

# Western Front, LLC

SPECIAL PERMIT APPLICATION FOR CANNABIS RETAIL STORE

567 MASSACHUSETTS AVENUE

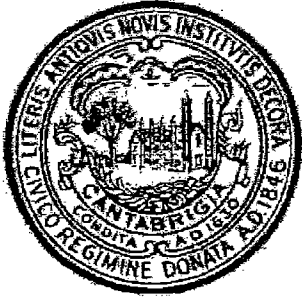
CENTRAL SQUARE

# WESTERN FRONT SPECIAL PERMIT APPLICATION

567 Massachusetts Avenue, Cambridge, MA

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CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

## SPECIAL PERMIT APPLICATION • COVER SHEET

In accordance with the requirements of the City of Cambridge Zoning Ordinance, the undersigned hereby petitions the Planning Board for one or more Special Permits for the premises indicated below.

Location of Premises: 567 Massachusetts Avenue, Cambridge, MA 02139

Zoning District: BB-CSQ

Applicant Name: Western Front, LLC

Applicant Address: Flaherty Law Offices, 699 Boylston Street, 12th Floor, Boston, MA

Contact Information: 617-227-1800 TimothyRFlaherty@gmail

Telephone #                      Email Address                      Fax #

List all requested special permit(s) (with reference to zoning section numbers) below. *Note that the Applicant is responsible for seeking all necessary special permits for the project. A special permit cannot be granted if it is not specifically requested in the Application.*

Special Permit from Planning to allow use for Cannabis Retail Store in the Business B (BB) District of Central Square, pursuant to 11.800, et seq.

List all submitted materials (include document titles and volume numbers where applicable) below.

1. Application Forms (Cover Sheet, Dimensional Form, Ownership Certificate, Fee Schedule)
2. Project Narrative and Requested Zoning Relief
3. Project Plans and Illustrations
4. Certificate of Other Agency Review

**Signature of Applicant:** \_\_\_\_\_

For the Planning Board, this application has been received by the Community Development Department (CDD) on the date specified below:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of CDD Staff

**DIMENSIONAL FORM**

**Project Address:** 567 Massachusetts Ave., Camb

**Application Date:** May 20, 2019

	Existing	Allowed or Required (max/min)	Proposed	Permitted
Lot Area (sq ft)	1882		1882	
Lot Width (ft)				
Total Gross Floor Area (sq ft)	3969/2027*		3969/2027*	
Residential Base				
Non-Residential Base	3969/2027*		3969/2027*	
Inclusionary Housing Bonus				
Total Floor Area Ratio	2.108/1.07	2.75/3.0	2.108/1.07	
Residential Base				
Non-Residential Base	2.108/1.07	2.75/3.0	2.108/1.07	
Inclusionary Housing Bonus				
Total Dwelling Units	0	0	0	
Base Units				
Inclusionary Bonus Units				
Base Lot Area / Unit (sq ft)				
Total Lot Area / Unit (sq ft)				
Building Height(s) (ft)	24	55	24	
Front Yard Setback (ft)	Existing	None	Existing	
Side Yard Setback (ft)	Existing	None	Existing	
Side Yard Setback (ft)	Existing	None	Existing	
Rear Yard Setback (ft)	Existing	None	Existing	
Open Space (% of Lot Area)	N/A	None	N/A	
Private Open Space	N/A	None	N/A	
Permeable Open Space	N/A	None	N/A	
Other Open Space (Specify)				
Off-Street Parking Spaces	0	2	0**	
Long-Term Bicycle Parking	N/A	2	0**	
Short-Term Bicycle Parking	N/A	2	0**	
Loading Bays	0	B less than 10000=0	0	

*Use space below and/or attached pages for additional notes:*

\*Total First Floor Gross Square Footage= 2027 (sq. ft) FAR 1.07. \*\* Small Business Parking Exemption pursuant to Article 6.32.1 of the Zoning Ordinance



**OWNERSHIP CERTIFICATE**

**Project Address:** 567 Mass Avenue

**Application Date:**

This form is to be completed by the property owner, signed, and submitted with the Special Permit Application:

I hereby authorize the following Applicant: Western Front, LLC

at the following address: Flaherty Law Offices, 699 Boylston Street, Boston, MA

to apply for a special permit for: Retail Marijuana Dispensary

on premises located at: 567 Massachusetts Ave.

for which the record title stands in the name of: Harry N. Katis and Victoria Katis, Trustee of Potamia Realty Trust

whose address is: 720 Massachusetts Avenue, Cambridge, MA

by a deed duly recorded in the:

Registry of Deeds of County:

Book: 01152 Page: 84

*OR* Registry District of the Land Court,  
Certificate No.:

Book: \_\_\_\_\_ Page: \_\_\_\_\_

  
Signature of Land Owner (If authorized Trustee, Officer or Agent, so identify)

To be completed by Notary Public:

Commonwealth of Massachusetts, County of Middlesex

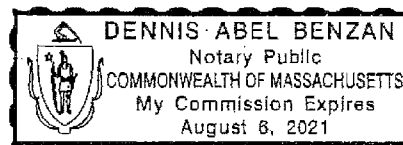
The above named Harry N. Katis personally appeared before me,

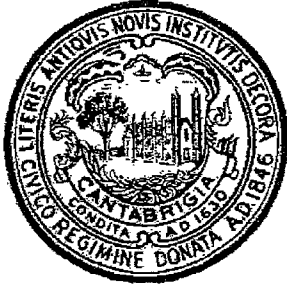
on the month, day and year April 30, 2019 and made oath that the above statement is true.

