



SMART GROWTH AND REGIONAL COLLABORATION

February 25, 2019

Matthew A. Beaton, Secretary
Executive Office of Energy & Environmental Affairs
Attention: MEPA Office – Alex Strycky, MEPA #15889
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Union Square Redevelopment, MEPA #15889, Draft Environmental Impact Report

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 requirements of the Global Warming Solutions Act (GWSA), as well as impacts on the environment.

The Union Square Redevelopment (the Project) is a mixed-use and transit-oriented development of approximately 2.4 million square feet (sf) in 7 development parcels, referred to as the "D Blocks." Union Square RELP Master Developer LLC (US2) and the Somerville Redevelopment Authority (SRA) (jointly, the Proponent) propose to redevelop approximately 15.1 acres in the Union Square neighborhood of Somerville. The only material Project change since the Environmental Notification Form (ENF) is that the former Post Office Building is no longer proposed to be included in the Project.

The development program includes 1.15 million sf of office/lab space, 123,000 sf of retail space, a 93,000-sf hotel (175 rooms), 54,000 sf of arts/creative space, and 933,000 sf of residential units (up to 998), including 200 of these designated as permanently affordable. This Project will help to advance equity in the region, in addition to creating strong links between transit, jobs, and homes. When complete, the Project will include a maximum of 1,495 parking spaces and is forecast to generate 9,397 average daily trips¹. It is anticipated that the entire Project will be constructed in three phases.

This Project is the product of an extensive public process spanning nearly a decade and reflects the City's ongoing partnership with the MBTA in support of the Green Line Extension project (GLX).

The Project is within walking distance of multiple MBTA bus routes and will be adjacent to the MBTA's GLX project once it is completed. As a high density mixed-use development, this Project has the potential to advance several of the region's transportation goals, as enunciated in *MetroFuture*. It also has the potential to advance the Commonwealth's statutory obligation to meet the GHG reductions of the GWSA — 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050.

¹ 9,397 average daily trips are adjusted. Unadjusted daily trips are 22,352.

**Metropolitan Area Planning Council (MAPC) comments on
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The following recommendations are intended to help this Project to reach its full potential. Specifically, MAPC's recommendations include providing cost estimates for proposed mitigation and ensuring a better bus line interface with the Green Line.

MAPC respectfully requests that you require the Proponent to address our comments in the Final Environmental Impact Report (FEIR) and the forthcoming Section 61 Findings.

Thank you for the opportunity to comment on this Project.

Sincerely,



Eric Bourassa
Transportation Director

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

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Mitigation

MAPC recognizes that the Proponent has made significant investments towards the GLX (both direct monetary and in-kind facility contributions) and the Somerville Avenue Utility and Streetscape Improvements project. MAPC supports these investments but would like to comment that they could be summarized more clearly and succinctly. The DEIR does not provide a defined mitigation program with cost estimates. In particular this is exemplified in Table A, Summary of Impacts and Mitigation Measures, of the Draft Section 61 Findings.

It is important to underscore that the request for the Proponent to provide a defined mitigation program with cost estimates was made more than once in the Secretary's EENF Certificate:

The DEIR should more fully document the design, impacts and mitigation measures associated with the first phase of the project and its close coordination with, and support of, City and State-sponsored infrastructure projects. (page 2) and

The Proponent should indicate a clear commitment to implement proposed mitigation measures and describe the timing of their implementation, including whether measures are implemented based on phases of the project or occupancy levels. The DEIR should identify projects that have or will be completed by the City that will affect transportation conditions. It should identify all mitigation measures, including TDM, roadway mitigation and pedestrian, bicycle and transit improvements, and outline a transportation monitoring program. (pages 26-27)

The Proponent needs to continue collaborating with the City to clearly designate financial commitments for specific programs or projects. MAPC respectfully requests that the Proponent's FEIR include a clearly framed mitigation program with cost estimates.

Bus Connectivity

The Project site is located within a quarter mile of five MBTA bus routes that directly serve Union Square: Routes 85, 86, 87, 91, and CT2. Five additional MBTA bus routes (69, 80, 83, 88, and 90) provide service within a half-mile of the Project site. The Project is designed and intended to build upon the expanded access that will be created by the GLX.

MAPC recognizes that the Proponent has been a major partner and contributor to the GLX project, including the coordination of design elements to benefit MBTA operations and access. US2 has agreed to fund approximately \$5.8 million toward the City's GLX payment. These payments will help offset the City's commitment to contribute \$50 million to the GLX project.

