



SMART GROWTH AND REGIONAL COLLABORATION

February 24, 2022

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, NPC/DEIR

Dear Secretary Theoharides:

MAPC has reviewed the Notice of Project Change/Draft Environmental Impact Report (NPC/DEIR) for the Dorchester Bay City project and we offer comments in the attachment below. The Project site, as reviewed in the Environmental Notification Form (ENF), included 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). The ENF included 17 new development blocks that contained a mix of uses including residential, retail/restaurant, and office/research and 2,650 on-site parking spaces.

A Notice of Project Change (NPC) has been filed simultaneously with the DEIR to reflect the addition of 180 Mt. Vernon Street (BTU Property) to the Project. An approximately 2.67-acre parcel of land, the BTU Property is directly adjacent to the Bayside Site. The addition of the BTU Property to the project includes the construction of three new buildings anticipated to include 188 residential units, 390,300 square feet (sf) of office/research space, and 17,300 sf of retail/commercial space. The addition of the BTU Property to the Project is forecast to add approximately 4,852 vehicle trips per day.

The Bayside Proponent, the 2 Morrissey Proponent, and the BTU Property (collectively the Proponents) propose a mixed-use redevelopment totaling approximately 6.48 million sf of building program (the Project). Accordia Partners, LLC is the development agent for the Proponents. The proposed Project contains a mix of uses, including approximately 1,970 residential units (1,712,700 sf), approximately 4,395,600 sf of office, research, and development, and/or potentially academic uses, and 165,000 sf of ground floor retail/commercial uses on approximately 36.2 acres. The entire Project site spans from the JFK/UMass MBTA station to both sides of Mt. Vernon Street and out toward the Dorchester Shores Reservation between the Harbor Point Apartments and Moakley Park.

The entire Project includes approximately 2,865 parking spaces (an increase of 215 spaces from the ENF), 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 55,838 vehicle trips per day¹. Full build-out of the Project is anticipated to occur in five phases over a period of 15-20 years.

The Project has excellent access to both public transportation and the regional roadway network. The Project site benefits from nearby MBTA Red Line and Commuter Rail services, as well as MBTA local and commuter bus routes, which all operate within a quarter mile. Due to its local connections to Morrissey Boulevard and Day Boulevard, as

¹ This number was calculated using the ITE Trip Generation Manual. The Proponent's transportation analysis, which is based on the CTPS Travel Demand Model, estimates about 66,395 daily person trips for the full build of the Project (2040 condition), plus 12,451 truck/delivery trips, which totals 78,846 trip ends per day.

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well as the I-93 ramps at the Columbia Road interchange, the Project also has strong access to the regional roadway network.

MAPC has reviewed the NPC/DEIR and has comments that address the proposed mitigation bank, coordination with proximate roadway and development projects, access to JFK/UMass Station, 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.

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen
Executive Director

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

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Mitigation Bank

The Proponents have noted in the NPC/DEIR that an “informal” Transportation Working Group has discussed the formation of a mitigation bank. The mitigation bank will “leverage private funds and public dollars to implement further infrastructure changes agreed upon by State and City officials working with area stakeholders, including the Proponents, in consultation with other parties.” (p. 5-1) The mitigation bank’s revenue will advance roadway and public transit improvements in the area.

The Proponents have agreed to contribute \$26.7 million to the mitigation bank. Of this contribution, \$14.7 million is proposed to be allocated to initiate the reconstruction of Mt. Vernon Street (and its Complete Streets multimodal and streetscape upgrades) during Phase 1. The remaining funds would be used to help advance the following roadway, transit, and safety improvements, which have all been identified by the Proponents as priority areas for improvement of the local transportation system:

- Upgrades to JFK/UMass MBTA Station;
- Improvements at Kosciuszko Circle;
- Improvements to the Columbia Road interchange at I-93; and
- Improvements to Morrissey Boulevard.

