



SMART GROWTH AND REGIONAL COLLABORATION

May 28, 2019

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strycky, MEPA #16024
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Riverside Station Redevelopment, MEPA #16024

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.

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.

An Environmental Notification Form (ENF) has been filed with the EOEAA by MD 399 Grove Owner LLC, Ramirez Concord LLC, BH Normandy Riverside LLC, c/o Mark Development LLC (together, the Proponent) propose to redevelop land comprising the surface parking lot associated with the MBTA's Riverside Green Line Station and the site of the existing Hotel Indigo in Newton. The Proponent proposes to redevelop the 14.4-acre Project site with a mixed-use, transit-oriented development comprising approximately:

- 702,202 square feet (sf) of residential space (675 units);
- 611,437 sf of office space;
- 103,852 sf of hotel space (194 rooms);
- 64,655 sf of retail space; and
- Open space comprising over 4 acres.

The building area is approximately 1.5 million sf¹ and will include 10 buildings. The Project site is expected to generate an estimated 14,500 trips per day and 2,922 parking spaces are proposed.

Adjacent to Riverside Station, the Project site is bordered by the MBTA maintenance facility and Charles River greenway to the northwest; the existing Riverside Office Park to the northeast; Grove Street, a golf course, and a small condominium complex to the southeast; and the I-95 Exit 23 interchange to the west. The Project site includes a portion of the existing MBTA facility at 355 Grove Street and the Hotel Indigo site (399 Grove Street).

MAPC has reviewed the Environmental Notification Form (ENF) and has concerns that primarily address reducing the number of proposed parking spaces, developing a robust Transportation Demand Management (TDM) program, developing a program that outlines how the Proponent will monitor the achievement of mode share goals, and a mitigation timeline. These issues, proposed recommendations, and questions are detailed as an attachment to this letter.

In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance.

Thank you for the opportunity to comment on this project.

Sincerely,

Marc D. Draisen
Executive Director

cc: James Freas, City of Newton
David Mohler, MassDOT

¹ Excluding structured parking.

**Metropolitan Area Planning Council (MAPC) comments on
The Riverside Station Redevelopment, ENF, MEPA # 16024**

Equitable Transit Oriented Development

Equitable transit-oriented development (ETOD) is generally defined as a mixed-use residential, office, or retail area situated at or in close proximity to a transit station. What makes a project “transit oriented” as opposed to merely “transit adjacent” are active steps taken by the municipality, the developer, and the transit agency to maximize transit and bicycle/pedestrian uses, and to minimize auto use, and particularly single-occupancy vehicle (SOV) trips. What makes a project “equitable” is an emphasis on ensuring that the site provides benefits to a variety of less advantaged constituencies who can benefit from living or working in a transit oriented location, including low-income households, older adults, youth, people with disabilities, racial or ethnic minorities, and recent immigrants.

In ETOD locations, bicycle and pedestrian uses are encouraged by having amenities such as secure bicycle storage and wide, well-lit and landscaped pedestrian routes. SOV use is discouraged by minimizing the amount of parking spaces and charging aggressive parking fees. Buildings are generally constructed to allow for easy movement between the multiple uses on site. In addition, shared parking strategies are utilized to minimize the number of parking spaces on site. Maximizing the number of affordable units also has positive environmental impacts, because lower-income households own fewer cars, and they may also take fewer auto trips and take shared trips more frequently.

MAPC has long advocated for ETOD, and this site clearly has the potential for a significant ETOD. We look forward to a project design that takes full advantage of its location at a major MBTA transit station.

Transportation Demand Management (TDM) Strategies

To ensure the success of this site as a TOD, it is critical that the Proponent commit to a strong Transportation Demand Management (TDM) program. An aggressive TDM program is necessary to optimize the advantages of a development in close proximity to transit as well as minimize vehicular usage and project-related traffic impacts. TDM items such as shared parking, car-sharing, and connections to other transit lines should be explored and addressed. We strongly encourage the Proponent to consider the following TDM measures:

Parking and Transportation Demand Management (TDM)

The Proponent proposes 2,922 parking spaces for this Project. Specifically, 1,964 spaces will be allocated for the Project’s residents, employees, and visitors and 958 spaces will be set aside for the MBTA commuters. The Proponent should look to reduce the amount of parking proposed for the overall project. Riverside Station is a premiere ETOD site located in close proximity to public transportation (bus and rail), enabling people to live and work car-free, or with limited auto ownership and use. The biggest determinant of whether people will use an automobile is the amount of parking provided at both the origin and destination at the site. Therefore, reducing the amount of parking is the most effective strategy to reduce auto trips.

