



SMART GROWTH AND REGIONAL COLLABORATION

November 23, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strysky, MEPA #16195
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Boynton Yards, MEPA #16195

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, public 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 at least 85% from 1990 levels by 2050.

Boynton Yards LandCo LLC (the Proponent) proposes the construction of a mixed-use development that includes four buildings containing up to approximately 1,365,000 square feet (sf), divided as follows: 963,500 sf of office, research and development, and lab-enabled uses, 338,000 sf of residential space, and 42,500 sf of retail and/or restaurant space. The Draft Environmental Impact Report (DEIR) proposes up to 1,050 parking spaces on-site (1,002 below-grade and 48 on-street). Boynton Yards (the Project) is projected to generate 6,684 (adjusted)/15,092 (unadjusted) vehicle trips per day. Exceptionally well-served by public transportation, the Project will be within a quarter mile walking distance of the planned MBTA Union Square Green Line Station and is in close proximity to several bus routes.

MAPC has reviewed the DEIR and has concerns regarding the proposed parking program. Given the transit-rich location, we have concluded that the Project's approximate overall 0.75 space per 1,000 sf parking ratio and future mode share of 50% for vehicles to be too high and a 20% future mode share for transit to be too low. The Proponent must aim for a higher future transit mode share and a reduced number of parking spaces. We note that the proximate Union Square Development, a mixed-use project of 2.4 million sf, has a collective parking ratio of 0.63 spaces per 1,000 square feet.

Allocation and Phasing of Parking Spaces

MAPC appreciates that the Proponent has provided an estimated number of proposed parking spaces for each building. MAPC respectfully requests that the Proponent provide information regarding the allocation of proposed parking spaces to land use for each Project phase, preferably in a matrix format along with an explanation of the methodology used to determine the total parking proposed. The methodology should include an analysis that quantifies the anticipated parking usage based on the different types of parking demand (e.g., market residential, affordable residential¹, employee, retail/restaurant customer) and projected parking demand. The total number and allocation of proposed parking spaces by land use type needs to be provided by the Proponent as a baseline for full build-out.

¹ Please note the importance of distinguishing between market and affordable residential, since the residents of affordable units may own fewer cars and take fewer auto trips.

Shared Parking Program

While the Proponent anticipates opportunities for parking spaces to be shared between residents and workers, the DEIR neither outlines nor commits to a shared parking program. A shared parking program that does not overbuild parking would encourage and reinforce the use of available alternative modes of transportation to access the Project (e.g., Green Line, buses, walking, and bicycling) and minimize dependence on auto travel.

The EIR should include a shared parking analysis and specific plans to implement a shared parking program. Without this information, we are unable to assess whether the number of parking spaces could be reduced to limit environmental impact and to encourage non-auto access to the site.

Transportation Demand Management (TDM)

MAPC is pleased that the Proponent has proposed to unbundle residential parking, that office/lab parking spaces will be unbundled from tenant leases, and mentions the Proponent, and ultimately the Property Management Firm, will commit to the following TDM measures:

- Charge market rate for parking spaces through tenant lease agreements;
- Implement short-term parking lease agreements;
- Require tenants to offer short-term parking lease options to employees, such as month to month; and
- Require tenants to charge employees market rate for on-site employee parking.

However, the Proponent's TDM program could be expanded to include more specific and robust parking management strategies with the goal of reducing and better managing parking. We respectfully request the Secretary to require the Proponent to include the following TDM measures:

- Demand-responsive pricing, which adjusts hourly rates for public and customer parking to manage parking availability;
- Charging for parking on a daily, not monthly, basis; and
- Offering parking cash-out incentives for employees.

Subsequent to reevaluating the number of parking spaces based on the shared parking analysis and identification of the number of parking spaces that can be reduced through implementation of additional TDM measures, the Proponent should produce a revised parking program.

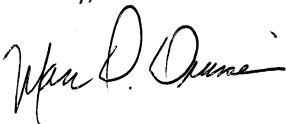
Promote Transit Use

The Project site is exceptionally well served by public transportation and public transit needs to be strongly promoted for employees, residents, and visitors. In turn, the demand for vehicular travel and parking spaces could be reduced. We strongly urge the Secretary to require the Proponent to promote future employer/resident incentives such as a 100% employer/resident subsidized transit passes (e.g., through tenant lease arrangements), and even if such a requirement is forthcoming, MAPC strongly urges the Proponent to consider such an arrangement.

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 submit comments on the DEIR and to provide input to the MEPA scoping for this Project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Mayor Joseph A. Curtatone, City of Somerville
George Proakis, City of Somerville
Brad Rawson, City of Somerville
David Mohler, MassDOT