



SMART GROWTH AND REGIONAL COLLABORATION

April 21, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strysky, MEPA #15614
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: North Quincy Station Redevelopment Project, MEPA #15614

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.

The North Quincy Station Redevelopment Project (the Project) proposes to construct an approximately 1.1-million-square-foot mixed-use development (including a parking garage) in the City of Quincy. This Project will comprise 610 residential units, a 45,000 square foot (sf) supermarket, 5,000 sf of retail, and 1,600 parking spaces on a 7.2 acre site adjacent to North Quincy Station. North Quincy Partners LLC (the Proponent) proposes that of the 1,600 parking spaces, 871 will be replacement spaces for the MBTA.

Since the submittal of the Environmental Notification Form (ENF), the residential units now total 610, rather than 615, and the estimated square footage for residential units has decreased by 100,000 square feet to a total of 625,000 square feet. The Project is expected to generate approximately 3,976 new vehicle trips on an average weekday including slightly over 200 and 370 vehicle trips being made during the morning and evening peak hours, respectively. On a typical Saturday, the Project is projected to generate an estimated 5,724 new daily trips, including 426 new vehicle trips during the Saturday midday peak hour.

Parking Program

The Project now proposes 1,600 parking spaces, down from 1,700 proposed in the ENF. The overall need for parking supply is reduced by proposing shared parking between the residential use and the MBTA parking during the peak evening residential demand. MAPC applauds the Proponent for both reducing the number of parking spaces and developing a shared parking program.

Specifically, the Proponent's ground lease with the MBTA anticipates a shared parking program for residents to have access to approximately 0.5 spaces per residential unit at off-peak commuter parking times (i.e., nights and weekends). The residential peak demand is 1.25 spaces per unit (0.75 reserved and 0.50 shared with the MBTA). The Proponent recognizes that effectively managing parking will be important to the Project's success and indicates that parking will be monitored on an on-going basis by the parking operators.

The amount of proposed parking at this site is consistent with *MBTA's Draft TOD Guidelines and Policies*¹ which "supports reduced parking ratios for TOD, particularly within the station area core" (p. 27). Specifically, the MBTA guidelines specify ranges between 0.5 and 1.0 spaces per residential unit, and 1.0 to 2.0 spaces per 1,000 square feet of retail. It should also be noted that the MBTA "encourage[s] shared parking among TOD uses, and between park-and-ride and TOD uses where feasible" (p. 27). In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, the reduced parking supply and shared parking program will reinforce the success of this Project as a TOD.

Transportation Demand Management (TDM) Program

MAPC is pleased that the Proponent has committed to include a strong Transportation Demand Management (TDM) program that includes a variety of measures to minimize automobile usage, parking demand, and project-related traffic impacts. These measures include employing a TDM coordinator, providing electric car charging spaces on-site, locating bicycle parking areas within the site, as well as providing location information for car sharing services.

The benefits of a strong TDM program include maximizing the efficiency of the existing transportation system, providing healthy commuter choices, reducing vehicle trips, and reducing greenhouse gas emissions. While the Proponent mentions that residential parking will be unbundled, we also recommend that, to discourage vehicle trips, the Proponent implement additional parking fees for residents wanting to bring a second vehicle per unit.

The Project will improve access to the site for vehicles, pedestrians, and bicycles alike, thus providing amenities to adjacent neighborhoods and also encouraging use of North Quincy Station. Furthermore, the Proponent is coordinating with the MBTA and the City of Quincy to make off-site improvements along the perimeter of the Project site, including enhanced pedestrian, bike, and vehicular connectivity. The Project will include significant improvements to the public realm. These improvements include active ground-floor retail and sidewalks to enhance pedestrian connectivity through the site and to the MBTA station.

Affordable Housing

MAPC applauds the Proponent for advancing a mixed-use TOD that includes a substantial commitment to expanding the housing supply in Quincy, and thereby, in the region. As recognized in the DEIR, a draft five-year housing production plan prepared by the Quincy Planning Department and MAPC outlines the need for 4,000 new housing units by 2020. The 610-unit residential component of the proposed Project will serve to advance this objective, meeting fully 15% of the total goal.

However, the Proponent needs to clearly identify the affordable housing component for the estimated 610 residential units, and whether these units will be rental, homeownership, or a combination. We do recognize that the Proponent states that they will work with the City to contribute to the Affordable Housing Trust, but this needs to be further explained. We don't know how much the Proponent will contribute, how many affordable units will be created as a result, and whether any affordable units will be built on this site. It is important to note that currently only 9.6 percent of Quincy's housing stock is

¹ Draft revised June 22, 2016.

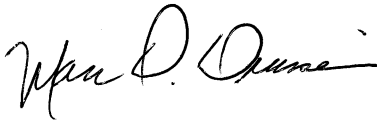
designated on the state's Subsidized Housing Inventory (SHI), just below the 10-percent state threshold. This percentage could decline over time as a result of market-rate additions to Quincy's housing stock. Therefore, the Project represents an important opportunity to create more affordable units, and to maintain or advance Quincy's achievement of the 10% goal.

As we outlined in our EIR comment letter, 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*², "people of color, low-income households and renters are all more likely to use transit than the average American" (p. 2).

Overall, given its adjacency to the North Quincy MBTA Station, the Project is uniquely situated to serve the community by creating residential opportunities and neighborhood retail as well as functioning as a transportation destination. Development of this Project will support growth in the area by creating new residential units and retail opportunities at a currently underutilized site. This Project is also consistent with regional goals of creating new housing in urban areas and close to job centers as well as creating new housing adjacent to public transit. This TOD has been designed to encourage a greater shift of auto trips to transit, bicycling, and walking. In turn, this will minimize adverse impacts and help to keep the Commonwealth on track to meet its statutory and regulatory goals.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: James J. Fatseas, City of Quincy
David Mohler, MassDOT

² 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>