The Proponent should disclose the allocation of proposed parking spaces to land use type for each Project phase, preferably in a matrix format along with an explanation of the methodology used to determine the total parking proposed. The methodology should include an analysis of the anticipated parking usage based on the different types of parking demand (e.g., residential, employee, hotel guest) and projected parking demand at different times of day and week.

We ask the Secretary to require the Proponent to evaluate the following strategies that reduce and manage the supply of parking and to elaborate on the extent to which they will be applied for this Project. It should not be sufficient for the Proponent to suggest that these issues will be studied or encouraged; rather, the Proponent should lay out detailed plans to implement each recommendation, or to explain why it cannot be accomplished:

Shared Parking

Shared parking strategies should be utilized to decrease the number of parking spaces on-site. We urge the Proponent to take full advantage of the benefits of mixed-use development, including the fact that the various users at the site will have different parking needs throughout the day, thus enabling the Proponent to reduce the number of spaces on site.

**Metropolitan Area Planning Council (MAPC) comments on
The Riverside Station Redevelopment, ENF, MEPA # 16024**

We respectfully ask the Secretary to require the Proponent to submit a comprehensive parking analysis that quantifies how shared parking will be developed for this Project. For example, designating parking for residents in the evening while using the same parking spaces for office use during the day could be an effective shared parking strategy.

Unbundled Parking

MAPC urges the Proponent to “unbundle” parking and housing costs at the site 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. Unbundling parking is an effective strategy that encourages households to own fewer cars and to rely more on walking, bicycling, and transit. In addition, unbundling parking allows allocation of space for other components of a building’s design which would have otherwise been allocated for parking.

Parking Pricing

Since the site is located at a transit station, MAPC recommends an aggressive parking fee structure for all land uses and/or offer a parking cash-out incentive for office employees. Parking pricing is an effective tool that both balances demand and encourages people to travel using more cost-effective modes such as transit, walking, and bicycling. There should be no free parking available at this site for any routine use, with the obvious exception of emergency parking.

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.

Other TDM Strategies

This Project offers significant opportunities for transit users, pedestrians, and bicyclists. Other TDM components that should be addressed include:

Shuttle to Commuter Rail

As the site is located only three-quarters of a mile from the Auburndale Station (Worcester commuter rail line), MAPC recommends that a peak-hour shuttle be provided to offer access between the commuter rail and Riverside Station. Given the mixed-use nature of the Riverside Station site, the shuttle should be functional in both directions. During the morning peak hours, residents of the site would be dropped off at Auburndale Station and office employees would be picked up, and vice-versa during the evening peak hours. This shuttle would provide direct transit access between Riverside and destinations to the west (Worcester, Framingham, Natick, Wellesley) and to the east (downtown Boston, including the Longwood Medical Area, the Back Bay, and South Station). The importance of providing such a shuttle is paramount and has the potential to significantly reduce SOV trips to and from the site.

Provide Infrastructure for Electric Vehicle Charging

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.

Additional TDM strategies include:

- Joining and participating in the 128 Business Council Transportation Management Association (TMA);
- Providing an on-site transportation coordinator;

**Metropolitan Area Planning Council (MAPC) comments on
The Riverside Station Redevelopment, ENF, MEPA # 16024**

- Allocating reserved parking spaces for car sharing services such as ZipCar;
- Subsidizing transit passes for residents and employees;
- Offering ridesharing through NuRide, the Commonwealth's web-based trip planning and ridematching service, which enables participants to earn rewards for taking "green trips";
- Installing internal bicycle parking spaces and outdoor bicycle racks throughout the site;
- Providing preferential carpool and/or vanpool parking;
- Designating appropriate pickup/drop-off locations for taxi and private ride services; and
- Discussing how tenancy lease agreements or a tenant manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Bicycle and Pedestrian Uses

The Proponent has indicated that the Project will be designed to encourage pedestrian and bicycle travel and will provide improved facilities and connectivity to and through the Project site. In order to reduce traffic and parking demands, this Proponent needs to promote pedestrian and bicycle travel to the fullest extent possible. MAPC is pleased the Proponent has indicated incorporating pedestrian and bicycle roadway improvements as well as connecting to trails and recreation spaces such as a new multi-use path from Grove Street to the Charles River Path.

To promote these modes of transportation and further reduce the number of SOV trips to the site, the Proponent should act to address the following:

- Potential conflicts between vehicles and buses;
- Design access to secure bicycle facilities to involve zero, or minimal, conflicts with vehicles and buses; and
- Identify the number and locations of long-term and short-term bicycle parking spaces.

In order to encourage bicycle use, one bicycle space per residential unit is suggested, along with an adequate number of bicycle parking facilities located at the office buildings for employees. Ideally, showers should also be provided for office employees who bike or walk to work.

