



SMART GROWTH AND REGIONAL COLLABORATION

May 8, 2020

Kathleen Theoharides, Secretary  
Executive Office of Energy & Environmental Affairs  
Attention: MEPA Office – Page Czepiga, MEPA #15995  
100 Cambridge Street, Suite 900  
Boston, MA 02114

RE: Allston Yards, MEPA #15995

Dear Secretary Theoharides:

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.

A Draft Environmental Impact Report (DEIR) has been filed with the EOEEA by the Stop & Shop Supermarket Company LLC with New England Development (together, the Proponent). The Proponent proposes to redevelop the existing retail center located at 60 Everett Street in the Allston neighborhood of Boston. Allston Yards (the Project) lies within the Allston neighborhood just south of the Massachusetts Turnpike and is bounded by the Everett Street bridge to the east, Arthur Street to the west, along with a mix of other uses that front on North Beacon Street to the south. The Project is located adjacent to the MBTA Boston Landing commuter rail station. Eight bus routes - 51, 57/57A, 64, 66, 70/70A, 86, 501, and 503 - all operate within a half mile of the Project site and the MBTA Green Line "B" route is located approximately three-quarters of a mile from the site.

The Project site currently houses approximately 100,000 square feet (sf) of retail space, including a 65,000 sf Stop & Shop constructed with smaller ancillary retailers in a one-story building with a 450-space surface parking lot. The Proponent proposes to redevelop the 10.6-acre Project site with an approximate 1.25 million sf mixed-use, transit-oriented development (TOD) comprising approximately:

- 350,000 sf of office/research space;
- 868 residential units;
- 117,000 sf of retail space, including a 67,000-square foot grocery store; and
- Public open space comprising one acre.

At full-build, the Project is expected to generate an estimated 4,150 adjusted trips per day<sup>1</sup> and will include up to 1,200 parking spaces.

MAPC is pleased that the Proponent has outlined a comprehensive mitigation program as well as a robust Transportation Demand Management (TDM) program. However, we have concerns that pertain to the amount of proposed parking spaces and the need to include mode share goals.

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<sup>1</sup> Unadjusted daily trips are 8,360.

## **Parking**

The Proponent proposes an overall residential parking ratio of 0.5 spaces per residential unit and 1.56 spaces per 1,000 sf of office space. While the residential parking ratio is between 33-60%<sup>2</sup> lower than the Boston Transportation Department's (BTDs) residential parking guidelines, the office space parking ratio exceeds BTD's guidelines. BTD's parking ratio guidelines for office use near an MBTA station in Allston range between .75 to 1.25 spaces per 1,000 sf.

We recognize the Proponent proposes to unbundle parking from the leasing or purchase of residential units, and the Proponent further plans for future reuse of space through structured parking. However, the Proponent did not follow the EENF Certificate's requirement to evaluate measures to reduce parking supply that include providing cash-out incentives for employees, metering on-street parking, and fees for structured parking<sup>3</sup>. MAPC respectfully requests the Secretary to require the Proponent to reevaluate reducing the number of office parking spaces.

We also note that while the DEIR mentions the proposed project's land use approvals include incentives to convert parking space to usable space in the future, the DEIR does not identify what these incentives are. We would like the Proponent to clarify.

## **Mode Share Goals**

The Proponent has committed to a monitoring program but has omitted any discussion of mode share goals. The EENF Certificate directed the Proponent to "clearly state mode share goals and discuss how the TDM program is designed to meet these goals."<sup>4</sup> 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. Mode share goals should result in an increase of public transportation (bus and rail), walking, and bicycling, and a decrease for single-occupancy vehicle (SOV) use.

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

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<sup>2</sup> BTD's residential parking guidelines in Allston/Brighton near an MBTA station are between 0.75 – 1.25 spaces per unit.

<sup>3</sup> EENF Certificate, April 12, 2019, page 15.

<sup>4</sup> EENF Certificate, April 12, 2019, pages 16-17.