April 24, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Holly Johnson, MEPA #11085R
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Union Point, MEPA #11085R

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.

LStar Southfield LLC (the Proponent) is proposing the Union Point Project as the updated development plan (the Project) for the former South Weymouth Naval Air Station, a tract of approximately 1,462 acres of land located in Abington, Rockland, and Weymouth. The Project is a mixed-use redevelopment project comprising 8 million square feet (sf) of commercial space, 3,855 housing units, and between 19,500 and 43,900 parking spaces on a brownfield site. The Project is forecast to generate 79,900 vehicle trips per day. The amount of proposed parking and vehicle trips is significantly higher compared to the 2007 Final Environmental Impact Report (FEIR), which proposed a range of 8,770-12,200 parking spaces and 34,300 vehicle trips.

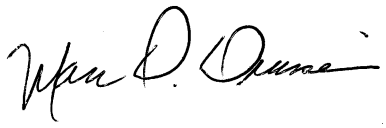
The Notice of Project Change (NPC) outlines the implementation of a significantly changed development plan from the 2007 FEIR. The proposed number of residential units has increased from 2,855 units to 3,855 units and proposed commercial space has increased from 2.06 million sf to 8 million sf. Predominant land uses include office (2.89 million sf), life sciences (2.8 million sf), hi-tech manufacturing (800,000 sf), manufacturing (800,000 sf), retail (348,300 sf), a conference center (120,000 sf), and a 285-room hotel. A previously proposed golf course, an indoor recreational field house, and a fitness/wellness center have been removed from the Project. The indoor skating facility has been expanded and a 15,000 seat sports stadium is now included in the Project.

Please see the attached set of comments and recommendations regarding this Project. While MAPC is pleased that this Project proposes to develop a significant amount of housing and redevelop a brownfield site, it is imperative that the EIR include a mitigation program, a shared parking program, and an effective monitoring program that addresses mode share goals.

The intent of these recommendations is to encourage a greater shift of auto trips to transit, bicycling, and walking, which will minimize adverse impacts 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 for the project's EIR.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: John Lucas, Town of Rockland
Robert Luongo, Town of Weymouth
Pat Ciaramella, Old Colony Planning Council
David Mohler, MassDOT

Building Program

Project Phasing
The NPC indicates that Phase 1 will comprise 2.06 million square feet (sf) of commercial development and 2,855 housing units. The EIR needs to indicate the phasing for the remainder of this Project which is slated for completion in 2036.

Sports Stadium
The NPC mentions the potential addition of a sports stadium for a minor league team. The Proponent needs to clearly indicate whether the sports stadium is planned as part of Phase 1. If so, the sports stadium needs to be included in the EIR's transportation analysis. While MAPC recognizes that the trips the stadium will generate will most likely occur on the weekends and after the evening peak hour, a transportation analysis will need to be prepared. The transportation analysis will need to address how patrons will access the facility and outline traffic management plans for crowd surges following events. The EIR should include information about the stadium location, what types of sporting events will take place at the stadium, whether the facility will be a home stadium for a specific sports team, and whether the facility will be used for other events (e.g., concerts) at times when games are not being played.

Additional Uses
Table 1.3-1, Union Point Development Program Comparison to 2007 FEIR Development Program, identifies several Additional Uses which are listed below:

- Long-term care facility (300 beds)
- Multi-modal facility (5,000 sf)
- Public school (600 students)
- Civic/community facility (40,000 sf)
- Institutional/Social services (37,000 sf)

The Proponent needs to indicate clearly whether any of these Additional Uses are planned as part of Phase 1. If so, they need to be included as part of the EIR's transportation analysis. The Proponent should also indicate which, if any of these facilities, will be built in Phase 1. Even if they are not scheduled for Phase 1 construction, the Proponent should indicate whether they actually intend to build all of these facilities, or only some which turn out, upon further analysis, to be most feasible for future development in later project phases. If these Additional Uses are planned for later phases, their proposed timing should be outlined in the EIR.

Preservation and Repurposing of Other Buildings
The NPC indicates that the Project also includes the preservation and repurposing of other buildings, which should be included as part of the transportation analysis in the EIR, if the work is scheduled for Phase 1. For example, the NPC mentions plans to refurbish Hangar 2 and Building 82, and that other buildings are being evaluated for preservation and reuse.

Components Already Completed or Under Construction
According to the NPC, work on the project has proceeded continuously since the issuance of the FEIR Certificate in 2007. Project components have already been completed (e.g., Eventide, Fairing Way, Highlands Neighborhood, Snowbird) or are under construction (e.g., Brookfield Village, The Commons, Transit Village, Winterwoods). The EIR needs to clarify the total number of dwelling units already completed or under construction, the amount of allocated parking (structured or surface), and indicate the locations of these projects on a site plan. The EIR should clarify how the transportation analysis will incorporate trips for projects already completed or under construction (e.g., as part of existing conditions or as part of Phase 1).

