The Union Square Neighborhood Plan was originally released on April 21, 2016 with the following message on the cover, “The Mayor’s Office of Strategic Planning and Community Development is working to finalize watercolor illustrations, correcting any clerical errors, cross checking references, and ensuring graphics provide clear and properly labeled information that is not substantive to the content of this plan.” OSPCD is still in the process of making these changes and prior to any final printing of the plan.

At the public meeting of the Planning Board on April 28, 2016 and through written comments, the Board has received public feedback and testimony regarding the Union Square Neighborhood Plan. This memo was prepared by OSPCD to clarify and/or respond to this feedback. Where applicable, edits recommended or desired by OSPCD are called out in red text.

Open Space – The CAC and City Staff agree that it is necessary to determine what portion of SomerVision’s goal for new open space should be attributed to Union Square. However, the specific calculation for 20.4 acres of new open space proposed by the CAC did not first subtract new public space built or already in the development pipeline since the adoption of SomerVision. A corrected calculation is found on pages 46-48 and 80-84 of the Union Square Neighborhood Plan that sets the new target at 15.25 acres. OSPCD will double check the text in these subsections to ensure it is clearly explained.

To contribute toward achieving the open space goals of SomerVision, the neighborhood plan calls for 15.25 acres of new public space within the plan area. With this goal in mind, the project team balanced all development needs (commercial, residential, open space) to determine an ideal build out for the Union Square plan area and accounted for sites that added up to 12.32 new acres of public space. This leaves just under 3 acres of public space still needed, and the neighborhood plan calls upon the city to find those acres through means that could not be predicted at this time.

Civic Space on the D Parcels – In contribution toward achieving the goal for 15.25 acres of new public space in the Union Square plan area, the neighborhood plan recommends a 15% useable open space zoning requirement across all of the D Parcels. Each D Parcel spread in the document shows an ideal division of the parcel into lots, a massing model to show the building form and scale appropriate for the parcel, and a narrative describing the character of development. Public spaces in these diagrams are based on the best urban design solution for the option shown. There is the possibility aggregate the required amount of space for each D Parcel together onto one site to create a larger space. As illustrated in the neighborhood plan, the D4.3 lot is illustrated as a new neighborhood park in its entirety. This is an example of a ‘receiving lot’ accommodating the useable open space required for other ‘sending lots’ that is mentioned multiple times throughout the plan. The actual location of public space on the D Parcels may be different from what is shown in the plan but the 15% requirement would remain the same. OSPCD requests to edit the development objectives language for each D Parcel to say: “At least 15% of the D[#{] Parcel should be provided as useable open space unless aggregated offsite.”

Leins Automotive – Page 196 of the neighborhood plan explains how the scattered sites were selected. Hypothetical development on any of these sites simply illustrates what’s possible outside of any other
intervention, including historic preservation. In the write up for 65 Bow Street, the neighborhood plan describes the an existing colonial revival building that was Somerville’s first gas station and suggested that any redevelopment should include preserving and relocating this 12’ x 12’ building. After comments submitted by the owner, OSPCD recommends editing the text to say that if development happens, the City should provide financial with the relocation of the building. CPA funds can be used in historic preservation efforts among other sources. Regarding the owner’s comment on the zoning and height in this district, the staff believes that the 3 story height is adequate, and it matches the current 3-story 40-foot NB zoning district in which this lot currently sits.

Street Design & Bike Facilities – The neighborhood plan illustrates conceptual designs for streets and bicycling facilities within the plan area to show what could fit within the current right-of-way. Proper surveying and engineering analysis is necessary to determine the appropriate type of protected bikeway facility and lane width for each street. The neighborhood plan includes conceptual examples of protected bikeways mainly to illustrate that enough space is available for their implementation. Detailed design of these facilities will include further opportunity for public input.

Housing – The insatiable demand for housing in Somerville was taken into consideration along with other development needs, including the need for commercial development in the Union Square plan area. The plan also focuses on meeting the correct proportion of SomerVision’s 6000 unit goal. In the Vision for Housing section (starting on page 88) the neighborhood plan summarizes two informative housing studies: a Housing Needs Assessment for affordable housing by LDS Consulting Group and a Market Rate Housing Analysis by Zimmerman/Volk.

