



SMART GROWTH AND REGIONAL COLLABORATION

July 18, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Paige Czepiga, MEPA #15717
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Oak Grove Area Urban Renewal Plan, MEPA #15717

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 Environmental Protection (DEP)* ordering the state's DEP to take additional measures to implement the 2008 Global Warming Solutions Act. This ruling reasserts the state's obligation to meet these goals.

The Medway Redevelopment Authority (MRA), in cooperation with the Town of Medway, proposes to designate an Oak Grove Area Urban Renewal Area (URA), which would comprise approximately 82.2 acres and 238 parcels. According to the description in the Environmental Notification Form (ENF), this URA differs from most urban renewal projects in that it is currently predominantly "undeveloped and vegetated." In addition, almost 60 percent of the URA is uniquely configured of very small parcels and fragmented ownership, referred to as the Bottle Cap Lots, which render it unlikely that the area will be redeveloped under the normal operation of the private market. The URA is roughly bounded by Route 109 (Milford Street) to the north, West Street to the east, Alder Street to the south, and wetlands to the west. The URA is located approximately ¼ mile from the Exit 19 interchange on I-495.

Implementation of the Urban Renewal Plan (URP) within the URA is anticipated to occur over a 20-year period, by multiple developers, and in phases based on anticipated funding. While the MRA indicates that they seek to remain flexible and open to feasible opportunities, the URP concept calls for 11 lots to be created for disposition. The new lots will contain an anticipated 35 new buildings providing a mix of uses (e.g., office, hotel, retail, industrial, research & development, and restaurant). Approximately 110 new apartment or townhouse dwelling units are also proposed. Not including the apartment or townhouse dwelling units, the URP indicates a maximum build-out potential of 467,000 square feet (sf). According to the preliminary build-out analysis, at full-build, there would be 2,617 parking spaces and 13,990 new vehicle trips generated on an average weekday.

It should be noted that the URA currently contains one 120,000 sf industrial building and 9 single family homes, 2 of which include small businesses. Five of these residential structures are proposed for eventual demolition.

MAPC commends the Town of Medway for outlining a vision of mixed land uses that is consistent with existing town plans and takes adjacent land uses into consideration. As identified in the I-495/MetroWest Development Compact Plan,¹ the URA is within a designated Regionally Significant Priority Development Area. Implementation of the Oak Grove Area URP presents a unique opportunity for the MRA and the Town of Medway to implement a strong smart growth plan that mixes land uses, takes advantage of compact design, creates a range of housing choices (including affordable units), advances opportunities for walking and biking, fosters a strong sense of place, preserves sensitive environmental areas, generates public open spaces, implements Low Impact Development (LID) techniques, and minimizes impermeable surfaces.

More specifically in the transportation arena, it will be important to incorporate measures that minimize parking, advance access to various modes of transportation, develop mode shift goals – as well as a monitoring program, and incorporate a series of Transportation Demand Management (TDM) measures.

MAPC stands ready to assist the town in designing such a smart growth plan. We also respectfully request that the Secretary include the following measures in the Certificate:

Parking Supply

MAPC strongly encourages the MRA and the Town to investigate measures that reduce the overall number of parking spaces to deter single occupancy vehicle trips (SOV). As there is a critical relationship between parking supply and transportation behavior, reducing the amount of parking can contribute to an overall decrease in vehicular traffic and trips. The consequences of overbuilding parking include increased housing costs that can get passed along to homeowners and renters, storm-water infiltration issues caused by increased impervious surface, and less space for housing units because of the parking requirements. Parking reserves, unbundling, and shared parking can facilitate the reduction of overall parking supply and vehicular trips. MAPC notes that Medway's by-law does allow for the designation of green space for reserve parking and that reduced parking can be granted by special permit.²

Parking Reserves

Consider banking some of the parking spaces unless and until 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

Unbundling parking from space rent or sales price allows renters or owners to purchase only as much parking as they need. It would give future residents the opportunity to save money by using fewer parking spaces, and this reduced demand would also enable developers 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.

Shared Parking

The MRA and the Town should consider incorporating shared parking to the extent feasible. Shared parking can be particularly effective in mixed use developments, since there are different periods when parking demand is highest (e.g., an office building, which needs parking during the day, can share parking with a restaurant, which sees the greatest parking demand in the evening).

¹ Dated March 2012.