Notary: Dennis A. Benzan



My Commission expires: August 6, 2019





CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

## CERTIFICATION OF RECEIPT OF PLANS BY CITY OF CAMBRIDGE TRAFFIC, PARKING & TRANSPORTATION

City Department/Office: Traffic, Parking and Transportation

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Project Address: 567 Massachusetts Ave., Cambridge

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Applicant Name: Western Front LLC

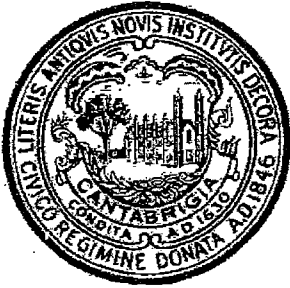
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For the purpose of fulfilling the requirements of Section 19.20 and/or 6.35.1 and/or 5.28.2 of the Cambridge Zoning Ordinance, this is to certify that this Department is in receipt of the application documents submitted to the Planning Board for approval of a Project Review Special Permit for the above referenced development project: (a) an application narrative, (b) small format application plans at 11" x 17" or the equivalent and (c) Certified Traffic Study. The Department understands that the receipt of these documents does not obligate it to take any action related thereto.

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Signature of City Department/Office Representative

Date



CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

## CERTIFICATION OF RECEIPT OF PLANS BY CITY OF CAMBRIDGE DEPARTMENT OF PUBLIC WORKS

City Department/Office: Department of Public Works

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Project Address: 567 Massachusetts Ave., Cambridge, MA

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Applicant Name: Western Front LLC

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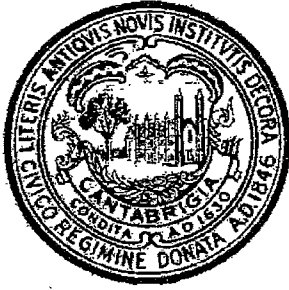
For the purpose of fulfilling the requirements of Section 19.20 of the Cambridge Zoning Ordinance, this is to certify that this Department is in receipt of the application documents submitted to the Planning Board for approval of a Project Review Special Permit for the above referenced development project: (a) an application narrative and (b) small format application plans at 11" x 17" or the equivalent. The Department understands that the receipt of these documents does not obligate it to take any action related thereto.

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Signature of City Department/Office Representative

Date





CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

## CERTIFICATION OF RECEIPT OF PLANS BY CITY OF CAMBRIDGE TREE ARBORIST

City Department/Office: Tree Arborist

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Project Address: 567 Massachusetts Ave., Cambridge, MA

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Applicant Name: Western Front LLC

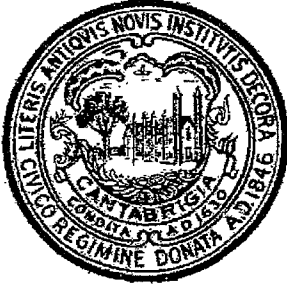
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For the purpose of fulfilling the requirements of Section 4.26, 19.20 or 11.10 of the Cambridge Zoning Ordinance, this is to certify that this Department is in receipt of the application documents submitted to the Planning Board for approval of a MultiFamily, Project Review or Townhouse Special Permit for the above referenced development project: a Tree Study which shall include (a) Tree Survey, (b) Tree Protection Plan and if applicable, (c) Mitigation Plan, twenty one days before the Special Permit application to Community Development.

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Signature of City Department/Office Representative

Date



CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

## CERTIFICATION OF RECEIPT OF PLANS BY CITY OF CAMBRIDGE WATER DEPARTMENT

City Department/Office: Water Department

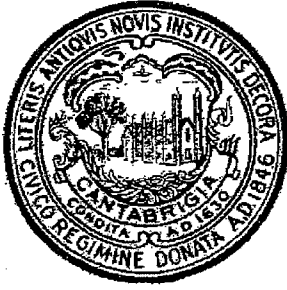
Project Address: 567 Massachusetts Ave., Cambridge, MA

Applicant Name: Western Front LLC

For the purpose of fulfilling the requirements of Section 19.20 of the Cambridge Zoning Ordinance, this is to certify that this Department is in receipt of the application documents submitted to the Planning Board for approval of a Project Review Special Permit for the above referenced development project: (a) an application narrative and (b) small format application plans at 11" x 17" or the equivalent. The Department understands that the receipt of these documents does not obligate it to take any action related thereto.

\_\_\_\_\_  
Signature of City Department/Office Representative

\_\_\_\_\_  
Date



CITY OF CAMBRIDGE, MASSACHUSETTS

# PLANNING BOARD

CITY HALL ANNEX, 344 BROADWAY, CAMBRIDGE, MA 02139

## CERTIFICATION OF RECEIPT OF PLANS BY CITY OF CAMBRIDGE LEED SPECIALIST

City Department/Office: Not Applicable (under 25,000 sf)

Project Address: 567 Massachusetts Ave., Cambridge, MA

Applicant Name: Western Front LLC

For the purpose of fulfilling the requirements of Section 22.20 of the Cambridge Zoning Ordinance, this is to certify that this Department is in receipt of the application documents submitted to the Planning Board for approval of a Special Permit for the above referenced development project: (a) an application narrative, (b) small format application plans at 11" x 17" or the equivalent and (c) completed LEED Project Checklist for the appropriate LEED building standard, accompanying narrative and affidavit. The Department understands that the receipt of these documents does not obligate it to take any action related thereto.

