



SMART GROWTH AND REGIONAL COLLABORATION

August 24, 2018

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, Environmental Notification Form

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 equitable transit-oriented development (ETOD) 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 15.7 acres in the Union Square neighborhood of Somerville. It is anticipated that the entire Project will be constructed in three phases.

The development program includes 1.15 million sf of office/lab space, 140,000 sf of retail space, a 93,000-sf hotel, 74,000 sf of arts/creative space, and 933,000 sf of residential units (up to 998), including 183-213 affordable units. These affordable units help to earn the Project the ETOD title, because it 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 1,500 parking spaces and is forecast to generate 9,770 average daily trips¹.

The Proponent has requested a Phase 1 Waiver. Phase 1 involves development of the 3.5 acre D2 Block and includes a total of 607,000 sf of development (Phase 1 Project). Specifically this development would comprise 166,000 sf of office/lab space, 29,000 sf of retail space, and 450 residential units (including 90 affordable units). The Phase 1 Project site is bound by Prospect Street to the west, the MBTA Fitchburg Commuter Rail tracks to the south, and Somerville Avenue to the north. The Phase 1 Project will include 290 parking spaces and is forecast to generate 2,100 average daily trips².

¹ 9,770 average daily trips are adjusted. Unadjusted daily trips are 23,239.

² 2,100 average daily trips are adjusted. Unadjusted daily trips are 4,992.

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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 currently 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.

The following recommendations are intended to help this Project to reach its full potential. The recommendations include ensuring that the robust Transportation Demand Management (TDM) program outlined for the Phase 1 Project is implemented for the rest of the Project, as well as aligning this project with the goals of the soon-to-be-completed Lower Mystic Regional Working Group's (LMRWG) study.

In this case, MAPC supports granting of the Phase 1 Waiver, because it will help to coordinate the early elements of the Project with ongoing GLX and Site Improvement activities, while minimizing adverse impacts and helping to keep the Commonwealth on track in meeting its regulatory and statutory goals. MAPC respectfully requests that you require the Proponent to address our recommendations and questions in the Draft Environmental Impact Report (DEIR) and 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

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Phase 1 Waiver

The Proponent is seeking a Phase 1 waiver in order to allow for the conveyance of the D2 Block to US2 by the SRA and for construction to commence prior to completion of the full MEPA review for the Project as a whole. The Proponent intends to proceed on an accelerated timeline in order to facilitate coordination with the construction schedules of the GLX and the Somerville Avenue Utility and Streetscape Improvements project. The granting of this waiver, and the ability of these activities to proceed in tandem, will ensure that required infrastructure is in place in a timely manner and will limit the amount of time that overall construction will impact the community around Union Square Station.

Therefore, MAPC supports the granting of the Phase 1 Waiver in this case.

Public Transportation

When complete, the Project will be an equitable transit-rich development that will bring significant opportunities to increase use of public transportation and reduce demand for single occupant vehicle (SOV) travel. This mixed-use site will serve as both a neighborhood with expanded residential opportunities, an urban employment center, and a new community node for transit, walking, and biking.

The Phase 1 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 Phase 1 Project site. The GLX will serve as the catalyst for the Project and will be constructed adjacent to the Phase 1 Project. The Project is designed and intended to build upon the expanded access that will be created by the GLX.

The Project 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, with approximately \$1.5 million coming from the Phase 1 Project. These payments will help offset the City's commitment to contribute \$50 million to the GLX project.

While MAPC applauds the Proponent for addressing improvements to public transportation as part of the GLX project, the DEIR should address how the Proponent will coordinate with the MBTA, specifically identifying how connections to and from the Project can be enhanced for the MBTA buses servicing this area. The Proponent should partner with the MBTA by contributing to service improvements for bus lines servicing the site, in an amount that is reasonably related to the Project's additional demand.

As part of a mitigation program, the Proponent needs to work with the MBTA to address how these MBTA bus routes could be improved to maximize ridership. This includes, but is not limited to, review of pick-up/drop-off locations, scheduling, and route adjustments. It is important to point out that a key recommendation of the LMRWG Study will be make improvements to public transit.

There are two such precedents for developers committing to public transit improvements through the MEPA process. One is Encore Boston Harbor's commitment to improving Orange Line

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service. The second precedent relates to development in Kendall Square in Cambridge, where Boston Properties, the City of Cambridge, the Cambridge Redevelopment Authority, the MBTA, and MassDOT signed a Memorandum of Understanding, under which Boston Properties will contribute a transit improvement fee of \$6 million to support MBTA service improvements.