Despite the significant investments outlined by the Proponent, it is unclear how the Proponent plans to invest in efficient bus connections to the GLX and other bus service improvements. MAPC wishes to emphasize the importance of detailing commitments to improving bus service which will ensure that the project will realize the proposed 60% non-automobile mode share. The mode share will be critical to reducing the effects of congestion on roadways and associated negative environmental impacts due to increased trips from the development.

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MAPC would like to echo the comments in the City of Cambridge's ENF comment letter which states: *While the project is not estimated to generate enough new bus trips to reach crush capacity, the quality of the bus system may be deteriorated by project generated trips contributing to roadway congestion. Even with the completion of the GLX project, efficient, reliable bus connections both to the GLX station as well as throughout the area will be critical to mitigating the traffic and travel impacts of the project on adjacent communities. High quality pedestrian and bicycle facilities, including amenities to increase the comfort of these modes, are also critical.* (page 2)

The FEIR should clearly address how the Proponent will coordinate with the MBTA, specifically identifying how connections to and from the Project (e.g., Kendall Square, Davis Square, Harvard Square, Sullivan Square) can be enhanced for the MBTA buses servicing this area.

The Proponent should commit to an ongoing partnership with the MBTA and the City of Somerville to address how these MBTA bus routes could be improved to maximize ridership. This includes, but is not limited to, engagement in the Better Bus project, review of pick-up/drop-off locations, bus stop improvements, scheduling, route adjustments, and traffic signal modifications. Modifying bus routes to improve service and reliability for customers are essential service adjustments needed to achieve the 60% non-automobile travel mode share. A high degree of bus transit connectivity will allow employees, residents, and visitors to avoid having to drive to and from the Project site.

Parking

MAPC commends the both the City of Somerville and the Proponent for recognizing that parking management is a key element to managing vehicular demand. The City has already established mandatory requirements for best practices in parking management: "unbundled" parking and appropriate parking pricing. These requirements are included in the City's Coordinated Development Special Permit and Mobility Management Plan. In addition, the Proponent intends to include unbundled parking, market rate pricing, daily pricing, and limiting dedicated parking as measures to manage parking.

Allocation of Parking Spaces

The Proponent plans to establish a 1,495 parking space maximum for the Project. MAPC appreciates that the Proponent has provided the number of proposed parking spaces for each lot as well as included information that the collective parking ratio is 0.63 spaces per 1,000 square feet.

MAPC respectfully requests that the Proponent provide information regarding the allocation of proposed parking spaces to land use for each Project phase, preferably in a matrix format along with an explanation of the methodology used to determine the total parking proposed. The methodology should include an analysis of the anticipated parking usage based on the different types of parking demand (e.g., market residential, affordable residential², employee, hotel guest) and projected parking demand at different times of day.

² Please note the importance of distinguishing between market and affordable residential, since the residents of affordable units may own fewer cars and take fewer auto trips.

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Shared Parking

While MAPC is pleased the Proponent indicates that parking will be managed to minimize auto travel by implementing shared parking policies. The FEIR should include a shared parking analysis and specific plans to implement shared parking. Without this information, we are unable to assess whether the number could be reduced to limit environmental impact and to encourage non-auto access to the site.

Lower Mystic Recommendation to Establish Regional Mitigation Fund

MAPC is particularly interested in monitoring the development that takes place for this Project since it is contained within the study area of the Lower Mystic Regional Working Group (LMRWG) www.lowermysticstudy.org. The LMRWG has developed a comprehensive regional land use and transportation study that was required by your office as part of the Encore Boston Harbor MEPA process. This study is in the final stages of approval for public release. Encore Boston Harbor, MassDOT, and the Barr Foundation are funding the Working Group, with MassDOT as the Working Group lead. MAPC is a member, along with the cities of Everett, Boston, and Somerville.

As one of the first projects to occur within the framework of the LMRWG Study, it is critical that the Proponent's transportation mitigation program be aligned with the Study's recommendations. MAPC appreciates that the Proponent has confirmed that they will continually work with the City to support the recommendations as appropriate.

Affordable Housing

MAPC applauds the Proponent for recognizing that maintaining local housing affordability is an important underpinning of economic growth and is a goal in the Union Square Neighborhood Revitalization Plan adopted by the City in 2016. Somerville's inclusionary housing policy dictates that 20% of all housing provided be permanently affordable.

Approximately 200 of the 998 units will be designated as permanently affordable across three income tiers. Furthermore, 15% of these affordable units will be three-bedroom, deepening the City's commitment to families who desire to call Somerville home. Additionally, the Proponent will fund over \$10.9 million of housing linkage payments that can be utilized to address other local housing needs.

It is important to note that affordable units may also have an impact on traffic, because the owners or renters of affordable units may own fewer vehicles, generate fewer vehicular trips, and depend more frequently on transit, walking, or biking.