



SMART GROWTH AND REGIONAL COLLABORATION

October 6, 2021

Kathleen Theoharides, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alexander Strysky, MEPA #16320
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Enterprise Research Campus Project, MEPA #16320, Draft Environmental Impact Report

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, 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 (GHG) emissions by at least 50% by 2030, 75% by 2040, and 85% from 1990 levels by 2050 to achieve net zero emissions by 2050.

A Draft Environmental Impact Report (DEIR) has been filed by Tishman Speyer ERC Developer, L.L.C. (the Proponent), which proposes to redevelop an approximately 14-acre parcel at 100 Western Avenue in the Allston neighborhood of Boston. The Proponent proposes to develop the project site into a mixed-use development of approximately 1.94 million square feet across 10 buildings, including laboratory/research and development, office, residential, hotel, conference center, and retail uses, as well as public realm and open space improvements.

The Project will be built in two phases, referred to as Phase A and Phase B, and collectively as the Full Build. Phase A is expected to include approximately 900,000 square feet of development and Phase B will include an additional approximately 1,040,000 square feet of development for a combined Full Build of approximately 1,940,000 square feet of development. At Full Build, the development program will comprise:

- › 1,054,000 sf of lab/office use
- › 581,500 sf residential use (750 units)
- › 127,000 sf of hotel (250 keys)/conference use
- › 61,500 sf conference
- › 115,700 sf of active ground floor

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The Project is anticipated to generate approximately 4,030 adjusted daily vehicle trips in Phase A and approximately 7,110 adjusted daily vehicle trips at Full Build. The Project is proposed to be supported by approximately 620 parking spaces under Phase A and 1,280 parking spaces under the Full Build (Phase A + Phase B).

The Project is located in an area with access to the local and regional roadway network and is served by several MBTA bus routes (Routes 64, 66, 70, and 86) that connect to various nearby neighborhoods and the MBTA Red Line. The Red Line's Harvard Station is the closest rapid transit station to the Project, located about a 0.9-mile walk across the Charles River to the north. The Red Line's Central Station is located one mile east of the Project via Western Avenue. The Boston Landing Commuter Rail station on the Framingham/Worcester Line is the nearest commuter rail stop located 1.2 miles to the west.

MAPC has reviewed the DEIR and has comments that address commitments to the Environmental Justice Plan, mitigation, project monitoring, and advancing a robust Transportation Demand Management (TDM) program. Proposed recommendations and questions regarding these topic areas are detailed as an attachment to this letter.

In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary incorporate our comments as part of the Certificate issuance.

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen
Executive Director

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

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Environmental Justice Plan

On March 26, 2021, the Commonwealth passed legislation to advance environmental justice efforts in the State. While regulations resulting from that legislation have yet to be finalized, the Proponent, in collaboration with the MEPA Office and the State's Director of Environmental Justice, has developed a Project-specific Environmental Justice (EJ) Plan. The Proponent notes that the project site is surrounded by EJ communities that meet the thresholds for a low-income community, for a minority population community, and for a language proficiency community. The Proponent has indicated that they will continue to work with state agencies and the local community to improve its EJ plan. While the Proponent has identified a public outreach plan in the DEIR, we look forward to reviewing potential analyses of cumulative environmental and public impacts in the Final Environmental Impact Report (FEIR) as has been requested in the Certificate.

Parking

The Proponent intends to limit and actively manage a shared-parking supply for the Project. At Full Build, the Proponent has proposed parking ratios for the Project of 0.8 spaces per 1,000 sf of lab/office space, 0.5 spaces per residential unit, and 0.2 spaces per hotel key/room. The parking ratios, which are below the City of Boston's Access Boston parking requirements for these land uses, should encourage non-vehicular travel.