The Market Rate Housing Analysis projects the number of households in the market for new and existing market rate housing each year over the next five years and estimates the potential absorption of these households by Somerville each year. ZVA projects that 14.31% of the annual market for new or existing housing in Somerville is Family Oriented Households (620 of the 4,330 total) and estimates anywhere between 69 and 132 of these households could be absorbed annually across the entire city.

The figures on page 89 of the neighborhood plan project the number of households in the market for multi-unit rentals and condos by every year over the next five years. The total number of households in the market for new multi-unit rentals and condos is only 3,145 households (annually), making Family Oriented Households 6.8% of the annual market for that specific type of housing. This section of the neighborhood plan does not identify the total number of households or the number of Family Oriented Households in the market for new single unit attached and detached housing in Somerville because that type of housing is not likely to result from redevelopment in Union Square and Boynton Yards (see last paragraph in column one of page 89). Only 215 Family Oriented Households are projected to be seeking multi-unit rentals or condos and between 38 and 51 of these households could be absorbed annually across the entire city. Page 90 identifies a Family Housing Target of 160 three or more bedroom units because that is 6.8% of the total housing development target for the neighborhood plan, which is equal to the percentage of Family Oriented Households that make up the annual market for new multi-unit rentals or condos. The demand for affordable housing and affordable family oriented housing should be understood as needed in addition to the numbers provided by ZVA because their analysis is specifically for market rate housing.

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OSPCD has also prepared a response to selected feedback from various neighborhood groups. Comments submitted are in bold and followed by a response from OSPCD. Where applicable, edits recommended or desired by OSPCD are called out in red text.

From Union Square Neighbors:

Transportation analysis is not included. (See p. 254.)

A transportation analysis is now complete and has been transmitted to the Planning Board.
A section of the plan makes a strong case for implementing transportation demand management strategies, but it does not appear to recommend which parcels or buildings should be subject to demand management zoning requirements (p. 116 -123).

The neighborhood plan specifies that new commercial and multi-tenant residential development would be subject to Mobility Management requirements. A neighborhood plan can recommend policy solutions and even provide guidance for how a policy might function, but it cannot provide specific policy details that require further analysis and community dialogue before an "ideal" policy framework can be implemented.

Relatively little detail is included on location of taxi stands, bus stops, and paratransit ("The Ride") locations relative to the Union Square GLX station. USN recognizes plans for the GLX are fluid. These issues will need to be addressed in the future.

The identification of ideal locations for taxi stands, bus stops, and paratransit ("The Ride") locations relative to the Union Square GLX station is best addressed through other means than a Neighborhood Plan. The Transportation & Infrastructure division of the Mayor's Office of Strategic Planning and Community Development interfaces with representatives from the MBTA on such matters regularly.

The Neighborhood Plan does not adopt USN's recommendation to include a two-way protected bike lane that connects Union Square to Brickbottom via Somerville Avenue; however it does call for one-way protected bike infrastructure on Somerville Avenue between Union Square and Brickbottom (p. 135, 179). It is not clear why the two-way bike lane is not carried through from Union Square to Brickbottom for purpose of continuity.

Pages 132-135 of the neighborhood plan focus on improving cycling in the Union Square plan area. Specifically, page 135 includes a map that proposes all of Somerville Avenue from Church Street to the intersection with McGrath Highway to have a protected bikeway facility of one type or another. (See also street design and bike facilities above.)

The Neighborhood Plan does not adopt USN's recommendation to show two-way protected bike lane on GLX-side of Prospect and Washington Streets. (See p. 141.) It is not clear why this recommendation was not integrated into the plan.

See above.

The Neighborhood Plan does not appear to adopt USN's recommendation for a community path parallel to Fitchburg railroad tracks on p. 135; however, the image on p. 143 suggests green/open space in this approximate location, so perhaps this will be addressed in the future.

This was unintentionally omitted from the bike network map and will be corrected.

The Plan does not adopt the CAC's recommendation for 20.4 acres of new open space in Union Square and instead provides only 15.3 acres.

