



SMART GROWTH AND REGIONAL COLLABORATION

December 9, 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),  
Final Supplemental Environmental Impact Report, 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*<sup>1</sup>, and *improving accessibility and regional connectivity*<sup>2</sup>. 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.

Turquoise Southfield NR 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 it proposes a revised combination of residential and commercial development to align with current market conditions. Specifically, the number of proposed residential units has risen from 3,855 to 7,274, while the proposed commercial space has been reduced from 8 million square feet to 2 million square feet. Given the long-term buildout of the project over a 12 to 15-year period, the project will be developed in five phases, which the Final Supplemental Environmental Impact Report (FSEIR) refers to as "tiers." Given potential changes in market demand over this period, a specific development program in terms of the mix of residential and commercial uses will be advanced in the future for each tier.

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."

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

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

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MAPC commends the Proponent for adhering to the Secretary's Certificate<sup>3</sup> directives in the Draft Supplemental Environmental Impact Report (DSEIR) by setting a higher non-SOV (Single Occupancy Vehicle) mode share target, proposing enhanced monitoring and mitigation measures, tracking mode shares, and outlining how additional Transportation Demand Management (TDM) measures will be implemented if targets are not met. A full Transportation Impact Assessment (TIA) will be submitted at each tier development (Phase) of the Project for review to reevaluate the Project's transportation impacts in the study area and re-assess the mitigation and parking programs. For each tier, MAPC expects the proponent to clearly distinguish between each parking type (e.g., housing, commercial).

The Proponent has updated their goal to achieve 20% non-SOV trips by the project's completion, an increase from the 15% outlined in the DSEIR. This target will be implemented in phases as the project develops. The 20% goal was determined after evaluating the potential for greater reductions in SOV trips that could be achieved through an extensive Parking and Transportation Demand Management (PTDM) program and recognizing current trends in personal transportation that include reduced car ownership, growing use of transportation network services such as Uber and Lyft, and increasing use of demand-responsive micro-transit. The number of daily vehicle trips is projected to decrease from 44,656 to 43,986, representing a 1.5% reduction compared to the DSEIR.

MAPC is also encouraged by the Proponent's intent in the FSEIR to aim for a 10% reduction in parking spaces through shared parking and parking management strategies. Additionally, the Proponent has indicated that for commercial tenants, where shared parking may not be feasible, they will adopt a "right-sizing" approach through land banking (designing but not building) or employing structural soil solutions, such as Grasscrete™ or similar, for temporary parking areas.

However, the FSEIR does not include a comprehensive parking analysis for each tier, which is called for in the Secretary's Certificate on the draft DSEIR. This analysis should include an evaluation of anticipated parking demand and usage for each development phase (or "tier"), projected traffic demand at different times of the day, expected parking duration, and different types of parking demand (e.g., resident, employee, visitor, etc.). Determining the characteristics of parking and traffic demand for each future tier is essential in order to identify the level of mitigation needed commensurate with the impacts associated with each tier. MAPC was concerned to see that the FSEIR still includes an extremely wide range of parking spaces, from 11,050 to 20,500 spaces, because the FSEIR does not specifically define the development program for each development tier. Although the current MEPA review is not well-suited to address future phases of development, the Proponent provides a means to address future development tiers through the Section 61 Findings, which will require the filing of TIAs as each future phase is developed. This should provide specificity for the review of the parking program and other transportation issues for each development tier.

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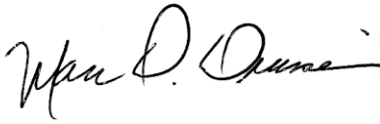
<sup>3</sup> Dated August 30, 2024.

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We note that the Proponent has included MAPC as a participant in the review of the subsequent TIAs and we look forward to participating in the ongoing review process. Thank you for the opportunity to comment on this project.

Sincerely,



Marc Draisen  
Executive Director

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