



SMART GROWTH AND REGIONAL COLLABORATION

January 26, 2016

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Purvi Patel, MEPA #15459
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Ashland Rail Transit Apartments, MEPA #15459

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, the GreenDOT initiative, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

The Ashland Rail Transit Apartments project site encompasses approximately 29.1 acres of land located off an MBTA access road and is about one-third of a mile from the Ashland MBTA commuter rail station for the Framingham/Worcester Line. The currently vacant site is part of the Town of Ashland's Rail Transit Zoning District (RTD). The *495/MetroWest Development Compact*, jointly completed by MAPC and the Central Massachusetts Regional Planning Commission with funding from EOHEd, identified the site as a local, regional, and statewide Priority Development Area (PDA).

Campanelli Companies (the Proponent) proposes a 398 unit apartment project that will involve the construction of 9 buildings (comprising a total of 408,500 square feet). The breakdown of apartment styles includes 149 one bedroom and 249 two bedroom apartments (10% of which will be affordable). The Proponent proposes a high amount of parking – 717 spaces or 1.8 spaces per unit. At full build, the project will generate approximately 2,536 new vehicle trips per day. The weekday morning and evening peak hour traffic generation is estimated at 199 and 237 new vehicle trips respectively.

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 light of these commitments, MAPC has reviewed the Environmental Notification Form (ENF) and our recommendations primarily address reducing the number of parking spaces in addition to developing mode share goals and implementing a monitoring program. 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 Environmental Impact Report (EIR).

Thank you for the opportunity to comment on this project.

Sincerely,

Marc D. Draisen
Executive Director

cc: Nathaniel Strosberg, Town Planner, Ashland
David Mohler, MassDOT

Metropolitan Area Planning Council (MAPC) Comments on Ashland Rail Transit Apartments - MEPA #15459

Overall Parking Supply

MAPC strongly encourages the Proponent to investigate measures to reduce the overall number of parking spaces to deter Single Occupancy Vehicle (SOV) trips. As there is a critical relationship between parking supply and transportation behavior, reducing the amount of parking can contribute towards an overall decrease in automotive traffic and trips related to this project.

There are several innovative parking strategies that can facilitate the reduction of overall parking supply at this transit adjacent site. These measures include parking reserves, unbundling, and utilizing existing spaces in the Ashland Station parking lot.

Parking Reserves

Consider banking some of the parking spaces until and unless they are determined to be necessary based on monitoring. A parking reserve would require reducing the number of parking spaces initially built, but land would be held in reserve to provide additional parking spaces if – and only if – they are needed in the future. As long as the additional parking is not needed, the land can be landscaped or used for other amenities such as playgrounds or parks.

Unbundling

Unbundle parking from space rent or sales price. Unbundling parking allows renters or owners to purchase only as much parking as they need. It would give residents the opportunity to save money by using fewer parking spaces, and this reduced demand would also enable the developer to save money on parking construction. By changing parking from a required purchase to an optional amenity, vehicle ownership and parking demand can be reduced.

Utilizing Existing Spaces in the Ashland Station Parking Lot

There are 652 parking spaces at the MBTA owned Ashland Station parking lot. It is possible that spaces are available during the day, and they are almost certainly available at night. If it is determined that there are underutilized parking spaces at this lot, the Proponent should consider entering into a lease arrangement with the MBTA. According to Ashland Station's utilization was 37 percent between 2012-13.¹

Negative Consequences of Overbuilding Parking

Based upon MAPC's research of off-street parking utilization of large residential sites close to a commuter rail station, we feel many of the 717 parking spaces planned for this development will not be used. The consequences of overbuilding parking include increased housing costs that get passed along to homeowners and renters, storm-water infiltration issues caused by the increased impervious surface, and fewer overall housing units on the site because of the parking requirements. We recommend a parking ratio of 1 space for one bedroom units and 1.5 spaces for two bedroom units.