Parking

A key finding of the LMRWG report is local parking policies have a powerful impact on traffic demand. Therefore, one of the study's key recommendations is to reduce the amount of parking in new residential development within walking distance to transit.

MAPC commends the both the City of Somerville and the Proponent for recognizing that parking management is a key element to managing vehicular demand. As part of the Phase 1 Project, 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. The Proponent intends to pursue the following measures to manage parking:

Unbundled Parking

All residents and employers must purchase and/or lease parking separately from any office and/or residential space. This strategy ensures that users understand the true cost of parking and can make transportation choices accordingly. Since on-site parking will be an optional amenity rather than a required purchase, this policy allows the developer to focus resources on the creation of commercial and residential space, including affordable rentals, rather than parking that could be under-utilized in the future.

Market Rate Pricing

Parking for both residential and commercial uses will be available at local market rates. Parking pricing is an effective tool that both balances demand and encourages people to travel using more cost-effective modes such as transit, walking, and/or bicycling.

Daily Pricing

When practical and feasible, employers will be encouraged to provide parking at daily rates rather than monthly leases. When users pay for parking each day, they are reminded of its cost, which encourages them to choose other modes. Moreover, avoiding monthly leases helps to eliminate the mentality that parking is a "sunk cost" and instead encourages flexibility in travel options.

Allocation of Parking Spaces

Union Square is a premiere ETOD site located in close proximity to public transportation, enabling many people to live and work car-free. While MAPC applauds the Proponent for establishing a 1,500 parking space maximum for the Project, we respectfully request that the DEIR present a detailed parking needs assessment. The Proponent needs to disclose 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

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the different types of parking demand (e.g., market residential, affordable residential³, employee, hotel guest) and projected parking demand at different times of day. Without such an explanation, we are unable to assess whether the number could be reduced to limit environmental impact and to encourage non-auto access to the site.

Shared Parking

To help minimize the amount of parking spaces required, it is essential that a shared-parking approach be utilized. Due to the varying peak times for the multiple onsite land uses (residential, office/lab, retail, and hotel), there is significant opportunity for parking spaces to be shared. The DEIR should include a comprehensive shared parking analysis, and specific plans to implement shared parking with existing or upcoming developers. The City can and should play a key role in helping various developers to implement shared parking across nearby sites.

Provide Infrastructure for Electric Vehicle Charging

At least four percent of the parking spaces should be allocated for electric vehicles, unless the City of Somerville requires dedication of a greater number of spaces. As the Proponent may be aware, Massachusetts is party to a multistate Memorandum of Understanding for an action plan facilitating implementation of zero-emission vehicle (ZEV) programs. The goal is to ensure that there are 3.3 million ZEVs on the roads by 2025, which requires adequate infrastructure, including charging stations.

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. In addition, MAPC is providing significant 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 LMRWG Study specifically anticipated development at the Project site, along with additional growth occurring in this general area, including additional growth in Assembly Square, Sullivan Square, other areas of Charlestown, the Encore Boston Harbor casino and resort, and other parts of Somerville and Everett. Only a truly regional approach can address the traffic impacts that will result from this development.

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, and the TDM actions that property owners will be required to take are all critical to minimizing and mitigating traffic impacts. As one of the first projects to occur within the framework of the

³ 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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LMRWG Study, it is critical that the Proponent's transportation mitigation program be aligned with the Study's recommendations.

In light of the tremendous growth occurring in this area, the LMRWG Study is expected to recommend establishing a Regional Mitigation Fund, which would enable developers to deposit mitigation funds into a pool for transportation investments. The funds could support improvements to MBTA rapid transit or bus service; regional roads, highways, and bridges; bicycle and pedestrian infrastructure; regional bicycle share systems; or other improvements jointly agreed upon by the Proponent, municipalities, and MassDOT.

One great value of establishing such a fund is that it ensures all future developers will contribute according to reasonable and equitable rules to mitigate the impacts of their projects, rather than burdening the first, the last, or the largest project with all or most of the responsibility. A Regional Mitigation Fund, and the rules guiding contributions to such a fund, can provide predictability to developers, while ensuring full mitigation of negative impacts. It is anticipated that once the LMRWG Study is adopted, a mechanism to enable the allocation of funds for a Regional Mitigation Fund will be established.

Since we expect the LMRWG Study to be finalized by September 2018 and submitted to your office, we ask that the Proponent take the Study's recommendations into account when preparing the DEIR and ensure that the Project and its mitigation commitments are consistent with the recommendations, including a contribution to a new Regional Mitigation Fund.

