



SMART GROWTH AND REGIONAL COLLABORATION

November 21, 2018

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Page Czepiga, MEPA #15595
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: XMBLY, MEPA #15595, Final Environmental Impact Report (FEIR)

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews proposals deemed to have regional impacts. The Council reviews proposed Projects for consistency with *MetroFuture*, the regional policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, consistency with Complete Streets policies and design approaches, consistency with the requirement of the Global Warming Solutions Act, as well as impacts on the environment.

XMBLY (the Project) is a mixed-use development located at 5 Middlesex Avenue in Somerville. The Project is located on a 9.38-acre lot bounded by Foley Street, Middlesex Avenue, Revolution Drive, and Grand Union Boulevard on the outer edge of Assembly Row, within a 5-minute walk from the Assembly Square Orange Line Station and multiple MBTA bus routes.

CDNV Assembly, LLC (the Proponent) proposes to develop the site with approximately 1.5 million square feet (sf) of mixed-use development, with 5 buildings surrounding 48,000 sf of publically accessible central open space. When completed, the development program will comprise:

- › 836,000 sf office use
- › 520,000 sf residential use (489 units)
- › 140,000 sf commercial use

The Project is anticipated to generate approximately 13,638 unadjusted daily vehicle trips. Once mode shares are applied, the Project is anticipated to generate approximately 6,765 adjusted daily vehicle trips. Of these trips, 452 are projected to be during the morning peak hour, 533 during the evening peak hour, and 344 during the Saturday peak hour. A total of 1,695 parking spaces are proposed. There have been no significant changes to the Project since the filing of the Draft Environmental Impact Report (DEIR).

MAPC is pleased that the FEIR has adequately addressed transportation mitigation and Transportation Demand Management (TDM) programs. It also outlines a comprehensive monitoring and reporting program. However, MAPC does have remaining concerns regarding the number of proposed parking spaces and integrating this project with the recommendations of the draft Lower Mystic Regional Working Group (LMRWG) Study, which was called for in the Secretary's MEPA Certificate on the DEIR.

**Metropolitan Area Planning Council (MAPC) comments on
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MAPC has a long-term interest in reducing vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions per the Commonwealth's statutory obligation to meet the GHG reductions of the Global Warming Solution Act (GWSA) — 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory GHG goals, MAPC respectfully requests that you require the Proponent to include MAPC's recommendations in the forthcoming Certificate and subsequent Section 61 Findings.

Thank you for the opportunity to comment on this Project.

Sincerely,



Marc D. Draisen
Executive Director

cc: Mayor Joseph A. Curtatone, City of Somerville
George Proakis, City of Somerville
Brad Rawson, City of Somerville
David Mohler, MassDOT

**Metropolitan Area Planning Council (MAPC) comments on
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Parking

It is our view that the 1,695 parking spaces proposed by the Proponent should be significantly reduced. In order to minimize adverse impacts and to keep the Commonwealth on track in meeting its regulatory and statutory goals, MAPC respectfully requests that you require the Proponent to reduce the proposed number of parking spaces to the fullest possible extent. A reduced parking supply would reinforce the success of this Project as a Transit Oriented Development (TOD). Indeed, MAPC's own research and other studies have shown that the availability of parking increases the likelihood a person will choose to drive instead of taking another mode. A significant determinant of mode choice is the availability of free parking provided at the site. Therefore, reducing the amount of parking is the most effective strategy to reduce auto trips and to shift a greater proportion of travel to non-automobile modes¹.

As we previously stated in our EENF (Expanded Environmental Notification Form) and DEIR comment letters², the amount of parking proposed for the entire project should be reduced by at least 50%. This is a premiere TOD site located less than a 5-minute walk to public transportation, as well as a very short walk to retail and restaurants at Assembly Row, enabling people to live and work without owning a car. If we cannot achieve more limited parking in this and similar projects, the mandatory goals under the GWSA will be more difficult to reach.

It is important to underscore that both MassDOT and the City of Somerville have recommended parking reductions. Specifically, MassDOT's comment letter states, "*The Lower Mystic Regional Working Group study included analysis which showed how limiting parking at new developments is associated with decreased automobile usage to access development sites. Given the capacity limitations on the study area's roadway network, the Proponent is strongly encouraged to investigate reducing on-site parking...*"³ The City of Somerville's comment letter notes that, "*Reducing automobile mode share is an overarching policy goal of the City of Somerville, and is essential to meeting our ambitious environmental goal of becoming a carbon-neutral city. Reducing automobile mode share also advances the City's adopted Comprehensive Plan.*"⁴ It should also be noted that the Proponent recognizes that, "*[a]lternate means of travel, such as taxi, private ride services (Uber, Lyft, and others) should continue to reduce the parking needs for this area.*"⁵

Consistent with these comments, the Secretary's Certificate states, "*Provision of excessive parking supply is contrary to the LMRWG goals and State policy. I refer the Proponent to comments from MAPC and MassDOT which strongly encourage the Proponent to investigate reducing on-site parking, particularly in coordination with measures to increase multi-modal access to the site.*"⁶

¹ [MetroBoston Perfect Fit Parking Initiative](#), Phase 1 Report, MAPC, February 2017.

[Who Pays for Parking?](#), TransitCenter + Frontier Group, September 2017.

