



SMART GROWTH AND REGIONAL COLLABORATION

September 26, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Paige Czepiga, MEPA #15757
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Needham Street Redevelopment – Environmental Notification Form (ENF), MEPA #15757

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*. Furthermore, the Commonwealth encourages an increased role for bicycling, transit and walking to meet our transportation needs while reducing traffic congestion and vehicle emissions. 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 (MassDEP)* ordering the state's DEP to take additional measures to implement the 2008 Global Warming Solutions Act (GWSA). Consistent with the *Kain* decision, MassDEP issued new regulations in August 2017 to meet the GWSA's emission reduction requirements. This ruling and issuance of MassDEP's regulations reasserts the state's obligation to meet these goals.

Northland Development, LLC (the Proponent) proposes to redevelop a 28.7-acre site located along Needham Street in Newton. The Needham Street Redevelopment (the Project) includes a mixed-use building program of approximately 1.4 million square feet (sf) of development, including the retention of an historic 172,000 sf mill building that was previously converted to office space. Approximately 372,000 sf of commercial space will be provided for restaurant, retail, and office uses. An estimated 865 housing units are proposed, 173 (20 percent) of which will be affordable.

Proposed to be constructed in four phases, the Project intends to advance the evolution of the Newton-Needham (N²) Innovation District and the Needham Street Corridor as well as connect to, reinforce, and build-upon the Newton Upper Falls village center.

This Project is consistent with MAPC's 2013 study, *Needham Street in Newton: Potential Additional Development and Associated Traffic Impacts Study*. A component of this study identified the market potential for a broader mix of uses including retail, office, and housing and determined that Needham Street would be an attractive market for these uses.

The Project proposes 1,124 new parking spaces, resulting in a total parking supply of 2,250 parking spaces, which will be provided in a combination of on-street parking, surface lots, and structured parking. The new development is expected to add 4,521 daily vehicle trips to the site for a total of 12,548 daily vehicle trips¹.

MAPC commends the Proponent for proposing a mixed-use development that includes a substantial housing component with a significant affordability factor and an on-site “Mobility Hub”. The proposed housing will help to address the regional challenge of an inadequate housing supply, especially a shortage of affordable units. A well-designed “Mobility Hub” that creates a centralized space for pedestrians, bicyclists, shuttle activities, TNC/taxi drop-off and pick-up, and car-sharing could be very influential in encouraging people to choose alternative means of travel to, from, and within the Project site.

Moving forward with the next phase of MEPA review, it will be important for the Draft Environmental Impact Review (DEIR) to refine and commit to mitigation measures that reduce parking, enhance access to public transportation, expand pedestrian and bicycle access, continue coordination with MassDOT’s Needham Street Reconstruction Project, and expand the Upper Falls Greenway. In addition, a strong Transportation Demand Management (TDM) program along with mode share goals, mitigation, and monitoring is imperative. MAPC recommends the following measures for inclusion in the DEIR:

Parking

In order to minimize adverse traffic impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that strong efforts be made to minimize new parking at the Project site. To that end MAPC requests that the DEIR address the following issues:

Parking Methodology

The DEIR should explain the methodology used to determine the total parking proposed. The methodology should include an analysis of the anticipated parking usage based on the different types of parking demand (e.g., resident, shopper, employee). Without such an explanation, we have no way of assessing whether the proposed parking spaces are in fact needed, or whether the number could be reduced to limit environmental impacts and to encourage non-auto access to the site.

Shared Parking

MAPC strongly encourages shared parking and requests that the DEIR include a shared parking analysis that outlines how various users will be able to use the same parking spaces at different times of the day or week.

Enhance access to Public Transportation

MBTA Coordination

MAPC is pleased the Proponent intends to enhance access to public transportation by working with the MBTA to encourage enhanced bus transit opportunities, including increased service along Needham Street, exploring additional on-site bus routing through the site, and the provision of additional or enhanced bus stops (e.g., at the proposed “Mobility Hub”).

Shuttles

It is imperative that shuttle connections to the two proximate MBTA Green Line stations and the Commuter Rail station² be explored as a TDM mitigation commitment.

¹ The Project site currently generates 8,028 vehicle trips per day.

² Eliot and Newton Highlands Stations on the Green Line and Needham Heights Station on the Needham Line Commuter Rail.

Upper Falls Greenway

MAPC is pleased the Proponent intends to incorporate enhanced bicycle and pedestrian connections and amenities both internal to the site and to neighborhoods. Specifically, the Proponent makes mention of “exceptional opportunities or enhanced mobility connections along Needham Street facilitated by the former rail alignment behind the Site, known as the Upper Falls Greenway” (p. A-4) and will work with the City of Newton and interested parties to assess the potential for mobility enhancements and connections along this critical corridor. The ENF also mentions a proposed extension of the Greenway from an old rail spur. MAPC looks forward to reviewing the proposed extension in the DEIR. Although the location of this segment is not clearly shown on the site plan graphic in the ENF, it should be shown clearly in the DEIR.

MassDOT Needham Street Reconstruction Project

MAPC is encouraged that the ENF states the Proponent is coordinating with MassDOT on the Department’s ongoing re-design of Needham Street and anticipates that this coordination will continue as both projects proceed.

TDM Program

MAPC is pleased that the Proponent plans to join the 128 Business Council and implement a TDM program intended to reduce project-related vehicle trips and to minimize potential impacts to the transportation system. The Proponent has identified a good TDM plan, which includes the following components:

- Participate in shared services with other larger employers in the area.
- Provide financial incentives for non-automobile travel.
- Unbundle parking costs from rent/lease to discourage car ownership.
- Charge higher parking rates and shorter payment periods to reduce high turnover in congested portions of the site to help reduce vehicle usage.
- Charge parking fees directly to employees.
- Provide on-site bicycle accommodations.

The TDM program should include a shuttle service that would, at a minimum, provide access within the Project site and the proximate Commuter Rail and Green Line stations. The Proponent should also consider the inclusion of a bike sharing facility, or assist in supporting a bike sharing program, if (as expected) Newton establishes such a system over the next year. MAPC looks forward to reviewing a further developed TDM program in the DEIR.

Mode Share Goals and Monitoring

The DEIR should clearly define mode share goals (vehicular, transit, bicycling and walking) and commit to conducting regular monitoring and reporting of transportation mode shares. Adoption of mode 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* 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)

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.

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 in achieving mode share goals. 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 City of Newton 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)

Affordable Housing

MAPC commends the Proponent for proposing a project with a significant affording housing component. We look forward to a more in-depth analysis of the distribution of the proposed housing units in the DEIR. Specifically, the DEIR should address the type of housing (e.g., rental or condo), bedroom distribution, and level of affordability. It is our perspective that affordable housing is an environmental factor, because lower-income households tend to own fewer cars and to travel fewer miles.

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 to be further developed and incorporated in the Project’s DEIR. Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Barney Heath, City of Newton
James Freas, City of Newton
David Mohler, MassDOT