² Section 7.1.1.J. – Off-Street Parking and Loading

Access to Transportation

Although public transportation options in and around the URA are currently limited,³ MAPC is pleased that the MRA and Town intend to work with the Greater Attleboro Taunton Regional Transit Authority (GATRA), to advance ride-share shuttle services, and to incorporate bicycle amenities into the proposed developments. MAPC recognizes that GATRA submitted a letter stating that they are willing to work with Medway and its urban renewal planning efforts to plan for additional services.

Mode Share Goals, Monitoring Program, and Transportation Demand Management (TDM)

Specific mode share goals should be established along with specific actions to achieve these goals. These actions should be designed to result in an increase of public transportation, bicycling, and walking, and a decrease in automobile trips.

The MRA and the Town of Medway should outline a monitoring program to ensure that the specific mode share goals for residents, employees, hotel patrons, and retail/restaurant patrons are accomplished along with specific steps to achieve these goals. Data from the monitoring program should be presented in a summary format that clearly distinguishes among the impacts generated by the various land uses on the site. MRA and the Town of Medway should provide annual updates, publicly sharing the results.

The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. Contingency measures can include traffic signal timing and phasing modifications and/or further refinement of the TDM program. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified. Shortfalls in meeting mode share or other targets can be identified and remedied.

In the long run, the successful implementation of TDM programs can have a significant benefit on the efficiency of the transportation network and economy of an area. In order to achieve maximum success, MAPC encourages developing a TDM program that includes but is not limited to:

- Implementing a shuttle bus program
- Providing bicycle racks throughout the site
- Providing electric vehicle charging stations
- Implementing a car-sharing program
- Subsidizing transit passes

We ask the Secretary to incorporate elements in the Certificate to ensure the establishment of specific mode share goals, a monitoring program, and TDM measures to ensure these goals are achieved.

Affordable Housing

According to the MA Department of Housing and Community Development, Medway's 2016 Subsidized Housing Inventory (SHI) comprises 5.37% of the total housing stock, short of the Commonwealth's 10% target for all municipalities. In order to add to the SHI total, it is imperative that the Town commit to including affordable units on site. Since lower/moderate-income households routinely own fewer vehicles and travel fewer miles, the inclusion of these units may have a salutary impact on emissions as well as generating much-needed housing.

³ The site is approximately 8 miles from the Franklin Commuter Rail Station and approximately 9.5 miles from the Norfolk Commuter Rail Station. Two of GATRA's Medway T shuttle stops, which provide service to the Norfolk Commuter Rail Station, are over 4 miles from the URA.

Low Impact Development Techniques (LID)

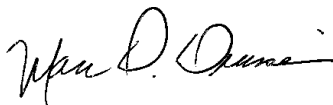
The ENF indicates there are environmental considerations associated with the site's development, including regulated resource areas and a Zone II wellhead protection area. There are also infrastructure considerations associated with water and sewer capacity and service. The plan should show how the anticipated development will be served with water supply and wastewater in a sustainable manner, taking into consideration the regulatory context for providing these services within the Charles River watershed. Care should be taken to avoid increasing flood risks within or near FEMA flood hazard zones, and protect the quality of the Town's drinking water resources within the designated Zone 2 aquifer recharge area.

MAPC encourages implementation of Low Impact Development (LID) techniques in an effort to maximize retention of water on site, prevent flooding, and protect water quality. LID ensures that maintenance of natural drainage flow paths, minimization of land clearance, building clustering, and impervious surface reduction are incorporated into a project's design. LID includes a specific set of strategies that treat stormwater management at the site level, ensuring that water is managed locally rather than engineering the discharge of water away from its source. LID techniques can include, but are not limited to rain gardens, infiltration of surface runoff, permeable pavement, and bioretention areas.

MAPC looks forward to seeing the continued advancement of the URP that includes incorporation of measures to reduce parking, to advance access to transportation, to include TDM measures, to accommodate affordable housing, and to implement LID techniques. The successful execution of a URP that integrates these recommendations has the potential to serve as a leading example for future projects in other communities to follow. MAPC is eager to work with the community to further develop a plan that is committed to accomplishing smart growth goals and maximizing benefit for the community as a whole. We stand ready to assist in this endeavor.

Thank you for the opportunity to comment.

Sincerely,



Marc D. Draisen
Executive Director

cc: Stephanie Mercandetti, Town of Medway
David Mohler, MassDOT