[The Strongest Case Yet that Excessive Parking Causes More Driving](#), CityLab, January 12, 2016.

² MAPC EENF comment letter dated November 23, 2016 and DEIR comment letter dated July 20, 2018.

³ MassDOT DEIR comment letter dated July 20, 2018, page 8.

⁴ City of Somerville's DEIR comment letter dated July 20, 2018, page 3.

⁵ FEIR, page 2-22.

⁶ Secretary's Certificate, July 27, 2018, page 8.

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Therefore, MAPC strongly urges the Secretary to require that the Proponent strictly limit the amount of free parking and take other complementary steps to discourage auto use, including implementing a shared parking program, charging for parking, and unbundling parking, all of which are effective strategies to reduce auto trips associated with this Project.

Provide Infrastructure for Electric Vehicle Charging

MAPC strongly encourages the Proponent to commit to, not just consider, providing electric vehicle charging stations to accommodate at least four percent of the total parking and sufficient infrastructure capacity for future accommodations for at least 15 percent of the total parking spaces. If there is rapid adoption of electric vehicles, the Proponent should be open to increasing these percentages over the life of the buildout. Massachusetts is party to a multistate Memorandum of Understanding for an action plan facilitating implementation of zero-emission vehicle (ZEV) programs⁷. The goal is to ensure that there are 300,000 ZEVs on the roads in Massachusetts by 2025, which requires adequate infrastructure.

Lower Mystic Regional Working Group

The draft LMRWG Study specifically anticipated development at the Project site, along with tremendous growth occurring in this general area, including additional build-out in Assembly Square, growth in Sullivan Square and other areas of Charlestown, the Encore Boston Harbor casino and resort, and additional growth planned close by in other parts of Somerville and Everett. As the first development project to occur within the framework of the draft LMRWG Study, it is critical that the Proponent's transportation mitigation program be aligned with the draft Study's recommendations.

Accordingly, the Certificate directs the Proponent to develop a comprehensive mitigation package consistent with the aims of the Lower Mystic Regional Working Group, consider contributing to a Regional Mitigation Fund if one is established, and make significant mitigation commitments to increase use of public transportation. Specifically, the Certificate states, "*Comments from MAPC note the LMRWG recommends the establishment of a Regional Mitigation Fund in which developers could deposit mitigation funds to support larger transportation improvements. The Proponent should consider provision of an operating subsidy commensurate with identified impacts which could be directed to MassDOT/MBTA or to a regional mitigation fund, if one is established.*"⁸ Since the Proponent did not address this in the FEIR, we ask that the Secretary require the Proponent to recognize the draft LMRWG and include a provision that the Proponent may contribute to a Regional Mitigation Fund, when and if one is established, as part of the Section 61 Findings.

⁷ State Zero-Emission Vehicle Programs, Memorandum of Understanding, October 24, 2013. <https://www.zevstates.us/>

⁸ Secretary's Certificate, July 27, 2018, pages 18-19.

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Transit Mitigation Package

MAPC is pleased that the Proponent will continue to coordinate with MassDOT and the MBTA to develop a transit mitigation package that will:

- Enhance connections for MBTA buses servicing the area;
- Enhance travel for employees, visitors, and residents of the site between the site and proximate bus stops and Assembly Station; and
- Ensure that Future Build conditions maintain or improve the MBTA's policy capacity, which is the MBTA's benchmark for subway car capacity without overcrowding.

In addition, the Proponent has discussed with the MBTA and MassDOT potential approaches to assess and mitigate Project crowding impacts in relation to the MBTA's policy capacity. This could include, for example, a contribution from the Project towards MBTA system improvements that could result in increased Orange Line frequencies and/or a shift in usage from the Orange Line to other modes (e.g., bus). MAPC notes that this transportation mitigation package could be advanced as part of a Regional Mitigation Fund.

Include Development Covenant as Part of Section 61 Findings

The Proponent and the City of Somerville have developed a draft Development Covenant outlining the Project's mitigation commitments⁹. Transportation mitigation commitments include transportation demand management programs, new vehicle and bicycle parking, roadways, sidewalks; and other public realm improvements. Since the draft Development Covenant addresses many of the Proponent's commitments as directed by the Secretary's Certificate, MAPC highly recommends that the final document be included as part of the Section 61 Findings.

Affordable Housing

MAPC is pleased the Proponent, consistent with the City of Somerville's mandatory on-site affordable housing requirement,¹⁰ will set aside 20% of the residential units to be constructed as affordable units within the project. Affordable units are a critical mechanism to reduce the number of cars, vehicle trips, and GHG emissions. 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.*"¹¹ It should be noted that the City also implements a Housing Linkage Ordinance, which requires large development projects to pay a mitigation fee of \$10 per square foot into the City's Affordable Housing Trust Fund. According to the draft Development Covenant, the Affordable Housing linkage fee for this Project is an estimated \$7.9 million.

⁹ The draft Development Covenant is in Appendix E of the FEIR.

¹⁰ Article 13 – Inclusionary Housing of Somerville's Zoning Ordinance

¹¹ Prepared by the Dukakis Center for Urban and Regional Policy; Stephanie Pollack, Barry Bluestone, Chase Billingham; October 2010, page 2. <http://www.northeastern.edu/dukakiscenter/transportation/transit-oriented-development/maintaining-diversity-in-americas-transit-rich-neighborhoods>