



SMART GROWTH AND REGIONAL COLLABORATION

November 23, 2016

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

RE: The Office and Research Center + The Residences at Assembly, MEPA #15595

Dear Secretary Beaton:

The Metropolitan Area Planning Council (MAPC) regularly reviews development proposals deemed to have regional impacts for consistency with *MetroFuture*, the regional smart growth plan for the Boston metropolitan area, and other impacts on the environment.

MAPC is particularly interested in monitoring the development that takes place in Assembly Square because it is contained in the study area of the Lower Mystic Regional Working Group (LMRWG) www.lowermysticstudy.org. The LMRWG is a comprehensive regional land use and transportation study that was required by your office as part of the Wynn Casino permitting. Wynn Casino, MassDOT, and the Barr Foundation are funding the working group. MAPC is a member, along with the cities of Everett, Boston, and Somerville. In addition, MAPC is providing some of the staff support for the working group, particularly in regard to deriving policy and planning recommendations based on the modeling conducted by the Central Transportation Planning Staff.

The overarching goal of the LMRWG is to identify the likely growth that will occur in the study area over the next 25 years, to estimate the traffic impacts of this growth, and to identify transportation and land use strategies (both infrastructure improvements and public policies) to minimize and mitigate congestion at the local and regional level.

Although the study is not yet complete, we have identified tremendous growth occurring in this area — expected growth at this site, additional build-out in Assembly Square, growth in Sullivan Square and other areas of Charlestown, the Wynn Casino, and additional growth planned close by in other parts of Somerville and Everett. Only a truly regional approach can address the traffic impacts that will result from this development, including consistent and well-thought-out policies by local and state government, working in partnership. While additional transportation improvements will be needed, infrastructure alone will not address the anticipated increase in vehicle trips. The mix of uses, the amount of parking that is provided, and the transportation demand management (TDM) actions that property owners will be required to take, are critical to addressing the problem.

The Office and Research Center + The Residences at Assembly (the Project) is a four-phase development located on an approximately 9.4-acre lot within Somerville's Assembly Square area. Somerville Office Associates Limited Partnership (the Proponent) proposes to develop a mixed-use development containing office, retail, restaurant, hotel, and residential uses in four phases. When completed, the entire Project will comprise roughly 1.7 million square feet (sf) of development as follows:

- › 1,271,000 sf of office uses;
- › 239,000 sf residential (219 units);
- › 188-room hotel (approximately 151,250 sf);
- › 86,000 sf of retail uses;

A total of 1,670 parking spaces are proposed and, when fully complete, the site is forecast to generate 21,166 daily vehicular trips.

However, the Proponent does not have firm plans for the latter phases of the site and is requesting a Phase 1 Waiver. Phase 1 comprises 147 residential units (239,000 sf) and a 188-room hotel (approximately 151,250 sf). The Phase 1 component of the project is expected to generate 2,038 daily weekday trips, with 130 trips during the morning peak hour and 166 trips during the evening peak hour. On a Saturday, Phase 1 is expected to generate 2,042 daily trips. The Proponent has indicated that no mitigation is proposed as part of Phase 1. While the EENF indicates that Phase 1 will be served by 233 parking spaces (147 residential and 86 hotel), the summary plan for Phase 1 (Figure 1-7) states that a total of 442 parking spaces are required for Phase 1. This appears to contradict the previously mentioned total of 233 parking spaces for Phase 1. The Draft Environmental Impact Report (DEIR) needs to clarify the total number of parking spaces proposed for Phase 1.

In addition to the LMRWG process, 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 May 2016, the Massachusetts Supreme Judicial Court released a unanimous decision in *Kain vs. Massachusetts Department of Environmental Protection (DEP)* ordering the DEP to take additional measures to implement the GWSA. Specifically, the Court held that DEP must impose volumetric limits on the aggregate GHG emissions from certain types of sources, and that these limits must decline on an annual basis. The *Kain* decision also highlighted that the transportation sector is now the leading source of GHG emissions in Massachusetts. This recent ruling reasserts the state's obligation to meet these GHG reduction goals.

