



SMART GROWTH AND REGIONAL COLLABORATION

April 17, 2023

Rebecca Tepper, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Jennifer Hughes, MEPA #16277
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Dorchester Bay City, MEPA #16277, SDEIR

Dear Secretary Tepper:

The Metropolitan Area Planning Council (MAPC) has reviewed the Supplemental Draft Environmental Impact Report (SDEIR) for the proposed Dorchester Bay City project and provides the following comments.

The Project site includes three parcels in the Dorchester neighborhood of Boston – the Bayside Site, the 2 Morrissey Site, and the BTU Property (180 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 Morrissey Proponent). An approximately 2.67-acre parcel of land, the BTU Property (BTU Proponent) is directly adjacent to the north side of the Bayside Site.

The Bayside Proponent, the Morrissey Proponent, and the BTU Proponent (collectively the Proponents) propose a mixed-use redevelopment totaling approximately 6.13 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 1,957 residential units (1,693,400 square feet (sf)), approximately 4,049,000 sf of office and research uses, and 180,900 sf of retail and commercial uses on approximately 36.2 acres. Of the 1,957 residential units, 20% will be affordable and on-site.

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. Since the issuance of the Notice of Project Change (NPC)/Draft Environmental Impact Report (DEIR), the Proponent has reduced the building program on the Bayside Site by approximately 350,000 square feet, reducing primarily for office and research uses.

The entire Project includes approximately 2,865 parking spaces, which will be supported by a new street circulation system to accommodate vehicles, pedestrians, and bicyclists within the Project site. Full build-out of the Project is anticipated to occur in three 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 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 SDEIR and we commend the Proponents' thorough responses to the Secretary's NPC/DEIR Certificate issued on March 4, 2022, as well as MAPC's comment letter dated February 24, 2022. However, we have some comments and concerns that we would like to bring to your attention. These comments and concerns relate to mitigation, mode share goals, and the Memoranda of Understanding, which are explained in more detail below. MAPC respectfully requests that the Secretary consider our comments as part of the Certificate issuance.

Mitigation

Transportation Mitigation Bank

The Proponents have reported ongoing negotiations regarding the formation of a Transportation Mitigation Bank. The revenue will be used towards implementing major transportation infrastructure improvements. MAPC strongly endorses the idea of a Mitigation Bank and urges the Proponents to continue collaborating with other stakeholders, both public and private, to bring it to fruition. In the event that the Mitigation Bank does not materialize, the Proponents have stated their intention to contribute to an agreed-upon dollar amount per approved square foot (\$6/sf) to a force account established by agency stakeholders. The next MEPA filing should specify whether the Transportation Mitigation Bank will be established or if the Proponents will contribute financially to a force account. In either case, the filing should indicate how, when, and for what purposes the funding will be used. This information should be included alongside the details of the prioritization of the mitigation measures in the next MEPA filing.

Kosciusko Circle/Morrissey Boulevard Corridor Study

The Proponents have committed to allocating funds for public agency implementation to further major infrastructure improvements in the area. This commitment is expected to align with the recommendations of the Kosciusko Circle/Morrissey Boulevard Corridor Study which is currently being finalized by the Massachusetts Department of Transportation (MassDOT), the Department of Conservation and Recreation (DCR), the Executive Office of Energy and Environmental Affairs (EOEEA), and the City of Boston/Boston Planning and Development Agency (BPDA).

While the timing of the study's completion is unlikely to coincide with the Project's MEPA review schedule, the Proponents must continue to collaborate closely with stakeholders to develop a phased and prioritized mitigation plan that addresses the Project's impacts while not precluding the long-term transportation improvements that may arise from the planning study. The importance of this coordination is conveyed in MassDOT's comment letter dated February 25, 2022, "consensus has always been to use the recommendations of the planning study to identify a comprehensive set of multimodal improvements across multiple roadway jurisdictions, land uses, and neighborhoods, and include both physical and non-physical improvements to accommodate future growth in the study area. Out of these recommendations, the Proponent or future developers would either implement elements of the mitigation program or contribute funding that could be used by state or local agencies to continue that program of improvements."

Of note, the Proponents have indicated that the decision to prioritize the design of a new intersection on Morrissey Boulevard at First Street cannot be made until the Kosciusko Circle/Morrissey Boulevard Corridor Study is finalized. It is crucial to mention that this intersection has the potential to redirect a significant amount of traffic from Kosciusko Circle and the I-93/Columbia Road interchange and alleviate congestion and delays at the intersections along Columbia Road. A mechanism should be established to ensure that mitigation resources from this Project can be available to support implementation of the study's recommendations, despite timing challenges.

Mode Share Goals

The Proponents have committed to executing a Transportation Monitoring Program to measure trip activity, ensuring that Transportation Demand Management (TDM) measures are implemented. The Proponents plan to conduct travel surveys to evaluate mode shares, which they have indicated will be used to inform potential changes in TDM measures, parking pricing, and transportation services and amenities.

**Metropolitan Area Planning Council (MAPC) comments on
Dorchester Bay City, Supplemental Draft Environmental Impact Report, MEPA #16277**

While the use of monitoring data to track trip activity is commendable, MAPC points out that the Proponents have not set any mode share targets or benchmarks for public transportation, walking, bicycling, and reducing Single Occupancy Vehicles (SOVs). While MAPC recognizes that the SDEIR has projected an estimated automobile mode share of approximately 39%¹ for project person trips during weekday peak periods, the Proponents should clearly define mode share goals for residents and employees as part of their commitment to monitor the Project.

The development of mode share goals and monitoring of actual travel patterns in relation to these goals are essential components of Traffic Impact Assessments (TIAs) as per 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)

MAPC recommends that the Proponents follow up on the completion of each Project phase with a summary and evaluation of the monitoring and reporting results and continue to do so after the completion of the project on a regular and ongoing basis.

Memoranda of Understanding

According to the SDEIR, the Proponents and DCR are currently in the process of developing a Memorandum of Understanding (MOU) that addresses the Project and proposed mitigation for lands under DCR jurisdiction. The SDEIR also mentions that an MOU with MassDOT and the MBTA is under discussion. The final MOU between the Proponents and DCR should be included in the next MEPA filing and any mitigation measures outlined in the MOU must be incorporated into the Section 61 Findings. The same would apply if the Proponents establish an MOU with MassDOT and the MBTA.

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Brad Gerratt, Boston Transportation Department
James Fitzgerald, Boston Planning and Development Agency
David Mohler, MassDOT

¹ According to the CTPS Travel Demand Model.