



SMART GROWTH AND REGIONAL COLLABORATION

March 22, 2016

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Holly Johnson, MEPA #15479
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: 526 & 528 Boston Post Road Redevelopment, MEPA #15479

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 other impacts on the environment.

Located on approximately 50 acres, 526 & 528 Boston Post Road (the Project) is bordered by Boston Post Road (Route 20) to the south, to the east by commercial properties, to the west by agricultural use and open space, and to the north by a former railroad right-of-way in Sudbury. BPR Sudbury Development, LLC (the Proponent) proposes a mixed-use development that will comprise approximately 80,000 square feet of mixed retail use¹ and a range of residential developments. Specifically, the proponent proposes 250 apartment units², 60 age-restricted (55 or older) condominium units, and a 54-bed assisted living/memory care facility. The Proponent proposes to demolish the existing buildings on the site, formerly owned by Raytheon, in phases.

The Project will modestly help to meet Sudbury's and the region's housing needs. We are somewhat disappointed that the Project continues a trend we see in much of the region, with most units directed to senior citizens and only a few to households with children. Since 114 of the units are directly or effectively age restricted, and since fully half of the 250 rental apartments are one-bedroom units, a significant majority of residents are likely to be senior citizens. We recognize that Sudbury has a need for increased senior housing, and that many of these units may help seniors who are selling their homes in Sudbury to remain in their community. The Project is consistent with Sudbury's 2012 Housing Production Plan, which specifically identifies the site as one of the top six preferred sites for development of affordable housing.

Nevertheless, the region – and certainly communities in this part of the region – have a serious deficit of affordable rental units for families, and developments of this kind represent a critical opportunity to address this deficit. Although the project has many positive aspects, we believe the Proponent will largely miss this important opportunity to diversify the housing stock of Sudbury, to advance Fair Housing goals and to help meet the housing needs of families.

¹ The 80,000 square feet of retail use will comprise a 45,000 square foot grocery store and 35,000 square feet of restaurant/commercial use.

² The 250 apartment units will consist of approximately 125 1-bedroom, 100 2-bedroom, and 25 3-bedroom units. 25% percent of the apartment homes permitted under M.G.L. Ch. 40B will be restricted to households earning no more than 80 percent of the Area Median Income.

Moving beyond the housing question, we note that this site has been identified as a Priority Development Area (PDA) locally as part of the 495/MetroWest Development Compact planning process, but it was not chosen as a regional priority by MAPC or as a state priority by the Executive Office of Housing & Economic Development. Sudbury's 2001 Master Plan also identified the site as a key location for redevelopment and expansion once vacated by Raytheon.

526 & 528 Boston Post Road proposes a total of 1,300 parking spaces. This Project is forecast to generate an estimated 7,920 daily vehicle trips, an increase of 2,810 trips compared to the office and research & development uses at the former Raytheon site. The weekday morning and evening peak hour traffic generation is estimated at 264 and 447 vehicle trips respectively. Due to the dispersed impacts of the mixed-use development, it is anticipated that vehicle trips will be distributed throughout the day and generate less traffic during the weekday morning and weekday evening peak hours as compared to the previous land use.

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. Despite the positive aspect of housing production, this largely auto-dependent development will make it more difficult to attain these goals. Therefore MAPC recommends robust traffic mitigation measures in order to realize the benefits of this mixed use development while minimizing any negative impacts.

MAPC has reviewed the Environmental Notification Form (ENF) and our recommendations primarily address providing bus access as part of the mitigation commitments, reducing the number of parking spaces, and developing mode share goals. Our intent is to encourage a greater shift of auto trips to transit, bicycling, and walking, which will reduce the adverse impacts of this project. MAPC respectfully requests that the Secretary incorporate these recommendations into the Certificate on the ENF.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, written in a professional style.

