



SMART GROWTH AND REGIONAL COLLABORATION

January 30, 2024

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

RE: South Weymouth Naval Air Station (SWNAS), Notice of Project Change, EEA No.11085R

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.

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*¹, and *improving accessibility and regional connectivity*². Furthermore, the Commonwealth has a statutory obligation to reduce greenhouse gas (GHG) emissions by at least 50% from 1990 levels by 2030, 75% by 2040, and 85% by 2050 to achieve net zero emissions by 2050.

BPD Union Point LLC (the Proponent) proposes to recalibrate the 13 million square feet (sf) of previously proposed development at the approximately 1,440-acre South Weymouth Naval Air Station (SWNAS) (the Project) in Abington, Rockland, and Weymouth. SWNAS lies between two of the area's primary north-south transportation corridors: Main Street (Route 18) and Route 228/Route 3. The 2023 Modified Development Program maintains the 13 million square feet of development outlined in the 2017 Notice of Project Change (NPC) but proposes a revised combination of residential and commercial development to align with current market conditions. Namely, the proposed number of residential units has increased from 3,855 units to 7,274 units and proposed commercial space has decreased from 8 million sf to 2 million sf. Based on the previously reviewed 2017 NPC, the number of daily vehicle trips is forecast to decrease from 79,000 to 53,438. The number of proposed parking spaces has greatly decreased from a range of 19,500-43,900 to 11,050-20,500.

To date, SWNAS has been developed to include 1,274 homes, 73,000 sf of commercial space, and an estimated 2,525 parking spaces. The existing homes include a variety of attached and detached single family as well as townhomes, condominiums and age restricted choices. The NPC proposes a mix of for-sale and for-rent homes and approximately 10% of the homes will qualify as "affordable" or "workforce."

MAPC commends the Proponent's commitment to smart growth and sustainable development principles that minimize negative impacts to the natural environment including sensitive wildlife areas, encourage the use of alternative modes of transportation over single-occupancy vehicles (SOV), and create much

¹ <https://metrocommon.mapc.org/announcements/recommendations/2>

² <https://metrocommon.mapc.org/announcements/recommendations/1>

**Metropolitan Area Planning Council (MAPC) comments on
South Weymouth Naval Air Station, Notice of Project Change, EEA No. 11085R**

needed housing opportunities for a range of incomes near transit. This laudable development approach is enhanced by a robust suite of transportation demand management (TDM) commitments including the establishment of a new Tri-Town Transportation Management Association (TMA), a new shuttle service for residents and employees, bikeshare and carshare services, and public transit benefits and incentives. However, there are three critical elements we have identified as being conspicuously absent from the Proponent's TDM program:

1. **Parking:** The NPC does not explain the methodology used to determine the total amount of proposed parking for the Project, nor does it clarify how parking will be constructed to meet the needs of each construction phase. While residential parking is included per local zoning established by the three municipalities with jurisdiction within the Project site, there is no mention of if or how employee parking will be managed and whether TDM strategies such as parking cash-out incentives or pricing will be incorporated into the TDM Program. **MAPC respectfully recommends that the next MEPA submittal should clearly state how the Proponent will incorporate parking policies that will minimize parking demand and automobile use**, such as charging market rates for parking, parking cash-out policies for employees, parking fees for residents with multiple vehicles, unbundling residential parking from rents, shared parking, parking banks/landscape reserves, and other demand-reduction policies for employees and residents of the site. All these strategies could be developed, administered, and managed by the TMA.
 - a. **Methodology:** The Environmental Impact Report (EIR) needs to specify a precise number of spaces and explain the methodology used to determine the total amount of proposed parking for the entire Project. The methodology should include an analysis of the anticipated parking usage based on the distinct types of parking demand (e.g., office, residential, hotel), projected parking demand at various times of day, anticipated parking duration, and whether the parking is surface or structured. With this analysis, MAPC and other reviewers will be able to assess whether the proposed parking spaces are needed, or if the number could be reduced to limit permeable surface and other environmental impacts, and to encourage non-auto access to the site. With the capacity to implement shared parking, being close to a commuter rail station, and having the ability to implement various parking reduction programs, we think the number of parking spaces could be reduced. The following parking policies and management strategies would effectively reduce the demand for parking onsite:
 - i. **Offer Parking Cash-Out Incentives for Employees:** This strategy encourages tenants to provide cash instead of individual parking spaces to their employees, thus encouraging employees to choose alternative modes.
 - ii. **Charge a Parking Fee for Residents with More than One Vehicle:** Charging a parking fee for residents with more than one vehicle will serve as a disincentive, and it will more legitimately recognize the true cost of parking construction and maintenance.

