



CITY OF SOMERVILLE, MASSACHUSETTS
MAYOR'S OFFICE OF STRATEGIC PLANNING & COMMUNITY DEVELOPMENT
KATJANA BALLANTYNE
MAYOR

THOMAS GALLIGANI
EXECUTIVE DIRECTOR

October 10, 2023

Secretary Rebecca L. Tepper
Executive Office of Energy and Environmental Affairs
Attn: Alex Stryisky
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Mr. Stryisky,

Thank you for the opportunity to comment on the submitted Final Environmental Impact Report (FEIR) for the proposed "East of Broadway" (formerly known as Encore Boston Harbor) redevelopment project (EEA#15060) dated August 31, 2023 and published in the Environmental Monitor on September 8, 2023.

The City of Somerville submitted extensive comments at the Project's prior stage of MEPA review. Several of our key concerns remain valid based on the FEIR as submitted. These include:

- Methodology to calculate proposed motor vehicle parking supply is invalid
- Proposed motor vehicle parking supply is excessive
- Analysis ignores induced demand relationship between parking and driving
- Proposed free parking strategy undermines non-automobile mode share
- Mitigation funding proposal for MBTA Silver Line is inappropriately low
- Proposal claims mode share mitigation credit for MBTA Orange Line connection via Mystic River Pedestrian Bridge, but does not propose any mitigation contribution to project
- Mitigation funding for employee transit pass program is insufficient to achieve mode share goals

Methodology to calculate proposed motor vehicle parking supply is invalid

The FEIR uses illegitimate methods to calculate its proposed parking supply, inventing inflation factors such as “operational capacity factor” and “parking inefficiencies factor” to justify the addition of 517 parking spaces. These factors are not used in ITE, MassDOT or MEPA-standard processes, and the City of Somerville respectfully requests that MassDOT and EOEEA require the Proponent to reduce its proposed parking program by 517 spaces.

Another example of inappropriate methods is the FEIR’s inclusion of parking associated with the original casino resort, which is not part of the “East of Broadway” project. An arbitrary adjustment factor described as “unmet demand for Encore” is proposed to justify the addition of 195 parking spaces. This factor is not used in ITE, MassDOT or MEPA-standard processes, and the City of Somerville requests that MassDOT and EOEEA require the Proponent to reduce its proposed parking program by 195 spaces.

Proposed motor vehicle parking supply is excessive

The FEIR describes a Project with 895,000 square feet of building space and 2,640 motor vehicle parking spaces, representing a ratio of roughly 3 parking spaces for every 1,000 square feet of built space. This ratio is far in excess of typical ratios used in urban, walkable, transit-oriented areas.

In its comments on the Project’s SDEIR, MassDOT noted its concerns “about the high number of parking spaces provided for the Project”, which “would encourage more driving to the site, limit the potential of the TDM program, and be a key contributor to congestion and delay along the Broadway corridor”. Although the FEIR appears to reduce the proposed parking supply, it remains excessive and therefore detrimental to safety and sustainability goals. The City of Somerville respectfully requests that MassDOT and EOEEA require the Project to reduce the proposed parking supply by at least 712 spaces from the proposed 2,640 spaces, resulting in a maximum of 1,928 parking spaces (which would still yield a generous ratio of 2.1 spaces per 1,000 square feet).

Analysis ignores induced demand relationship between parking and driving

The City reiterates its previous comments on the “induced demand” relationship between parking supply and automobile mode share. We express our ongoing concern that the Project has not provide a sensitivity analysis to determine how different parking supply scenarios could impact automobile trip generation and mode share projections. We request that MassDOT and EOEEA require the Proponent to calculate trip generation and mode share under low, medium, and high parking scenarios to illuminate the relationship between land use and transportation and then determine appropriate mitigation strategies based on that analysis.

Proposed free parking strategy undermines non-automobile mode share

The City reiterates its previous comments on the Project's strategy of providing subsidized free parking for nearly all operations. Parking pricing is a widely-accepted TDM best practice. The City requests that MassDOT and EOEEA require the Proponent to implement a more aggressive paid parking program than is currently described in the FEIR in order to mitigate transportation impacts.

We note that the FEIR proposes to treat drivers differently than transit riders in that a 100% subsidy is provided to parking users while only a 60% subsidy is provided to transit users. This inequity should be remedied through the MEPA process.

Mitigation funding proposal for MBTA Silver Line is inappropriately low

The City notes that the MBTA has calculated that the Project's proportional contribution to the planned Silver Line Extension should be \$5 million. The FEIR asserts without evidence that \$1 million is adequate and appropriate. The City requests that MassDOT and EOEEA support the MBTA's recommendation and require the Proponent to provide the needed funding to advance this critical transit project.

Proposal claims mode share credit for MBTA Orange Line connection via Mystic River Pedestrian Bridge, but does not include any mitigation contribution to project

As we noted at the SDEIR filing, the City acknowledges and applauds the Proponent's earlier contributions to design and engineering of the Mystic River Pedestrian Bridge, which was required to mitigate the transportation impacts of the original casino resort proposal. The current FEIR acknowledges that the Project's non-automobile mode share will increase if a direct bicycle/pedestrian connection is made from Everett to the MBTA Orange Line station at Assembly Square. The City requests that MassDOT and EOEEA require the Proponent to contribute an appropriate share of the project costs for the integrated bridge/station access project.

Mitigation funding for employee transit pass program is insufficient to achieve mode share goals

The FEIR states that the Project will provide a 60% transit pass subsidy to Project employees. Accepted TDM best practices from Cambridge and Somerville specify a minimum of 90% transit pass subsidy for employees of new developments.

The City notes that the MBTA has recently launched a new "Pay Per Use" workforce transit pass program under which participating employers may provide universal employee transit passes, but only pay for actual trips using those passes. We urge the Proponent to investigate this program and offer enhanced transit benefits to employees.

The City also notes that the FEIR treats drivers differently than transit riders in that a 100% subsidy is provided to parking users while only a 60% subsidy is provided to transit users. This inequity should be remedied through the MEPA process.

Thank you for the opportunity to comment on this proceeding.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Rawson", with a long horizontal stroke extending to the right.

Brad Rawson
Director, Mobility Division
Mayor's Office of Strategic Planning & Community Development
City of Somerville, MA