Marc D. Draisen
Executive Director

cc: Jody Kablack, Director of Planning and Community Development, Town of Sudbury
David Mohler, MassDOT

Metropolitan Area Planning Council (MAPC) Comments on 526 & 528 Boston Post Road - MEPA #15479

Public Transportation

Currently, there is no MetroWest Regional Transit Authority (MWRTA) service on Boston Post Road in Sudbury near the Project. The MWRTA bus routes closest to the Project are located at Hager Street in Marlborough to the west (Route 7C) and at the Nobscot Shopping Center in Framingham to the south (Routes 2 and 3). The closest stops to the Project along these routes are located at a distance of approximately three miles to the west and south, respectively.

A recently completed Comprehensive Service Assessment by the MWRTA¹ identifies service gaps and proposes recommendations for their resolution. The Service Assessment explicitly recommends extending the current weekday service along Route 7C in Marlborough to include Sudbury and Wayland along Boston Post Road. The route, when extended, would provide hourly weekday service along Boston Post Road between 6:00 AM and 8:00 PM. The estimated cost for this service extension is \$220,000 annually. This extension has been identified in the Service Assessment as a Phase 1 project that “increases service levels on the agency’s routes with the highest ridership and fills unserved gaps in the system.” The Service Assessment states that “MWRTA fully believes that additional resources targeted on these services will strengthen the system as a whole.” (p.10)

While the Proponent has committed to a mitigation program for roadway improvements, mitigation for public transportation is not addressed. The Proponent should outline how they will coordinate with the MWRTA, specifically identifying how connections to and from the Project site can be enhanced for bus use. The Proponent should partner with the MWRTA by contributing to the operating costs of area bus lines in an amount that is reasonably related to the Project’s additional demand. The Proponent should also collaborate with the owners of other sites along Boston Post Road who could also contribute to the operating costs of extending MWRTA bus lines. Additionally, the Proponent’s site design should be able to accommodate MWRTA vehicles.

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. Although the ENF states there will be a total of 1,300 parking spaces, how the spaces are allocated among the various land uses is not indicated. The EIR should describe the allocation of parking spaces the various land uses. It should be noted that MassDOT’s Transportation Scoping Letter (TSL) dated October 20, 2015, states that the Transportation Impact Assessment (TIA) “should explain the derivation of the proposed parking supply for the project. The number of proposed spaces should be compared to the amount required based on information contained in the most recent edition of ITE’s Parking Generation as well as the requirements of local zoning codes.”

Parking reserves and unbundling are innovative parking strategies that can facilitate the reduction of overall parking supply at this site:

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, parks, or stormwater mitigation. MassDOT’s TSL also recommended that the Proponent investigate this parking strategy. It should be noted that the Proponent can take advantage of the provision in the Town’s Zoning Bylaw which allows for reserve parking spaces².

¹ MWRTA, Comprehensive Service Assessment, December 2015.

² Town of Sudbury Bylaw, Article IX, 2014, Section 3113. Reserve Parking Spaces.

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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.

In addition to applying these two parking strategies, the Proponent should be required to implement the following Transportation Demand Management (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.

Pedestrian and Bicycle Accommodations

MAPC is pleased that the Proponent has identified roadway improvements that include pedestrian and bicycle accommodations as well as proposed pedestrian connections. To further enhance pedestrian and bicycle accommodations, the Proponent should implement the following:

- Ensure connectivity to the two bicycle trails planned within close proximity to Project's site, i.e., the Mass Central Trail along the northern edge of the property and the Bruce Freeman Rail Trail to the east of the site.
- While the ENF mentions that there will be secure bicycle parking at convenient locations on the site, the number and location of parking spaces is not provided. The EIR should specify the number and location of bicycle racks and covered parking throughout the Project site.

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. Adoption of modes share goals along with a comprehensive monitoring program would allow the Proponent to 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)

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. MAPC also notes MassDOT's TSL states, "The Proponent will be expected to set specific mode shift goals, particularly for residents of the residential portion and employees of the retail portion of the project."

Monitoring Program

A monitoring program can help to determine if the defined mode share goals are being achieved. A monitoring program should evaluate achievement of 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 Sudbury 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*. (p. 44).