



SMART GROWTH AND REGIONAL COLLABORATION

July 26, 2024

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

RE: Watertown Mall Transformation, Draft Environmental Impact Report, EEA No.16637

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.

Alexandria Real Estate Equities, the Proponent, has submitted a Draft Environmental Impact Report (DEIR) to redevelop parcels at 400, 446, 458, 500 and 550 Arsenal Street and 480 Arsenal Way in Watertown. The 32.5-acre Site currently includes the Watertown Mall, retail, and research and development buildings. Following demolition of approximately 246,000 square feet (sf) of existing buildings, the Proponent proposes to construct a total of 1,011,600 sf across four office/life science laboratory buildings, one residential building above a retail podium, and two amenity buildings (the Project). Furthermore, the Project proposes about 2,538 parking spaces, of which about 658 will be surface parking spaces and about 1,880 in two structured garage spaces.

Upon full completion, the Proponent contends that the Project will generate 13,432 vehicle trips per weekday, a 16% increase over current conditions. According to the Proponent, the forecasted motor vehicle CO₂ emissions generated by this project will be 11,281 tons/year¹. The plan calls for the Project to be constructed in five phases over ten years, with the Proponent indicating that the timeline and schedule may change depending on market and other conditions.

Overall, this is a project that is true to its name - the "transformation" of an auto-centric box style strip mall with industrial origins into a mixed-use destination emphasizing public realm and greenspace improvements as well as the creation of a new neighborhood. MAPC commends the Proponent on their steadfast commitment to environmental sustainability, transportation demand management (TDM), and cooperation with the Town of Watertown and community stakeholders, many of whom have been engaged in the community process to date. However, there are several elements contained in the DEIR that raise concerns as to whether the goals put forth by the Proponent - such as minimizing single occupancy vehicle (SOV) trips and climate harming emissions - can be achieved by the Project as proposed.

¹ Watertown Mall Transformation, Draft Environmental Impact Report, Regional Traffic GHG Emissions Analysis Summary (2031 Mitigated Build), Table 10-5, Page 10-11.

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As this project will generate a significant number of vehicle trips, making it more difficult for the Commonwealth to achieve its robust climate reduction goals and effectively facilitate land use and development patterns that shape a sustainable future, MAPC recommends reconsideration of the proposed parking program, transportation demand (TDM) efforts, and mode share goals. In particular, we recommend that the Proponent address the following issues:

Clarify the Parking Program and Proposed Number of Spaces

As mentioned, the Proponent proposes to provide about 2,538 parking spaces for this Project. Out of these, approximately 1,880 will be in two structured garages, and 658 will be surface parking spaces. The parking numbers are presented within a range of 2,221 and 3,011 spaces, reflecting local ordinance requirements and subject to varying levels of demand over time. Given the lengthy build out of the Project, the flexibility of an inventory range makes sense, although **we strongly suggest the Proponent begin by constructing towards the minimum rather than the maximum end of that range.**

Although the DEIR states that one parking garage will be constructed during Phase 1 and the other in Phase 3, it does not specify the timeline of the 658 surface parking spaces. Furthermore, Phase 1 indicates “temporary surface parking” will be at the future site of the office/life science laboratory building (OL4). **What is the number of these temporary parking spaces, and how long will they remain at this location?** Given a construction period of ten years, this parking lot may go beyond being “temporary” and could significantly influence the mode share of trips generated by the project, especially since Building OL4 will not be constructed until the final phase (phase 5).