Trip Generation

The NPC states that the Project is forecast to generate 79,900 vehicle trips per day and that the Proponent is working with CTPS to determine the number of new trips that will be generated by the revised master plan and make trip assignments, including trips on existing and future roadway infrastructure. The EIR should clarify the extent to which the Proponent is working with CTPS on the Project's four-step modeling process – trip generation, trip distribution, mode choice and trip assignment.

Transportation Mitigation

It is important to point out that the Proponent has not yet committed to a clearly outlined transportation mitigation program. The table in Section 3, Preliminary Mitigation Measures, broadly states: "Improvements to road segments and intersections affected by site-generated traffic and implementation of Traffic Demand Management plan. A traffic monitoring program will be implemented to validate traffic projections." In fact, the Secretary's FEIR Certificate dated July 18, 2007 criticized the Proponent for not providing "a more specific presentation of certain project details, including mitigation." Subsequently, the Secretary directed the Proponent to "finalize clear and enforceable mitigation commitments in consultation with the state permitting agencies." *(p. 2)*

Due to the significant increases in the building program's square footage, parking, and traffic impacts, MAPC expects the EIR to contain a comprehensive program for transportation-related mitigation. MAPC recognizes that the Proponent has indicated that improvements, which were also considered in the 2007 FEIR, are being evaluated. Nevertheless, the EIR must contain a comprehensive transportation mitigation program, which also needs to be included in the draft Section 61 Findings. The transportation mitigation program should build upon the improvements identified by the Proponent which were considered in the 2007 FEIR as outlined below:

Route 3 Connection

Reconstruct Hingham Street to provide a consistent four-lane cross-section between Weymouth Street and Route 3.

South Weymouth Commuter Rail Station Improvements

Improve the South Weymouth Commuter Rail Station by relocating the station platform, adding parking spaces, providing pedestrian and bicycle connections, and introducing a multimodal center with a pick-up/drop-off area and shuttle bus service.

Intersection Improvements

- Route 58 at Route 139
- Pond Street at Derby Street/Hollis Street
- Columbian Square (Pond St/Pleasant St/Union St)
- Columbian Street/Forest Street
- Weymouth Street/Sharp Street/Abington Street
- Columbian Street/Park Avenue West

Planned Transportation Projects

The NPC mentions several projects that are currently in either the design or construction stages. The timing of when these projects are anticipated to be completed and whether their transportation impacts require mitigation needs to be addressed in the EIR. These projects include:

- Route 18 Widening
- Improvements to the Route 3 interchange at Derby Street
- Route 53/Derby Street/Gardner Street - signal and geometric improvements
- Extension of Market Street (formerly New Main Street) to the William Delahunt Parkway

Multi-Modal Transportation Facility

As outlined in the Secretary's FEIR Certificate dated July 18, 2007, the construction of a multi-modal transportation center was a central component of the Project. From reviewing the NPC, it appears that the commitment to construct the multi-modal transportation center has been reduced to a mitigation measure that may be included based on further evaluation. MAPC strongly encourages the addition of a multi-

modal transportation facility based on the MBTA's planned improvements to the existing South Weymouth Commuter Rail Station and urges the Secretary to require the Proponent to commit to constructing the facility.

In addition to committing to the multi-modal transportation facility as a mitigation requirement, the EIR should clearly distinguish what improvements pertain to the South Weymouth Commuter Rail Station and what specific components comprise the multi-modal transportation facility. A well-designed multi-modal facility has the potential to improve accessibility and connectivity between modes in addition to coordination with land use plans.

Parking

Parking Program
The estimated parking demand for Union Point ranges from 19,500 to 43,900 parking spaces. The EIR needs to specify a precise number of spaces and explain the methodology used to determine the total amount of proposed parking for the entire Project, parking proposed as part of Phase 1, and the timing of parking proposed subsequent to Phase 1.

The methodology should include an analysis of the anticipated parking usage based on the different types of parking demand (e.g., office, residential, hotel), projected parking demand at different times of day, anticipated parking duration, and whether the parking is surface or structured. With this analysis, MAPC will be able to assess whether the proposed parking spaces are in fact needed, or whether the number could be reduced to limit permeable surface and other environmental impacts, and to encourage non-auto access to the site. With the capacity to implement shared parking, close proximity to a commuter rail station, and opportunities to implement various parking reduction programs, it is our view that the amount of parking spaces could be significantly reduced.

MAPC requests that the EIR provide detailed information about the construction phasing and to closely monitor parking utilization. In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary require the Proponent to develop a strong program to reduce the proposed number of parking spaces to the fullest possible extent. A reduced parking supply would encourage the use of non-auto modes of transportation and lead to a more successful project from an environmental perspective.