Under the Full Build, a total vehicle parking supply of approximately 1,280 spaces is proposed to support the Project. Approximately 600 of those spaces are expected to be in below-grade parking garages, approximately 640 spaces will be in an above-ground parking garage, and approximately 40 spaces will be located on-street. The Proponent indicates that off-site parking will be provided as a temporary condition as part of Phase A. According to Table 1-1 in the DEIR, 280 temporary surface parking spaces will be provided "proximate to, or within the Project Site" to satisfy Phase A parking demand. We respectfully ask the Secretary to ensure that the Proponent clearly indicates where the temporary parking spaces will be located and what land use(s) they will support.

Mode Share Goals and Monitoring/Reporting

Mode Share Goals

MAPC is pleased that the Proponent has identified mode share assumptions for both Phase A and Full Build of the Project. These assumptions attempt to ensure limited vehicular use and high percentages of transit and walking. We note however, that these assumptions should be considered mode share goals which should be reported on as part of the monitoring program discussed later in this section.

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The bike mode share is low for both Phase A and Full Build of the Project¹. Considering that the Proponent is strongly supporting bicycle use by proposing improvements to the bicycle infrastructure network and providing covered and secured bicycle spaces within its buildings, outdoor public bicycle racks near building entrances, and an on-site Bluebikes bikeshare station with possible plans for a second, we strongly encourage the Proponent to increase the bicycle mode share goal for both Phase A and Full Build.

MassDOT's Environmental Notification Form (ENF) comment letter² stated that the Proponent should also include mode share estimates for taxi/Transportation Network Company (TNC, i.e., Uber and Lyft) trips because this would likely be a popular mode for the hotel and conference patrons. While the Proponent conducted analysis for trip generation calculations and curbside demand analysis, mode share estimates for taxis and TNCs were not provided. This should be addressed in the FEIR.

Monitoring/Reporting

MAPC is pleased the Proponent plans to commit to a transportation monitoring program to both evaluate the effectiveness of its TDM program and to measure the Project's impacts on the transportation network. The intent of the transportation monitoring program is to confirm that actual changes are consistent with forecasted changes and mode share goals. With a monitoring program, the actual impacts of a project can be determined, mitigation measures adjusted, and additional mitigation measures identified, if necessary.

The Proponent indicates the monitoring program will include the annual collection of traffic counts and parking garage activity; a review of transit ridership; and a biennial travel choice survey of residents, employees, and patrons of the site. The transportation monitoring program will begin six months after full occupancy of the Phase A development and continue for a period of five years after the full build-out of the Project.

However, the Proponent should also address how the proposed transportation monitoring program will be used to monitor mode share goals, TDM measures, traffic counts, and transit ridership and what additional corrective measures will be taken, if needed. MAPC recommends that the Proponent review and incorporate the traffic and TDM monitoring and reporting plan outlined in the Supplemental Draft Environmental Impact Report (SDEIR) for the Riverside Station Redevelopment in Newton³. For example, this project will require additional mitigation if the actual total numbers of vehicle trips to and from the Riverside Station Redevelopment exceed

¹ Bike mode share for Phase A is 8%, 3%, and 7% for residential, office/R&D, and hotel/retail/restaurant respectively. For Full Build, bike mode share is 8%, 3%, and 8% for residential, office/R&D, and hotel/restaurant respectively.

² Dated March 2, 2021.

³ Riverside Station Redevelopment, Supplemental Draft Environmental Impact Report, Section 3.6.9 Traffic and TDM Plan Monitoring and Reporting, EEA No. 16024, May 2021.

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weekday evening adjusted volumes by more than ten percent as a result of traffic generated by the development.

MAPC notes that monitoring mode share goals is a central component as identified 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.” (p. 17) An essential component of a successful project is not just identifying, but also the monitoring mode share goals.

The Proponent’s monitoring program and associated reporting program must be clearly defined in the Section 61 findings.