When totaling the Proponents’ financial transportation commitments identified for each phase in Tables 12-2 through 12-6, Summary of Proposed Mitigation Phase 1 through Phase 5, MAPC arrived at a total of \$31.7 million rather than \$26.7 million. The Proponents need to clarify this discrepancy.

MAPC notes that the “Proponents hope to use the Project as a catalyst to attract other investments and advance off-site infrastructure improvements, some of which will be by others, that will benefit the Project, the Columbia Point Peninsula, Dorchester, and South Boston neighborhoods, and the regional transit and transportation network.” (p. 1-2) It is critical to point out that both the structure of the mitigation bank and allocation of capital from the mitigation bank have yet to be determined. MAPC strongly supports this concept and encourages the Proponents to continue collaborating with other parties (public and private) to make the mitigation bank a reality. However, should a mitigation bank not advance, the Secretary needs to require the Proponents to outline and implement a contingency plan.

MAPC recently led a similar effort for Sullivan Square and its vicinity by convening the Lower Mystic Regional Working Group². The Working Group, which was established jointly by the Secretaries of EOEAA and MassDOT through the MEPA process, fostered cross-municipal coordination, and coordination between those municipalities and the Commonwealth, in addressing the impacts of new development in the Sullivan Square area. Following a collaborative effort among the many stakeholders involved in planning for the future of the Sullivan Square area, the Working Group identified funding mechanisms to pay for needed regional transportation investments. The Working Group also identified ways to coordinate individual development project mitigation funds for regional investment, including transit, and/or designing a regional transportation mitigation process. As a result of this project and other MAPC work, we have the expertise to address these challenges. MAPC, as the regional land use, transportation, and environmental planning agency for Greater Boston, respectfully offers to facilitate discussions and provide technical assistance to coordinate a similar effort for this area of Dorchester.

² Lower Mystic Regional Working Group, Spring 2019. https://www.mapc.org/wp-content/uploads/2019/03/SPRING19_LowerMysticReport_FULL.pdf

Proximate Infrastructure and Development Projects

There are several significant transportation infrastructure improvement projects nearby, whose completion is critical to the success of this Project. These projects are Morrissey Boulevard, Mt. Vernon Street³, Kosciuszko Circle, and JFK/UMass Station. It is critical that Proponents' phasing plan be coordinated with the programming and timeframes of these identified projects. We also urge the Secretary to require ongoing coordination between the Proponents and the City of Boston, MassDOT, DCR, and the MBTA. In the event there are proposed projects in the vicinity of Dorchester Bay City that may undergo MEPA review, MAPC respectfully requests that the Secretary encourage the proponents of these projects to contribute to the mitigation in the area and use the mitigation bank should it be formed.

MAPC underscores the need for clear coordination, commitments, and mitigation plans in place for both infrastructure and large-scale development projects in the vicinity of the Project site. Without such synchronization, evaluation, and mitigation of aggregate impacts, traffic congestion, air pollution, greenhouse gas emissions, and in this area will only increase. Longer term impacts of climate change such as increased stormwater runoff and sea-level rise should also be taken into consideration for future mitigation.

Kosciuszko Circle

In Chapter 1, the Proponents state that the proposed new neighborhood streets open to public travel will relieve congestion at Kosciuszko Circle. (p. 1-74) However, the transportation analysis outlined in Chapter 5 determined that Level of Service (LOS) remains at LOS F for both AM and PM peak periods in 2030 and 2040. The Proponents concluded that the Project is "expected to generate additional traffic on area roadways, including the already congested rotaries within the Study Area. As these rotaries are at or near capacity, traffic conditions at these intersections are expected to worsen in all future (both no-build and build) scenarios." (p. 5-88) The Proponents acknowledges that "improvements to resolve existing issues are needed, especially at Kosciuszko Circle, and are expected to be evaluated as part of the MassDOT-led Kosciuszko Circle/William T. Morrissey Boulevard Corridor Study." (p. 5-88) MAPC recommends that, once the corridor study is complete, the Proponents work with MassDOT to consider additional mitigation measures. Based on MassDOT's data, four intersections in the study area had above average crash rates for District 6. Of these four intersections, Kosciuszko Circle had the worst crash rate and highest number of crashes over a 5-year period (2014-2018), with 180 crashes reported.