\_\_\_\_\_  
Signature of City Department/Office Representative

\_\_\_\_\_  
Date



17

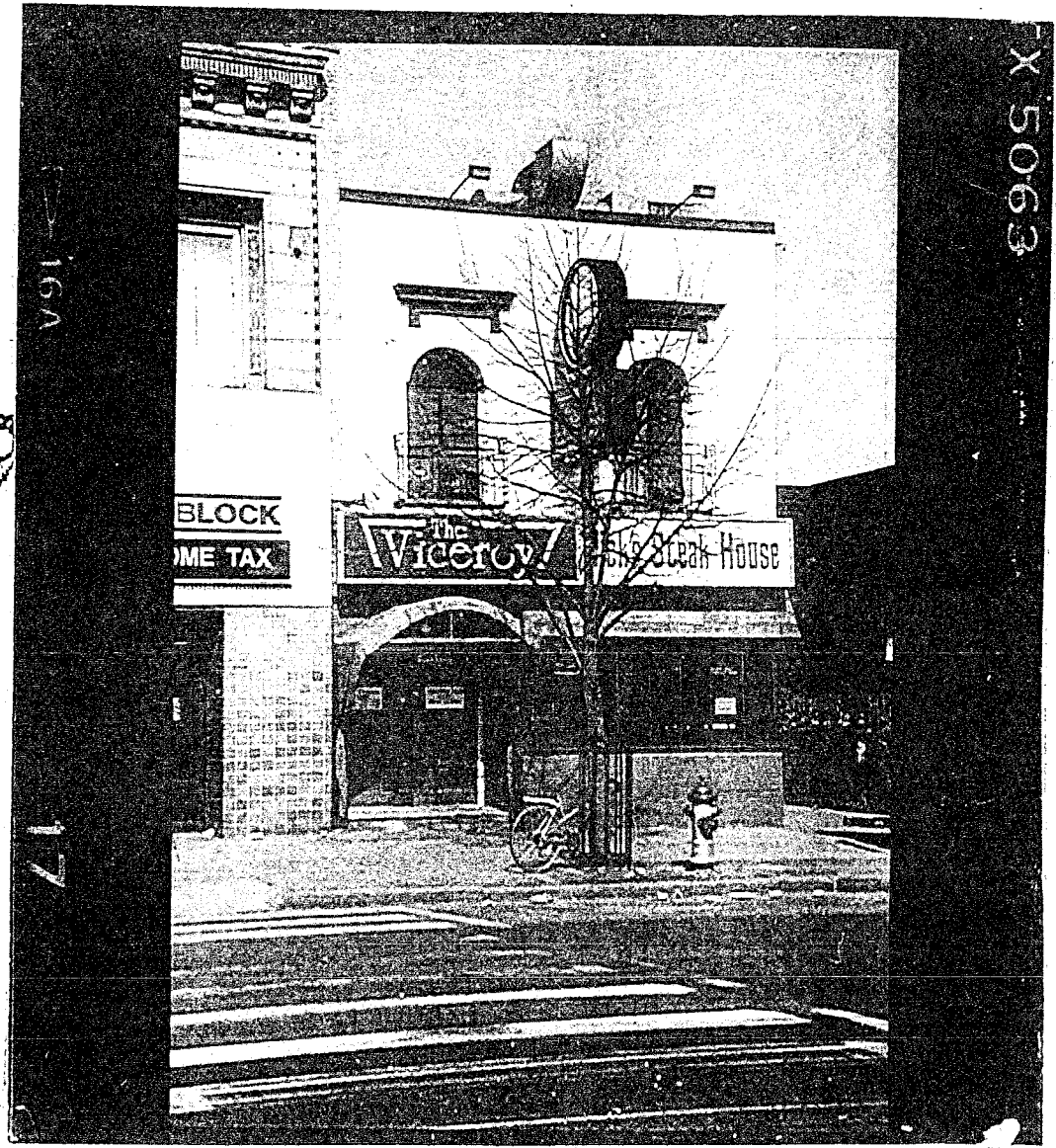
1987

55. 19

40

19

B



res. upper floor

tenement

Apartment.



**Western Front, LLC**

**Proposed Cannabis Retail Store at 567 Massachusetts Avenue**

**Project Narrative and Request for Special Permit Relief**

**Summary of Proposal**

Western Front, LLC, a duly certified Economic Empowerment Applicant, is proposing to repurpose the first floor of the existing building at 567 Massachusetts Avenue to operate a Cannabis Retail Store. The project does not propose adding any off-street parking. The proposal includes renovation of the 2,027 square feet located on the first floor of the existing structure and includes minor renovations to the exterior façade.

The site is within the Central Square Overlay District and in the Central Square National Register District, but the building is not a contributing structure. Western Front, LLC has discussed the proposed exterior alterations with the Cambridge Historical Commission and the Central Square Advisory Committee.

**Requested Special Permit Relief**

The project is located in the Business B (BB) District and requires a Special Permit to allow a Cannabis Retail Store use per Section 11.800, *et seq.* Western Front, LLC seeks specific Special Permit relief per 11.803.1, 11.803.3, 11.805 and 10.43.

**Project Narrative pursuant to 11.804 (a) thru (g)**

- (a) Description of Activities: a narrative providing information about the type and scale of all activities that will take place on the proposed site, including but not limited to cultivating and processing of Cannabis Products, on-site sales, off-site deliveries, distribution of educational materials, and other programs or activities.**

Western Front, LLC proposes to construct a boutique Cannabis Retail Store that will provide cannabis products for non-medical use within the 2,027 square foot space located on the first-floor of 567 Massachusetts Avenue, Cambridge. There will be no cultivation or processing of cannabis products at this location, nor will there be any off-site deliveries made to customers. All products will be pre-packaged off-site and there will be no packaging or repackaging of cannabis products. This location will be used only to purchase and transport cannabis or marijuana products from Cannabis or Marijuana Establishments and to sell or otherwise transfer these products to Cannabis or Marijuana Establishments and to consumers. This space is currently occupied by Central Kitchen Restaurant. The second floor of 567 Massachusetts Avenue is occupied by Brick and Mortar Restaurant. No changes are proposed to the second floor, either in use or construction, and the restaurant will remain in full operation.