The CAC and City Staff agree that it is necessary to determine what portion of SomerVision's goal for new open space should be attributed to Union Square. However, the specific calculation for 20.4 acres of new open space by the CAC did not first subtract new public space built or already in the development pipeline since the adoption of SomerVision. A corrected calculation is found on pages 46-48 and 80-84 of the Union Square Neighborhood Plan. OSPCD will double check the text in these subsections to ensure it is clearly explained. Also, please see comments on the first page of this memo.

The plan does not include design guidance for residential buildings and public spaces that families will choose to call home. It should include housing typologies such as townhouses and courtyard housing and provide for access to private and public outdoor spaces, shared play spaces, teen rooms, etc., in residential developments.

The Parks & Open Space team of the Mayor's Office of Strategic Planning and Community development works every day to design new public spaces that are inviting to everyone, but places special interest in
designing spaces that are family friendly. The neighborhood plan identifies the new Civic Space Types proposed by OSPCD for the Somerville Zoning Ordinance that included intricate design standards and guidelines based on the best practices for the design of public space. Additionally, page 96-97 discusses the need for programs and policies that ensure that Family Housing is for Families and recommends three possibilities, including the establishment of Design Guidelines for Family Housing.

The draft Neighborhood Plan states that the D7 parcels make particularly good family housing opportunities due to their proximity to the residential neighborhood and a short walk to the Argenziano School. We agree. However, the descriptions and massing of these buildings in the plan should reflect family friendly design, including features such as outdoor gathering and play space, townhouse/stacked townhouse housing typologies, square footage and number of bedroom requirements, porches, a community room, etc.

The neighborhood plan illustrates the upper limit of an appropriate building massing for the D7 Parcel. If designed and developed as family housing, the details mentioned above would typically be addressed during development review for that site.

The Neighborhood Plan continues to show exciting images of a redesigned Bow Street, Sanborn Court, and Boynton Yards (see pp. 165-168), but it does not extend this quality of pedestrian experience to the master development blocks, notably alleys on D1, D2, and D6. The alleys on D2 and D3 are characterized for use as “rear access and loading for any future development” (p. 181, p. 247). The plan states that pedestrian passage on D6 should serve should serve as the vehicular access point and drop-off for a potential hotel (p. 191), an unremarkable outcome for the heart of Union Square.

The neighborhood plan includes widened and redesigned sidewalks for all of the D parcels and identifies ideal locations for new public spaces for all of the master development blocks, including a new plaza at D2, a new neighborhood park for all of D4, a new green on D1. Active streetscapes are depicted along Somerville Avenue, Prospect Street, and Washington Street that the redevelopment blocks front onto. One of the most important ways to protect the pedestrian realm in the heart of Union Square is to introduce alleys into the redevelopment blocks that consolidate vehicular crossings and permit a continuous and uninterrupted pedestrian experience. Although alleys can permit pedestrian access, they need to function first and foremost for rear access and loading for any future development. The development objectives for D6 call for a pedestrian passage to connect Somerville Avenue to Everett Street and only identify vehicular access in the chance that a hotel is developed on the site. In such a case, this pedestrian passage would function just like Palmer Street in the heart of Harvard Square. This is covered on the same page of the neighborhood plan as the development objectives.

The revised version of the Neighborhood Plan does not make changes to the massing diagrams for the D blocks to suggest context sensitive façade design and human-scaled buildings (see p. 191); however, p. 104 discusses importance of human-scaled buildings.

Massing diagrams do not convey architectural design details. Instead, they illustrate a building’s height and size. It is not appropriate for a massing diagram to include façade design details regardless of whether or not they are context sensitive or human scaled.

The Neighborhood Plan does not include any public or civic buildings on the Civic Block (D1). The only mention of a new public/civic use building appears in the captions to images on pp. 186-187, which contemplates potential re-use of an auto garage on D4.3 for public use, a welcome idea, but one that is not developed in any meaningful way.

Page 178 of the neighborhood plan states: "Civic uses should remain a significant feature of the D1 Block, such as a public library or community center. The D1 block could also host a new SCATV studio, freeing up the historic fire station on Union Square Plaza for more active ground floor use (which is a municipally owned building in a public space).

