



SMART GROWTH AND REGIONAL COLLABORATION

November 14, 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 #15849, Draft Environmental Impact Report

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.

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 addition, MassDEP issued new regulations last year 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. As a high density mixed-use development in close proximity to two MBTA rapid transit stations, the Hood Park Master Plan (the Project) has the potential to advance these transportation and greenhouse gas goals.

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 City of Boston has approved the Project for approximately 1.2 million square feet (sf) of predominantly commercial development. While the overall square footage has not increased since the filing of the Environmental Notification Form (ENF), the Proponent has refined the arrangement and massing of the buildings on the site, relocated uses within the buildings, and eliminated the proposed 45 Stack Street hotel. Hood Park LLC (the Proponent) proposes to create a 1.7 million mixed-use development with 1,765 parking spaces on a 19.92-acre site with land uses to be allocated as follows:

- Office – 1,260,250 sf
- Residential – 316,200 sf
- Retail – 82,050 sf
- Hotel – 77,300 sf

The Project site is located in an area well served by public transportation, being within walking distance from the MBTA Orange Line Sullivan Square and Community College Stations as well as multiple MBTA bus routes. The Project is a long-term development that will be implemented in phases over 15-20 years.

MAPC has reviewed the Draft Environmental Impact Report (DEIR) and our key recommendations address reducing the overall amount of parking, aligning this project with the draft Lower Mystic Regional Working Group's (LMRWG) study recommendations, as well as developing a robust mitigation and Transportation Demand Management (TDM) program. These recommendations, detailed as an attachment to this letter, are intended to help this Project to reach its full potential and to encourage a greater shift of single occupant vehicle (SOV) auto trips to transit, bicycling, or walking.

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MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance for the Final Environmental Impact Report (FEIR).

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen  
Executive Director

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

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### **Parking**

The Proponent proposes 1,765 parking spaces (relocating 1,671 existing on-site spaces and adding 94 spaces). According to Table 1-2, Proposed Building Program, of the 1,765 proposed parking spaces, almost 57% are currently under construction (912 spaces at 100 Hood Park Drive and 90 spaces at 50 Hood Park Drive). The 912 parking spaces at 100 Hood Park Drive will serve as a primary parking garage for the public. With the exception of 78 on-street parking spaces, the remaining spaces (853) will be distributed within the proposed new buildings to be used by building tenants and guests.

MAPC requests that the Proponent be directed to reduce the amount of parking proposed for the overall Project, strictly limit the amount of free parking, and implement a shared parking program. This is a premiere TOD site located in close proximity to public transportation (bus and rail), enabling people to live and work car-free. MAPC's own work and other studies have shown that the availability of parking increases the likelihood a person will choose to drive instead of taking another mode<sup>1</sup>. Therefore, reducing the amount of parking and charging for parking are effective strategies to reduce auto trips associated with this Project. According to the Proponent's shared parking analysis, the peak parking demand is expected to be approximately 1,525 spaces. There is clearly room to reduce the number of proposed parking spaces. Additionally, at approximately 1.0, the overall parking ratio for this mixed-use development is a high ratio for a Transit-Oriented Development (TOD).

### Unbundling of Parking

MAPC was pleased to read that parking will not be bundled with the residential units of the Project. However, the FEIR should outline the specifics of how unbundling will be implemented. It is important to note that one of the key preliminary recommendations of the draft Lower Mystic Regional Working Group (LMRWG) study is to substantially reduce the amount of parking in new residential developments within walking distance to transit.

### Monitoring and Reducing Parking

A comprehensive parking monitoring program needs to be developed and implemented as the 912-space parking garage and other parking structures are constructed. To avoid overbuilding of parking, existing parking needs to be closely monitored with new parking only constructed if a justified need is demonstrated. It is important to note that the MassDOT comment letter<sup>2</sup> stated that *"the Proponent should investigate reducing parking or land banking of parking spaces until and unless needed, based on monitoring conducted at a future date...[and]...the Proponent should make a concerted effort to reduce the number of parking spaces for consistency with the LMRWG recommendations."*

The Proponent has indicated that the majority of the proposed structured parking can be converted to future office use in the event parking demand is no longer justified. The FEIR needs to indicate the number of parking spaces that could be removed under this scenario. MAPC notes that once parking demand is induced, it is highly unlikely that the garage(s) will be converted to office use. The Proponent has not adequately responded to the Secretary's request to reduce parking.

### Curbside Management

While the Proponent states that the Project has allocated parking spaces for car sharing services and designed designated pickup/drop-off locations for taxi and ride share services, the number and locations should be clearly conveyed in the FEIR. Plans to accommodate a potential increase for on-demand services should be specified.

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<sup>1</sup> [MetroBoston Perfect Fit Parking Initiative](#), Phase 1 Report, MAPC, February 2017.

Who Pays for Parking?, TransitCenter + Frontier Group, September 2017.

[The Strongest Case Yet that Excessive Parking Causes More Driving](#), CityLab, January 12, 2016.