The structure at 567 Massachusetts Avenue is brick and wood framing construction typical of the day and age. Each floor of the building is accessed through separate entrances which are located side-by-side on Massachusetts Avenue. Western Front, LLC has consulted with the Cambridge Historical Commission and plans to make minor renovations to the front façade in order to restore the historical integrity of the

building. These renovations include re-centering the cornices above the second floor windows and repainting the façade in historical colors. **There will be no new exterior mechanical equipment installed.** Western Front, LLC does not anticipate reconstructing the main entrance on Massachusetts Avenue, other than to comply with the security requirements promulgated by the CCC and contained in 105 CMR 725.110. The building is serviced by on-street metered parking and Cambridge Municipal parking lot No. 5, which is located immediately adjacent to the rear of the building. Municipal parking lot No. 5 provides 82 automobile parking spaces and allows 2-hour parking for \$1.25 per hour between 8:00 a.m. and 6:00 p.m. There are four additional municipal parking lots within walking distance. In addition, this site is approximately 100 steps from the Central Square MBTA Red Line station, and there are 7 MBTA bus lines that connect in Central Square. There are also four Blue Bike Stations within a 5-minute walk of the site.

The interior of the first floor of 567 Massachusetts Avenue will undergo extensive remodeling to repurpose as a boutique Retail Cannabis Store. The Retail Cannabis Store will be outfitted with a sophisticated security system that will include surveillance cameras, silent and audible alarms, motion detectors and real-time remote monitors that can be readily accessed by the Cambridge Police Department. Steel entry doors will be installed that are equipped with an electronic control access system and will be controlled by key card locks that create an audit trail. The exterior of the building will be monitored by surveillance cameras enabled to pan, tilt, and zoom, and with the ability to see during both day and night (without additional lighting). The perimeter of the facility will be amply lit, in compliance with the recommended standards of the Draft Outdoor Lighting Ordinance provided to the City Council by the City's Lighting Task Force, with warning and surveillance signs displayed. A secure storage vault room will be constructed which will contain a GSA approved 13 cubic-foot, drill-resistant, steel-plated safe with keypad access that will be anchored to the floor. All security measures will meet or exceed compliance with 105 CMR 725.110.

Customers will only gain access to the Cannabis Retail Store after providing a valid, government-issued photographic ID that is verified both electronically and manually. All customers will be initially greeted by a registered marijuana agent located in the security vestibule inside the main entrance, and after verification, customers will be admitted to a secure waiting/education area where they will receive a brief orientation to the facility and be required to execute a Community Norms Agreement. Each customer must execute a Community Norms Agreement as a condition to enter and make use of a Western Front, LLC facility. All Western Front, LLC employees will be trained to provide important information to all customers during this one-on-one interaction regarding the safe use of cannabis. A registered marijuana agent will then escort the customer to the display pedestals from which the customer will be able to make their selection. Products displayed will include cannabis flowers, concentrates and marijuana infused products. The customer's order will be placed on a handheld device by the registered marijuana agent, and then he/she will move to the fulfillment/point-of-sale area where payments will be processed and the product will be sealed in an opaque, tamper-resistant childproof exit bag. All exit bags will contain printed educational materials.

The customer will exit through the entrance at the security vestibule. Customers will be required to exit the facility as soon as their order has been filled, will not be allowed to loiter around the premises, and will be prohibited from ingesting any cannabis product on the premises. A single violation of the



Community Norms Agreement will result in that customer being barred from this facility and any other Western Front, LLC facility.

Because Western Front, LLC is a locally owned and operated cannabis company (The entire Board of Managers, namely, Marvin Gilmore, Dennis Benzan and Omowale Moses, were all born and raised in Cambridge, all attended and graduated from the Cambridge Public Schools, and all are Cambridge residents) there is an intimate understanding of the special character and important vibrancy of Central Square. Western Front, LLC recognizes the need to create a street façade that engages the sidewalk, encourages interaction, and which enhances the pedestrian corridor along Massachusetts Avenue, despite the restrictions regarding screening the interior activities from public view. Accordingly, Western Front, LLC has designed a secure waiting/education area that is located immediately inside the clear glass windows on Massachusetts Avenue, which will display local artwork that celebrates the historical contributions of the minority community to Cambridge. This artwork will be engaging and will be displayed in a way to attract the attention of the pedestrian. The proposal contemplates that the art will be displayed inside the waiting/education and will be visible to pedestrians through the clear glass windows on Massachusetts Avenue. The retail area, where cannabis products will be displayed, will be located behind a dividing security wall. The existing artwork on the building's east wall, known as "Graffiti Alley", will remain protected from damage during renovation. The proposed alterations to the property are shown on the Plans attached hereto and incorporated herein by reference.

#### **1. Security Systems Summary**

As noted above, this building will be outfitted with state-of-the-art security systems. Western Front, LLC has retained Lan-Tel Security Systems, one of the leading security consultants in the cannabis industry which has already developed and implemented security systems for existing RMDs in Cambridge, to provide Western Front, LLC with engineering, logistics and systems support. Confidential security information will be submitted to the Cambridge Police Department for review and feedback. During all hours when the Cannabis Retail Store is open for business, there will be live on-site security agents who have been trained in crime prevention standards and will have experience in the surveillance of highly regulated retail operations. All security measures will meet or exceed compliance with 105 CMR 725.110. The interior and exterior of the building will be outfitted with approximately 20 (twenty) high definition IR surveillance cameras that are connected to a secure video VLAN. All cameras will be stored for a minimum of ninety days. Silent and audible alarms will be added as another security layer via Access Control and Intrusion. Real-time remote monitors for Access Control and CCTV will be available 24 hours a day. Steel entry doors will be equipped with an electronic control access system and will be controlled by electric and electrical mechanical locks that create an audit trail. Staff access within the facility will be monitored by a keycard program that provides staggered levels of access to staff members. Only essential staff will be granted access to secure points within the facility, such as the vault and fulfillment area. Limited Access areas will be identified by clearly visible signs. Only designated staff, law enforcement and CCC regulatory agents will be allowed access to those areas. The perimeter will be amply lit, in compliance with the recommended standards of the Draft Outdoor Lighting Ordinance provided to the City Council by the City's Lighting Task Force, and surveillance signs will be posted.

