



SMART GROWTH AND REGIONAL COLLABORATION

December 11, 2020

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Erin Flaherty, MEPA #16277
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Dorchester Bay City, MEPA #16277, ENF

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.

MAPC has reviewed the Environmental Notification Form for the Dorchester Bay City project and offers comments in the attachment below. The Project Site includes two parcels in the Dorchester neighborhood of Boston – the Bayside Site and the 2 Morrissey Site – which are separated by Mt. Vernon Street. The Bayside Site is a 19.94-acre parcel of land bounded by the Dorchester Shores Reservation to the east, Harbor Point Apartments to the south, and Mt. Vernon Street to the west. The Bayside Site will be redeveloped by Bayside Property Owner, LLC (the Bayside Proponent). The 2 Morrissey Site is a 13.61-acre parcel of land bounded by Mt. Vernon Street to the northeast, Morrissey Boulevard to the west, and Boston College High School to the south. The 2 Morrissey Site will be redeveloped by Morrissey Property Owner, LLC (the 2 Morrissey Proponent).

Combined, the Bayside Proponent and the 2 Morrissey Proponent (the Proponent) propose a mixed-use redevelopment totaling approximately 5.9 million sf of building program across two parcels - the Bayside Site and the 2 Morrissey Site (the Project). The proposed Project includes approximately 1,740 residential units (1,460,000 sf), approximately 4,008,000 sf of office, research and development, life sciences and/or potentially academic uses (referred to as office/research), and approximately 155,000 sf of retail/restaurant uses.

The Project will include 17 new development blocks, and approximately 2,650 parking spaces, which will be supported by a new street circulation system to accommodate vehicles, pedestrians, and bicyclists within the Project site. At full build-out, the Project is projected to generate 16,692 (adjusted)/50,986 (unadjusted) vehicle trips per day. Full build-out of the site is anticipated to occur over a period of 10-15 years.

The Project has excellent access to both public transportation and the regional roadway network. Specifically, the Project site is proximate to the MBTA JFK/UMass Red Line station, the MBTA commuter rail, and local MBTA bus routes. Due to its local connections to Morrissey Boulevard and Day Boulevard, as well as the I-93 ramps at the Columbia Road interchange, the Project site has strong access to the regional roadway network.

MAPC has reviewed the Environmental Notification Form (ENF) and has comments that address coordination with proximate roadway projects, access to JFK/UMass Station, advancing a parking program, implementing a robust Transportation Demand Management (TDM) program, and developing a mode share and monitoring program. These comments, proposed recommendations, and questions are detailed as an attachment to this letter. MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance for the Environmental Impact Report (EIR).

Thank you for the opportunity to comment on this Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc D. Draisen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Marc D. Draisen
Executive Director

cc: Gregory Rooney, Boston Transportation Department
Tad Read, Boston Planning and Development Agency
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on
Dorchester Bay City, Environmental Notification Form, MEPA #16277**

Development Program

The Proponent states that the phasing strategy is still being developed. As part of the EIR submission, the Proponent needs to clearly identify how the sequencing of the proposed Project's overall phasing strategy will be implemented. The EIR must also outline commitments to provide impact analysis at key build-out thresholds, along with identifying parking supply and mitigation for each phase.

We note that the Proponent has indicated that development on the 2 Morrissey Site will occur at a later stage of the Project, after the existing tenancy at that property has expired. The timing of that portion of the development, which comprises 40 percent of the total built square footage of the site, must be identified in the EIR.

There are several significant nearby transportation infrastructure projects that have been initiated by the City of Boston, MassDOT, the Department of Conservation and Recreation, and the MBTA. These projects are the re-design of Morrissey Boulevard, Mt. Vernon Street¹, Kosciuszko Circle, and JFK/UMass Station. It is critical that the programming of these projects be identified as part of the Proponent's phasing strategy. The extent to which these transportation infrastructure projects may impact the Project's phasing strategy, traffic conditions, and design at the Project site needs to be identified.

The Proponent also needs to indicate how they will coordinate with other large scale development projects in the vicinity of the Project site. These projects include but are not limited to: the Mary Ellen McCormack Public Housing Development, 135 Morrissey Boulevard (former Boston Globe Headquarters), and 75 Morrissey Boulevard (residential development).

Monitoring Program and Mode Share Goals

Mode Share Goals

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 Transportation Demand Management (TDM) program as necessary. Mode share goals should specify a numerical target for increased use of public transportation, walking, and bicycling, and a decrease for Single Occupancy Vehicle (SOV) use. The monitoring and reporting 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. MAPC recommends that a full assessment based on the data gathered take place annually and for at least five years after full occupancy.

