



SMART GROWTH AND REGIONAL COLLABORATION

October 9, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strycky, MEPA #16247
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: The Pinnacle at Central Wharf, MEPA #16247, Environmental Notification Form

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, public 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 at least 85% from 1990 levels by 2050.

RHDC 70 East India, LLC (the Proponent) proposes to redevelop the Boston Harbor Garage site in Boston's Downtown Waterfront District. The Pinnacle at Central Wharf (the Project) will include the construction of a single tower totaling approximately 864,600 square feet (sf) up to 600 feet in total height as well as improvements to the Harborwalk and the public realm. The proposed development program for the Project will comprise:

- 284,600 sf residential space (approximately 200 residential units currently anticipated to be rental);
- 538,000 sf office space; and
- 42,000 sf of publicly accessible amenity space (e.g., retail, restaurant, and other uses to activate the streetscape).

Bounded by Atlantic Avenue, Milk Street, and East India Row, the Project site is situated between the New England Aquarium and the Harbor Towers condominiums. The Harbor's edge is located approximately 90 feet east of the Project site. The Project site fronts both the Harbor and the Rose Kennedy Greenway.

The Project is anticipated to generate approximately 9,866 unadjusted daily vehicle trips. Once mode shares are applied, the Project is anticipated to generate approximately 3,838 adjusted daily vehicle trips. A total of 1,100 parking spaces are proposed to be located within a below-grade garage. Extraordinarily well-served by public transportation, the Project site immediately adjacent to the Aquarium station on the MBTA Blue Line. It is located within walking distance of both North Station and South Station, which provide convenient access to the MBTA Red, Green, Orange and Silver lines,

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Commuter Rail, Amtrak, and regional bus lines. There are also several MBTA bus stops in the vicinity of the Project site. Multiple commuter ferries, serving Boston's outer neighborhoods and suburban destinations, are proximate to the Project site. Logan Airport is easily accessible by subway or water taxi and several Bluebikes stations are close by.

MAPC has reviewed the Environmental Notification Form (ENF) and has comments that address advancing a shared parking program, a Transportation Demand Management (TDM) program, as well as a mode share and monitoring program. These comments, 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 for the Environmental Impact Report (EIR).

Thank you for the opportunity to submit comments on the ENF and to provide input to the MEPA scoping for this Project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Gregory T. Rooney, Boston Transportation Department
Tad Read, Boston Planning and Development Agency
David Mohler, MassDOT

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Open Space

All open space on the Project site will be accessible to the public. MAPC looks forward to reviewing in more detail how the Project will link the Harborwalk on the Aquarium site to the Harborwalk on the Harbor Towers site and provide an improved connection to the Greenway in the EIR. We also look forward to reviewing how the Project will be designed for integration into the New England Aquarium's proposed "Blueway" vision for Harbor access, how the Project will serve as a destination for outdoor gathering space, and be activated on the ground level. It is critical that the Project site be designed to be inviting and encourage public access to the fullest extent possible. For example, this can be done by enhancing wayfinding signage and lighting.

Parking

Parking for the Project will be located within an approximately 1,100-space underground garage. According to the Proponent, the parking will serve both the Project and the surrounding neighborhood and will be managed under a shared parking arrangement. MAPC looks forward to reviewing a quantitative shared parking plan that addresses how these parking spaces will be assigned to different users, which should include the Project tenants, residents, and visitors, Aquarium visitors, Harbor Towers residents, and the general public.

Along with a quantitative description of the level of use, the EIR should identify how the current 1,475 parking spaces at the Boston Harbor Garage will be reallocated to the 1,100-space underground garage and detail what will happen to the parking spaces not planned for reallocation.

The EIR should discuss how the following will be incorporated into the parking program:

- Charging market rates for parking for all users. One of the biggest determinants of whether people will use an automobile is the cost of parking. Charging market rates for parking is an effective strategy to reduce auto trips.
- Applying un-bundled parking for the residential tenants. This strategy discourages auto use for the residential component by uncoupling the parking from the unit lease or sale and charging the tenant/owner a monthly or annual fee to park a vehicle at the site.
- Utilizing existing parking in proximity to the Project. The Proponent has noted that there are six parking lots and 14 parking garages located within a quarter mile of the Project site, comprising a total of 1,669 private parking spaces and 6,476 public spaces.
- The extent to which existing parking could be converted to alternative uses if demand warrants.