Transportation Demand Management Program

It is critical that a robust Transportation Demand Management (TDM) program be designed to minimize automobile usage and project-related traffic impacts. MAPC is pleased that the Proponent has indicated they will implement a comprehensive TDM program for the Phase 1 Project. However, it is imperative that the TDM measures delineated for the Phase 1 Project be extended to the entire Project. Key components of the Phase 1 Project's TDM program include:

Transit Passes

MAPC applauds the Proponent for recognizing that free or discounted transit passes can increase transit ridership and, in turn, reduce travel by private vehicle. As such, the following is proposed:

Employer Transit Passes

Employers will be encouraged to provide a certain level of transit pass or Blue Bike membership as an employee benefit. This will be included as a benefits package, similar to insurance or a gym membership, and can be part of providing a competitive workplace environment to attract talent. For example, this may mean that Union Square employers subsidize a portion of all employee transit passes, or a capped base amount. The actual amount will be developed along with a final parking pricing program.

Resident Transit Passes

With a large concentration of units at Union Square, the Proponent may be able to secure a bulk purchase of transit passes. Passes could be provided at no cost for a set amount of time to new residents to encourage the development of sustainable transit patterns. Providing a

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subsidy for residents, particularly new residents who are still establishing travel patterns, can lower a barrier to taking transit (both paying for and obtaining the pass) and encourage people to choose transit over driving.

Additional TDM Strategies

MAPC is also pleased that the Proponent plans to allocate reserved parking spaces for car sharing services such as ZipCar and offer ridesharing through NuRide, the Commonwealth's web-based trip planning and ride-matching service, which enables participants to earn rewards for taking "green trips." In addition, employees at the Phase 1 Project site will have the opportunity to enroll in federally-designated Commute Benefit tax deduction programs.

In addition to the areas described above, TDM components that should be included in the DEIR and Section 61 Findings are:

- Whether the Proponent will partner with an existing, adjacent Transportation Management Association (TMA) or lead the creation of a new Union Square-based TMA.
- Designating appropriate pickup/drop-off locations for taxi and private ride services.
- The DEIR should discuss how tenancy lease agreements or a tenant manual will be used as a mechanism to ensure implementation, maintenance, and success of TDM measures.

Pedestrian and Bicycle Access

In order to reduce traffic and parking demands, the Project needs to promote pedestrian and bicycle travel to the fullest extent possible. MAPC is pleased the Proponent has indicated that the Project will include bicycle facilities on all D Blocks and that streetscape improvements will encourage bicycling and walking.

Bicycle infrastructure is a significant component of the Phase 1 Project, with an estimated 650 bicycle parking spaces planned. Approximately 68 short-term spaces will be provided for customers and visitors, while approximately 492 long-term spaces will address resident and employee needs. Lastly, 90 covered and secure bicycle spaces will be provided to support the Union Square Station operation. When complete, the Project will have 1,900 bicycle parking spaces and two bike share stations. MAPC looks forward to reviewing the Proponent's pedestrian and bicycle plan in the DEIR.

Mode Share Goals and Monitoring Program

MAPC commends the Proponent for its commitment to a 60% non-auto mode share, which includes the ongoing monitoring of access in conjunction with the City, and increasing TDM measures as needed to maintain this commitment. This commitment is memorialized in US2's Coordinated Development Plan and Mobility Management Plan. US2 pledges to post-construction monitoring of mode share and adjustment of mobility management measures to ensure compliance with the 60% non-automobile mode share requirement. While the 60% requirement is for the Phase 1 Project, it is critical that this mode share goal be applied to the entire Project. In the DEIR, the Proponent should define mode share goals clearly (vehicular, subway, bus, bicycling, and walking) for residents, employees, and visitors as part of their

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commitment to conduct monitoring and reporting, and they should also agree to adjust the project's TDM program as necessary based on monitoring outcomes.

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. Similarly, this policy addresses affordability across a range of income brackets, assigning these units to three distinct income tiers. These tiers, designating units to earners of up to 50% of area median income (AMI) in tier 1, 80% in tier 2, and 110% AMI in tier 3, will serve a broad range of incomes, expanding the way in which the City addresses matters of affordability. Furthermore, 15% of these affordable units will be three-bedroom, deepening the City's commitment to families who desire to call Somerville home. In addition, the Phase 1 Project program will yield approximately \$1.5 million in a housing linkage payment, which will be utilized to address other local housing needs.

The Phase 1 Project will construct 90 affordable units and, when fully complete, the Project will provide 183 to 213 affordable units. 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.