



SMART GROWTH AND REGIONAL COLLABORATION

April 8, 2024

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

RE: Single Environmental Impact Report (SEIR), 420/430 Bedford Street, EEA No.16600

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. We have reviewed the Single Environmental Impact Report (SEIR) and our comments primarily pertain to the project's parking and Transportation Demand Management (TDM) programs. MAPC respectfully requests that the Secretary incorporate our comments, proposed recommendations, and questions as part of the Certificate issuance.

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.

The Proponent, Elandzee Trust, is proposing to redevelop 420-430 Bedford Street in Lexington into two buildings comprising Office/Lab/R&D space (the "Project"). The Project is located on a previously developed 21.03-acre parcel of land in Lexington (the "Project Site"). The existing on-site uses include two outdated office buildings, which the Proponent has owned for several decades. The Project proposes to construct two buildings totaling approximately 437,030 gross square feet (representing approximately 268,815 net new square feet) to meet the demand for lab, office, and research and development space in Greater Boston. The Project Site is well served by existing infrastructure and will be redeveloped to include an approximately 980-space above-grade parking garage (representing approximately 521 net new spaces), improved stormwater management system, site landscaping, and transportation improvements along Bedford Street.

MAPC commends the Proponent on their commitment to improving safe multimodal access to the site, to developing a TDM program, and to the promotion of bicycle use with the Town of Lexington. However, **we are concerned that all of the 2,744 expected new trips generated by the project are anticipated to be made by private vehicles, with no mode share targets or commitment to managing auto-demand**. We are also concerned that the submittal includes no discussion or analysis of parking – how the numbers were calculated or how it will be managed - other than the number of spaces and size

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

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

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of the structure. To reduce the emissions and negative climate impacts of this Project, we respectfully recommend that the Secretary require the Proponent to take the following actions as part of the Certificate issuance for this SEIR.

TMA Membership: The Project Site exists within the service area of the 128 Business Council, a Transportation Management Association (TMA) which serves businesses, employers, and communities along the Rte. 128 corridor with a robust suite of commuter options, including shuttle service from Alewife Station in Cambridge, Hartwell Ave. in Lexington, and Lexington Center. The Proponent could significantly reduce both daily vehicle trips and demand for onsite parking by offering employees access to these convenient, free shuttles as well as other commuter programs such as rideshare matching, emergency-ride home (ERH) services, and pre-tax benefits. (*Note: The Proponent states on page 2-7 that it will implement a ride matching program through the 128 Business Council but does not specify whether this includes becoming a member of the TMA.*)

Connections to Minuteman Bikeway: The Proponent notes that the popular Minuteman Commuter Bikeway traverses a 10-mile former railroad right-of-way between Bedford Street and Alewife Station on the MBTA Red Line, but that the closest access point to the Project Site is along Hartwell Avenue. We note that the Proponent states there are anticipated roadway improvements through which there is a “strong likelihood of connecting the Project to the Bikeway entry point along Hartwell Avenue.” (p 3-3). Due to the high level of impact that this multimodal connection to the Project Site would have on mode shift and the overall effectiveness of the TDM program, we urge the Proponent to commit to ensuring that it is complete or underway prior to beginning operations on site.

Parking Management: The SEIR 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 the lab and office spaces. There is also no mention of whether 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 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, shared parking (between lab and office spaces), and other demand-reduction policies for employees and of the site. All these strategies could be developed, administered, and managed by the TMA.

- a. **Methodology:** The precise number of spaces and explanation of the methodology used to determine the total amount of proposed parking for the entire Project Site should be provided. The methodology should include an analysis of the anticipated parking usage, based on the distinct types of parking demand (e.g., office, lab), 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 shared parking, the nearby commuter shuttle and local bus route (Lexpress), and various parking reduction programs, we believe it is likely to reduce the number of parking spaces. The following parking policies and management strategies would effectively reduce the demand for parking onsite:

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- 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 for Parking Daily: Rather than charging employees for parking by the month, which becomes a “sunk cost,” offer onsite parking by the day, which has been shown to reduce demand for parking significantly.
 - iii. Preferential Parking Program: Provide a preferential parking program for carpools and vanpools and provide access to carsharing in convenient locations.
 - iv. Electric Vehicles: Provide electric vehicle charging stations and charging infrastructure and reserve those spaces for such vehicles.
- b. **Shared Parking:** MAPC strongly encourages the Proponent to develop a shared parking program between the office (545 spaces) and lab facilities (408 spaces) included in the Project Site, recognizing that the nature of work hours and peak occupancy for each can differ significantly. To make such a program work, the Proponent needs to determine how these two different uses 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 varying nature of shifts and peak occupancy times between lab and office spaces, the Proponent should be able to optimize the amount of shared parking to reduce the number of spaces required.

MAPC and the Central Transportation Planning Staff (CTPS) recently released the first phase of an ongoing study³ on parking demand at lab and life science facilities in Greater Boston and found that there is often a disconnect between what is needed at these sites and what zoning guidelines and regulations dictate should be built. Specifically, the study revealed that if the use designations applied to these buildings do not account for these differences, then the parking ratios for that use might not correctly fit the needs of life science facilities. In addition, the study notes worker density as a key difference between labs and offices that greatly impacts parking demand as labs tend to have fewer people per square foot, resulting in fewer vehicle trips to these sites. Therefore, if a zoning ordinance equates lab and office uses and assigns them the same parking ratio based on square footage, the result may be an underutilized parking supply that induces more SOV trip to the site.

Mode Share Goals: The SEIR includes no clarity on mode share targets, other than to assert that most trips will be vehicular, and no recognition of parking as a driving factor behind the number of cars that will visit the site daily. Developing and monitoring mode share goals is a vital component of an 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*

³ [Lab and Municipal Parking Study \(Phase I\) | Boston Region MPO \(ctps.org\)](http://Lab and Municipal Parking Study (Phase I) | Boston Region MPO (ctps.org))

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modes, and achieve the assumed mode shares.” (p. 17). The Proponent needs to define employee mode share goals clearly (vehicular, commuter rail, shuttle, bus, bicycling, and walking) as part of their commitment to monitor and report on mode share, and to adjust the project’s TDM program as necessary based on evidence collected through the monitoring efforts. All projects developed in Massachusetts during a time of palpable climate change should include specific commitments to multimodal access and/or reduction of single occupancy vehicle (SOV) trips.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc Draisien
Executive Director

CC:

James Malloy, Town of Lexington
Abby McCabe, Town of Lexington
David Mohler, MassDOT