



SMART GROWTH AND REGIONAL COLLABORATION

November 13, 2023

Rebecca Tepper
Secretary of Energy and Environmental Affairs
MA Executive Office of Energy & Environmental Affairs
Attention: Alexander Strysky, MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: 66 Cambridge Street, Draft Environmental Impact Report, EEA No.16609

Dear Secretary Tepper:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed projects for consistency with *MetroCommon 2050*, MAPC's regional land use and policy plan, consistency with Complete Streets policies and design approaches, as well as impacts on the environment.

60 Cambridge Development, LLC, the Proponent, has submitted a Draft Environmental Impact Report (DEIR) for the redevelopment of an approximately 4-acre site at 60-66 Cambridge Street in the Charlestown neighborhood of Boston. Currently, the site contains warehouse, parking, and vehicle storage uses, an Eversource/MBTA electrical substation structure, and an MBTA spur track. The proposed redevelopment will include approximately 802,000 square feet (sf) of life sciences/office/research and development (R&D) space in two buildings and approximately 10,000 sf of retail/restaurant/commercial space (the Project).

The Project site is well served by transit services, with access to two Orange Line MBTA stations (Sullivan Square and Community College) and numerous nearby bus routes. The Sullivan Square MBTA station is located approximately 300 feet north of the Project site and Community College station is approximately 0.6 miles from the Project site. This Project proposes a total of 482 parking spaces. Upon full completion, the Project is projected to generate 4,098 vehicle trips per day, a substantive amount given the site's proximity and access to rapid transit (both existing and planned). According to the Proponent, the predicted traffic net CO₂ emissions generated by this project will be 442 tons/year¹.

To reduce the negative climate, air quality and congestion impacts of this project, MAPC respectfully recommends that the Proponent make a few key adjustments to this project prior to their next submission. However, we would like to note that, overall, we find this project to be well planned and suited for an otherwise challenging and underutilized site in the shadow of an elevated highway, with laudable commitments to environmental sustainability and Transportation Demand Management (TDM).

¹ 66 Cambridge Street, Draft Environmental Impact Report, Table 12-5, Page 12-11.

Parking

While the proposed ratio of 0.6 per 1,000 sq ft parking ratio is decent, **we urge the Proponent to reduce this ratio to .4 per 1,000 sq ft** to keep pace with surrounding developments² and to reflect the goals of [PLAN: Charlestown](#) which outlines .4 parking spaces per 1,000 sq ft for commercial development³. We note that the Proponent does state (in Section 5) that the proposed number of parking spaces (not to exceed 482 spaces) will be reevaluated for on-site parking supply and demand when key PLAN: Charlestown Public Improvements are implemented. However, it is preferable to comply with PLAN's objectives now, rather than making a conditional promise to remove parking spaces at an unspecified date in the future.

To minimize demand for employee parking, incentivize use of transit, and reduce vehicle trips to the site, we strongly urge that the Proponent require employers to charge for parking on a daily, rather than monthly or even weekly, basis. Research⁴ consistently supports that availability of parking at the worksite is the top determinant of employees' decision to drive to work over other available options, and that when parking is free, or even offered through a monthly pass (therefore seen as a "sunk cost"), all other efforts to induce mode shift away from driving are significantly diminished.

To further reduce demand for parking, and to reflect the goals of the Transportation Demand Management (TDM) Point System Tool of the Boston Transportation Department (BTD), we commend the Proponent for "unbundling" the cost of parking from rent and leasing costs. By providing tenants with the option to lease or purchase building space without inclusion of a market rate price for on-site parking, companies are encouraged to rethink the value of parking at their worksite and to invest instead in other multimodal options. This can effectively reduce vehicle trips as well as dangerous emissions generated because of the project.

Commuter Incentives

To make transit a competitive choice for employees, it must be incentivized through subsidies on par with or superior to driving. MAPC commends the Proponent for committing to a minimum 25% T-pass subsidy for the property owner or employer. However, this commitment should also be included as a condition of lease agreements. This commitment is particularly critical if parking continues to be offered at no cost, which we strongly discourage (see above).

² For example, the nearby 753,783 square foot 40 Roland Street project will provide a maximum of 279 vehicle parking spaces or a parking ratio of no more than 0.2 per residential unit and 0.4 spaces per 1,000 square feet for lab and office uses to reduce daily vehicle trips to and from the site. a parking ratio of no more than 0.4 spaces per 1,000 square feet for lab and office uses. Approved by the BPDA Board on September 28, 2023, pages 3 and 14.

