



SMART GROWTH AND REGIONAL COLLABORATION

December 9, 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, Final Environmental Impact Report (#EEA 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 Proponent proposes about 2,538 parking spaces, of which about 658 will be surface parking spaces and about 1,880 in two structured garages.

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 forecast motor vehicle CO<sub>2</sub> emissions generated by this project will be 11,281 tons/year<sup>1</sup>. 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.

MAPC is most concerned with the transportation impacts of this project, particularly as they pertain to mode shift, VMT reduction and greenhouse gas emissions. As a result, we have reviewed the Proponent's FEIR with special attention to the following requests from the Secretary in the Certificate issued on August 2, 2024:

**Include a framework to monitor the effectiveness of the TDM program.**

To ensure the TDM program is delivering optimal results, the Secretary asked the Proponent to include a monitoring framework with specific metrics to evaluate mode share goals, commuter behavior, and program participation rates. Adaptive management strategies should be detailed to outline how the TDM program will be adjusted based on monitoring results to enhance its effectiveness continually. These strategies include continuous monitoring through regular collection of data on key performance

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<sup>1</sup> 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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indicators (KPIs), such as the proportion of commuters using different modes of transport, changes in commuter behavior, and overall participation rates in the TDM program. Systematic evaluation and analysis of the collected data should be included to evaluate the program's success in meeting its objectives by comparing current performance against predefined benchmarks or targets, identifying trends, and determining areas needing improvement.

The FEIR effectively outlines a Traffic Monitoring Program (TMP) to accompany the TDM program that will be used to measure its success in achieving the trip reduction standards, which the City of Watertown has established for the Project. MAPC commends the Proponent for clearly articulating the process through which this trip-reduction standard was established (using a combination of Census figures and local approvals for the Project to date) and arriving at a goal of no more than 54% of residents and 60% of employees driving alone to work, or a non-SOV goal of 46% for residents and 40% for employees. We also appreciate being included as a recipient of the parking data collection and resident/employee travel mode survey report **and urge the Proponent to continue this reporting for at least five years.**

While we commend the Proponent for setting forth key performance indicators (KPIs) such as SOV travel by residents that exceeds 54%, employee SOV travel that exceeds 60% and parking occupancy that exceeds 90% to trigger additional TDM measures, **we recommend that some of these measures be included as part of the initial TDM program, and that the 90% parking occupancy limit also be included as a TDM goal.** Namely, the Proponent purports that the following adaptive measures be taken only after KPIs are exceeded:

- Charging a fee for SOV parking.
- Enforcement by the Proponent (or subsequent owner) of parking policies restricting residents and employees from parking on neighborhood streets

Rather than waiting for undesirable travel behavior that warrants intervention to occur, we recommend that the Proponent include fees on SOV parking and enforcement against parking on residential side streets as integral components of the TDM program at its launch.

**Reevaluate methodology used to determine projected trip generation and evaluate how the project meets Watertown's Climate and Energy Plan, which calls for a 50% reduction in VMT.**

Comments from Watertown Faces Climate Change (WFCC) note that the methodology used to determine auto trips should be adjusted for post pandemic patterns of reduced transit use. Additionally, WFCC notes that the Proponent has not met Watertown's Climate and Energy Plan (WCEP), which calls for a 50% reduction in vehicles miles traveled.

MAPC notes that the FEIR has thoroughly reevaluated the methodology used to determine projected trip generation as a means of evaluating how the project meets WCEP, and whether the existing transportation infrastructure affords sufficient capacity to accommodate the established trip-reduction goals of the City (no more than 54% of residents and 60% of employees driving alone to work). While we agree with the Proponent's conclusion that the transportation infrastructure does not currently provide the resources necessary to achieve this goal, **we respectfully emphasize that the MBTA's Bus Network**

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**Redesign (BNRD), which commences its first phase on December 15, 2024. Although this first phase does not include Watertown routes, future phases are scheduled to include significant improvements in bus service along Arsenal Street, which will directly serve the Project.** The existing service provided by the MBTA Route 70, which sometimes exceeds headways of 30 minutes, will be enhanced to provide “high frequency service” every 8-15 minutes, 7 days per week between Waltham and Kendall Square in Cambridge as the new “T70.” Combined with bus priority and bus facility improvements, such as dedicated bus lanes and real time arrival boards, as well as significant increases in shuttle service on the WAT Connector, this improvement in transit service, along with supporting infrastructure proposed throughout the FEIR, has the capacity to meet the trip-reduction/mode-shift goals/mandates of both the City and the WCEP. Therefore, MAPC urges the Proponent to establish and commit to the same mode shift and trip-reduction goals held by the City, with a robust TDM program and companion TMP used to measure performance and make improvements toward supporting the WCEP’s more ambitious goal.

**Minimum parking development.**


Finally, we reiterate the recommendation from our initial comment letter on the DEIR that the Proponent construct the on-site parking facilities to reflect the minimum rather than the maximum ends of the projected inventory range to facilitate a build out, which supports a transit-supportive, climate friendly Project.

**Conclusion.**

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, TDM, and cooperation with the Town of Watertown and community stakeholders and appreciate their efforts to minimize single occupancy vehicle (SOV) trips and climate harming emissions, which have been further addressed in this FEIR.

Thank you for the opportunity to comment on this project.

Sincerely,



cc: George Proakis, Watertown Town Manager  
Commissioner Brian Arrigo, DCR  
David Mohler, MassDOT