



SMART GROWTH AND REGIONAL COLLABORATION

April 17, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strysky, 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.

A Draft Environmental Impact Report (DEIR) has been filed with the EOEEA 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. Since the filing of the Environmental Notification Form (ENF), the overall project size has decreased by approximately 30 percent from approximately 1.5 million square feet (sf) to 1.03 million sf. The amount of parking has also been reduced by approximately 30 percent from 2,922 to 2,041 spaces.

The Proponent proposes to redevelop the 13.5 acre Project site with a mixed-use, transit-oriented development (TOD) comprising approximately:

- 653,571 sf of residential space (579 units);
- 250,887 sf of office space;
- 77,300 sf of hotel space (150 rooms);
- 43,242 sf of retail space; and
- Open space comprising over 4 acres.

The Project will generally be built in two phases and will include ten buildings. The proposed buildings can be developed together, independently of each other, and in differing sequences. The mix of uses constructed will be in response to evolving market conditions, which is probable particularly appropriate given current market uncertainties.

The Riverside Station Redevelopment (the Project) is at the end of the MBTA Green Line Riverside Branch (D), Newton's busiest transit stop. The Project site is expected to generate an estimated 11,368 new weekday daily vehicle trips¹ and 2,041 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 Draft Environmental Impact Report (DEIR) and has concerns that address advancing a robust Transportation Demand Management (TDM) program, developing mode share goals, project monitoring and reporting, mitigation, parking, and bicycle/pedestrian connections. Proposed recommendations and questions regarding these topic areas 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: Jenifer Caira, City of Newton
David Mohler, MassDOT

¹ New Unadjusted Vehicle Trips (Note: This number does not include the current 4,700 vehicle trips per day generated at the site by the MBTA Station. Table 4-5 – Project Trip Generation).

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

MAPC is pleased the Proponent has advanced a mixed-used transit-oriented development (TOD) at a major MBTA transit station. Below are our comments and questions that, if implemented and addressed, will ensure the Project reaches its maximum potential as a successful TOD site.

Transportation Demand Management (TDM) Program

Clearly Identify TDM Program Commitments

The Transportation Appendix² contains two documents, both of which identify components to consider for implementing a Transportation Demand Management (TDM) program: *Draft 128 Business Council TDM Plan* (dated December 9, 2019) and *VHB Traffic and TDM Monitoring Summary* (dated January 14, 2020). While both documents identify considerations to implement a TDM program, the language is unclear as to whether these TDM components are clear commitments or are simply mentioned for consideration. Additionally, the TDM commitments need to be clearly identified in the draft Section 61 Findings for the MassDOT Access Permit, not as an Appendix. We respectfully request that the TDM program commitments be consolidated and included in the draft Section 61 Findings for the MassDOT Access Permit. Doing so will ensure future monitoring of the Proponent's TDM program.

Proposed Reimbursements for Use of Sustainable Modes of Transportation

Both the *Draft 128 Business Council TDM Plan* the *VHB Traffic and TDM Monitoring Summary* contain sections on Incentives for Sustainable Transportation, which propose reimbursements for reliance upon sustainable modes of transportation. While we applaud the proposal that residents who entirely forgo the use of a residential parking space would be eligible for reimbursement of up to \$200/month, we strongly disagree with the proposal to reimburse residents who lease a single parking space to be eligible for reimbursements of up to \$75/month. To ensure the Project is a successful TOD and has a strong TDM program, residents should not receive a monetary reimbursement if they lease a single parking space. We also note that both documents mention a similar program will be instituted for office users, the specific details of which will be determined by ongoing traffic monitoring. MAPC respectfully requests that a similar program be instituted for office users as soon as the Project is ready for occupancy, and not after the fact when it likely would be more difficult to implement.

Importantly, the TDM program also needs to specify the proposed reimbursements for resident and employee MBTA passes and/or bikeshare memberships.

Specific TDM Strategies

MAPC recommends the TDM Program include:

- A commitment to join and participate in the 128 Business Council Transportation Management Association (TMA) in addition to hiring an on-site Transportation Coordinator, and:
- A discussion of how tenancy lease agreements or a tenant manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Mode Share Goals, Monitoring and Reporting

One of the primary goals of the Project is to create a TOD at Riverside Station that will encourage residents, employees, and visitors to access the Project site via public transportation and other modes of transportation and not place pressure on the existing roadways by creating significantly more vehicle trips. To ensure this is accomplished, it is essential that the Project identify mode share goals and have a monitoring and reporting program in place.

² Appendix C

**Metropolitan Area Planning Council (MAPC) comments on
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Mode Share Goals

The DEIR contains no mention of mode share goals and this is even acknowledged by the Proponent. It is important to underscore that the ENF Certificate³ required the Proponent to develop a traffic monitoring program that includes mode share goals. The Proponent needs to delineate a program that ensures clearly defined mode share goals are accomplished over a specified time frame related to the two phases of the Project's development. Along with specific steps to achieve these goals, the Proponent should provide annual updates, and publicly share the results.

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. An essential component of a successful TOD project is the identification and monitoring of mode share goals.

Monitoring and Reporting

The Proponent should specifically outline their monitoring and reporting program and commit to it in the Section 61 findings. The ENF Certificate required the Proponent to include in the DEIR *"a draft traffic monitoring program to evaluate the assumptions made in the traffic study, including mode share goals, and the adequacy of the transportation mitigation measures, including the TDM and shared parking programs. The program should include annual traffic monitoring for a period of five years. The monitoring program should include:*

- *Automatic traffic recorder (ATR) counts at each site driveway for a continuous 24-hour period on a typical weekday and Saturday;*
- *Travel survey of employees and patrons of the site;*
- *Weekday AM and PM and Saturday peak hour turning movement counts (TMC) and operations analysis at mitigated intersections; and,*
- *Vehicular and bicycle parking counts."* (p. 10)

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 recognizes that the Proponent has committed to requiring additional mitigation action and adjustments to the TDM plan should the Project traffic exceed ten percent of the projection for new traffic. However, 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.