While the footprint of parking will decrease with the replacement of surface lots with two structured garages, the overall inventory of parking spaces will increase, even if the number of spaces at the bottom end of the inventory range is produced. This presents a conflict with the Proponent’s stated goal of reducing SOV trips and their expectation that “a significant portion of the residents, employees and patrons of the Project will use public transportation/shuttle services, walk, or bicycle” due to the availability of public transportation services at and in the vicinity of the Project and the Proponent’s “commitment to implement a robust and comprehensive TDM program.”²

With such a high number of parking spaces - all offered with no time restrictions or charge - efforts to curb SOV trips through TDM will be significantly challenged. Furthermore, driving will remain the most significant component of the Project’s mode share. **MAPC respectfully requests that the Proponent clarify the exact number of structured and surface parking spaces proposed for each construction phase. This information is needed to assess whether a reduction in parking spaces during the early construction phases could support stronger TDM efforts and reduce the mode share of SOVs.**

Finally, MAPC would like to raise concerns over the retention of the large surface parking lot in the lower left quadrant of the Site, adjacent to Building R1 along Arsenal Street. Given the conversion of the land use and urban fabric of the Site from auto-centric, big box mall to place-based, walkable and transit-centered, this appears incongruent with both the goals and the preferred characteristics of the

² Watertown Mall Transformation, DEIR, page 5-41.

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Project. With the construction of two new parking garages, plus a “temporary surface lot,” is it necessary to retain this surface lot, which appears to cover more land area than most of the proposed buildings?

Coordination of Shuttles and MBTA Transportation (Route 70 Bus)

As noted by the Proponent, the Project site is well situated for access to public transportation. Specifically, MBTA bus Route 70 and the Watertown Transportation Management Association’s (WTMA) – WATConnector – Arsenal Street Shuttle provide service along Arsenal Street and Arsenal Way, with stops located adjacent to the site. MAPC commends the Proponent for their commitment to becoming a WTMA member and for coordinating with the WTMA and other area residential properties and businesses to support additional transit service to the area. The DEIR states the Proponent operates a private shuttle that will serve the Project as an additional measure to reduce automobile trips. MAPC respectfully asks the Proponent to supply more details about the shuttle, including but not limited to: current and proposed route, existing and proposed pick-up and drop-off locations, as well as planned and future ridership.

However, to maximize public transportation use and access, it is crucial for the Proponent to coordinate with the MBTA, WTMA, and other stakeholders to avoid duplication of services and ensure optimal utilization of resources. This includes coordinating the two MBTA bus stops along Arsenal Street and collaborating with the WTMA to extend access to the Arsenal Street shuttle to the public, thereby maximizing transit options to the Site.

MAPC commends the Proponent for planning to coordinate with the WTMA and other area businesses to provide funding on a proportionate basis to establish a shuttle service that will link the Project to residential areas within the City, the Newtonville and/or Boston Landing Commuter Rail Stations, Harvard Square, Kendall Square, and/or other commuter hubs. This service will be offered at no cost to the residents and employees of the Project.

Strengthen the Transportation Demand Management (TDM) Program

MAPC recognizes that the Proponent has developed a strong TDM program intended to encourage alternative modes of transportation and discourage SOV use. Elements of the TDM program include, but are not limited to:

- Hiring a full-time TDM Coordinator (TDMC);
- Adding two Bluebikes stations;
- Providing bicycle racks and storage throughout the Project;
- Providing a secure indoor bike room that will be proximate to the Watertown-Cambridge Greenway;
- Offering new residents who sign a 12-month lease an unlimited bus/subway pass for the first 30 days of tenancy;

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- Offering new residents who sign a 12-month lease and that do not select the transit pass offer, a bike share membership for the first year of residency; and
- Contributing \$1,000,000 to the Town to apply, at its discretion, to their Complete Street Prioritization Plan and Bicycle and Pedestrian Plan.

However, we note that some TDM commitments in the DEIR are “soft” and do not mandate adherence to these measures. MAPC strongly recommends replacing the word “encourage” with “require” to the following commitments in the Transportation Chapter’s TDM Program Management section. Additionally, the TDM Program commitments identified in Section 5.6.3 of the DEIR (pages 5-114 through 5-118) should be included in the Proposed Section 61 findings, Summary of Mitigation Measures.