The Proponent should partner with the City of Newton's dockless bike-sharing system, Lime, to allow bicycles to be available for rent at the Project site. Should the City of Newton decide to invest in a bike-share program that requires investments in permanent stations (e.g., BlueBikes), the Proponent will support the installation of a station at the Project site if deemed necessary.

Public Transportation Mitigation

While the Proponent has mentioned roadway improvements in the ENF, there should be a similar commitment to mitigate the project's impacts on public transportation. The Proponent needs to indicate how they will coordinate with the MBTA, specifically identifying service improvements to the MBTA's Green Line and Bus Route 558. The Proponent should partner with the MBTA by contributing to the cost of service improvements in an amount that is reasonably related to the Project's additional demand on transit services.

There are three such precedents for developers committing to public transit improvements through the MEPA process. The proponents for Encore Boston Harbor and XMBLY have committed to improve Orange Line service. The third precedent is in Kendall Square, where Boston Properties, the City of Cambridge, the Cambridge

**Metropolitan Area Planning Council (MAPC) comments on
The Riverside Station Redevelopment, ENF, MEPA # 16024**

Redevelopment Authority, the MBTA, and MassDOT signed a Memorandum of Understanding, under which Boston Properties will contribute a transit improvement fee to support MBTA service improvements.

Roadway Design

The Proponent has proposed significant access, interchange enhancements, and off-site improvements in the immediate area of the site, such as a new direct connection to Route 128/I-95 and a pick-up/drop-off loop for commuters using the Riverside MBTA Station. MAPC looks forward to reviewing these design changes in more detail, as well as an assessment of vehicular impacts to Grove Street and other area roadways.

Open Space

The Proponent indicates the Project will create new public open space. Open space encourages bicycling/pedestrian activity and creates a sense of place for users and residents. MAPC urges the Proponent to create easily accessible open space opportunities for residents, office tenants, hotel patrons, and transit users, in accordance with the City of Newton's Open Space and Recreation Plan (2014-2020).

It is critical that the Project be designed to be inviting and to encourage public access to the fullest extent possible. For example, this can be done through enhancing wayfinding signage and lighting to encourage access.

Mode Share Goals, Monitoring and Reporting

Mode Share Goals

The Proponent should delineate a program that ensures clearly defined mode share goals are accomplished over a specified time frame related to the phases of project development. Along with specific steps to achieve these goals, the Proponent should provide annual updates, and publicly share the results. Mode share goals should specify a numerical target for increased use of public transportation, walking, and bicycling, and a decrease for SOV use.

Developing and monitoring mode share goals is a central component as outlined in the EOEEA/MassDOT Guidelines for Traffic Impact Assessments (TIAs). 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 specifically, with numerical targets for automobiles (SOV and shared), bicycle, pedestrian, Green Line, and bus as part of their commitment to conduct monitoring and reporting, and to adjust the project's TDM program as necessary.

Monitoring and Reporting

The Proponent should specifically delineate their monitoring and reporting program and commit to it in the Section 61 findings. Trip generation, parking usage, and Level of Service (LOS) must all be monitored on a continuous basis. It is imperative that the Proponent outline an extensive and thorough transportation monitoring and reporting program. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes.

The monitoring program needs to include details of how mode share goals will be attained, as well as steps that will be taken if goals are not met. The Proponent must also commit to conducting regular monitoring and reporting of transportation mode shares and adjust the Project's alternative transportation services and TDM programs as necessary. MAPC recommends that the monitoring program take place annually and for at least five years after full occupancy. The monitoring and reporting program should include annual data collection of traffic counts, parking, public transportation, bicycling, and walking.

Mitigation and Draft Section 61 Findings

As part of the Section 61 Findings, the DEIR should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The mitigation implementation schedule should clearly note how mitigation will be provided in relation to project phasing. For example, the Proponent should tie commitments to either completion of project elements by square footage or generation of a specific number of traffic trips based upon project build out.

**Metropolitan Area Planning Council (MAPC) comments on
The Riverside Station Redevelopment, ENF, MEPA # 16024**

Affordable Housing

When complete, the Project will have a total of 675 residential units. The Proponent needs to specify what number of these units will be affordable, and to what income groups. It is important to note that affordable units may also have an impact on traffic, because the owners or renters of affordable units may own fewer vehicles, generate fewer vehicular trips, and depend more frequently on transit, walking, or biking. According to the study, *Maintaining Diversity in America's Transit Rich Neighborhoods*², "people of color, low-income households and renters are all more likely to use transit than the average American" (page 2).

² <https://www.northeastern.edu/cssresearch/dukakiscenter/publication/maintaining-diversity-in-americas-transit-rich-neighborhoods-tools-for-equitable-neighborhood-change/>