As a high density mixed-use development very close to an MBTA rapid transit station, the Project has the potential to advance these transportation and greenhouse gas goals. The recommendations outlined below are intended to help this project to reach its full potential to encourage a greater shift of single occupant vehicle (SOV) auto trips to transit, bicycling, or walking. Specifically, our key recommendations address reducing the overall amount of parking, developing a regional transportation mitigation fund, adding mode share goals, and developing an effective monitoring program. Details addressing these recommendations are outlined as follows:

Parking

The amount of parking proposed for the entire project should be reduced by at least 50%. Given that the site is a less than a 5-minute walk to both the Assembly Square Orange Line Station and the stores and restaurants at Assembly Row, there is a strong ability for people to live and work car-free at this site. The biggest determinant of whether people will use an automobile is the amount of free parking provided at both the origin and destination. Therefore, reducing the amount of parking provided is the most effective strategy to reduce auto trips.

Furthermore, it is likely that a shared parking program for the Phase 1 component of the project could be implemented by the Proponent in coordination with the planned office development in Phases 2, 3 and 4. The significant potential for shared parking, coupled with the sites' close proximity to rapid transit and retail/restaurant amenities, make a strong case to reduce the overall amount of residential parking.

Another strategy to discourage auto use for the residential development is to uncouple the parking from the housing unit lease or sale, and to charge the tenant a monthly or annual fee to park a vehicle at the site.

MAPC requests that the Section 61 Findings require the Proponent to reduce the overall amount of free residential parking provided on site, which could be accomplished through working with the City of Somerville to reduce parking requirements, developing a shared parking program, and charging for the use of on-site parking. All three steps are essential to success.

Regional Transportation Mitigation Fund

In light of the tremendous growth occurring in this area, a mitigation fund should be established by the Commonwealth and the municipalities in the area to support regional transportation improvements. The funds could support improvements to MBTA bus or rapid transit service; regional roads, highways, and bridges; major bicycle and pedestrian infrastructure; the regional Hubway bicycle share system; or other improvements

jointly agreed upon by the Proponent, municipalities, and MassDOT. There is precedent for such a transportation mitigation fee established through the MEPA process. One such precedent is the Wynn Casino's commitment to improving Orange Line service. Another is the recent Memorandum of Understanding among Boston Properties, the City of Cambridge, the Cambridge Redevelopment Authority, the MBTA, and MassDOT, under which Boston Properties will contribute a transit improvement fee to support MBTA service improvements.

One great value of establishing such a fund is that it ensures that all future developers will contribute according to reasonable and equitable rules to mitigate the impacts of their projects, rather than saddling the first, the last, or the largest project with all of most of the responsibility. Such a fund, and the rules guiding contributions to it, can provide predictability to developers, while ensuring full mitigation of negative impacts.

Mode Share Goals and Monitoring Program

MAPC expects that the Proponent will clearly define mode share goals (vehicular, bus, shuttle, Orange Line, bicycling, and walking), commit to conduct monitoring and reporting, and agree to adjust the Project's TDM program as necessary based on the results of the monitoring for the project as a whole.

City of Somerville Requirements

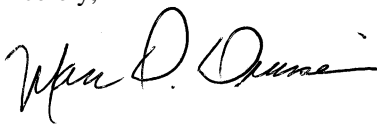
MAPC expects the Proponent will comply with the City of Somerville's mandatory on-site affordable housing requirement, which will total 20% of the residential unit count under the City's Inclusionary Zoning ordinance. Affordable units are a critical mechanism to reduce the number of cars, vehicle trips, and GHG emissions. According to the study, *Maintaining Diversity in America's Transit Rich Neighborhoods*¹, "people of color, low-income households and renters are all more likely to use transit than the average American (page 2)."

MAPC is also pleased that, in working with the City of Somerville, the Proponent will participate in the Assembly Square Transportation Management Association (TMA) established by Federal Realty Investment Trust and Partners Health Care.

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 address MAPC's recommendations and questions in the Draft Environmental Impact Report (DEIR) as well as part of 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
David Mohler, MassDOT

¹ Prepared by the Dukakis Center for Urban and Regional Policy; Stephanie Pollack, Barry Bluestone, Chase Billingham; October 2010.

<http://www.northeastern.edu/dukakiscenter/transportation/transit-oriented-development/maintaining-diversity-in-americas-transit-rich-neighborhoods>