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August 24, 2018

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
Alex Strysky, EEA #15889
100 Cambridge Street, Suite 900

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Mike Katz, Clerk Resident

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Ryan Habbyshaw Loyal Supply Co.

Jim McGinnis Resident

Philip Parsons Resident

Jacob Taylor, Resident Dear Secretary Beaton:

Boston MA 02114

The Board of Union Square Main Streets, Inc., after extensive analysis and discussion, voted unanimously on August 15 to support the request by Union Square Associates ("US2" or "the master developer") and the Somerville Redevelopment Authority for a Phase 1 Waiver.

Since 2005, Union Square Main Streets, Inc. (USMS) has worked collaboratively to actively support a vibrant neighborhood by preserving the character and advancing the economic strength of the Union Square business district and community. Currently 51 businesses located in Union Square are members of the organization.

This decision was not arrived at lightly. The Board spent several weeks familiarizing themselves with the MEPA process. Members gained an understanding of the significance of a Phase 1 Waiver, in order to determine that a waiver, if granted, would not have an adverse effect on the discharging of environmental responsibilities associated with the development of the so-called "D2 Block".

The D2 Block is directly adjacent to the new Green Line Station, currently in development. This review of the Phase 1 Waiver Environmental Notification Form (ENF) involved gaining reassurance that a waiver would in no way reduce the need for review of the environmental impact of the D2 Block development, but would simply disaggregate, for the purposes of MEPA, this first phase of a multi-year, and possibly multi-decade development, from the other non-contiguous parcels currently under the control of the master developer appointed by the Somerville Redevelopment Authority. In the opinion of the Board, separating the D2 Block from the remaining parcels under the control of US2 is reasonable, as all parcels are in discrete sections of Union Square, separated by roads or other property, and will be developed over an extended period of time.

The Board became confident that the term "waiver" does not signify that MEPA staff abandoned responsibility for review of the environmental impact of redevelopment of the D2 Block. The Board also concluded that the ENF submitted by the developer's consultant, Epsilon Associates, was detailed and rigorous in its analysis of

environmental impact, and that any work on the D2 site, since it was subject to all federal and state requirements for a contaminated site, would eliminate rather than increase existing environmental hazards.

Once this reassurance was gained, the Board took aggressive steps to understand US2's and the City's need for a waiver. An initial meeting in June with US2 led to a presentation by the master developer's representatives to USMS Board members, where a full range of questions was raised. This was followed by a plan for community outreach. A presentation based on a Question and Answer approach was made to Union Square businesses at the July USMS Business Meeting, and no concerns were raised about the granting of a waiver, either at the meeting or subsequently. At a meeting of the Built Environment Committee of the Union Square Neighborhood Council, a community group, attendees were invited by the USMS executive director to submit additional questions to the master developer about the Phase 1 Waiver. This invitation was also shared with the full Neighborhood Council membership through its listsery. Subsequently an enlarged series of questions and answers was published in the USMS e-newsletter, which reaches 4,000 people. and no questions or concerns were received.

The Board of USMS is particularly concerned that denial of a Phase 1 Waiver could result in significant delay in the D2 Block construction. The results of this delay would be twofold:

The delay would have an immediate and significant impact on local businesses. Lack of coordination with completion of the new Green Line station and extension of disruption resulting from construction activity would unnecessarily prolong the hardship imposed on our rapidly expanding business and cultural district.

There would also be a major opportunity cost. The new construction in the D2 Block will bring approximately 400 new residents, an estimated 500 new daytime workers, and support 4,000 people walking to and from the station each day who will contribute positively to the local business climate, rich in restaurants and other retail activity, and compensate for the losses experienced during the construction period. Delaying this opportunity of course also increases the risk that an economic cycle will be missed.

The City's finances would also be severely affected, with an annual loss of \$2.3 million in tax revenue, revenue essential to funding infrastructure obligations already undertaken by the City, and critical to Union Square's economic and environmental sustainability. In addition, one-time payments to the City of more than \$23 million would be delayed.

The plans for this first phase of the redevelopment of Union Square result from a multi-year community process, with extensive studies of environmental impact. Given the negative consequences of the delay, not only to the immediate impact of the Green Line Extension completion, but more significantly for the local business community, to the vitality and well-being of this important business and cultural district, we hope you will look favorably on the Phase 1 Waiver ENF for the Union Square Redevelopment.

Sincerely,

Philip Parsons on behalf of the Union Square Main Streets, Inc. Board of Directors