## **2. Law Enforcement and Public Safety Official Communication**

Western Front, LLC has contacted the Cambridge Police Department to discuss the development and implementation of its security systems. Western Front, LLC will seek to maintain direct communication and an open door policy with regards to all state and local law enforcement, public safety and public health agencies, including, but not limited to the CCC. This policy begins by notifying all such agencies of the presence of a Cannabis Retail Store, its security protocols and the intended operations. It continues by informing them of all on-going operations and educating them on various aspects of what the company does. This can include informing them about the products it handles, the purpose and locations of key functions in the facility, incident preparedness policies and procedures, emergency exits and assemblage locations, utility service shut off points, and emergency/post emergency contact information.

## **3. On-Site Security Personnel**

Dispensary security operations will be overseen by dedicated security agents who will be present on-site at all times during business operations. The duties of these agents are multifaceted and include monitoring and surveillance of the facility entrance and exit, perimeter inspections, and working with WF staff to prevent adverse incidents from occurring. The agents will be supported by a comprehensive electronic security system comprised of cameras, motion detectors, and duress alarms, as well as comprehensive emergency procedures and employee training. Western Front, LLC will ensure that its security agents inform all customers that loitering. All identified violations of the Community Norms Agreement will be immediately reported.

## **4. 24/7/365 Surveillance Cameras**

A secured network of surveillance cameras will be strategically placed around the perimeter of the building and in every area inside the building where customers will be and where regulated products are handled. This includes all entrance and exit traps, the secure waiting/education area, the display floor, the sales and fulfillment areas, the inventory safe area, all back-office entrances, exits and corridors, and the entire delivery packaging/loading/unloading area. The building will be outfitted with 20 (twenty) plus high definition IR surveillance cameras that are connected to a secure video VLAN. All cameras will be stored for a minimum of ninety days. Surveillance cameras are enabled to pan, tilt, and zoom, and ability to see during both day and night (without additional lighting). Real-time remote monitors for Access Control and CCTV will be available 24 hours a day.

## **5. Access Control System**

An automated access control panel will control all access points in the facility. The system is strategically designed to enhance personal safety and prevent diversion and theft by limiting work area access to authorized personnel only and tracking activity throughout the facility. Only personnel that are essential to the operation of a given area will be allowed access to that area. All visitors must be logged in and out, and that log will be available for inspection by the CCC at all times. All visitor identification badges shall be returned to the security vestibule upon exit.

## **6. Alarm Systems**

The facility will be equipped with two independent alarm systems on all perimeter entry points and perimeter windows. Two independent systems (access control/intrusion) will monitor the system 24 hours a day. The system provides redundant backup in the event that the primary system fails to function properly.

## **7. Inventory Tracking and Control System**

A comprehensive inventory tracking and control system is essential to the security of the facility. It allows Western Front, LLC to maintain awareness and control over where products are at any given stage in the distribution process. Western Front, LLC will utilize a fully integrated enterprise application software package that includes cultivation management, inventory management, cash management, and employee tracking, as well as a Point-of-Sale system. In addition to daily inventory tracking procedures, a monthly inventory count will be conducted by the entire Inventory Department to ensure absolute accuracy and accountability.

## **8. Employee Training**

Staff will be hired on a 3-month probationary status. They will participate in rigorous training conducted at the Western Front, LLC Workforce Training Center in Chelsea, and will be evaluated for suitability in a restricted-access, highly regulated retail environment. Training includes the employee handbook, reading materials, lectures by professionals, hands-on training and quizzes. Legal training will cover all State & Federal laws relating to cannabis and marijuana infused products. Legal obligations of licensed cannabis establishments will be emphasized. Topics will include the CCC rules and regulations, sexual harassment, interaction with law enforcement, and the rights and responsibilities of Economic Empowerment Applicants. Legal training will include at least one two-hour session with an attorney.

Medical training will include disabled rights and sensitivity, how to identify and interact with any individual having a medical emergency, the proper uses and benefits of cannabis use and appropriate warnings.

Sales staff will be trained in safe cannabis use and will be instructed to guard against pushing retail sales. The focus will be on assisting customers in making appropriate decisions about how best to choose the type of cannabis that is right for them. Staff will be provided with ongoing training in product information as well as general service philosophy.

In addition to its focus on safety, security training will include acceptable currency identification, warning signs of possible diversion to the illegal market, lock and alarm procedures, perimeter and entrance control, robbery response techniques, conflict resolution techniques and diversion detection techniques.

## **9. Operations**

Western Front, LLC anticipates operating a Cannabis Retail Store between the hours of 9:00 AM –10:00 PM, subject to the approval of the Planning Board.

## **10. Careers**

Western Front, LLC anticipates hiring in excess of 20 employees for full and part-time positions. Employees will receive a salary, benefits, and substantial training. Because Western Front, LLC is a certified Economic Empowerment Applicant, it will hire 75% of its employees that reside in areas of disproportionate impact by the first day of business, and at least 51% of its employees will have drug-related CORI but are otherwise employable in a cannabis-related enterprise. Western Front, LLC will prioritize hiring local Cambridge residents.

