



SMART GROWTH AND REGIONAL COLLABORATION

June 21, 2019

Kathleen Theoharides, 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, FEIR, MEPA #15889

Dear Secretary Theoharides:

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 land use and policy plan for the Boston metropolitan area, the Commonwealth's Sustainable Development Principles, 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 goals of *MetroFuture*. Furthermore, the Commonwealth encourages an increased role for bicycling, transit and walking to meet our transportation needs while reducing traffic congestion and vehicle emissions. Additionally, the Commonwealth has a statutory obligation to reduce greenhouse gas emissions (GHG) by 25% from 1990 levels by 2020 and by 80% from 1990 levels by 2050. We take all of these matters into account in commenting as part of the MEPA process.

The Union Square Redevelopment (the Project) is a mixed-use and transit-oriented development (TOD) of approximately 2.4 million square feet (sf) in seven 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 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 development (up to 998 units), including 200 of these designated as permanently affordable. This Project will create strong links among transit, jobs, and homes. It is anticipated that the entire Project will be constructed in three phases.

The sizeable development of new homes will help to alleviate the region's housing shortage, consistent with the commitment made by the Metropolitan Mayors' Coalition to create 185,000 new homes between 2015 and 2030. Additionally, the inclusion of 200 affordable units will not only provide housing for vulnerable residents of limited means, but it will also have a beneficial impact on the environment, since residents of affordable units tend to own fewer cars and to take fewer auto trips.

MAPC is pleased that the FEIR responds to the comments we raised and includes additional analysis and more detailed mitigation measures. The Proponent has developed a strong Transportation Demand Management (TDM) program to reduce single occupancy vehicles (SOVs) and proposed quantitative transportation metrics to be applied as part of the annual monitoring program to determine future transportation improvements. These transportation metrics include growth in bus ridership at individual locations, annual growth in roadway or intersection volumes, annual growth in pedestrian volumes at specific locations, and the non-auto mode share goal of 60 percent. These metrics will also be part of the annual reporting the Proponent will be required to submit to the City that tracks, assesses, and reports on the implementation of the Mobility Management Plans as required by the Somerville Zoning Ordinance and the Planning Board's Mobility Management Plan Submittal Standards.

There is one aspect of the proposed mitigation that we would like the Proponent to clarify. The Summary of Impacts and Mitigation Measures (Table A), includes "Participation in a Transportation Management Association to help administer TDM programs," however the FEIR does not state if a new TMA will be created for the Union Square area. We strongly encourage the Proponent to contribute to the formation of a TMA for the Union Square area. MAPC requests that this question be clarified in the final Section 61 Findings. Doing so will provide a structure to ensure that the TDM services and programs committed to by the Proponent will be carried out effectively.

MAPC recognizes the Proponent has committed to provide 38 electric vehicle charging parking spaces and to plan for 38 "electric vehicle-ready" parking spaces. These 76 parking spaces comprise five percent of the Project's total parking spaces¹. We recommend the Proponent commit to increase the number of "electric vehicle ready" parking spaces to at least 25 percent in order to accommodate anticipated future growth of electric vehicles in the region.

MAPC respectfully requests that you require the Proponent to address our comments regarding the formation of a new TMA for the Union Square area and increasing the number of "electric vehicle ready" parking spaces in the forthcoming 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

¹ For example, the City of Boston has recently required that 25 percent of parking be equipped by electric vehicle chargers and an additional 100 percent be electric vehicle ready. This requirement is for substantially modified (triggers Article 80) or new construction projects and all projects in the South Boston and Downtown parking freeze zones.

<https://www.boston.gov/departments/environment/ev-boston-electric-vehicle-resources#city-of-boston-ev-policy>