- The Proponent (or subsequent owner) will **require** their commercial tenants and resident asset owner/manager to actively promote the use of alternative modes of transportation to SOVs through promotional and public awareness programs that will incentivize travel mode changes. (page 5-115);
- The Project proponent (or subsequent owner) will **require** their commercial tenant(s) to allow employees to set aside pre-tax funds as allowable under the Commuter Choice provisions of the Federal Tax Code, including the MBTA “Perq for Work” program, which provides employees the opportunity to buy MBTA passes as a pre-tax exemption. (page 5-115);
- The Proponent (or subsequent owner) will **require** in lease agreements with their tenant(s) that they offer a monthly transportation benefit, capped at the cost of an unlimited bus/subway pass (Monthly LinkPass), to all employees who commute by a non-SOV mode for a minimum of three days per week and register with the TDMC. The cost of this pass is currently \$90 per month, and this cap will increase with each fare increase that is initiated by the MBTA to ensure that the benefit will allow employees to purchase an unlimited bus/subway pass each month. Eligible employees will be able to spend the monthly transportation benefit however they choose (e.g.; on transit fares, bicycle maintenance, gas for carpools, vanpool fees, walking shoes, etc.) (page 5-116); and
- The Proponent (or subsequent owner) will **require** in lease agreements that their commercial tenant(s) provide an annual membership to a bike share service for employees who commute to work by bicycle a minimum of three days per week and register with the TDM. The cost of this benefit is currently \$129 (based on the current annual membership for Bluebikes) and will be adjusted to reflect currently available bikesharing options at the Project. Eligible employees will be able to spend the annual bike share membership stipend however they choose (e.g., on bicycle maintenance, bicycle safety equipment, cycling shoes and apparel, etc.) (page 5-117)

Strengthen the Monitoring Program

MAPC commends the Proponent for proposing a Monitoring Program for this Project, particularly its focus on monitoring parking utilization. The Monitoring Program specifies that if parking occupancy exceeds 90 percent of the total constructed spaces during the monitoring period, corrective measures, such as charging for employee parking, will be taken to encourage non-SOV modes. MAPC recommends extending parking charges to include residents as well. Furthermore, parking occupancy monitoring should include both surface and structured parking.

The Proponent (or subsequent owner) has also committed to identify and implement corrective measures should SOV use exceeds 54 percent for residents and 60 percent for employees, as determined by the baseline survey or if there is evidence of increased parking on proximate neighborhood streets that can be attributed to the Project.

The Proponent has indicated that the traffic monitoring program will start immediately after issuance of any Certificate of Occupancy for any new buildings within the Project site and will continue annually for a minimum of two years after full build-out and occupancy of the approved building program. MAPC respectfully requests that this monitoring period be extended to five years, in accordance with MassDOT's Transportation Impact Assessment Guidelines³.

Revisit Mode Share Goals to Reflect Increase in Multimodal Access

We acknowledge that the Proponent has provided a method for assessing the potential impact of the Project. The Proponent estimated that 69 percent of trips generated by the residential and retail components would be by automobile, 24 percent by transit, and 7 percent by pedestrian or bicycle. For the office/laboratory component, the Proponent estimated that 60 percent would be automobile trips, 33 percent transit, and 7 percent pedestrian or bicycle trips. These percentages serve as an analytical basis for impact assessment and are not mode share goals. **MAPC respectfully requests that the Proponent provide mode share goals for automobile trips lower than the 69 percent and 60 percent, respectively.** Additionally, we note the Secretary's request for setting mode share goals in her Certificate⁴.

MAPC notes that [Watertown's TDM Regulations](#), adopted in 2019, stipulate that SOV use should not exceed 54 percent for residential projects and 60 percent for commercial projects. [Watertown's Climate and Energy Plan](#), adopted in 2022, has a goal to reduce personal vehicular travel miles by 50 percent by 2050.

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*

³ <https://www.mass.gov/doc/transportation-impact-assessment-guidelines/download>, page 44.

⁴ Watertown Mall Transformation, Environmental Notification Form Certificate, January 13, 2023, page 11.

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*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 advances our efforts to achieve those goals.

Thank you for the opportunity to comment on this project.

Sincerely,



Marc Draisen
Executive Director

cc: George Proakis, Watertown City Manager
Commissioner Brian Arrigo, Department of Conservation and Recreation
David Mohler, MassDOT

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

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