



SMART GROWTH AND REGIONAL COLLABORATION

December 14, 2016

Matthew A. Beaton, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Paige Czepiga, MEPA #15610  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: 115 Winthrop Square, MEPA #15610

Dear Secretary Beaton:

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*. The Commonwealth also has established a mode shift goal of tripling the share of travel in Massachusetts by bicycling, transit and walking by 2030. 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. In May 2016, the Massachusetts Supreme Judicial Court released a unanimous decision in *Kain vs. Massachusetts Department of Protection (DEP)* ordering the state's DEP to take additional measures to implement the 2008 Global Warming Solutions Act. Specifically, the Court held that DEP must impose volumetric limits on the aggregate greenhouse gas emissions from certain types of sources and that these limits must decline on an annual basis. This recent ruling reasserts the state's obligation to meet these goals.

115 Winthrop Square (the Project) proposes to develop an approximate 47,962 square foot site bounded generally by Summer Street to the south, Federal Street to the east, and Devonshire Street to the west in Boston. Specifically, MCAF Winthrop LLC (the Proponent) proposes to construct a mixed-use building that will include approximately 1.1 to 1.5 million square feet (sf). The Project is anticipated to generate between 4,530 to 4,554 daily vehicle trips.

While the Environmental Notification Form (ENF) states that the allocation of specific uses will be determined during the design process, the approximate minimum and maximum project elements include:

<u>Project Element</u>	<u>Approximate Minimum</u>	<u>Approximate Maximum</u>
Residential	290 Units	460 Units
Office	463,000 sf	663,000 sf
Retail and Restaurant	35,000 sf	60,000 sf
Great Hall	10,000 sf	15,000 sf

The Proponent indicates that between 400 to 550 parking spaces will be constructed. However, it is important to note that the Project site includes approximately 1,000 parking spaces. It is unclear whether, and to what extent, these parking spaces will be included as part of the Project and whether the existing parking garage will be retained. This should be clarified in the Environmental Impact Report (EIR).

In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that you require the Proponent to clearly indicate the

proposed number of parking spaces for each project element. In addition to implementing a shared parking program with nearby uses, if feasible, the number of parking spaces in the Project itself should be reduced to the fullest possible extent, particularly for the residential component. A reduced parking supply will encourage and reinforce the use of the many available alternative modes of transportation in this transit-rich location.

The *Perfect-Fit Parking Initiative: Phase 1 Report* now being completed by MAPC, and expected to be released by early January, has studied 80 multifamily developments in 5 urbanized communities north of Boston, demonstrating that 26% of spaces are vacant at night. Our conclusion is that parking at multifamily developments is routinely overbuilt, and that extra parking tends to generate more cars and increased traffic. We therefore routinely suggest that efforts be made to minimize parking at new multifamily developments.

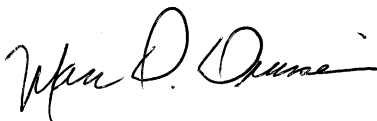
On another matter, we expect the Environmental Impact Report (EIR) will indicate the number of affordable housing units, the level of affordability, and the bedroom distribution of both affordable and market-rate units. This is an environmental as well as a housing issue, because there is strong evidence 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>1</sup>, "people of color, low-income households and renters are all more likely to use transit than the average American" (p. 2).

It is important to call attention to the fact that significant concerns have been expressed regarding the shadow impacts this Project may create, specifically over Boston Common and the Public Garden. Specifically, concerns have been raised that the shadows this Project will generate could violate a state law that prevents new buildings in most of central Boston from casting additional shadows on either park for more than one hour a day. It has been reported that the proposed Project could extend shadows for as long as 90 minutes in the morning over the parks, possibly reaching the start of the Commonwealth Avenue Mall, a mile away, at certain times of year<sup>2</sup>. MAPC expects that the Project's EIR will contain information about the building's height, a comprehensive shadow analysis, and address whether this Project affects existing laws regarding shadow impacts.

The intent of these recommendations is to encourage a greater shift of auto trips to transit, bicycling, and walking, which will minimize the adverse impacts of this Project and help to keep the Commonwealth on track to meet its statutory and regulatory goals. MAPC respectfully requests that the Secretary incorporate these recommendations into the Certificate defining the scope of the Project's EIR.

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen  
Executive Director

cc: John Barros, Chief of Economic Development, MAPC Representative  
Andrew Grace, MAPC Alternate Representative  
Brian Golden, BRA  
Gina Fiandaca, BTB  
David Mohler, MassDOT

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<sup>1</sup> Prepared by the Dukakis Center for Urban and Regional Policy; Stephanie Pollack, Barry Bluestone, Chase Billingham; October 2010.

<http://www.northeastern.edu/dukakiscenter/transportation/transit-oriented-development/maintaining-diversity-in-americas-transit-rich-neighborhoods>

<sup>2</sup> *Tall Tower is Planner in Boston. What Shadow will it Cast?*, Boston Globe, November 1, 2016.