



SMART GROWTH AND REGIONAL COLLABORATION

October 11, 2019

Kathleen Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Erin Flaherty, MEPA #16044  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Proposed Multi-Family Mixed Use Redevelopment, DEIR, MEPA #16044

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.

A Draft Environmental Impact Report (DEIR) has been filed with EOEEA by South Harbor Associates LLC (the Proponent) to construct a mixed-use, multifamily apartment development (the Project) at 800-810 Lynnway in Lynn. The 8.46-acre site, currently operated as "The Lynnway Mart," includes a commercial building with a total footprint of approximately 116,500 square feet (sf) with outdoor storage areas. An indoor/outdoor flea market currently operates six days of the week at this site. The Proponent proposes to demolish the existing building and construct a mixed-use, multifamily apartment development comprising four buildings with 550 residential units and 11,620 sf of retail space. The Project site abuts industrial land to the south, Hanson Street and a Walmart to the north, the Lynnway to the west, and the Lynn Community Path to the east.

The Project site is primarily served by three MBTA bus routes<sup>1</sup> along the Lynnway. In addition, the GE/River Works MBTA Commuter Rail Station is located about 2,000 feet west of the site. However this is currently a private station not open to the public. The adjacent Lynn Gear Works Redevelopment Project has proposed to convert this to a public station, which would also provide service to the Project proposed by South Harbor Associates. The nearest existing commuter rail service to the Project site operates out of Lynn Station, approximately 1.5 miles northeast of the site. The Blue Line Wonderland station stop is about 3 miles to the south, and is accessible to the project site via MBTA buses. The Project site is expected to generate an estimated 3,434 weekday daily trips and 2,336 Saturday trips<sup>2</sup>. A total of 866 parking spaces are proposed, of which 538 spaces will be structured.

---

<sup>1</sup> MBTA Bus Route 441/442 (Marblehead - Wonderland), MBTA Bus Route 448/449 (Marblehead – Downtown Crossing), MBTA Bus Route 448/449 (Marblehead – Downtown Crossing).

<sup>2</sup> Unadjusted daily trips.

Below are MAPC's comments as they pertain to parking, project coordination, connectivity, monitoring, mitigation, and affordable housing:

### Parking

Although the Proponent is currently proposing 866 parking spaces, which is in conformance with the City of Lynn Zoning Ordinances for multi-family housing and retail<sup>3</sup>, the Proponent also indicates that a reduction in the number of parking spaces is viable. Accordingly, *"the Proponent seeks to reduce the amount of structured parking upon project phasing and surface parking at the discretion of the City zoning"*<sup>4</sup>.

The Proponent expects to construct the Project in sequential phases, which will allow the Proponent to assess the parking utilization rate and resident mode share as occupancy occurs over time. Specifically, the DEIR states that *"as each phase of the Project is constructed, the Proponent will reassess the mode share, parking utilization, commuter versus non-commuter public transportation usage, and the vehicle ownership rate of the residents. The Proponent, with a variance from the City of Lynn, seeks to reduce the structured, under podium, and surface parking supply comparably to the monitored parking utilization rate after each subsequent phase to better maximize public transportation utilization, and reduce SOV trips. As an overwhelming majority of the on-site parking is to be structured or under-podium, the Proponent has agreed that it is in their best financial interest to reduce the number of parking spaces, if not needed, to reduce the capital construction costs."*<sup>5</sup> MAPC applauds the Proponent for outlining this approach and strongly encourages the City of Lynn to collaborate in an effort to reduce the number of parking spaces. We strongly recommend this be incorporated in both the Secretary's Certificate and in the Draft 61 Findings.

It is important to underscore that the City of Lynn recently revised their Zoning Ordinance to establish Waterfront Zoning Districts, which allow a reduced parking ratio of 1.0 spaces per unit for projects with more than 300 residential units. Applying this ratio to this Project results in a minimum requirement of 550 residential parking spaces<sup>6</sup>, which is considerably lower than the 866 currently suggested in the DEIR. In addition, the EENF Certificate notes that, according to MassDOT, the project is providing 176 more spaces than identified as necessary based on ITE Parking Generation (4<sup>th</sup> Edition)<sup>7</sup>. The Proponent should ensure that a discussion of both the revised Zoning Ordinance and the ITE Parking Generation are included in the Final EIR.

In addition, MAPC's recently released *Perfect-Fit Parking Initiative: Phase 2 Report*<sup>8</sup>, studied nearly 200 multifamily developments in 14 communities in Metro Boston, and found that 30% of spaces are vacant at night during peak residential demand. Our conclusion is that parking at multifamily developments is routinely overbuilt. Furthermore, our research indicates that the availability of ample parking is the single greatest factor in encouraging residents with cars (or with more than one car) to locate in a development. A reduced parking supply will also reinforce the success of this Project as a TOD and encourage the use of alternative methods of transportation. We therefore routinely suggest that efforts be made to minimize parking at new multifamily developments.

In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC asks that the Secretary require the Proponent to analyze fully measures to reduce parking demand, which include:

#### *"Unbundling" Parking*

*"Unbundling" parking and housing costs by separating parking from the housing unit lease or sale and charging the tenant a monthly or annual fee to park a vehicle at the site 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.*

---

<sup>3</sup> Waterfront Zone 1A (WF1) district - 1.5 spaces per unit for multi-family housing and 1 space per 300 sf of gross floor area (GFA).

<sup>4</sup> Multi-Family Mixed-Use Redevelopment, DEIR, August 31, 2019, p. 2-63.

<sup>5</sup> Multi-Family Mixed-Use Redevelopment, DEIR, August 31, 2019, p. 2-68.

<sup>6</sup> City of Lynn Zone Ordinance with Amendments through October 23, 2018, Section 9.3 – Off-Street Parking Facility Requirements.