Transportation Demand Management (TDM) Program

MAPC is pleased that the Proponent is evaluating a commitment to implementing Transportation Demand Management (TDM) measures to minimize vehicle use and Project related traffic impacts by site residents, tenants, and visitors. In order to develop a robust TDM program, MAPC recommends the following TDM measures for the Project, including but not be limited to:

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- *Transit Pass Programs*
Requiring the property manager and/or individual lessees to foster employee use of transit by offering on-site transit pass sales and MBTA pass subsidies to employees.
- *TMA Membership*
Joining A Better City's Transportation Management Association (ABC TMA) on behalf of commercial tenants and residents and actively participate in their commuter programs.
- *Car Sharing*
Allocating reserved parking spaces for car sharing services such as ZipCar.
- *Pick-Up/Drop-Off Locations*
Designating pick up/drop off areas and accommodating on-demand car services, such as Uber and Lyft, and taxis.
- *Cash-Out Incentives*
Providing cash-out incentives for employees that do not utilize on-site parking facilities.
- *Flexible Work Hours and Teleworking*
Offering flexible work hours and teleworking, and providing incentives in commercial tenant leases to encourage such practices; such steps are even more appropriate in light of the increase in remote working during the COVID pandemic, and the likelihood that such work practices will be desirable to both workers and employers even after recovery; and
- *Tenancy Lease Agreements/Tenant Manual*
Addressing how tenancy lease agreements or a tenant manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Provide Infrastructure for Electric Vehicle Charging

MAPC's supports the Boston Transportation Department's (BTD) Electric Vehicle (EV) Readiness Policy for New Developments¹, which requires large project review developments to equip 25% of their total parking spaces to be EVSE (electric vehicle supply equipment) installed and the remaining 75% of the total spaces to be EV ready.

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 3.3 million ZEVs are on the roads by 2025, which requires adequate infrastructure.² Large-scale projects such as the Pinnacle at Central Wharf should help us to meet this commitment.

Protection of Pedestrians at Garage Entrances

While the Proponent mentions that the new public open spaces will include pedestrian pathways through and around the Project site to allow for safe and convenient use by pedestrians, the Proponent should address how pedestrians will be protected when traversing the sidewalks at the garage/loading entrance on Atlantic Avenue and at the garage entrance on East India Row.

¹ <https://www.boston.gov/departments/transportation/recharge-boston-electric-vehicle-resources>

² State Zero-Emission Vehicle Programs, Memorandum of Understanding, October 24, 2013. <https://www.zevstates.us/>

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Bicycle Parking

MAPC is pleased that the Proponent will fund the installation of a Bluebikes station to be placed in the area in accordance with BTG guidelines. Based on BTG guidelines, the Proponent will provide secure/covered bicycle parking spaces within the building at a rate of 0.3 spaces per 1,000 sf of retail and office, and one secure indoor bicycle parking space per residential unit. Also, in accordance with BTG guidelines, additional bicycle storage will be provided by outdoor bicycle racks accessible to visitors to the Project site. MAPC looks forward to reviewing a detailed indoor and outdoor bicycle parking plan in the EIR.

Monitoring Program and Mode Share Goals

Monitoring and Reporting

It is imperative that the Proponent outline an extensive and thorough monitoring and reporting program. This program must be well defined and be committed to in the Section 61 findings. The intent of the monitoring and reporting program is to confirm that actual changes are consistent with forecasted changes. With a monitoring and reporting program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary. The monitoring and reporting program should include annual data collection for vehicular trips, parking usage, public transportation, bicycling and walking.

Mode Share Goals

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. Mode share goals should specify a numerical target for increased use of public transportation, walking, and bicycling, and a decrease for Single Occupancy Vehicle (SOV) use. The monitoring and reporting 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 recommends that a full assessment based on the data gathered take place annually and for at least five years after full occupancy.

Developing and monitoring mode share goals is a central component of TIA preparation 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.* (page 17)

Shadow and Wind Analysis

MAPC expects that the Project's EIR will contain a comprehensive shadow and wind analysis.

Affordable Housing

The ENF states that the Proponent will comply with the applicable City of Boston Inclusionary Development Policy by providing a to-be-determined combination of on-site affordable units, off-site affordable units and/or a monetary contribution to an affordable housing fund. MAPC strongly encourages that all affordable units be on-site. The effort by some developers to avoid affordable units in high-end developments downtown, and to place those units instead in lower-opportunity neighborhoods with more serious environmental hazards helps to reinforce the current pattern of discrimination against Environmental Justice populations. It is therefore appropriate for the MEPA process take a clear stand in favor of providing affordable units on-site.