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

It is imperative that the Proponent outline an extensive and thorough monitoring and reporting program. The monitoring and reporting program should include annual data collection for vehicular trips, parking usage, public transportation, bicycling, and walking. This program must be well defined, and committed to in the Section 61 findings. The intent of the monitoring and reporting program is to confirm that actual changes are consistent with forecasted changes. With a monitoring and reporting program, the actual impacts of a project can be determined and additional mitigation measures identified, if necessary.

¹ The BPDA has completed a [25% Design of Mt. Vernon Street](#) with the intent to beautify the street and make it safe and comfortable for all users: walkers, bikers, drivers, and transit passengers.

Transportation Analysis

CTPS Regional Model

MAPC recommends that the Proponent use the services of the Central Transportation Planning Staff (CTPS) to estimate future traffic volumes for the study area based on the CTPS regional model. The modeling effort can be designed to depict the actual transportation network as closely as possible, including attributes such as capacity and travel speeds along with roadway links. Based on many factors in the model, including socio-economic projections, CTPS will be able to estimate as accurately as possible the likely number of vehicle trips to be generated by the project, and assign vehicle routes based on roadway capacity and travel speeds. In addition, the model will be able to derive an internal capture rate for the site and to make assumptions for transit and non-motorized trips. The Proponent should also use the model to quantify the effectiveness of the TDM plan. There is precedence for utilizing the regional travel model as it was applied for the Suffolk Downs Redevelopment in Boston/Revere and Union Point development in Weymouth.

The ENF proposes Medium- and Long-Term scenarios for 2025 and 2030 respectively, yet also notes that the Project will likely be built out over 10 to 15 years. MAPC respectfully requests that the Proponent use the forecasting years of 2030 and 2040 for the Medium- and Long-Term scenarios.

Kosciuszko Circle

The Proponent states that the new roadway system will allow movement from Morrissey Boulevard through the 2 Morrissey and Bayside Sites over to Moakley Park and Day Boulevard, increasing access to civic open spaces while decreasing congestion points around Kosciuszko Circle. The reduction of traffic impacts to Kosciuszko Circle need to be detailed in the EIR.

Water Transportation

The EIR does not mention of the use of water transportation for the Project's residents, employees, and visitors. MAPC respectfully requests that the EIR address the viability of including water transportation (e.g., ferry service) at the Project site to provide access to/from downtown Boston.

Access to JFK/UMass MBTA Station

The EIR should outline the approach of how the Project will leverage proximity of the Red Line. Utilization of the Red Line will be a critical component to minimize vehicular use to/from the Project site as well as meeting mode share goals. Major effort in design, configuration and amenity must be focused on minimizing the perceived and real gap in distance from the Red Line to the Project site.

Public Transportation

The Proponent has indicated that they will examine the impact of Project trips assigned to the MBTA Commuter Rail, Red Line, and local bus services, that serve both the Project site and JFK/UMass MBTA station. MAPC's comments addressing impacts to the MBTA Red Line and MBTA bus routes are as follows:

MBTA Red Line Impacts

The EIR needs to analyze the extent to which the Project will impact service on the Red Line, especially during the peak morning and evening commute hours. The Proponent should work with the MBTA to determine whether service may need to be augmented in order to maintain appropriate levels of peak hours service (e.g., signalization).

MBTA Bus Impacts

The EIR needs to include a summary of the specific MBTA bus routes that will be impacted by the Project, the estimated increase in trips by route, and whether those routes will experience over-crowding. The Proponent should work with the MBTA to determine whether service levels need to be increased to address crowding, and if so, those efforts should be added to the mitigation plan.

The EIR should also study the need for new MBTA bus stops, either within or adjacent to the Project site, to provide enhanced access. This should include improved bus connections between the Project site and the JFK/UMass MBTA station.

In conducting these analyses, the Proponent should assume that, over the long period of development and occupancy, MBTA service levels will return to and perhaps exceed pre-COVID levels, rather than assuming that MBTA service will remain at the levels of the pandemic emergency.

Parking

Allocation and Phasing of Parking Spaces

MAPC respectfully requests that the Proponent provide information regarding the allocation of the 2,650 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 residential², employee, retail/restaurant customer) and projected parking demand. The Proponent should provide the total number and allocation of proposed parking spaces by land use type as a baseline for full build-out.

Shared Parking

MAPC was pleased to read that the Proponent will explore opportunities to control parking demand through sharing of parking spaces for different users by time of day (e.g., between the Project's residential and commercial components). 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, including Red Line, bus, shuttle service, as well as walking and bicycling and minimize dependence on auto travel. MAPC looks forward to reviewing a quantitative shared parking plan that addresses how these parking spaces will be assigned to different users, which include the Project tenants, residents, and visitors, in the EIR.