Structured Parking
The Proponent has also noted that the Project will provide structured parking for most uses. The amount of structured and surface parking needs to be specified in the EIR.

Existing and Permitted Parking
The Proponent should clarify how the 2,056 parking spaces, which have already been permitted or constructed, are being allocated and utilized.

Shared Parking
MAPC strongly encourages the Proponent to develop a shared parking program. In order to make such a program work, the Proponent needs to determine how the different land uses (e.g., office, residential, hotel), will be able to use the same parking spaces given their different parking demands during different times of the day and week. Due to the variety of land uses and mixture of peak parking occupancy time periods, the Proponent should be able to optimize the amount of shared parking to reduce the number of spaces required.

Parking Banks (Landscape Reserves)
MAPC recommends that the Secretary require the Proponent to establish parking banks (a.k.a. landscape reserves) that would remain as greenspaces if it is determined that the surface parking may not be needed subsequent to the construction of the structured parking and full occupancy of the Project site. These areas would be converted to parking only if the need is clearly demonstrated. As long as additional parking is not needed, the land should remain landscaped.

Other Parking Policies and Management Strategies
Other specific parking policies and management strategies the Proponent is encouraged to include are:

- Offer Parking Cash-Out Incentives for Employees
  This strategy encourages tenants to provide cash instead of individual parking spaces to their employees, thus encouraging employees to choose alternative modes.

- Charge a Parking Fee for Residents with More than One Vehicle
  Charging a parking fee for residents with more than one vehicle will serve as a disincentive, and it will more legitimately recognize the true cost of parking construction and maintenance.

- Preferential Parking Program
  Provide a preferential parking program for carpools and vanpools, and provide access to Zipcars in convenient locations.

- Electric Vehicles
  Provide electric vehicle charging stations and charging infrastructure and reserve those spaces for such vehicles.

Shuttle Service
MAPC is pleased that the Proponent has mentioned it intends to provide its own shuttle service. Specifically, the shuttle will be a clean-fuel, potentially self-driving, on-site transit shuttle between Union Point districts and the South Weymouth Commuter Rail Station.

MAPC recommends that the Proponent expand the shuttle service to access other area residential and business centers and to provide a connection to MBTA Bus Route 225. The shuttle service must ensure that travel times and headways are convenient enough to encourage riders to use the system instead of other modes. In addition, the shuttle service's routes should be based on an on-going assessment and analysis of commuting patterns based on the data collected as part of the Project's monitoring program. MAPC looks forward to reviewing plans of the proposed shuttle routes in the EIR.

Bicycle and Pedestrian Connections
The NPC indicates that the Project has an extensive and comprehensive network of sidewalks, paths, and bicycle lanes. For example, residential areas are linked to the Town Center District by paths that encourage walking and biking. The NPC mentions that the Proponent has started construction of a proposed 50-mile trail network. The EIR needs to describe the extent to which the proposed 50-mile trail network will connect with the regional trail network. MAPC looks forward to written and graphic descriptions addressing the internal network of sidewalks, paths, and bicycle lanes within and connecting to the Project site.

The Proponent should also plan to install bicycle racks proximate to building entrances. These bicycle racks should be secure, weather-protected, and highly-visible. Internal bicycle parking for employees and financial incentives to encourage employees to bicycle to the project should also be provided by the Proponent. The specific number of internal and external spaces should be included in the EIR.

Mode Share Goals and Monitoring Program

Mode Share Goals
While the Proponent has committed to a monitoring program that will include vehicular data collection, there is no discussion of mode share goals. Developing and monitoring mode share goals is a central component of TIA preparation as outlined in the *EOEEA/MassDOT Guidelines for Traffic Impact Assessments (TIAs)*. Specifically, the TIA Guidelines state: *"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)*

The Proponent needs to define mode share goals clearly (vehicular, commuter rail, shuttle, bicycling and walking) for residents and employees as part of their commitment to conduct monitoring and reporting, and to adjust the project's TDM program as necessary.

Monitoring and Reporting
The Proponent's monitoring and reporting program must be well defined and eventually be committed to in the Section 61 findings. Trip generation, parking usage and Level of Service (LOS) must all be monitored on a continuous basis. It is imperative that the Proponent outline an extensive and thorough transportation monitoring and reporting program.

The monitoring program needs to include details of how the mode share goals will be attained, as well as steps that will be taken if goals are not met. The Proponent must also commit to conducting regular monitoring and reporting of transportation mode shares and adjust the Project's alternative transportation services and TDM programs as necessary (see below). MAPC recommends that the monitoring program take place annually and for at least five years after full occupancy. The monitoring and reporting program should include annual data collection of traffic counts, parking, public transportation, shuttle, bicycling, and walking. 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, if necessary.