<sup>7</sup> Expanded Environmental Notification Form (EENF) Secretary's Certificate, July 18, 2019, p 5.

<sup>8</sup> <http://perfectfitparking.mapc.org/>

#### *Parking Banks (Landscape Reserves)*

The Proponent should establish parking banks (a.k.a. landscape reserves) that would remain as greenspaces if it is determined that the surface parking may not be needed subsequent to the construction of the structured parking and full occupancy of the Project site. These areas would be converted to parking only if the need is clearly demonstrated. As long as additional parking is not needed, the land should remain landscaped.

#### *Residential Parking Fee*

The Proponent should charge a parking fee for residents with more than one vehicle to reduce the number of vehicles residents are likely to bring to the Project site.

#### Coordination with Other Projects

The Proponent should continue to work closely with the City of Lynn and the Proponent of the GE Lynn Gear Works Redevelopment Project. Specifically, this includes reconstructing the Lynnway, accessing the GE/River Works MBTA Station Commuter Rail stop, and increasing pedestrian, bicycle, and public transportation connectivity.

MAPC is pleased the Proponent has committed to low-cost, short-term mitigation measures in the event that both the off-site mitigation for the Lynn Gear Works Redevelopment and/or the City's MassWorks Infrastructure Grant Project not commence prior to occupancy of the Project.

#### Connectivity

The Proponent should provide a comprehensive circulation plan clearly depicting how pedestrian and bicycle access will be provided within the site and to the waterfront, the Lynnway, and the GE/River Works MBTA Station. The circulation plan should specifically address:

- How the on-site pedestrian network will connect with the pedestrian and public transportation amenities along the Lynnway and future Sunrise Drive (access road to the GE/River Works MBTA Commuter Rail Station).
- Connectivity to the Lynn Community Path and shoreline.
- How the pedestrian path along the southern property line will access the boardwalk located adjacent to the rear property line.
- How the two parcels south of the Project will be integrated and whether they will provide waterfront access.
- How the reconstructed Hanson Street Corridor will connect with the City's MassWorks Infrastructure Project to the waterfront where future work along the shoreline is expected as part of the Lynn Waterfront Master Plan.

#### Monitoring

MAPC is pleased the Proponent has committed to conduct an annual traffic monitoring program beginning six months after the issuance of the first Certificate of Occupancy and continuing for five years following full occupancy of the project. The monitoring program will include:

- Automatic Traffic Recorder (ATR) counts at site driveways;
- Turning Movement Counts (TMC) at site driveways and "mitigated" intersections;
- Evaluation of the parking supply;
- Evaluation of the project's intended mode share splits; and
- Review of crash reports.

However we disagree with the Proponent's statement that the "*monitoring program may be suspended at any time upon agreement with DCR and the City of Lynn that the Project has sufficiently provided evidence that the*

upper limits of vehicle delay and trip project would not be feasibly satisfied.<sup>9</sup> As stated earlier, the commitment to monitor the Project should be at least five years.

MAPC requests that the monitoring program also include coordination of monitoring information from the GE Lynn Gear Works Redevelopment project.

#### Mitigation Commitments and Draft Section 61 Findings

MAPC applauds the Proponent for proposing a robust Transportation Demand Management (TDM) program as well as committing to infrastructure improvements. We recommend expanding the TDM program to include commitments to:

- Subsidize a portion of the cost of transit passes for commuter rail, bus, and ferry service (when operational);
- Install charging stations for electric vehicles for a minimum of 5% of the parking; and
- Become a member of the North Shore TMA.

MAPC is pleased the Proponent has committed to work with DCR and the City of Lynn to investigate potential mitigation measures should an increase in the crash rate of more than 10% occur at any of the study area intersections.

The Draft Section 61 Findings should include Table 2.6.1 – Infrastructure Improvement Matrix. The matrix should be expanded to include individual cost estimates for each project segment.

#### Absence of an Affordable Housing Program

MAPC applauds the Proponent for advancing a TOD that includes a substantial commitment to expand the housing supply in Lynn, and thereby, in the region. Even though Lynn does meet the 10% target for subsidized housing under MGL Ch. 40B, we remain concerned that the Project lacks an affordable housing component. This is an environmental as well as a housing issue, because there is strong evidence that lower-income households own fewer cars, use less parking, and generate less traffic. According to the study, *Maintaining Diversity in America's Transit Rich Neighborhoods*<sup>10</sup>, "people of color, low-income households and renters are all more likely to use transit than the average American." Similar findings were attained in the study *Transportation Impacts of Affordable Housing: Informing Development Review with Travel Behavior Analysis* which found "significant reductions in vehicle trip making with lower incomes and increasing urbanization<sup>11</sup>."

Furthermore, 46% of all households in Lynn are currently cost burdened, which means they are paying more than 30% of their income for rent; fully 21% of all households in Lynn are paying more than 50% of income for rent. Therefore, additional affordable units are likely to provide a significant opportunity for current Lynn residents to access more affordable housing, while avoiding displacement and remaining in the City. As a result of these factors, MAPC respectfully suggests that the Proponent should incorporate an affordable housing component into this Project.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen  
Executive Director

cc: James Cowdell, Lynn EDIC  
Meaghan Hamill, City of Lynn  
James Marsh, City of Lynn  
David Mohler, MassDOT

---

<sup>9</sup> Multi-Family Mixed-Use Redevelopment, DEIR, August 31, 2019, p. 2-66.

<sup>10</sup> Dukakis Center for Urban and Regional Policy, October 2010, p. 2.

<sup>11</sup> Transportation Impacts of Affordable Housing: Informing Development Review with Travel Behavior Analysis, The Journal of Transport and Land Use, Vol. 11, No 1, 2018, p. 103.