## **11. Trash Management**

Any trash containing cannabis or marijuana infused products is required to be stored securely on site within the facility vault. The products will be transported back to the cultivation facility from which they were purchased wholesale and where they may be safely destroyed. A minimal amount of business related waste will be generated from the facility and disposed of by commercial trash pickup.

## **12. Deliveries**

Product deliveries will occur between two and three times each week in unmarked sprinter vans. There will be no advertising, markings, or branding indicating that the vehicle is being used to transport cannabis. Routes and times used for the transportation of cannabis and marijuana infused products are randomized. Cannabis and marijuana infused products will be transported in secure, locked storage compartments that are an after-market modification made to the transport vehicle so that the cannabis and marijuana infused products cannot be easily removed. At least two agents will staff vehicles transporting cannabis. One agent will remain in the vehicle at all times, and the other will be accompanied by a designated Western Front, LLC staff member into the facility and within the vault where the inventory will take place. An armored car service will pick up cash as needed each week. At no time shall a transport vehicle stop or park on Massachusetts Avenue, or on any other public street, in a way that blocks emergency vehicle access or unreasonably impedes the flow of vehicle, pedestrian or bicycle travel. See the Logistics Plan prepared by Howard Stein Hudson and attached hereto as Exhibit A, in response to 11.804 (e) for additional detail.

## **13. Payment Processing and Cash Handling**

Western Front, LLC maintains a business banking relationship with a well-known financial institution and will accept cash and debit cards. Like any such business, Western Front, LLC will employ a sophisticated cash-handling procedure that will include comprehensive employee training, strict policies and procedures for how cash is counted, handled, recorded and stored. Cash collection will occur on a timely basis to ensure that no more cash than is necessary for the ordinary course of business is kept on site.

## **14. Traffic and Parking**

Western Front, LLC does not propose adding any off-street parking and seeks a small business exemption. Pursuant to Article 6.000, the minimum off-street parking for this use in the Business B (BB) district is 1 space per 1,800 square feet, or 2 spaces for this 2,027 square foot use at 567 Massachusetts Avenue. Per

Article 6.000, 6.35.1, and Section 6.32.1, *Small Business*, parking and loading requirements shall be waived for any nonresidential use in a business district if such use would require four (4) or fewer spaces.

Nonetheless, despite the ready availability of existing off-street parking in Municipal lot No. 5, Western Front, LLC has taken great care to develop operational procedures to ensure that customer visits are short in duration and will not result in queuing or other congestion to enter or exit the facility. Operational procedures will be adjusted as needed to ensure optimal function of the facility. When possible, consultations will be scheduled during off-peak hours. If necessary, Western Front, LLC will use an on-line appointment scheduling system.

Please see the enclosed **Transportation Logistics Plan** prepared by Howard Stein Hudson, attached hereto as **Exhibit A**.

Further, Western Front, LLC will undertake the following proactive traffic mitigation efforts:

- Provide 100% MBTA T-Pass subsidies, up to the federal fringe benefit, to all employees, with a pro-rated incentive for any part-time employees;
- Provide lockers in the break room for employees that walk or bike to work;
- Compile and provide to all employees, including during employee orientation, up to date transportation information explaining all commuter options;
- Provide customers with information regarding transportation options to access the facility;
- Provide and maintain information on the Applicant's website and other distributed material on how to access the facility by all modes of transportation, with an emphasis on non-automobile modes;
- Participate in transportation-related training offered by the City of Cambridge or a local Transportation Management Association; or
- Designate a Transportation Coordinator to develop and manage the implementation of a Transportation Demand Management plan.

## **15. Personnel Policies**

Western Front, LLC, as previously stated, is a certified Economic Empowerment Applicant. This certification requires that 75% of its employees will reside in areas of disproportionate impact by the first day of business, and at least 51% of its employees will have drug-related CORI but are otherwise employable in a cannabis-related enterprise.

Clearly defined and reinforced personnel policies will contribute to a consistently safe, focused work environment, staffed by a competent team. Adherence to proper safety protocols and adequate oversight of information will be the foundation of all personnel policies. Western Front, LLC is dedicated to

competitive pay structures, opportunities for advancement, and merit-based bonuses, and will provide employees with a highly competitive benefits package. Western Front, LLC will not discriminate against current or potential employees based on race, color, religious creed, national origin, sex, gender identity, sexual orientation, genetic information, or ancestry of any individual, refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation or in terms, conditions or privileges of employment, unless based upon a bona fide occupational qualification.

Western Front, LLC has received approval from the city of Chelsea to construct a 5,000 square foot Workforce Training Center to be located immediately adjacent to its Retail Marijuana Establishment at 121 Webster Avenue in Chelsea. Western Front, LLC will collaborate with the CCC to develop the core educational curriculum to establish an educational program designed to recruit, train, hire and manage prospective employees, and entrepreneurs, seeking to enter the legal cannabis marketplace. Western Front, LLC anticipates hiring more than 20 employees for full and part-time positions and will provide preferential hiring to Cambridge residents.

## **16. Customer Education**

Education is a top priority for Western Front, LLC and will be a central theme evident throughout its Cannabis Retail Store. Educational support will be provided on a one-to-one basis beginning with the first customer visit with the goal of establishing a long-term relationship. Western Front, LLC employees will be trained to listen attentively and provide auditory and visual educational instructions. All customers will be given printed as well as online information including scientific research related to cannabis use, how to promote an overall healthy lifestyle, the safest and most effective means of ingesting cannabis, and booklets and materials on a number of conditions, ailments, cannabis strains and products, and effects when ingested.

