeds south. This bikeway should be a required amenity, and one that could mitigate single occupant vehicle traffic destined for Winchester.

Parking

We applaud the shared parking plan and do believe the site could function well with much less parking than is currently required in local zoning. We encourage the Proponent to plan for the future adaptability of structured parking for productive reuse of the space, should parking demand decrease in the future due to changes in automotive technology or other causes.

Public Transportation

The Proponent should fund a shuttle bus connection to MBTA commuter rail stations and work with the MBTA to provide a bus stop and shelter at Hill Street for the 354 express bus to Boston.

Transportation Demand Management (TDM)

TMA Membership

The Proponent should join the Junction Transportation Management Organization (TMO) as a mitigation commitment.

Provide Infrastructure for Electric Vehicle Charging

MAPC is pleased the Proponent has committed to install preferred parking spaces for hybrid and electric vehicles as well as dual electric curb-side universal charging stations and that employees or visitors can receive a free electric charge. However, 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.

MAPC recommends that at least four percent of the parking spaces should be allocated for electric vehicles, unless the City of Woburn requires dedication of a greater number of spaces.

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.

Stormwater Impacts

The Town of Stoneham has stated that their 10-year storm design is 730 cubic feet per second (cfs) utilizing a 6 x 18 foot culvert east of I-93. Replacement culverts should be sized to equal or exceed this at full flow, rather than a peak flow of 600 cfs referenced in the DEIR.

The project should implement a robust maintenance program for the existing stormwater outfalls and any new stormwater management facilities. Inadequate maintenance in the past has resulted in downstream impacts to the Town of Stoneham, and this should be remedied by the project.

The proponent has not yet filed a Wetlands Protection Act Notice of Intent (NOI) with the Woburn Conservation. When that is filed, the downstream towns of Stoneham and Winchester should be notified and afforded an opportunity to review technical reports and model results.

Stormwater Mitigation and Draft Section 61 Findings

The Mitigation and Draft Section 61 Findings section of the DEIR states in several places that Low Impact Development and other mitigation measures will be “investigated,” “explored,” or “considered.”

10.1 Land Alteration:

“the Proponent will continue to **explore strategies** to reduce impervious area and minimize land alteration impacts.

10.4 Stormwater:

Strategies **could** include:

- Roof Runoff from commercial buildings **could** be collected through internal systems routed to subsurface storage systems/rainwater harvesting cisterns to be used for irrigation and/or slowly released to the storm drainage system. This **will be investigated** where feasible and cost effective.
- Rain water harvesting **will be investigated** for irrigation of residential areas.
- Permeable pavement **will be considered** where it may be applicable in nonvehicular areas or parking/storage areas expected to experience less intensive use to promote infiltration and groundwater recharge in areas where soils are suitable.
- Bioretention areas **may be constructed** in landscaped areas and islands within impervious parking areas to promote water quality treatment and groundwater recharge where Project Site conditions and soils are appropriate.

The Section 61 Findings should include a specific list of actions that the Proponent clearly commits to implement in order to properly and adequately mitigate the impacts of the development. While there are some clearly stated commitments to mitigation actions for several other topics in the Draft Section 61 Findings, the stormwater mitigation statements referred to above are little more than aspirational. At

this stage in the project, with the filing of a Draft EIR, the Proponent should have already “investigated,” “explored,” and “considered” which mitigation measures will be incorporated in to the project, and clearly committed to implementing them in the Section 61 Findings, as was done for some of the other subject matter issues.

Further, it is hard to see how the stormwater impacts of the project could have been accurately modeled and quantified without a set of mitigating actions being included in the analysis. If the mitigating actions have the intended benefit, they would have modified the outcome of any stormwater calculations. The stormwater site plan (Figure 5.11) further bears out this concern, as it shows little in the way of the potential Low Impact Development features. The drainage facilities shown include infrastructure such as underground storage facilities, water quality inlets, catch basins, and outlet control structures. While these are critical components of the proposed stormwater system, the lack LID features as part of stormwater management plan, beyond broad statements of goals, leaves this DEIR incomplete, which should be rectified in the Final EIR.

Affordable Housing

Finally, MAPC is pleased the Proponent, consistent with the City of Woburn’s Zoning Ordinance, 15 percent of the total number of residential dwelling units within the Project (excluding senior housing) will be affordable to persons and households of low and moderate income as defined by MGL Chapter 40B, Section 20.

Affordable units are a critical mechanism to reduce the number of cars, vehicle trips, and GHG emissions. According to the study, *Maintaining Diversity in America’s Transit Rich Neighborhoods*⁵, *people of color, low-income households and renters are all more likely to use transit than the average American* (page 2).