Underground Parking

While the ENF mentions that the majority of proposed parking will be underground, the EIR needs to identify the number of spaces and where these spaces will be located. The distinction between below-grade and at-grade parking needs to be clearly outlined in the EIR. Also, plans for future adaptability of underground parking should be explored for the potential productive reuse of the space, should parking demand decrease in the future due to emerging technologies.

Current Parking

Along with a quantitative description of the level of use, the EIR should identify when and where the existing estimated 2,200 parking spaces at the Project site will be reallocated. The Bayside Site currently contains approximately 1,300 surface parking spaces used by UMass Boston and the 2 Morrissey Site contains approximately 900 accessory parking spaces.

Shuttle Service

According to the ENF, the Proponent is evaluating the viability of a private shuttle system to connect the Project to the JFK/UMass MBTA station to supplement and/or integrate with existing shuttle services in the area. Beyond evaluation, the Proponent should commit to operating a shuttle service for the Project's employees, residents, and visitors to, from, and within the site. Specifically, the on-site shuttle should run as a continuous connection providing access to the various buildings within the Project and most importantly to and from the JFK/UMass MBTA station, which is challenging to access either on foot or by bicycle.

² 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.

The shuttle service should be designed to enhance connectivity with existing MBTA subway, bus, commuter rail, and potential integration with other existing shuttle services at JFK/UMass MBTA station. To ensure significant mode shift, strong connectivity among these transportation options is critical. The EIR should include a conceptual map of the shuttle service area and provide information about anticipated routes, stops, connectivity to existing services (subway, bus, and rail), and schedules. MAPC recommends the shuttles use alternative fuels (e.g., Compressed Natural Gas, Liquefied Natural Gas) or be electric. The EIR should outline the commitment to a shuttle service.

Transportation Demand Management

MAPC is pleased that the Proponent proposes to implement a robust Transportation Demand Management (TDM) program, which will include a new Transportation Management Association (TMA) to encourage active and sustainable modes of transportation and minimize vehicle use. According to the Proponent, the new TMA will be created in conjunction with other area landowners and nearby institutions, such as UMass Boston.

Parking Management Strategies

In addition to shared parking, we respectfully request the Secretary to require the Proponent to evaluate the following parking management strategies with the goal to reduce and better manage parking:

- Unbundle residential parking from tenant leases;
- 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;
- Require tenants to charge employees market rate for on-site employee parking;
- Implement demand-responsive pricing, which adjusts hourly rates for public and customer parking to manage parking availability;
- Charge to park on a daily, not monthly, basis; and
- Offer parking cash-out incentives for employees.

In order to develop a robust TDM program, MAPC recommends the following TDM measures for the Project, which include but are not limited to:

Transit Pass Programs and Bikeshare Memberships

Foster employee use of transit by promoting 100% employer subsidized transit passes (e.g., through tenant lease arrangements). Consider reimbursements for resident transit passes and/or bikeshare memberships.

Car Sharing

Allocate reserved parking spaces for car sharing services such as ZipCar.

Pick-Up/Drop-Off Locations

Designate pick up/drop off areas and accommodate on-demand car services, such as Uber and Lyft, and taxis.

Tenancy Lease Agreements/Tenant Manual

Address how tenancy lease agreements or a tenant manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Provide Infrastructure for Electric Vehicle Charging

MAPC supports the Boston Transportation Department's (BTD) Electric Vehicle (EV) Readiness Policy for New Developments³, which requires large project review developments to equip 25% of their total parking spaces to be EVSE (electric vehicle supply equipment) installed and the remaining 75% of the total spaces to be EV ready. As the

³ <https://www.boston.gov/departments/transportation/recharge-boston-electric-vehicle-resources>

Proponent may be aware, Massachusetts is party to a multistate Memorandum of Understanding for an action plan facilitating implementation of zero-emission vehicle (ZEV) programs. The goal is to ensure that 3.3 million ZEVs are on the roads by 2025, which requires adequate infrastructure⁴. Large scale projects such as Dorchester Bay City should help us to meet this commitment.

Pedestrian/Bicycle Access

The Project will result in the construction of an extensive system of new on-site roadways to accommodate pedestrians, bicycles, and vehicles. MAPC is pleased the Proponent intends that the new street circulation system will accommodate pedestrians and bicyclists in addition to vehicles.