All customers will be required to review and sign a Community Norms Agreement, in which they certify that they understand that the ability to utilize any Western Front, LLC facility is contingent on respect for the surrounding neighborhood. Western Front, LLC will provide online access and print booklets to a family of appropriate materials including; Research on Cannabis, History of Cannabis as Medicine, Comparison of Medications - Efficacy and Side-Effects, Chronic Pain and Medical Marijuana, Multiple Sclerosis and Medical Cannabis, Cancer and Medical Marijuana, HIV/AIDS and Medical Marijuana, ASA Newsletters, Talking to Your Doctor, Cannabis Safety, Guide to Using Medical Cannabis, Recipes for Non-Inhalation Delivery Methods, and a How to Access Local Support Groups. WF will also provide information and resource materials about substance abuse and marijuana addiction from national health organizations. Website and booklets will be available in English and Spanish, with more languages to follow.

Distribution of Educational Materials will be as follows:

First Visit: Customers visiting the Retail Cannabis Store for the first time will go through an intake process where they receive a primer on regulations surrounding cannabis; how to safely consume, store, and transport their product; and information regarding strains, dosage, and desired effects. All customers will

be required to review and sign a Community Norms Agreement, in which they certify that they understand that the ability to utilize a Western Front, LLC store is contingent on respect for the surrounding neighborhood. Public consumption, diversion, queuing, loitering, and other behaviors are not tolerated and practicing them will result in an immediate ban from all Western Front, LLC facilities.

Visual Materials: Western Front, LLC will display a variety of educational materials. Flyers, pamphlets, and other materials will be available in the waiting/education area as well as throughout the sales floor. There will also be signage proximate to point-of-sale terminals reminding customers about the consequences of product diversion.

Auditory Reminders: Western Front, LLC employees will receive ample training about effective educational tools that can be used during transactions. Employees will educate customers at the point of sale about how to safely store, consume, and transport their product in a friendly, approachable manner.

Takeaway Material: Product safety guides and general informational material will be placed in each and every bag to ensure customers have access to safety materials when they intend to utilize the product. Western Front, LLC intends to work with the Cambridge DPH to develop these materials.

**(b) Context Map: A map identifying, at a minimum, the location of the proposed establishment, the locations of all other Cannabis Uses in the vicinity, the locations of all public or private schools providing education in kindergarten or any grades one through 12, and the locations of all children's playgrounds, youth athletic fields, or other youth recreation facilities, with measured distances provided to demonstrate whether the location complies with the standards of Section 11.803 above.**

Please see enclosed **Context Maps** prepared by RJ O'Connell Associates, Inc., and attached hereto as **Exhibit B**. The Context Maps identify a 300 foot, 500 foot, and 1,800 foot buffer zone around 567 Massachusetts Avenue.

The site is located within 300 feet of the Henry Buckner School, a private facility that provides early childhood learning and care to approximately 70 infants, toddlers, pre-school, kindergarten and first grade children. The property line of the Henry Buckner School is located 246 feet from the rear property line of 567 Massachusetts Avenue. The main entrance of the proposed Cannabis Retail Store, however, is located in the front of the property on Massachusetts Avenue, approximately 335 feet from the property line of the Henry Buckner School.

Also, Revolutionary Clinics II, Inc., has been granted a Special Permit from the Planning Board to operate a Registered Marijuana Dispensary at 541 Massachusetts Avenue. That premises is presently under construction. Upon information and belief, Revolutionary Clinics II, Inc., intends amend its previously issued special permit to authorize the co-location of a Cannabis Establishment to provide the non-medical use cannabis. As previously stated, Western Front, LLC is a certified Economic Empowerment Applicant and is therefore exempt from the 1800 foot buffer between Cannabis Retail Stores per 11.803.1 (b).

There are no other children's playgrounds, youth athletic fields or other youth recreation facilities within 300 feet of the property.

**(c) Site Plan: A plan or plans depicting all existing and proposed development on the property, including the dimensions of the building, the detailed layout of automobile and bicycle parking, the location of pedestrian, bicycle and vehicular points of access and egress, the location and design of all loading, refuse and service facilities, the location, type and direction of all outdoor lighting on the site, and any landscape design.**

Please see the enclosed **Site Plan** prepared by RJ O'Connell Associates, Inc., attached hereto as **Exhibit C**.

**(d) Building Elevations and Signage: Architectural drawings of all exterior building facades and all proposed signage, specifying materials and colors to be used. Perspective drawings and illustrations of the site from public ways and abutting properties are recommended but not required.**

Please see the enclosed **building renderings** and signage prepared by Lincoln Architects, LLC, attached hereto as **Exhibit D**.

**(e) Logistics Plan: A plan identifying the on-site or off-site locations where deliveries and loading functions will take place and a narrative describing how deliveries to the site, loading and other service functions will be conducted, as well as a plan and narrative identifying the transportation options for customers and employees, including public transportation services, on-site and off-site parking facilities, and bicycle facilities.**

Please see the enclosed **Transportation Logistics Plan** prepared by Howard Stein Hudson, attached hereto as **Exhibit A**.

**(f) License or Registration Materials: Copies of all materials submitted to applicable state and local agencies for the purpose of licensing and/or registration, and any certification or license issued by any such agency, excluding any information required by law to be kept confidential.**

Please see the enclosed **documentation submitted to the Cannabis Control Commission**, attached hereto as **Exhibit E**. Please also see CCC license number EE202211, granted to Western Front, LLC on May 22, 2018, attached hereto as Exhibit F.

**(g) Host Community Agreement: A narrative describing progress that has been made at the time of application toward establishing a host community agreement with the City of Cambridge.**

Western Front, LLC has initiated communications with the Office of the City Manager to determine the time frame for negotiation of the terms of a Community Host Agreement.

