



SMART GROWTH AND REGIONAL COLLABORATION

May 24, 2019

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strycky, MEPA #16011
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Parcel 12, MEPA #16011

Dear Secretary Theoharides:

Since is the very first MEPA comment letter I am sending you since your appointment, congratulations and good luck in your new post. MAPC stands ready to assist you in any way possible.

As you may be aware, 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.

An Expanded Environmental Notification Form (EENF) has been filed with the EOEEA by S&A P-12 Property LLC (the Proponent) to construct a 634,000-square foot (sf) mixed-use development on a vacant site, known as Parcel 12 (the Project), comprising both land and air rights parcels above and adjacent to the Massachusetts Turnpike in the City of Boston. Currently undeveloped, Parcel 12 is bounded by Boylston Street, Massachusetts Avenue, and Newbury Street.

The Project proposes a mix of uses that will consist of approximately 429,000 sf of office uses, 55,000 sf of retail and restaurant uses, and 150,000 sf of residential or hotel uses. The Project is expected to generate an estimated 3,650 adjusted trips per day¹ and will include up to 150 parking spaces in a below-grade parking garage.

Below are MAPC's comments as they pertain to parking, transit analysis, mitigation, and monitoring:

Parking

While we applaud the Proponent for proposing a limited number of parking spaces and committing not to overbuild parking, we also recognize the Proponent has indicated that some people traveling to the site will be required to find parking at nearby parking facilities. According to the EENF, the Urban Land Institute's parking analysis estimates the weekday shared parking demand peak to be approximately 532 spaces², meaning that there will be an additional parking demand of at least 382 spaces offsite. The Proponent has identified the Hynes Auditorium Garage, Prudential Center Garage, 425 Newbury (Somerset) Garage, and the Haviland Street Garage to be the primary garages for offsite parking. We recommend that the Proponent look at the utilization rates and capacity of these parking facilities to determine whether they have excess parking capacity and can absorb the additional amount of parking. This analysis will also help determine whether it may be necessary for the Proponent to make arrangements with these facilities to accommodate the projected parking overages. To further reduce parking demand, we recommend the Proponent provide incentives (e.g., employee parking cash-out, ZipCar memberships) for tenants to avoid bringing vehicles to the site. From the onset, developments on Parcel 12 should be marketed as "car-free" locations.

¹ Unadjusted daily trips are 10,487.

² Table 6-23b – Estimated Weekday Parking Demand (Continued). Table 6-23a – Estimated Weekday Parking Demand indicates an unshared demand of 796 spaces.

Transit Analysis – Hynes Station

The Proponent has indicated that the “Green Line may experience conditions that are slightly over capacity during the evening peak hour while entering and exiting Hynes Station”³. While we recognize the Proponent has included a transit analysis, it would be helpful to understand more fully the potential cumulative impacts of the project on the Green Line, and the relation of those impacts to the MBTA’s capacity standards. We therefore ask that the next MEPA submission provide a more thorough analysis of transit capacity and ridership at this location. This analysis should also take into account the reopening of the currently closed underground pedestrian tunnel between the west side of Massachusetts Avenue and Hynes Station.

Mitigation Commitments and Draft Section 61 Findings

MAPC applauds the Proponent for proposing a robust Transportation Demand Management (TDM) program as well as committing to infrastructure improvements. These mitigation commitments will all serve to improve access, connectivity, and safety for pedestrians, cyclists, and public transit users (Green Line, bus, and commuter rail).

If housing is proposed for this Project, we recommend that the Proponent further encourage reducing parking demand by unbundling the residential parking from the leasing or purchase of an individual unit. This strategy discourages auto use by residents by charging the tenant a monthly or annual fee to park a vehicle at the site.

Monitoring

The Proponent has noted that their monitoring program will comply with both the City of Boston’s and MassDOT’s guidelines. The details of MassDOT’s monitoring program is outlined in Section 6 of the EOEEA/MassDOT Guidelines for Traffic Impact Assessments (TIA)⁴. The Proponent and/or project tenant(s) are required to submit to MassDOT an annual Transportation Monitoring Program Report on the implementation of the TDM program for the first five years of operation.

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 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. Shortfalls in meeting mode share or other targets can be identified and remedied.

Developing and monitoring mode share goals is a central component of TIA preparation as outlined in the TIA Guidelines. 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, bus, 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.

MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance and the forthcoming Section 61 Findings.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc D. Draisen
Executive Director

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

³ Parcel 12 EENF, page 6-47.

⁴ https://www.mass.gov/files/documents/2017/09/21/TIA_Guidelines_3_13_2014.pdf