



SMART GROWTH AND REGIONAL COLLABORATION

March 16, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office - Purvi Patel, MEPA # 15269
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Woburn Landing, MEPA #15269

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.

Madison Woburn Holdings, LLC (the Proponent) proposes to develop an approximately 11.9-acre vacant parcel located at 369 Washington Street in Woburn. The proposed mixed-use project will consist of a limited service/extended stay 250-room hotel and three restaurants. Of the three restaurants, two will be full service with seating for 233 and 329 patrons. The third restaurant will be a 158-seat fast food facility with a drive-through window. The project site will comprise a total of 176,772 gross square feet in four separate buildings.

The project will generate an estimated 4,124 vehicle trips on an average weekday. The number of daily trips on a Saturday is projected to be higher at 5,178 vehicle trips. Primary access to the site will be provided via Tower Park Drive on the north side of the site from either Washington Street or the I-95 northbound ramps. A total of 536 parking spaces are proposed. The site, formerly owned by W.R. Grace and part of an EPA Superfund site, has been identified a local Priority Development Area (PDA) as part of MAPC's *North Suburban Planning Council Priority Mapping Project*, but it has not been identified as a PDA of either regional or statewide significance.

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. The proposed development on this site is likely to make all of these goals more difficult to achieve.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and our recommendations primarily address developing mode share goals, including Transportation Demand Management (TDM) strategies in tenant leases, and reducing the proposed number of parking spaces. The intent of these recommendations is to encourage a greater shift of auto trips to transit, bicycling, or walking. MAPC respectfully requests that the Secretary incorporate these recommendations intended to minimize the adverse impacts of this project in order to keep the Commonwealth on track in meeting its regulatory and statutory goals.

Mode Share Goals

While the Proponent has stated that the transportation analysis was prepared in accordance with the EOEA/MassDOT Guidelines for Traffic Impact Assessments (TIAs), there is no discussion of mode share goals. Developing and monitoring mode share goals is a central component of TIA preparation. 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)

MAPC is disappointed that, when discussing TDM, the DEIR noted that:

The build condition assumes no trip reduction due to TDM. Due to the lack of area transit, minimal existing pedestrian facilities and land uses on site (fast-food, restaurants) whose employees typically do not rideshare – traditional TDM measures would not be expected to produce any notable reduction in traffic to the site – likely one percent or less. Nevertheless, limited TDM measures will be implemented to try to reduce vehicle trips in the area. (chapter 4, p. 26)

We recognize that the site and the nature of development make mode shift difficult. This does not, however, absolve the Proponent from confronting the issue. Aggressive steps should be taken to encourage mode shift. The Proponent and future tenants should be committed to advancing transit and other non-auto service to the site. In summary, the Proponent should be required to further develop mode share goals as part of a mitigation program, along with appropriate monitoring requirements. The MEPA Certificate as well as the Expanded Environmental Notification Form (EENF) comment letters from MAPC, MassDOT, and MassDEP all previously commented on the need for the Proponent to include mode share goals.

The Proponent should work with the MBTA and nearby businesses to extend public transportation services to the area of the project site, specifically bus routes 354 and 134. Extending these routes will enhance access between downtown Boston, Woburn, and Medford. It is important to mention that MAPC is currently working with the City of Woburn on preparing a Master Plan. Recommendations will most likely include establishing a shuttle from Anderson RTC and modifying MBTA bus route 354 to surrounding employment areas in Woburn. These recommendations were also made in the North Suburban Commuter-Oriented Transit Opportunities Study Phase II prepared by the Central Transportation Planning Staff in 2005.

TDM Strategies in Tenant Leases

MAPC is pleased that the Proponent has committed to include TDM components such as joining the 128 Business Council, promoting ridesharing through MassRIDES' NuRide program, and adhering to a five year monitoring program. However, there are other TDM strategies that are worthwhile. Either the Proponent should commit to these directly or require them as a condition of tenant leases. It is not sufficient for the Proponent simply to "encourage" or "support" TDM strategies. Furthermore, any such commitments by the Proponent should be binding on any subsequent owner. Specifically, we suggest the following additional TDM strategies:

- Offer an on-site shuttle service for hotel patrons and employees that would, at a minimum, provide service to and from the Anderson Regional Transportation Center (RTC) and Mishawum MBTA Commuter Rail Station. The Lowell Commuter Rail, which provides a direct connection between downtown Boston and the City of Lowell, stops at these two stations.
- Subsidize transit passes for hotel guests and employees.
- Unbundle hotel guest parking from room charges.
- Offer parking cash-out incentives for employees.

It should be noted that the MEPA Certificate as well as MassDOT's and MassDEP's EENF comment letters also recommended inclusion of the above-mentioned TDM strategies.

Overall Parking Demand

MAPC appreciates that the DEIR includes a detailed shared parking analysis for on-site spaces based on guidelines from the Institute of Transportation Engineers and Woburn's zoning requirements. However, we strongly encourage the Proponent to reduce the number of on-site parking spaces by applying landscape reserves. This approach would allow the Proponent to hold land in reserve and phase in additional parking only if it is clearly needed. A reduction in the number of parking spaces would contribute towards an overall reduction of automotive traffic and trips to and in the vicinity of the project. It is worth mentioning that, as currently proposed, approximately 46 percent of the project site is devoted to parking.

To reduce further the overall number of parking spaces and to deter Single Occupancy Vehicle (SOV) trips, MAPC recommends that the Proponent and future tenants be required to collaborate with Tower Office Park and property owners directly across Washington Street to share existing parking spaces. It is feasible that ongoing conversations and sharing parking with the owners of adjacent or nearby parcels might advance cooperative ways in which all owners could encourage greater mode shift.

Photovoltaics

In its EENF comment letter, MAPC encouraged the Proponent to consider implementing solar power canopies as part of the parking design. The Proponent did respond that parking lot canopies may be feasible and may also be advantageous over roof mounted panels. Specifically, the Proponent noted that if parking canopies were to be applied to one acre of parking lot, annual generation could be up to 297 MWh/yr, offsetting 108 tons/yr of GHG emissions from the grid. However, the Proponent then states that a determination of whether to implement photovoltaics “must be made by the hotel brand that ultimately develops this portion of the site.” (chapter 4, p.14) The Secretary should insist that the installation of photovoltaics should be required as a condition of the tenant lease.

Carsharing and Electric Vehicle Charging Stations

The Proponent has committed to providing a minimum of one on-site carsharing parking space and one electric vehicle charging station. These are extremely minimal commitments, which should be increased.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Tina Cassidy, City of Woburn
Clinton Bench, MassDOT