Mitigation

The DEIR indicates that discussions are underway with the City of Boston, DCR, MassDOT, MBTA, and Harvard to define exact details for both studies to be undertaken and various mitigation proposals. MAPC respectfully requests that the Proponent clarify what studies will be undertaken, the Proponent’s level of involvement, and mitigation commitments between now and when the FEIR is submitted and documented in the Section 61 Findings. These studies and mitigation commitments include, but are not limited to, the following:

MBTA Bus Routes

The FEIR should indicate how Proponent will provide support to increase bus service (trip frequency) for Routes 64, 66, 70, and 86. According to the DEIR, under existing conditions, Route 86 is the only service experiencing capacity exceedances, which occur during the morning peak period. In the 2025 No-Build Condition, the addition of Project trips may exacerbate capacity exceedances and introduce additional exceedances during other time periods, except for Route 64. Under the 2030 No-Build condition, more service periods are projected to experience capacity exceedances. Routes 70 and 86 are projected to continue to experience the most capacity exceedances over multiple service periods.

Bus Transit Priority Treatments and Bus Stop Improvements

The FEIR should indicate the extent to which the Proponent will support study and implementation of:

- Bus transit priority treatments that include Western Avenue between Barry’s Corner and Soldiers Field Road. The Proponent should specify what the bus transit priority treatments will be.

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- Existing coordination, signal timing, and intersection configuration for the four “quad” intersections⁴ and assessing the potential for changes (including transit signal priority) that would reduce delays for MBTA buses (namely, Route 70 and Route 64).
- Feasibility of a transit bus queue jump lane on the Soldiers Field Frontage Road southbound approach to Cambridge Street.

Transit Connector Services

The FEIR should describe the extent to which the Proponent will provide supplemental transit connections/to from the site to supplement and/or integrate with existing MBTA transit services in the area. The FEIR should also include a map illustrating all services along with the Proponent’s level of commitment. The Proponent should specifically address the following two components:

Harvard University Shuttle System

Whether there will be an agreement with Harvard University that leverages two existing shuttle routes to support the Project and Harvard University demand between Allston and Harvard Square.

Joint Transit/Connector Fixed-Route Service

The extent to which the Proponent will be involved in anticipated future studies, such as the Allston-Brighton Neighborhood Connector Study, and programs that may advance joint transit/connector fixed-route service between existing and future developments in the area and regional transit hubs, such as Harvard Square and Boston Landing.

Roadway Safety Audits

The Proponent conducted Road Safety Audits (RSA) at five study area intersections in June 2021.⁵ Each RSA identified safety issues as well as potential roadway enhancements that would address each safety issue. The recommended enhancements range from low-cost and short-term treatments, such as refreshing pavement markings and reviewing/replacing existing signage, to high-cost and long-term treatments, such as implementing road diets and replacing traffic control equipment. The Proponent needs to identify the extent to which the recommended enhancements in the RSAs will be implemented.

The above measures form the critical mitigation program necessary to accommodate this Project while mitigating impacts to an acceptable level. While it is understandable that some of these measures were still being formulated at the time this DEIR was published, the Proponent should

⁴ Western Avenue at Soldiers Field Road, Western Avenue at Memorial Drive, Cambridge Street at Soldiers Field Road, and River Street at Memorial Drive

⁵ Memorial Drive at JFK Street / Anderson Bridge, North Harvard Street at Soldiers Field Road, Memorial Drive at River Street, and Memorial Drive at Western Avenue.

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more fully develop and commit to these measures by the time a FEIR is issued. There will not be an opportunity for further public review beyond the FEIR.

MassDOT and DCR Construction and Access Permits

The Proponent needs to clarify whether MassDOT and DCR Construction and Access Permits will be necessary. If so, the Section 61 findings should be included for both. The DEIR includes draft Section 61 Findings for DCR, but not for MassDOT. The mitigation commitments the Proponent has identified in the Section 61 Findings also need to be codified in the Transportation Access Plan Agreement(s) with the City of Boston.

Mitigation Fund

MAPC recommends that the Proponent consider establishing a mitigation fund with the MBTA to advance public transit improvements. There are several 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 a developer contribution to the creation of an Assembly Square station on the Orange Line.