The Neighborhood Plan shows 304-322 Somerville Ave as a fully redeveloped 5-story building despite ongoing efforts and an agreement to preserve and protect historic structure(s) on the site,
including 314-316 Somerville Avenue. The plan also shows demolition of a building with historic interest on the northwest corner of McGrath/Medford St and Washington Street.

Page 196 of the neighborhood plan explains how the scattered sites were selected. Hypothetical development on any of these sites simply illustrates what’s possible outside of any other intervention, including historic preservation.

Restoration of the historic cupola on SCATV building (old fire station) as a condition of redevelopment of the D1 block and relocation of SCATV should be included (p. 162).

Page 162 is a rendering of the potential of an expanded plaza space. The relocation of SCATV is addressed on pages 178 and 179 on the D1 spread. The restoration of the cupola is addressed in the Vision for Development section, specifically page 99.

Feedback from Union United:

We are very pleased to see the discussion of restricting the sale or rental of multi-bedroom units to families. However, we remain concerned that the projections for 3+ bedroom units are insufficient to meet the need described by MAPC. That data suggests that 46% of units should be sized for 2-3 person households and 29% for households of four or more. The figures on p.89 for “family oriented households” are far lower than this and should be reconsidered.

The figures on page 89 reflect the findings of Zimmer/Volk’s Market Rate Housing Analysis and project the number of households in the market for multi-unit rentals and condos by every year over the next five years. The total number of households in the market for new multi-unit rentals and condos is 3,145 households (annually), making Family Oriented Households 6.8% of the annual market. This section does not identify the total number of households or number of Family Oriented Households in the market for new single unit attached and detached housing in Somerville because that type of housing is not likely to result from redevelopment in Union Square and Boynton Yards (see last paragraph in column one of page 89). Page 90 identifies a Family Housing Target of 160 three or more bedroom units that is 6.8% of the total housing development target for the neighborhood plan, which is equal to the percentage of Family Oriented Households that make up the annual market for new multi-unit rentals or condos. The demand for affordable housing and affordable family oriented housing should be understood as in addition to the numbers provided by ZVA because their analysis is specifically for market rate housing.

We echo Mr. Capuano’s concern that the ZVA study may reflect availability over true demand. 162 units of a total 2,349 units is just over six percent. This seems low given the primacy of family housing in this document. We expect that these demand projections would change significantly if new development prioritized affordable family-friendly housing and would like to see this included in the plan.

Zimmerman/Volk does not research housing availability or the demand for affordable housing. The Market Rate Housing Analysis projects the number of households interested in new and existing market rate housing each year over the next five years and estimates the potential annual absorption of new households by the city. ZVA projects 14.31% of the annual market for new or existing housing in Somerville is Family Oriented Households (620 of the 4,330 total) and estimates anywhere between 69 and 132 of these households could be absorbed annually across the entire city. However, as mentioned above, only 215 Family Oriented Households are projected to be seeking multi-unit rentals or condos and that between 38 and 51 of these households could be absorbed annually across the entire city.

We recommend that the plan for offsite units include the identification of a designated actor that has proven capacity to receive and use the funds to build within a comparable time frame to the market rate development (a recommendation of the LDS Housing Needs Assessment). We also recommend that the implementation plan create a transparent system to determine the payment standard to guarantee that offsite units will “produce a greater benefit to lower-income households” than would the onsite construction of those units (p. 95). This system should include plans for monitoring implementation of the construction and lease-up of the offsite units and
contingencies for steps taken if the offsite units are not constructed in accordance with these stipulations.

The rules for Payment in Lieu are established in the Zoning Ordinance. Even today, they are designed to be rarely used, and recommended changes being developed by staff would further increase these strict standards. The language on page 95 of the plan states that payments in lieu of units would need to cover the cost of these units being built off-site, including land cost, unless there was a way they would provide a greater benefit to lower-income households. Implementation of this goal is achieved through zoning. The funds for a payment in lieu of units are provided to the Affordable Housing Trust Fund and the board of the fund identifies entities to build units with these funds.