MBTA Bus Routes

MBTA Bus Routes 8 and 41 meet or exceed the target standard of the MBTA's *Service Delivery Policy*. However, with a Service Delivery Policy comfort metric of 91.2 percent, MBTA Bus Route 16 falls below the MBTA's minimum standard for this metric. MAPC respectfully requests that the Proponents identify targeted mitigation measures to address improvements to MBTA Bus Route 16 in the next filing.

MassDOT's ENF comment letter (December 11, 2020), which was incorporated into the Secretary's Certificate, asked that the Proponents work with the MBTA to provide enhanced crosstown bus services, including connections to Nubian Square and Ruggles Stations. MAPC respectfully requests that the Proponents address this question in the next filing.

³ 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.

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Access to JFK/UMass Station

Overall, the NPC/DEIR shows adequate and well thought out connections for pedestrian and bicycle access. However, MAPC has significant questions regarding how the Proponents propose to ensure or enhance access to JFK/UMass Station, which is perhaps the most important connection for the entire Project. The materials in the NPC/DEIR are inconsistent between the description and plans, and not detailed enough to clearly understand what is proposed.

It is unclear whether the bike lanes along Mt. Vernon Street will be protected or not. We also note that while the NPC/DEIR states that the Proponents will be responsible for initiating the reconstruction of Mt. Vernon Street (and its Complete Streets multimodal and streetscape upgrades), Figure 5-60 shows that the bike lanes will be built by the City. The Proponents need to clarify exactly what components they propose to implement for Mt. Vernon Street.

We strongly encourage grander thinking among all parties for the whole intersection of Morrissey Boulevard, Mt. Vernon Street, and Kosciuszko Circle in terms of traffic circulation, and perhaps removal of roadways and ramps to clarify traffic movements and reduce exposure of pedestrians and bicyclists to traffic. For example, reconfiguration of the Morrissey/Mt. Vernon signalized intersection into a roundabout could provide safety benefits for cyclists and pedestrians and smoother traffic flow.

Although the distance is short, there are substantial obstacles and severe constraints between JFK/UMass Station and the Project site, which the proposed improvements to Mt. Vernon Street have not addressed. In the absence of such improvements, we strongly encourage the Proponents to revisit the provision of a shuttle service, which was originally proposed in the ENF. At this point, MAPC does not think that the withdrawal of a proposed shuttle service is merited. The Proponents should refer to the recommendations in the Secretary's Certificate and MassDOT's ENF comment letter (December 11, 2020), which was incorporated into the Secretary's Certificate, about the provision of a shuttle. These provisions include coordinating with the MBTA and the existing shuttle services of UMass Boston and the Medical Academic and Scientific Community Organization (MASCO). We also encourage the Proponents to consider collaborating with other projects in the vicinity of the Project to provide shuttle service to access JFK/UMass Station.

Parking

The Proponents have identified the number of proposed parking spaces per Project phase, confirmed that parking will be primarily underground, and indicated that the proposed parking supply is almost a third lower than the maximum supply allowed by the City of Boston.

MAPC applauds the Proponents for committing to adhere to the City of Boston's EV Readiness Policy (September 2020) and providing EVSE Level 2 chargers for 25 percent of the parking spaces created within each Project garage. The remaining 75 percent of the parking spaces in each Project garage will be EV-Ready for quick-updates to chargers as EV market demand dictates.

Monitoring Program and Mode Share Goals

While a monitoring program has been identified, it should be committed to in the Section 61 findings. MAPC recommends that the Proponents summarize and evaluate the results of monitoring following the completion of each Project phase.