<sup>2</sup> Dated July 31, 2018. The Secretary has incorporated by reference MassDOT's comment letter into the DEIR Scope.

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### **Public Transportation Mitigation**

The Proponent proposes to contribute to a series of roadway improvements, although no estimate of their contribution is provided. Beyond roadway improvements, a public transportation mitigation program is also necessary, given the scale of the Project, its contribution to increasing transit use, and the proximity of public transit services. It is essential for the Proponent to make public transportation a central component of its mitigation program<sup>3</sup>.

One of the recommendations identified in the draft LMRWG Study is to align developer transportation mitigation with the study's recommendations. The draft LMRWG Study specifically states, "*In order to accomplish all of the objectives in these recommendations, and to ensure a sustainable future for Sullivan Square and the surrounding areas of Boston, Somerville, and Everett, it would be necessary for all funders to contribute to the effort. Increased use of developer mitigation investments, not only from MEPA-eligible projects, but from locally permitted projects as well, can help ensure adequate funding is available for improvements above and beyond existing state and federal sources.*"<sup>4</sup>

The Proponent should work with the MBTA in a variety of ways to ensure that it assists in the implementation of the recommendation described above. For example, the FEIR should address how proximate MBTA bus routes could be improved to maximize ridership and to improve the quality of service. This includes, but is not limited to, review of pick-up/drop-off locations, scheduling, and route adjustments. 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.

Furthermore, contributions to the following public transportation improvements identified in the draft LMRWG Study should be considered, either as a contribution to further study or, in the longer term, contribution to the projects themselves:

#### *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 (BRT) 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 numerous precedents for developers committing to public transit improvements through the MEPA process. One is Encore Boston Harbor's commitment to improving Orange Line service. Another 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. A third is the developer contribution to the creation of an Assembly Square station on the Orange Line.

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<sup>3</sup> It is important to point out that while the DEIR mentions graphs of Orange Line and bus ridership and capacity are included in Appendix B, this information is not provided. As a result, MAPC is not able to determine the increased demand for either the Orange Line or the MBTA bus routes. This information needs to be provided in the FEIR.

<sup>4</sup> Draft - Lower Mystic Regional Working Group, Summer 2018, page 66.

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### **Trip Generation**

The ENF states that the Project is forecast to generate 17,860 vehicle trips per day. The DEIR indicates that the trip generation is projected to be 5,542 vehicle trips per day. The number of forecasted vehicle trips per day needs to be clarified in the FEIR, and this enormous change must be explained.

### **Advancement of New Technologies**

Over the period of project buildout, the Proponent should study the potential implications and opportunities that the rapid advancement of shared autonomous vehicle technology presents. The study should also describe how the Project will anticipate these changes, including flexibility in design to accommodate rapid shifts in transportation technology and travel behavior.

### **Mode Share Goals, Mitigation Commitments and Timeline, Monitoring and Reporting**

MAPC is disappointed that the Proponent neglected to address mode share goals as well as a timeline for monitoring and reporting, despite being directed to do so in the Certificate.

#### Mode Share Goals

The FEIR should delineate a program that ensures specifically defined mode share goals are accomplished over a specified time frame related to the phases of project development. Along with specific steps to achieve these goals, the Proponent should provide annual updates, and publicly share the results. Mode share goals should result in an increase of public transportation, shuttles, walking, and bicycling, and a decrease in single-occupancy vehicle (SOV) use.

Developing and monitoring mode share goals is a central component of preparing a Traffic Impact Assessment (TIA), 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.”*<sup>5</sup> The Proponent needs to define mode share goals clearly, with specific targets for automobiles (SOV and shared), bicycle, pedestrian, Orange Line, and bus.

#### Mitigation Commitments and Timeline

The Proponent should be required to outline specific mitigation commitments, covering not only roadways, but also transit, bicycle, and pedestrian, plus a timeline that addresses the Proponent’s contributions. A scope and timeline of mitigation commitments should also be included in the Section 61 findings as a basis for subsequent permitting. Plans for the long-range maintenance and upkeep of infrastructure improvements (e.g., new and existing roadways, transit improvements, and bicycle/pedestrian infrastructure) should also be included.

Transportation mitigation and monitoring measures can be most effectively implemented by coordinating with the Boston Planning and Development Agency’s (BPDA) Cooperation Agreement and the Boston Transportation Department’s (BTD) Transportation Access Plan Agreement.

#### Monitoring and Reporting

The scope should require the Proponent to develop a monitoring program for all modes. The monitoring program should have measurable milestones and serve as a benchmark for progress in meeting the mode share goals and other transportation objectives, including changes in parking, local and regional traffic, and public transportation. It should outline contingency measures that will be undertaken if these benchmarks are not met. The Proponent should provide annual updates, and publicly share the results. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecast changes. With a monitoring program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary. Shortfalls in meeting mode share or other targets can be identified and remedied. The need and schedule for the implementation of additional mitigation measures will depend on the results of the transportation monitoring

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<sup>5</sup> *EOEEA/MassDOT Guidelines for Traffic Impact Assessments*, page 17

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program. As directed by the Certificate, the Proponent will be required to conduct annual traffic monitoring for a period of five years beginning six months after occupancy of the project<sup>6</sup>.