Transportation Demand Management (TDM) Program
MAPC is pleased that the Proponent has committed to include a Transportation Demand Management (TDM) program that includes a variety of measures to minimize automobile usage and Project-related traffic impacts. These strategies include designating an on-site TDM Coordinator, subsidizing transit passes for employees, and establishing a ride-matching program. By working with the site's future tenants, the Proponent should be required to execute the following TDM measures:

- A guaranteed ride home program available for employees.
- Work with a car sharing service (e.g., ZipCar) to locate vehicles within the Project site.
- Provide bicycle parking and shower facilities/changing rooms within buildings.

TDM commitments should be institutionalized so that future managers of the development sites will be required to adhere to these commitments.

Water Supply
The previous MEPA filing found that connecting to the MWRA water system was the preferred alternative, and MAPC supported that proposal. The current project as described in this Notice of Project Change is notably different with respect to the Project's water demand, which has increased from 1.05 million gallons per day (mgd) to 2.7 mgd, as a result of an increase in both residential and industrial uses. The NPC continues to consider the MWRA as the source of water, although alternative routes for making the connection to Union Point are described. MAPC continues to support the MWRA alternative, and looks forward to the analysis of the preferred route in the DEIR.

The NPC also proposes to consider the Aquaria Desalination Plant in Brockton as an alternative source of water supply. Given that the role of an EIR is to explore all alternatives, it is appropriate to compare this alternative to the other water supply alternatives under review.

Whichever water source and piping route is ultimately selected as a preferred alternative, the project should include maximum efforts for water efficiency and demand management. This is especially important given that any of the water sources being considered would rely on importing water from other watersheds.

Wastewater

The wastewater option proposed in the previous MEPA filing was based on an on-site wastewater treatment facility that incorporated water reuse. Re-use of treated water was proposed for both the industrial users and for irrigation, including the then-proposed golf course. MAPC strongly supported this as one of the hallmarks of sustainability of the project.

The current project as described in the NPC has some marked differences. The total wastewater volume is significantly higher. The FEIR estimated a range of 0.64 mgd to 1.04 mgd, while the wastewater volume for the current project in this NPC is 2.3 mgd, despite the fact that a golf course is no longer part of the proposed project. Given these changes, the NPC proposes a range of three alternatives for managing the projects wastewater: (1) all MWRA sewer; (2) all on-site treatment; and (3) a combination of MWRA and on-site treatment.

Unlike the MWRA water system, which as ample capacity to add Union Point's water demand, the MWRA sewer system has significantly more constraints against added capacity. While it is understandable that all alternatives should be considered in the MEPA review process, there are clear advantages in terms of sustainability that favor on-site treatment with water reuse. That being said, given the significantly increased volume of wastewater in this NPC, the proponent makes the case that treating all of this volume on site would have its own challenges in terms of the increased land area needed, and the increased volume of treated wastewater to be assimilated in the local watershed. While the final decision on a preferred alternative will await the full analysis of the EIR, MAPC continues to express its support for including on-site treatment with water reuse to the maximum extent feasible, and to minimize reliance on the MWRA wastewater system to the maximum extent feasible.

Affordable Housing

Of the 3,855 dwelling units proposed by the Proponent, they are distributed as follows: 355 single-family detached, 2,000 apartments or condos, 500 townhomes, and 1,000 age-restricted. MAPC applauds the Proponent for including a substantial commitment to expanding the housing supply in Abington, Rockland, and Weymouth, and thereby, in the region.

MAPC is also pleased that at least 10 percent of the residential units will be priced as either affordable or workforce housing. We look forward to a more detailed description in the EIR that includes a breakdown of affordable housing among the different types of dwelling units and their locations. This should include a breakdown by tenure (ownership v. rental); a clear indication of the bedroom distribution (i.e., 1, 2, and 3 bedroom units); and specific indication of affordability (i.e., how many units will be affordable to households earning below a certain level of Area Median Income as determined by the US Department of Housing & Urban Development). MAPC recommends that the Proponent implement affordable housing throughout the development, so that neither location, design, nor amenities give any indication to the outside observer of where the affordable units are located.

We wish to emphasize that the issue of housing affordability 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*[1], "people of color, low-income households and renters are all more likely to use transit than the average American" (p. 2).

Finally, we ask that that the EIR outline the extent to which this affordable housing will contribute towards the 10 percent subsidized housing goal for the communities of Abington, Rockland, and Weymouth, pursuant to MGL Ch. 40B. According to the Department of Housing & Community Development Subsidized Housing Inventory, as of November 2016 Abington, Rockland, and Weymouth were at 7.61%, 6.39%, and 8.13%, respectively.

[1] 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