



SMART GROWTH AND REGIONAL COLLABORATION

July 31, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Purvi Patel, MEPA #15882
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Hood Park Master Plan, MEPA #15882, Environmental Notification Form

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, consistency with the requirement of the Global Warming Solutions Act (GWSA), as well as impacts on the environment.

The Hood Park Master Plan (the Project) is a mixed-use development located on the west side of Rutherford Avenue between D Street and Bunker Hill Industrial Park in Charlestown. Currently, the Project is approved for approximately 1.2 million square feet (sf) of predominantly commercial development by the City of Boston. Hood Park LLC (the Proponent) proposes to create a mixed-use development on a 19.92-acre site by adding approximately 500,000 sf of development for a total developed area of 1.7 million sf. Full build out is expected to take approximately 15 years.

The Project is located within walking distance from the MBTA Orange Line Sullivan Square and Community College Stations as well as multiple MBTA bus routes. The Proponent proposes 1,765 parking spaces (relocating 1,671 existing on-site spaces and adding 94 new spaces). When complete, the Project is anticipated to generate approximately 17,860 daily vehicle trips.

MAPC has a long-term interest in reducing vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions per the Commonwealth's statutory obligation to meet the GHG reductions of the GWSA — 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050.

As a high density mixed-use development in close proximity to two MBTA rapid transit stations, the Project has the potential to advance these transportation and greenhouse gas goals. The following recommendations are intended to help this Project to reach its full potential, to encourage a greater shift of single occupant vehicle (SOV) auto trips to transit, bicycling, or walking. In addition to aligning this project with the Lower Mystic Regional Working Group's (LMRWG) study, our key recommendations address reducing the overall amount of parking and developing a robust mitigation and Transportation Demand Management (TDM) program.

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

We also note that the project will cover 84% of the site with impervious surface. The site is in close proximity to the Mystic River, which has impaired water quality. This underscores the need to properly mitigate any stormwater impacts using state of the art Green Infrastructure measures.

In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that you require the Proponent to address our recommendations and questions in the Draft Environmental Impact Report (DEIR) and the forthcoming Section 61 Findings.

Thank you for the opportunity to comment on this Project.

Sincerely,



Eric Bourassa
Transportation Director

cc: Vineet Gupta, City of Boston, Boston Transportation Department
Tad Read, Boston Planning and Development Agency
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

Parking

The Proponent proposes 1,765 parking spaces (relocating 1,671 existing on-site spaces and adding 94 spaces) within three proposed above-grade parking garages. Specifically, the spaces will be distributed among a single 912-space garage and the remainder within the proposed new buildings. At approximately 1.0, the overall parking ratio for this mixed-use development is a high ratio for a Transit-Oriented Development (TOD) site.

The Proponent should look to reduce the amount of parking proposed for the overall project. This is a premiere TOD site located in close proximity to public transportation (bus and rail), enabling people to live and work car-free. The biggest determinant of whether people will use an automobile is the amount of free parking provided at both the origin and destination at the site. Therefore, reducing the amount of parking is the most effective strategy to reduce auto trips.

MAPC requests that the DEIR present a detailed parking needs assessment. Specifically, the Proponent should provide a breakdown of parking needs by land use category, time of day, and employee/customer/resident/visitor category to demonstrate the need for the proposed parking spaces.

To help minimize the amount of parking spaces required, it is essential that a shared-parking approach be utilized. Due to the varying peak times for the multiple onsite land uses (retail, hotel, lab, and residential), there is significant opportunity for parking spaces to be shared. The DEIR should include a comprehensive shared parking analysis.

The DEIR should also address un-bundled parking. This strategy discourages auto use for the residential development by uncoupling the parking from the housing unit lease or sale and charging the tenant a monthly or annual fee to park a vehicle at the site. Furthermore, one of the key preliminary recommendations of the LMRWG study is to substantially reduce the amount of parking in new residential developments within walking distance to transit.

MAPC requests that the Proponent be directed to charge for the use of on-site parking, develop a shared parking program, and reduce the overall amount of free residential parking provided on site. All three steps are essential to success.

Public Transportation

The Project is located in an area rich with access to public transportation. There are two MBTA Orange Line rapid transit stations located in close proximity to the Project site. Sullivan Square Station is located within 1/4-mile and Community College Station is just over 1/2-mile from the Project site. Sullivan Square Station also serves as a local transit hub and provides connections to twelve MBTA bus routes (86, 89, 90, 91, 92, 93, 95, 101, 104, 105, 109, and CT2).