Proposed bicycle and pedestrian access, both within and connecting the site to nearby areas, should be clearly identified in the EIR. To promote pedestrian and bicycle usage, the Project should include appropriately placed crosswalks, signage, short and long-term bicycle parking spaces, Bluebikes stations, as well as amenities such as benches, lighting, and landscaping. The location and number of these amenities need to be clearly indicated in the EIR. The EIR needs to clearly indicate how pedestrian and bicycle connections will be provided to safely access JFK/UMass Station, the Dorchester Shores Reservation, the Harborwalk, Moakley Park, UMass Boston, and the Harbor Point Apartments.

Open Space

The project will include approximately 20 acres of new open space, most of which will be publicly accessible. The Proponent has indicated that a public benefit would be the ability to access the open spaces within and proximate to the proposed development. The EIR should include details of the guarantee that the open spaces within and proximate to the Project site will be open to the general public, and that the access to and connections within the Project will be designed in a welcoming fashion.

Climate Mitigation and Building Resilience

The ENF states that the project will adhere to the City of Boston's guidelines pertaining to climate resilience and refers to the BPDA Coastal Flood Resilience Design Guidelines approved in September 2019, which may have been the most current city document at the time the ENF was prepared. However, the EIR should refer to the City of Boston's recently published "Coastal Resilience Solutions for Dorchester" (October 2020)⁵. This report provides detailed flood risk analyses and resilience recommendations specifically for the Dorchester shoreline, including the Project site. It documents areas at risk of flooding from a 1% storm (commonly referred to as a "100 year storm") under three scenarios: existing conditions, the 2030s, (assuming 9" of sea level rise), and 2070s (assuming 40" of sea level rise). For the Bayside site specifically, the report shows that a portion of the site is currently subject to flooding from a 1% storm, and by the 2030s the entire site would be subject to flooding from a 1% storm. By the 2070's, the report shows that a portion of the site would also be subject to much more frequent monthly tidal flooding. The projected 2070 depth of flooding on the Bayside site ranges from 3.5 to 5.0 feet.

Based on these flooding projections, the Dorchester coastal resilience report establishes a Design Flood Elevation (DFE) for the Bayside section of the shoreline of 16.2 feet, measured as North American Vertical Datum of 1988 (NAVD88). It should be noted that the City of Boston has its own elevation reference system, Boston City Base (BCB), which is 6.46 feet higher than NAVD88. The DFE of 16.2 feet NAVD88 would equate to approximately 22.7 feet Boston City Base. The difference between these two elevation reference systems is noted because the elevations discussed in the ENF are BCB, whereas the DFE of 16.2 feet in the Dorchester flood resilience report is NAVD88. For clarity's sake, the EIR should express all elevations in one format, preferably NAVD88, since that is how the city's DFE for Dorchester is measured.

⁴ State Zero-Emission Vehicle Programs, Memorandum of Understanding, October 24, 2013. <https://www.zevstates.us/>

⁵ <https://www.boston.gov/departments/environment/climate-ready-boston/climate-ready-dorchester>

The ENF states that portions of the Bayside site will be elevated to 21.5 feet BCB, which it states would provide 2 feet of freeboard above the base flood elevation of 19.5 feet BCB. However, this base flood elevation from the 2019 guidelines is lower than the DFE in the more recent Dorchester flood resilience document. As noted above, the DFE of 16.2 NAVD88 would equate to 22.7 feet BCB, which is 1.2 feet higher than the 19.5 feet BCB base flood elevation referred to in the ENF. The EIR should evaluate the proposed site design in relation to the DFE of 16.2 NAVD88, and ensure that the final design will meet that standard. It is possible that elevating the perimeter of the site along the shoreline to the DFE of 16.2 feet NAVD88 would accomplish this without the need to elevate the entire site. The EIR should review this and propose the most effective way to ensure the site and its connections to neighboring sites will maintain an elevation consistent with the DFE of 16.2 NAVD88.

Housing

The ENF mentions the project will be consistent with the City of Boston's Inclusionary Development Policy. The City's Inclusionary Development Policy can include a combination of on-site affordable units, off-site affordable units, and/or a monetary contribution to an affordable housing fund. MAPC strongly encourages that all affordable units be on-site and recommends the Proponent incorporate the following into the EIR for the Project:

- Include the number of affordable units, their level of affordability, tenure (ownership v. rental), and the bedroom distribution.
- In addition to meeting the Inclusionary Zoning requirements of the City of Boston (13% of total proposed units), the Proponent should commit to increasing the total number of affordable units through use of linkage payments or by other means. MAPC feels that a higher goal of 20% or 25% is more appropriate for a development of this scale.
- The affordable units should be constructed on site and incorporated into structures throughout the proposed development in such a way as to prevent the segregation of lower-income households.
- The development should include a mix of 1-, 2-, and 3-bedroom units, to ensure that there is housing for all types of households, including families, and these units should be distributed throughout the site. The bedroom mix in the market and affordable units should be the same.