We are disappointed that the Plan continues to rely primarily on “market forces” to regulate rents. As we commented on the first draft, there is a huge gap at present between Fair Market Rent (the amount a Section 8 voucher will pay) and average real rents, making many units that are technically “at market” unavailable to voucher holders. While we appreciate the suggestion for continued collaboration with owners of expiring use developments to extend affordability of their units, we had hoped to see some creative discussion of development incentives that would result in commitments to hold rents in line with HUD FMR levels throughout the planning area, but this seems to be absent. While there is a recommendation to “set the price requirements for newly built affordable housing to better match the needs of existing Somerville residents”, discussion of how this will be done is absent.

While the Planning Division staff shares the concern about the gap between the market price of new housing units and average family incomes, the use of rent control for market-rate units in Massachusetts was made illegal by ballot vote in 1991.

While the report acknowledges the role of local nonprofits in the design of the Center, it overlooks the roles of established programs that are potential assets to the Center and the overall objectives of promoting employment and advancement. We recommend that the report propose sustained funding of the First Source Jobs Program that promotes job readiness, placement, retention, and advancement as a key complement for job training and apprenticeships.

The plan identifies job training as a priority and anticipates that the continued discussions of public benefits will help to determine the best use of resources to achieve these goals.

The plan states that as part of studies related to the comprehensive zoning overhaul, the City worked with RCLCO, an economic development and real estate consulting firm, on an economic impact analysis. We would love to see the results of these and other studies, such as the ZVA report, that are referenced in this analysis.

RCLCO’s economic development analysis is already published on the Somerville zoning website (http://www.somervillema.gov/zoning/technical-reports.html). ZVA’s market rate housing analysis is expected to be released shortly and linked from the same webpage.

The community benefits agreement remains outside the purview of the Planning Board. At the same time, this point bears repeating: We do not, and have never characterized community benefits as an adhoc series of “perks” that development fees might pay. This characterization suggests that the developer’s interest should be placed before that of the community.

The community benefits spread is aimed to give a brief snapshot of public benefits and refer people to the work done by the community and stakeholders through the LOCUS process. Page 56 says, “Public Benefits as a component of the Neighborhood Plan process is a “package” of long-term community needs, not just perks that development fees can pay for.”

We respectfully disagree with the underlying premise of portions of the arts and creative economy section. The primary threat to arts and creative economy businesses is not an unwillingness to
buy art or local government’s willingness to fund it. It is a lack of affordable residential and commercial space for small ventures. If the city wants to retain this community, it needs to look seriously at whether existing options are affordable once small businesses outgrow local incubator space.

On page 67, the neighborhood plan takes the position that lack of affordable work space for arts and creative enterprises is the greatest threat to the arts community of Somerville. This premise was called Space=Work by members of the Somerville arts community and embraced by OSPCD. The “buy art” reference is not actually located in the section identified above, but is instead found in the subsection concerning the cultural integration of existing and new residents and businesses in the neighborhood and serves as a parable to remind us all to support the things that make Union Square attractive in the first place. OSPCD recommends a slight adjustment to the quote to clarify its original meaning: “One reason people come to union square is because they love the arts community we have here. But if they want to make sure artists stay a part of the neighborhood, all they have to do is buy art.” The artist that provided OSPCD with this comment was emphasizing the cultural awareness necessary of new residents and businesses in becoming a supportive contributor or participant in the existing neighborhood culture.

One significant change is that the total square footage projected for arts and creative use dropped from 250,000 square feet to 90,455. What merited this change? We would also like clarification on “sending” and “receiving” sites in the context of consolidating and relocating floor space for creative use and public space.

The 250,000 sf projection from the first draft of the neighborhood plan was a total for all of the arts & creative economy space that would exist in the Union Square plan area once development was complete. This number included such things as the Ames Envelop complex and other properties included in the proposed fabrication zoning district. The final neighborhood plan provides an estimate of the commercial space reserved for arts & creative enterprise uses resulting from the 5% floor space requirement recommended for zoning. The intent of the “sending” and receiving” sites would work exactly the same as sending and receiving sites for useable open space and affordable housing. Floor space for arts and creative enterprise uses could be aggregated multiple sites and built as a larger space on a single site, for example.