Additionally, the Proponents need to clearly define mode share goals (vehicular, commuter rail, bus, bicycling and walking) for residents and employees as part of their commitment to conduct monitoring and reporting. Mode

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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.

Developing and monitoring mode share goals is a central component of TIA preparation as outlined in the EOOEA/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)

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. It is worth noting that the Secretary's Certificate states that the Transportation Impact Assessment (TIA) "should include specific, defined mode share goals that target high rates of transit, bicycle, and pedestrian use. Data and analysis of existing modes (including public transportation, walking, and bicycling) should be employed to identify physical improvements and supporting programs to increase these modes." (p. 13-31)

Transportation Demand Management

MAPC is pleased that the Proponents will include Transportation Demand Management (TDM) measures that align with the requirements outlined in the City of Boston's Transportation Demand Management Point System as well as forming and joining a new Transportation Management Association (TMA) with other landowners near the Project site. To ensure a robust TDM program and minimize single occupancy vehicle use, MAPC respectfully requests that the Proponents' TDM program include the following:

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. MAPC notes that MassDOT's ENF comment letter (December 11, 2020), which was incorporated into the Secretary's Certificate, also recommends the "provision of free or subsidized transit passes." (p. 13-145)

Parking Management

MAPC is pleased the Proponents have committed to a fee structure that varies based upon location and adjacent uses, that parking rights for residential and commercial uses will be unbundled and not included in space rent, and that the parking garage floors will be designed with flat floorplates, which can be repurposed for other uses should parking demand decrease. However, MAPC respectfully requests that the following additional TDM components be incorporated into the overall parking program for the Project:

- Offer parking cash-out incentives for employees. MassDOT's ENF comment letter (December 11, 2020), which was incorporated into the Secretary's Certificate, also recommended the "provision of a parking cash-out program." (p. 13-145)
- Require landlords to offer short-term parking lease options to employees, such as month to month instead of annually; and
- Charge to park on a daily, not monthly, basis.

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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.

Centralized Parcel Pick-Up/Drop-Off Location

As suggested by the Proponents, MAPC strongly supports that the Proponents consider the provision of a centralized parcel pick-up/drop-off location. Properly designed, this can have a significant impact on trip reductions and increasing efficiency.

Role of Point Partners

The Proponents mention that they have participated in an informal group of business and institutional leaders on Columbia Point, named Point Partners. What relationship do the Proponents anticipate having with this group as the Project advances and a Transportation Management Association (TMA) is formed?

Pedestrian/Bicycle Access

MAPC applauds the Proponents for proposing three new on-site Bluebikes stations, adding approximately 3,875 covered/secured bicycle parking located within buildings for residents and employees, and approximately 476 outdoor, public bicycle parking spaces throughout the Project site based on the City of Boston's *Bike Parking Guidelines*. If demand warrants, the Proponents should consider adding additional Bluebikes stations. We also recognize that the site has significant open space and sufficient trail connections along the Harbor, connecting Carson Beach to the north and toward UMass Boston to the south.

Housing

The Proponents have stated they intend to "voluntarily provide more Inclusionary Development Policy (IDP) units than are required and provide all IDP units on-site." The Proponents intends to provide 15% of units, or 296 affordable units, 40 more than required. MAPC feels that a goal of 20% affordability is more appropriate for a development of this scale.

The Proponents have also agreed voluntarily to deepen the affordability of some units. MAPC recommends they specify the quantities and depths of affordability that will be provided. Depending on these details, a 15% set aside may be more appropriate.

MAPC also recommends the proportion of family-sized units in the project be higher. The current proposal states that studios will comprise 21% of all units, one-bedrooms will comprise 48% of all units, two-bedrooms will comprise 26% of all units, three-bedrooms will comprise 4% of all bedrooms, and there will be no four-plus-bedroom units. There is especially high unmet housing demand from low-income families who require three-plus-bedroom homes.

It is important to note that 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*⁴, *people of color, low-income households and renters are all more likely to use transit than the average American* (p. 2).

⁴ 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>