**Transportation Demand Management Program**

MAPC is pleased that the Proponent has plans to implement a comprehensive TDM program (e.g., car-sharing, bikeshare, transportation coordinator). However, certain components of the TDM Program could be strengthened. Specifically, the TDM program should include a greater commitment from the Proponent to offer incentives for using public transportation. It is important to note that the Certificate states, *“The study should propose an integrated and adaptive multimodal mitigation package that aggressively targets the improvement of traffic operations while minimizing the use of single-occupancy vehicle (SOV) travel by employees and patrons.”*<sup>7</sup> It is our contention that the Proponent has not yet fully addressed this requirement.

Other TDM programs the Proponent should consider include, but should not be limited to:

- Subsidizing MBTA passes and other incentives to use bike share, rideshare, and shuttle services for residents, office and retail tenants as well as hotel patrons;
- Offering real-time transit and mobility information within the lobbies of all Project buildings and at Orange Line stations;
- Developing a comprehensive car share network plan for the entire Project;
- Designating appropriate pickup/drop-off locations for taxi and private ride services;
- Providing cash-out incentives for employees and require those who drive to the site to pay for parking.
- Offering flexible work hours and teleworking; and
- Promoting ridesharing through NuRide, the Commonwealth’s web-based trip planning and ridematching service, which enables participants to earn rewards for taking “green” trips.

Tenancy Lease Agreements/Tenant Manual

MAPC recognizes the Proponent is committed to including best practice language in future leases to encourage participation in TDM measures and ensure successful implementation of new programs. However, the FEIR needs to address how tenancy lease agreements or a Tenant Manual will be used as a mechanism to ensure implementation, maintenance, success of TDM measures, and continuity when there may be changes in ownership and operation.

Shuttle

MAPC was pleased to read that the Proponent’s proposed TDM program includes a shuttle connecting to public transit locations in coordination with efforts being made by proximate developments, including the Shrafft’s Center. While this was briefly mentioned in the DEIR’s Transportation Chapter,<sup>8</sup> the shuttle program should be included as a commitment in the Proponent’s mitigation measures and proposed Section 61 findings.

The shuttle service should be designed to enhance connectivity with the existing MBTA Orange Line stations and bus routes. To maximize mode shift, strong connectivity among these transportation options is critical. MAPC recommends the shuttle use alternative fuels (e.g., Compressed Natural Gas, Liquefied Natural Gas) or be electric. The FEIR should indicate when the shuttle will be activated, how its implementation relates to overall project phasing, and who will be responsible for its maintenance and operations. The FEIR should include a conceptual map of the shuttle service area and provide information about anticipated routes, stops, and schedules. MAPC looks forward to reviewing more information about the proposed shuttle in the FEIR.

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<sup>6</sup> Secretary’s Certificate, page 7

<sup>7</sup> Secretary’s Certificate, pages 6-7

<sup>8</sup> pages 4-66 and 9-12

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### Provide Infrastructure for Electric Vehicle Charging

MAPC is pleased that the Proponent has committed to provide electric vehicle charging stations to accommodate at least four percent of the total parking and sufficient infrastructure capacity for future accommodations for at least 15 percent of the total parking spaces. If there is rapid adoption of electric vehicles, the Proponent should be open to increasing these percentages over the life of the buildout.

### Pedestrian and Bicycle Access

MAPC is pleased that the Proponent plans to construct a dedicated 20-foot wide pedestrian and bicycle corridor along the entire length of the northern property line. This pathway will allow for access along D Street, while maintaining a workable right of way for the Massport rail line should rail service ever be reintroduced. 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 future bike and pedestrian linear park along the east side of Rutherford Avenue.

The FEIR should clearly show where and how bicycle services and racks will be accommodated in the public realm and at individual buildings. The locations, number, and type of on-street and off-street bicycle provisions (e.g., indoor storage, outdoor racks, number of bicycles) should be detailed in the FEIR. As a final point, the Proponent should detail how the internal pedestrian and bicycle network will be separated from automobile traffic.

### Shared Micro-Mobility

The Proponent should also give consideration to integrating shared micro-mobility services (e.g, scooters, e-bikes, one-wheels) within the Project. This includes on- and off-street parking, storage within buildings, and roadway infrastructure maintenance and management.

### **Affordable Housing**

MAPC notes that the Proponent has reduced the number housing units from 377 in the ENF to 200 in the DEIR. Reducing the number of housing units will make it more challenging for the City of Boston to meet its goal of creating 69,000 new housing units in the city by 2030. The FEIR 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*, "people of color, low-income households and renters are all more likely to use transit than the average American."<sup>9</sup>

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<sup>9</sup> 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>, page 2