Feedback from Green and Open Somerville and Somerville Climate Action:

Somerville must define Green Space separately from Open Space. The EPA defines green space as “land that is partly or completely covered with grass, trees, shrubs, or other vegetation. Green space includes parks, community gardens, and cemeteries.” We would add: Green Space is anything that requires sun, water, and soil for its survival. It must release oxygen into the air and sequester carbon into the soil.

The Mayor’s Office of Strategic Planning and Community Development has recently developed a new system for planning and regulating the creation of public spaces in the city. The key component of this system is to differentiate one type of public space from another because different types of public spaces are better suited for different users groups and satisfy different needs. Each type of public space identified in the system has specific metrics that require landscaping (vegetation), permeable surfaces, and trees along with extensive development standards and design guidelines for each type. This system is proposed to be established in the Somerville Zoning Ordinance and that specific redevelopment districts (such as for Union Square and Boynton Yards) to call for certain types and numbers of different spaces to meet community goals. OSPCD believes this newly proposed system satisfies this particular concern, as each public space in the ordinance will have a requirement for the types of spaces that meet the Green and Open Somerville expectation for ‘green space’. Pages 78-84 of the neighborhood plan provide an overview of these matters.

Somerville must measure our current amount of green space and set this amount as a minimum requirement for green space in Somerville.
The Transportation & Infrastructure division of OSPCD is currently measuring and classifying the all of the existing public spaces in Somerville.

**The same rules of how close one must be to a playground must also apply to green space.**

The ideal proximity of playgrounds to children is different than the ideal proximity of public space for adults. OSPCD is of the opinion that every Somerville resident should be within ¼ mile of a neighborhood park and that every neighborhood should have a public plaza.

**We must have green space and recreational space in Union Square. It cannot be shunted to Boynton Yards.**

The neighborhood plan proposes multiple types public spaces in Union Square, including a neighborhood park on D4, a public plaza on D2, a ‘green’ on D1, and recreation fields at the former location of the Walnut Street Center. Each major developer must dedicate 15% of their land area in the form of one or more of the public spaces as identified in the zoning.

**All public spaces must adhere to a Somerville’s Green Space Standard. This future ordinance [could] be similar to that of New York’s City’s Biodiversity and Sustainable Public Landscapes’ one; but Somerville’s will be better.**

The Transportation & Infrastructure division of OSPCD is investigating the development of “Green Street’ standards similar to what is proposed for the Urban Ecology project current underway in New York City. Additionally, OSPCD is working to develop a customized local version of Seattle and Washington D.C.’s “Green Area Ratio” for the Somerville Zoning Ordinance. Green Area Ratio is a new best practice emerging that replaces conventional landscape and permeable surface requirements in zoning.

**We would like to see more renderings of our civic spaces.**

The neighborhood plan illustrates conceptual designs for recommended public spaces. Detailed renderings beyond what was already created are not appropriate at this point. This type of documentation will be required for the development review process of each individual space that is built in the Union Square plan as they are developed.

**Using Green Design Standards in Landscaping. Our current landscape practices are antiquated and often do more harm than good. They contribute to climate change, pollute the water systems, decrease biodiversity and have negative health impacts on humans and animals.**

Advocates including Green and Open Somerville and Somerville Climate Action are encouraged to work with DPW the Alderman on this issue.

**The plan says, “Somerville loves our green spaces.” According to the Gehl Architects Survey quoted in the Plan, when asked to provide their favorite place, “more than 10% of respondents prefer small intimate parks.” Out of the top five favorite places, number three was Prospect Hill Park and Union Square Plaza was five. What were one, two, and four? Where did Lincoln Park or the Community Path rank on that list? What did the other 90% of respondents say?**

The neighborhood plan identifies spaces within the Union Square plan area boundary. The most favorite places mentioned more than 10 times in order were: the Community Path (59 votes), Davis Square (Statue Park), Prospect Hill Park, Powderhouse/Nathan Tufts Park, Union Square Plaza, Albion Street Playground, and the Café at Bloc 11. Lincoln Park was not mentioned more than 10 times.

**Page 80 : The land for Merriam Street Park needs to be set aside before the green line is established.**
The MBTA purchased the Walnut Street center to use to stage equipment and supplies during construction of the GLX as well as to use the building as a field house. It is not possible to "set aside" the land prior to the GLX being built.