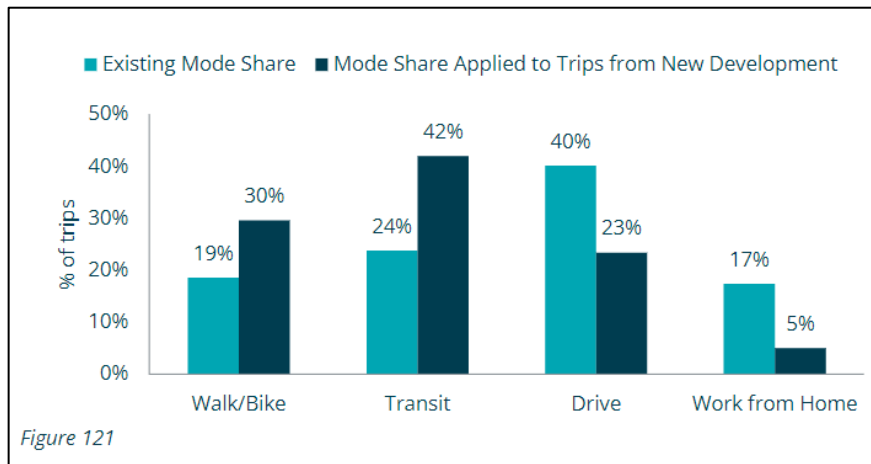
³ PLAN: Charlestown, BPDA, July 28, 2023, pages 96, 139, and 224.

⁴ [Online TDM Encyclopedia - Commuter Financial Incentives \(vtpi.org\)](#)

Mode Share

The Proponent states that there is expected to be a daily average total of 1,766 pedestrian/bicycle trips, 3,546 transit trips, and 4,098 vehicle trips generated by the Project. This equates to mode shares of 15%, 35%, and 50% respectively. **To be in accordance with PLAN: Charlestown, the mode share of pedestrian/bicycle trips should be increased to 30%. The Proponent should strive to increase the mode share of transit trips to 50% to uphold the mode share applied to trips from the new development put forth in PLAN: Charlestown.**

A mode share comparison for existing commutes and planned development in Charlestown is shown in this figure below from PLAN: Charlestown.



Source: PLAN: Charlestown, BPDA, July 28, 2023, Figure 121, page 139.

Increasing mode share for pedestrian/bicycle and transit trips will be strengthened by rapid transit and multimodal street improvements planned by way of the MBTA's Silver Line Extension (from Chelsea through Everett to Sullivan Station and potentially continuing to Downtown and Kendall Square) and the City of Boston's soon-to-be relaunched and revised redesign of Rutherford Avenue. Both projects will substantially increase transit as well as bike and pedestrian access to 66 Cambridge Street which, combined with the widespread development of new housing along Rutherford Avenue and throughout Everett, effectively warrant mode share goals with minimal vehicle trips. It is our understanding that the final report for the Silver Line Extension is forthcoming in early Winter 2024 and that funds for design and construction of the project will be committed in the next MassDOT Capital Improvement Plan (CIP) this Spring 2024. Rutherford Avenue, on the other hand, has already received a commitment of \$187 million in the Transportation Improvement Plan (TIP), as well as significant private (and unspent) developer contributions.

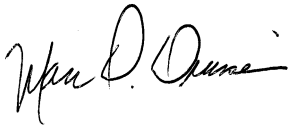
TMA & Shuttle Support

The Proponent commits to helping to fund a free Charlestown Neighborhood Shuttle, in coordination with PLAN: Charlestown, which we commend. However, the recently formed Lower Mystic Transportation Management Association (TMA) is actively planning for a neighborhood shuttle to serve employees collectively at worksite destinations throughout Everett and Charlestown. We urge the Proponent to commit to becoming an active member of the Lower Mystic TMA in perpetuity and, as such, to contribute financially to the formation of that shuttle so there is a coordinated and consolidated service between the project site and neighborhoods in both Everett and Charlestown.

MAPC has a long-term interest in alleviating regional traffic and environmental impacts, consistent with the recommendations of *MetroCommon 2050*, including *reducing vehicle miles traveled and the need for single-occupant vehicle travel through increased development in transit-oriented areas and walkable centers*⁵, and *improving accessibility and regional connectivity*⁶. Furthermore, 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. With the modifications included in this letter, we can ensure that this project does not put us further behind in meeting our climate and transportation goals.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc Draisen
Executive Director

cc: Jim Fitzgerald, Boston Planning & Development Agency
Commissioner Nick Gove, Boston Transportation Department
David Mohler, MassDOT
Chief Jascha Franklin-Hodge, City of Boston

⁵ <https://metrocommon.mapc.org/announcements/recommendations/2>

⁶ <https://metrocommon.mapc.org/announcements/recommendations/1>