MAPC also recognizes that the Proponent has committed to monitor vehicle trips within 12 months of full occupancy of each phase and will continue to do so annually for two years following final build-out. However, as required by ENF Certificate, monitoring needs to take place on an annual basis for at least five years after full occupancy.

In order to ensure the success of this Project as a TOD, it is imperative that the Proponent commit to an extensive and thorough transportation monitoring and reporting program with mode share goals that includes annual data collection of traffic counts, parking usage, public transportation (rail and bus), bicycling, and walking, as well as specific steps to be taken if mode share goals are not attained.

³ Dated June 7, 2019.

Mitigation

In order to fully realize this site as a successful TOD, it is critical that the Proponent commit to a strong 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.

Summary of Mitigation Measures

Table 11-1 *Summary of Mitigation Measures*, needs to be included as part of the draft Section 61 Findings for the MassDOT Access Permit. Table 11-1 should be expanded to include estimates of the costs for each proposed mitigation measure, identify the parties responsible for implementation, and a schedule for implementation.

Public Transportation Mitigation

The Proponent recognizes that the Green Line may be overcapacity during the “shoulder peak” just after and before the weekday morning and weekday evening peak periods, respectively. Accordingly, the Proponent has indicated that they will work with the MBTA to mitigate the effects of the Project on the MBTA system. What the Proponent has identified to mitigate the effects needs to be included in the mitigation section of the draft Section 61 Findings for the MassDOT Access Permit.

Shuttle to Commuter Rail

MAPC is pleased the Proponent mentioned that providing a shuttle service to offer access between Auburndale Station (Worcester commuter rail line) and Riverside Station is being considered and will be part of the future plan if there is demand. In addition to including a commitment to consider a shuttle in the *Summary of Mitigation Measures*, we respectfully ask that the Proponent evaluate a demand for this shuttle service as part of annual project monitoring.

MAPC considers that providing this service is paramount and has the potential to significantly reduce SOV trips to and from the Project site. Given the mixed-use nature of the Project 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).

Parking

The Proponent proposes 2,041 parking spaces for this Project. Specifically, 990 spaces will be allocated between the proposed residential, office, retail, and hotel uses. One thousand spaces will be dedicated for MBTA commuter parking. The remaining 51 spaces will be surface/on-street spaces located throughout the Project site. Riverside Station is a premiere TOD 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, continuing to explore ways to further reduce the amount of parking is the most effective strategy to reduce auto trips.

Allocation of Parking Spaces

The Proponent should disclose the allocation of proposed parking spaces for each land use type (residential, office, retail, and hotel).

Shared Parking

As required in the ENF Certificate, the Proponent needs to identify clearly the opportunities for shared parking. Shared parking strategies should be used to decrease the number of parking spaces on-site. We respectfully ask the Secretary to require the Proponent to quantify 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.

**Metropolitan Area Planning Council (MAPC) comments on
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We also note that while the current observed peak demand of MBTA parking is 636 spaces, there will be dedicated MBTA parking for 1,000 spaces. The Proponent should explore ways to utilize the MBTA parking spaces should they not be fully utilized by commuters. We urge the Proponent to take full advantage of the benefits of this 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.

MBTA Parking

MAPC notes the Proponent stated in the DEIR that “How the 1,000 dedicated MBTA spaces are designated and used is entirely at the discretion of the MBTA and not the Proponent.” (p. 12-57) MAPC requests that the Proponent work with the MBTA to ensure that spaces are made available for carsharing (e.g., ZipCar), carpooling and/or vanpooling, as well as bicycle parking and bicycle sharing programs. The MBTA should also commit to the provision that 10 percent of the parking spaces have electric vehicle charging, the same percentage to which the Proponent has committed.

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.

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. Additionally, construction of phased construction of the parking facility should be explored with additional parking added depending on demand.

Bicycle and Pedestrian Connections

MAPC is pleased to see the paths, trails, and other bicycle and pedestrian infrastructure as proposed in the DEIR. They clearly line up with what the community has requested in terms of connections. However, the proponent falls short in what we believe should be constructed as part of this project to provide the vital connections. The below comments can be referenced on Fig 4.28.

Railroad Bridge over 95

The abandoned railroad bridge over I-95 is part of a planned rail trail between Route 16 in Wellesley and Riverside Station, passing through the edge of Leo Martin Park. Completion of this trail is critical to providing seamless access for cyclists and pedestrians coming from points west in Wellesley and beyond. We request that the proponent construct this trail from Riverside Station across I-95 to DeForest Street (as well as the path the Proponent proposed along Recreation Road). Currently, we see only the funding of design.

Path under Recreation Road

We are pleased that the Proponent proposed this connection between the existing MWRA Trail and across the Charles River to Pigeon Hill. We request that the Proponent complete this connection by building the entire trail along Recreation Road and under it to meet the MWRA trail. One additional comment is that the trail along Recreation Road should be separated from the road by an ample tree planted landscaped buffer. Recreation Road should be moved westward as needed to accomplish this separation between the highway uses and the trail.

Grove Street Bike Lane

The proposed bike lane on Grove Street should be extended all the way to the proposed roundabout at Quinobequin Road.