As part of a mitigation program, the Proponent needs to work with the MBTA to address how these MBTA bus routes could be improved to maximize ridership. This includes, but is not limited to, review of pick-up/drop-off locations, scheduling, and route adjustments. It is important to point out that a key preliminary recommendation of the LMRWG Study is to make improvements to public transit.

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

While the Proponent has outlined roadway improvements in the Environmental Notification Form (ENF), public transportation improvements are not addressed. The Proponent needs to indicate how they will coordinate with the MBTA, specifically identifying how connections to and from the Project can be enhanced for the MBTA buses servicing this area. The Proponent should partner with the MBTA by contributing to service improvements for bus lines servicing the site, particularly MBTA Routes 86, 91, 92, 93, and CT2, in an amount that is reasonably related to the Project's additional demand.

The Proponent should consider contributing to the following public transportation improvements identified in the LMRWG Study:

Improved Orange Line Frequency

Reduce peak period headways from four and a half minutes to three minutes on the Orange Line. Achieving three-minute headways would require additional cars, a new signal system, upgrades in power supply, and an expanded maintenance facility at Wellington.

New Bus Rapid Transit Services

Provide two bus rapid transit routes to provide additional transit access between Everett, Cambridge, Charlestown, and Somerville. One route would provide service from Everett to North Station via Sullivan Square along Broadway and Rutherford Avenue. The second alignment would build off of the Silver Line from the Chelsea Station terminus and connect to Kendall Square and North Station, via Sullivan Square.

There are two such precedents for developers committing to public transit improvements through the MEPA process. One is Encore Boston Harbor's commitment to improving Orange Line service. The second precedent is Kendall Square where Boston Properties, the City of Cambridge, the Cambridge Redevelopment Authority, the MBTA, and MassDOT signed a Memorandum of Understanding, under which Boston Properties will contribute a transit improvement fee to support MBTA service improvements.

Lower Mystic Regional Working Group

MAPC is particularly interested in monitoring the development that takes place for this Project since it is contained within the study area of the Lower Mystic Regional Working Group (LMRWG) www.lowermysticstudy.org. The LMRWG has developed a comprehensive regional land use and transportation study that was required by your office as part of the Encore Boston Harbor MEPA process. Encore Boston Harbor, MassDOT, and the Barr Foundation are funding the Working Group, with MassDOT as the Working Group lead. MAPC is a member, along with the cities of Everett, Boston, and Somerville. In addition, MAPC is providing some of the staff support for the Working Group, particularly in regard to deriving policy and planning recommendations based on the modeling conducted by the Central Transportation Planning Staff.

The LMRWG Study specifically anticipated development at the Project site, along with tremendous growth occurring in this general area, including additional build-out in Assembly Square, growth in Sullivan Square and other areas of Charlestown, the Encore Boston Harbor casino and resort, and additional growth planned close by in other parts of Somerville and Everett. Only a truly regional approach can address the traffic impacts that will result from this

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

Project and nearby sites, including consistent and well-thought-out policies by local and state government, working in partnership. While additional transportation improvements will be needed, infrastructure alone will not address the anticipated increase in vehicle trips. The mix of uses, the amount of parking, and the TDM actions that property owners will be required to take are all critical to minimizing and mitigating traffic impacts. As one of the first projects to occur within the framework of the LMRWG Study, it is critical that the Proponent's transportation mitigation program be aligned with the Study's recommendations.

In light of the tremendous growth occurring in this area, the LMRWG Study considers the concept of establishing a Regional Mitigation Fund that would enable developers to deposit mitigation funds into a pool for transportation investments. The funds could support improvements to MBTA rapid transit or bus service; regional roads, highways, and bridges; bicycle and pedestrian infrastructure; regional bicycle share systems; or other improvements jointly agreed upon by the Proponent, municipalities, and MassDOT.

One great value of establishing such a fund is that it ensures all future developers will contribute according to reasonable and equitable rules to mitigate the impacts of their projects, rather than burdening the first, the last, or the largest project with all or most of the responsibility. A Regional Mitigation Fund, and the rules guiding contributions to it, can provide predictability to developers, while ensuring full mitigation of negative impacts.

Since we expect the LMRWG to be finalized by September 2018 and submitted to your office, we ask that the Proponent take the study's recommendations into account when preparing the DEIR and ensure that the project and its mitigation is consistent with the recommendations of the study.

Mitigation and Draft Section 61 Findings

As part of the Section 61 Findings, the DEIR should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation. The mitigation implementation schedule should clearly note how mitigation will be provided in relation to project phasing; for example, tying commitments to either completion of project square footages or generation of a specific number of traffic trips based upon project build out.