**Metropolitan Area Planning Council (MAPC) comments on
South Weymouth Naval Air Station, Notice of Project Change, EEA No. 11085R**

- iii. **Preferential Parking Program:** Provide a preferential parking program for carpools and vanpools and provide access to Zipcars in convenient locations.
- iv. **Electric Vehicles:** Provide electric vehicle charging stations and charging infrastructure and reserve those spaces for such vehicles.
- b. **Phasing:** MAPC requests that the EIR provide detailed information about the construction phasing and an explanation of how the Proponent intends to monitor parking utilization closely during each phase. To minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that the Secretary require the Proponent to develop a strong program to reduce further the proposed number of parking spaces fully based on evidence collected during the individual phases of development. A reduced parking supply would encourage the use of non-auto modes of transportation and lead to a more successful project from an environmental perspective.
- c. **Shared Parking:** MAPC strongly encourages the Proponent to develop a shared parking program. To make such a program work, the Proponent needs to determine how the different land uses (e.g., office, residential, hotel), will be able to use the same parking spaces given their different parking demands during various times of the day and week. Due to the variety of land uses and mixture of peak parking occupancy time periods, the Proponent should be able to optimize the amount of shared parking to reduce the number of spaces required.
- d. **Parking Banks (Landscape Reserves):** MAPC recommends that the Secretary require the Proponent to establish parking banks (a.k.a. landscape reserves) that would remain as greenspaces if it is determined that the surface parking may not be needed after the construction and full occupancy of the Project site. These areas would be converted to parking only if the need is clearly demonstrated. If more parking is not needed, the land should remain landscaped.
- e. **Electric Vehicle Charging:** MAPC recognizes that the Proponent will enable each single-family home and townhouse to provide for Level II EV charging. Additionally, 20% of parking spaces will be EV ready for the multifamily residential buildings and 10% of parking spaces will be EV ready for the other commercial buildings. The Proponent should also commit to provide EV chargers for a minimum of 6% of the parking spaces and to monitor the increase of EV and Plug-in Hybrid EVs in Massachusetts annually and increase the number of EV chargers as necessary to exceed the percentage of vehicles in Massachusetts that use EV chargers.

**Metropolitan Area Planning Council (MAPC) comments on
South Weymouth Naval Air Station, Notice of Project Change, EEA No. 11085R**

2. **Mode Share Goals** In addition, the NPC includes no clarity on mode share targets and, once again, no inclusion of parking as a factor. Developing and monitoring mode share goals is a vital component of environmental assessment, 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.”* (p. 17). The Proponent needs to define mode share goals clearly (vehicular, commuter rail, shuttle, bicycling and walking) for residents and employees as part of their commitment to conduct monitoring and reporting, and to adjust the project’s TDM program as necessary based on evidence collected through the monitoring efforts (see more on monitoring below).

3. **Monitoring:** While the Proponent has proposed a robust transportation monitoring program that includes corrective measures for roadways and intersections, MAPC underscores the importance of monitoring for parking, the shuttle, and TDM. MAPC supports MassDOT’s previous recommendation addressing the 2017 NPC³ that the Proponent consider travel demand data from CTPS modeling as part of the parking analysis in this monitoring program and to analyze the anticipated parking demand based on parking needs and supplies for comparable facilities.

While we applaud that the Proponent has stated in the NPC that “the Project will continue to be advanced in a manner that promotes mobility and the use of alternative modes of transportation to single-occupancy vehicles (SOVs)” (p. 117), MAPC recommends incorporating the measures listed below as part of the TDM program. These measures will further strengthen the Proponent’s commitment to supporting multi-modal transportation and reducing SOV trips to and from the site.