Mobility Hub

The Secretary's Certificate for the Project's ENF asked the Proponent to provide a "mobility hub to centralize multiple modes of transportation, including taxis and transportation network companies such as Uber and Lyft." (p. 12). However, the Proponent notes as part of its curbside and service analysis in the DEIR, that the "flexible use of these curb areas, rather than designating the space for a single purpose, allows curbside areas to be available for the purpose that is in greatest need at certain periods." (p. 3-94) While we note that the Proponent has provided information about linear analysis and dwell times, we ask that the Proponent provide additional information showing how the three designated curbside locations for flexible curb space and four curbside locations for pick-up/drop-off will work – particularly for taxi and private ride services as shown in Figure 3.37. This should be addressed for both Phase A and Full Build.

Transportation Demand Management Program

MAPC is pleased that the Proponent will become a member of the Allston-Brighton Transportation Management Association and will include unbundled parking that is priced at market rate as part of its TDM program. MAPC asks that the Proponent clarify what land uses will be unbundled and the number of parking spaces.

MAPC applauds the Proponent's commitment to provide preferred parking for low-emitting fuel-efficient vehicles and/or electric vehicle charging stations. The Proponent proposes to install 25% of spaces with electric vehicle charging and the remaining 75% of spaces as EV-Ready

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spaces in accordance with the requirements of the City's EV policy. EV-Ready spaces include construction of appropriate infrastructure to facilitate the future installation of charging stations.

We ask that the Proponent include the TDM program in the Section 61 Findings, and not reference the section of the DEIR where it is located.

Additional TDM program components that should be included are:

- providing more than one on-site car share parking space;
- subsidizing transit passes for residents and employees;
- implementing a parking cash-out program for employees that do not utilize on-site parking and/or charging market rates for parking; and
- offering ridesharing through NuRide, the Commonwealth's web-based trip planning and ride-matching service that enables participants to earn rewards for taking "green trips."

Tenancy Lease Agreements/Tenant Manual

The Proponent should discuss how tenancy lease agreements or a Tenant Manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Bike Parking and Bike Share Stations

MAPC is pleased that the Proponent will provide covered and secured bicycle spaces within its buildings as well as outdoor, public bicycle racks near building entrances for visitors, in a number and location that meets Boston's Bike Parking Guidelines. Phase A will include 566 employee/resident spaces and 108 visitor spaces. At Full Build, there will be 1,264 employee/resident spaces and 238 visitor spaces. Additionally, subsidized bike maintenance will be offered to each tenant twice per year per the guidelines of the Allston-Brighton TMA's Bike Check Reimbursement Program.

The Proponent will also encourage and support bicycle use through expansion of the Bluebikes bikeshare network by providing an on-site bikeshare station. The DEIR mentions that one 19-dock bike share station is currently anticipated each for Phase A and Phase B and a monetary contribution to the City's bike share program. The number of bike share stations and amount of monetary contribution should be clarified in the Section 61 findings.

Affordable Housing

MAPC is pleased the Proponent will provide a greater percent of affordable housing than the 13% required by the City's Inclusionary Development Policy. In Phase A, 17% of all residential units will be affordable, and in Phase B, 20% of all residential units will be affordable.

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Additionally, the Proponent will voluntarily comply with the requirements of the newly enacted Affirmatively Furthering Fair Housing (AFFH) zoning amendment as approved by the City.

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*⁶, *people of color, low-income households and renters are all more likely to use transit than the average American* (p. 2).

Public Realm Improvements and Open Space

Central to this Project are proposed public realm improvements, which aim to create connections through publicly accessible open spaces. The Project intends to advance the vision for a future connection from the existing Allston neighborhood toward Soldiers Field Road and the Charles River.

A key open space element is a project greenway and extension of an existing east-west path to provide a multi-modal connection between the neighborhood and Project site and to improve pedestrian and bicycle connectivity throughout Allston. It is critical that the public realm improvements be designed to be inviting and to encourage public access to the fullest extent possible. For example, this can be done through enhancing wayfinding signage and lighting to encourage access.

⁶ Prepared by the Dukakis Center for Urban and Regional Policy; Stephanie Pollack, Barry Bluestone, Chase Billingham; October 2010.
<http://www.reconnectingamerica.org/assets/Uploads/TRNEquityfinal.pdf>