Transportation Demand Management Program

MAPC is pleased that the Proponent has indicated they will implement a comprehensive TDM program. It is critical that a robust TDM program be designed to minimize automobile usage and project-related traffic impacts. The TDM components that should be included in the DEIR and Section 61 Findings are:

Pedestrian and Bicycle Access

In order to reduce traffic and parking demands, this Project needs to promote pedestrian and bicycle travel to the fullest extent possible. MAPC is pleased the Proponent has indicated incorporating the following pedestrian and bicycle improvements:

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

- Create a new integrated street, bicycle, and pedestrian plan designed to connect the Project with the surrounding neighborhoods (e.g., linkages across Rutherford Avenue at Baldwin Street and D Street/Mishawum Street) and Sullivan Square.
- Construct internal roadways in compliance with Boston Complete Streets guidelines and create pedestrian and bicycle paths within the Project and around the periphery on D Street and Rutherford Avenue. This path will be able to connect to pathways that are planned as part of the Inner Belt Master Plan to the west and the shared-use linear park along the east side of Rutherford Avenue.
- Install and maintain an on-site Blue Bike station. The Proponent should also commit to installing internal bicycle parking spaces and outdoor bicycle racks throughout the site.

MAPC looks forward to reviewing the Proponent's pedestrian and bicycle plan in the DEIR.

Provide Infrastructure for Electric Vehicle Charging

At least four percent of the parking spaces should be allocated for electric vehicles unless the City of Boston requires dedication of a greater number of spaces. As the Proponent may be aware, Massachusetts is party to a multistate memorandum of understanding for an action plan facilitating implementation of zero-emission vehicle (ZEVs) programs. The goal is to ensure that there are 3.3 million ZEVs on the roads by 2025, which requires adequate infrastructure.

Other TDM components that should be addressed include:

- Joining and participating in a local Transportation Management Association (TMA);
- Allocating reserved parking spaces for car sharing services such as ZipCar;
- Subsidizing transit passes for residents and employees;
- Offering ridesharing through NuRide, the Commonwealth's web-based trip planning and ridematching service that enables participants to earn rewards for taking "green trips"; and
- Designating appropriate pickup/drop-off locations for taxi and private ride services.

Tenancy Lease Agreements/Tenant Manual

The DEIR should discuss how tenancy lease agreements or a Tenant Manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Mode Share Goals and Monitoring Program

Mode Share Goals

The DEIR should include aggressive and specific mode share goals, either by use or phase, to ensure the achievement of any trip reduction measures assumed in the transportation study. The Proponent needs to define mode share goals clearly (vehicular, commuter rail, subway, bus, bicycling, and walking) for residents, employees, and visitors as part of their commitment to conduct monitoring and reporting, and to adjust the project's TDM program as necessary.

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

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.* (page 17)

Monitoring and Reporting

The Proponent's monitoring and reporting program must be well defined and 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 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. 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, 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.

Open Space

The Proponent states the Project will create new public open space for the public's use. Specifically, there will be open space planning for this Project with Ryan Playground and proposed Sullivan Square Redevelopment Parcel A, both of which are currently proposed for open space uses. It is critical that the streetscape be designed to be inviting and encourage public access to the fullest extent possible. For example, this can be done through enhancing wayfinding signage and lighting to encourage access. MAPC looks forward to reviewing the Proponent's open space plan in the DEIR.

Stormwater and Water Quality of the Mystic River

The project will cover 16.76 acres, or 84% of the site with impervious surface. The site is in close proximity to the Mystic River, which has impaired water quality according the MA Department of Environmental Protection's "Section 301 D list" of waters under the federal Clean Water Act.

While MAPC encourages development density at TOD sites such as this, we also emphasize the need to properly mitigate any stormwater impacts using state of the art Green Infrastructure measures. The priority should be on retaining stormwater on site, recharging it or reusing it for landscaping, and meeting the new MS4 Permit requirements to retain the first 0.8 inches on a redevelopment site.

**Metropolitan Area Planning Council (MAPC) comments on
Hood Park Master Plan, Environmental Notification Form, MEPA #15882**

Affordable Housing

When complete, the Project will have a total of 377 housing units. These housing units will help the City of Boston meet its goal of creating 53,000 new housing units in the city by 2030. The DEIR needs to specify what amount of the housing units will be affordable and on-site and the extent to which this Project is in compliance with the City of Boston's Inclusionary Development Policy.

Affordable units are a critical mechanism to reduce the number of cars, vehicle trips, and GHG emissions. 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* (page 2).

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>