- **Shuttle:** MAPC recognizes that the potential to expand this important transit linkage for residents and commuters alike is dependent on ridership and membership growth of the TMA, and we commend the Proponent for committing to provide support for this service at no cost for at least the first year of operation. To ensure the shuttle’s success we recommend requiring the Proponent to pursue interventions that will improve access, appeal, and legibility of the service. This includes but is not limited to providing wayfinding signage at all buildings, designing roads and paths that direct people to the shuttle stops, and high-quality facilities for people to access the shuttle such as covered stops/stations with seating, lighting, real time arrival boards and safe sidewalks and crossings. Additionally, the EIR should describe the proposed shuttle service, including potential routes, destinations, frequency, and ridership goals. We note that MassDOT provided similar recommendations in its comment letter addressing the 2017 NPC⁴.

- **Public Transit Subsidy:** The Proponent should require, not encourage, employers to provide a public transit subsidy for MBTA subway and Commuter Rail to all employees.

³ MassDOT 2017 NPC Comment Letter dated April 24, 2017.

⁴ MassDOT 2017 NPC Comment Letter dated April 24, 2017.

**Metropolitan Area Planning Council (MAPC) comments on
South Weymouth Naval Air Station, Notice of Project Change, EEA No. 11085R**

- **Complete Streets:** The Proponent plans to widen many roads serving the site as a means of increasing vehicular access, primarily through new turn lanes. We strongly suggest that the Proponent be required to follow a “complete streets” approach to these roadway changes such that safe accommodations for vulnerable road users – namely pedestrians and cyclists – are considered as paramount to these designs. Measures to accomplish this include curb extensions/bump-outs, raised pedestrian crossings, protected bike lanes, speed feedback signs, and other traffic calming interventions.
- **Public Transportation Benefits:** As membership services for the TMA are being developed, pre-tax public transit benefits for employees should be “baked in” to the lease agreements with commercial tenants, such that this valuable commuter benefit is not incorporated ad hoc and potentially excluded.

Affordable Housing

Of the 7,274 dwelling units proposed by the Proponent, we request that the EIR provide a breakdown of housing types (e.g., single-family detached, apartments, condos, townhomes, and age-restricted). MAPC applauds the Proponent for including a substantial commitment to expanding the housing supply in Abington, Rockland, and Weymouth, and thereby, in the region. MAPC is also pleased that at least 10 percent of the residential units will be priced as either affordable or workforce housing. We look forward to a more detailed description in the EIR that includes a breakdown of affordable housing among the different types of dwelling units and their locations. This should include a breakdown by tenure (ownership v. rental); a clear indication of the bedroom distribution (i.e., 1, 2, and 3 bedroom units); and specific indication of affordability (i.e., how many units will be affordable to households earning below a certain level of Area Median Income as determined by the US Department of Housing & Urban Development).

MAPC recommends that the Proponent implement affordable housing throughout the development, so that neither location, design, nor amenities give any indication to the outside observer of where the affordable units are located. We wish to emphasize that the issue of housing affordability is an environmental as well as a housing issue, because there is compelling evidence that lower-income households own fewer cars, use less parking, and generate less traffic. According to the study, *Maintaining Diversity in America’s Transit Rich Neighborhoods*, “people of color, low-income households and renters are all more likely to use transit than the average American” (p. 2).

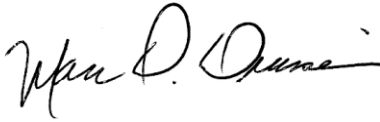
We wish to emphasize that affordability should be indicated numerically by indicating the maximum percentage of HUD-determined Area Median Household Income (AMI) at which rent will be affordable without paying more than 30% of income for rent plus utilities. We also caution that while “affordable” units are generally available to households earning below 80% of AMI, “workforce” units are often rented to households earning well about median income and are therefore not truly affordable units.

**Metropolitan Area Planning Council (MAPC) comments on
South Weymouth Naval Air Station, Notice of Project Change, EEA No. 11085R**

Finally, we ask that that the EIR outline the extent to which this affordable housing will contribute towards the 10% subsidized housing goal for the communities of Abington, Rockland, and Weymouth, pursuant to MGL Ch. 40B. According to the Executive Office of Housing and Livable Communities' Chapter 40B Subsidized Housing Inventory, as of June 2023, Abington, Rockland, and Weymouth were at 7.19%, 6.26%, and 6.44%, respectively.

Thank you for the opportunity to comment on this project. We look forward to reviewing the forthcoming EIR.

Sincerely,



Marc Draisen
Executive Director

cc: John Lucas, Town of Rockland
Robert Luongo, Town of Weymouth
Mary Waldron, Old Colony Planning Council
David Mohler, MassDOT