Reduced Parking Demand

According to the ENF, some of the residents are likely to use the MBTA Commuter Rail due to the close proximity of the project site to Ashland Station. Approximately 30 percent of the residents are likely to work in cities and towns located directly along the Worcester/Framingham Commuter Rail.² Subsequent to a review of data published in ITE's Trip Generation Handbook for residential land use in close proximity to a commuter rail station, 10 percent of project trips are likely to utilize Ashland MBTA Station. Although the Proponent used this assumption to reduce the impact to the adjacent roadways and intersections, it was not applied to reduce the number of parking spaces.

¹ Source: Memorandum, May 1, 2014, To: Congestion Management Process Committee Boston Region MPO. From: Ryan Hicks and Hiral Gandhi, MPO Staff, Re: 2012-13 Inventory of Park-and-Ride Lots at MBTA facilities.

² Based on Journey to Work 2010 Census data.

MAPC would like to underscore two key findings from industry studies pertaining to parking demand at Transit Oriented Development (TOD) sites:

- Suburban/town center parking utilization for residential developments ranges between 1.0-1.5 spaces per dwelling.³
- Parking requirements can typically be reduced between 20 and 50 percent in areas with good transit.⁴

In addition to applying the previously described innovative parking strategies (parking reserves, unbundling, and leasing existing parking spaces from the MBTA), the Proponent should be required to implement the following TDM measures intended to further reduce trip demand, which, in turn, is a rationale for reducing parking.

- Provide ride-matching/carpooling for residents; and
- Provide car-share vehicles and electric vehicle (EV) charging stations for use by residents as demand warrants.

Mode Share Goals and Monitoring

MAPC is concerned that the ENF does not address mode share goals or a comprehensive monitoring program. The Proponent needs to clearly define mode share goals (vehicular, transit, bicycling and walking) and commit to conducting regular monitoring and reporting of transportation mode shares and adjust the project's TDM program as necessary.

Mode Share Goals

Developing and monitoring mode share goals is a central component of a Traffic Impact Assessment (TIA). The *EOEEA/MassDOT Guidelines for TIAs* states: "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)

MassDOT's TIA Guidelines mention that TIAs should include an assessment of mode split assumptions, as well as the Proponent's plan to maximize travel choice, promote non-SOV modes, and achieve the assumed mode shares. Consistent with these guidelines, the TDM program should include specific, defined mode share goals that target the highest attainable rates of transit, bicycle, and pedestrian use. Data and analysis of existing modes (including public transportation, walking, and bicycling) should be employed to identify proposed physical improvements and supporting programs to increase these modes.

Monitoring Program

A monitoring program can help to determine if the defined mode share goals are being achieved. A monitoring program should evaluate the assumptions originally made in the transportation analysis and determine the effectiveness of the TDM program. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary.

We ask the Secretary to require that the Proponent work closely with the Town of Ashland and MassDOT to define clearly the project's intended mode split, to deploy specific practices intended to achieve that goal, and to develop a comprehensive monitoring program for all modes.

The project site should be monitored for a minimum period of five years, as outlined in *MassDOT's TIA Guidelines*.

³ Metropolitan Transportation Commission, *Reforming Parking Policies to Support Smart Growth: Toolbox/Handbook: Parking Best Practices & Strategies for Supporting Transit Oriented Development in the San Francisco Bay Area*, 2007.

⁴ Ming Zhang, University of Texas at Austin, *Getting the Parking Right for Transit-Oriented Development*, March 2012.

Additional Concerns from Town of Ashland

In MAPC's coordination with the Town of Ashland, we were made aware of the following concerns:

- The Proponent does not intend to mitigate an already-deteriorating culvert. Although the development will be adding volume to this culvert, they are asking for a waiver for volume. The Conservation Commission is highly concerned about the future condition of the culvert especially considering the impacts of the number of units to be constructed.
- The proposed emergency access road onto High Street will cut through a buffer zone and some very steep slopes. The Conservation Commission has expressed concern about the impact of constructing this road and questions whether the proposed access road could be relocated..

The Proponent should continue to work with the Town of Ashland in order to address these issues.