#### **Requested Special Permit Relief per 11.803.1**

This site of the proposed Cannabis Retail Store at 567 Massachusetts Avenue is located within the Business B (BB) zoning district, and pursuant to Section 11.803.1 (a), this use is permitted by the grant of special permit from the Planning Board. Moreover, the 1,800 foot buffer zone contained in 11.803.1 (b) does not apply to this proposal because Western Front, LLC is a certified Economic Empowerment Applicant. Please see CCC license number EE202211, granted to Western Front, LLC by the CCC on May 22, 2018, attached hereto as Exhibit F. All products offered to consumers will be pre-packaged off-site in childproof, tamper



resistant packaging. There will be no packaging or re-packaging of cannabis or marijuana products within the proposed Western Front, LLC facility.

**Requested Special Permit Relief per 11.803.3**

The site is located within 300 feet of the Henry Buckner School, a private facility that provides early childhood learning and care to approximately 70 infants, toddlers, pre-school, kindergarten and first grade children. The property line of the Henry Buckner School is located approximately 246 feet from the rear property line of 567 Massachusetts Avenue. The main entrance of the proposed Cannabis Retail Store, however, is located on the opposite side of the building facing Massachusetts Avenue, approximately 335 feet from the property line of the Henry Buckner School.

Per 11.803.3 (a), the Planning Board may, in issuing a special permit, approve a reduced distance upon finding that the location will cause no substantial adverse impact due to site-specific factors or other mitigating efforts agreed to in writing by the permittee and made conditions of the special permit. Western Front, LLC submits that the proposed Cannabis Retail Store is sufficiently separated from the Henry Buckner School by the existing site-specific factors which include Bishop Allen Drive, Municipal Parking lot No. 5, the existing landscape and picnic area, and the buildings that contain H Mart and Shalimar Gourmet Foods and Spices. The proposed Cannabis Retail Store is physically remote from the Henry Buckner School, its entrance is distant from the entrance and expected operations of the Henry Buckner School, and all business activity occurs within the secure walls of the Cannabis Retail Store. Western Front, LLC further submits that its proposed operation of a Cannabis Retail Store at this location will not cause any adverse effect to the school because its anticipated peak business hours, and the hours of operation of the school, do not overlap. Nearly all of the activity associated with the proposed Cannabis Retail Store will occur inside the physical location at 567 Massachusetts Avenue. All customers will be required to execute a Community Norms Agreement which demands respectful behavior and instructs customers that public consumption of cannabis, loitering and/or other nuisance activities will be monitored and reported to law enforcement. Further, any violation will result in an order barring the violator from entry to any Western Front, LLC facility. During all hours of operation, Western Front, LLC will have trained security personnel on site to observe, identify and eliminate any potential adverse impacts before it causes inconvenience to the surrounding community.

**Requested Special Permit Relief per 11.805**

**Special Permit Criteria. In granting a special permit for a Cannabis Retail Store or Cannabis Production Facility, in addition to the general criteria for issuance of a special permit as set forth in Section 10.43 of this Zoning Ordinance, the Planning Board shall find that the following criteria are met:**

**(a) The site is designed such that it provides convenient, safe and secure access and egress for customers and employees arriving to and leaving from the site using all modes of transportation, including drivers, pedestrians, bicyclists and public transportation users.**

Western Front, LLC does not propose adding any off-street parking and seeks a small business exemption. Pursuant to Article 6.000, the minimum off-street parking for this use in the Business B (BB) district is 1 space per 1,800 square feet, or 2 spaces for this use at 567 Massachusetts Avenue. Per Article 6.000, Section 6.32.1, *Small Business*, parking and loading requirements shall be waived for any nonresidential use in a business district if such use would require four (4) or fewer spaces. Western Front, LLC will create additional bicycle parking in Municipal Lot No. 5 by rehabilitating the existing bike structure and enclosing a portion of it to create additional long-term bicycle parking spaces. Moreover, Western Front, LLC will commit to maintaining the structure and the surrounding area.

Nonetheless, despite the availability of existing off-street parking in Municipal lot No. 5, Western Front, LLC has taken great care to develop operational procedures to ensure that customer visits within the proposed Cannabis Retail Store are short in duration and will not result in lines or other congestion to enter or exit the facility. Operational procedures will be adjusted as needed to ensure optimal function of the facility. When possible, consultations will be scheduled during off-peak hours. If necessary, Western Front, LLC will use an on-line appointment scheduling system.

Please see the enclosed **Transportation Logistics Plan** prepared by Howard Stein Hudson, attached hereto as **Exhibit A**.

Further, Western Front, LLC will undertake the following proactive traffic mitigation efforts:

- Provide 65% MBTA T-Pass subsidies, up to the federal fringe benefit, to all employees, with a pro-rated incentive for any part-time employees;
- Provide lockers in the break room for employees that walk or bike to work;
- Compile and provide to all employees, including during employee orientation, up to date transportation information explaining all commuter options;
- Provide customers with information regarding transportation options to access the facility;
- Provide and maintain information on the Applicant's website and other distributed material on how to access the facility by all modes of transportation, with an emphasis on non-automobile modes;
- Participate in transportation-related training offered by the City of Cambridge or a local Transportation Management Association; or
- Designate a Transportation Coordinator to develop and manage the implementation of a Transportation Demand Management plan.

**(b) On-site loading, refuse and service areas are designed to be secure and shielded from abutting uses.**

The on-site loading, refuse and service area are located in a shared parking area adjacent to the rear of the property. Deliveries will occur twice per week at randomized times and will consist of a single sprinter van arriving in the rear parking lot. The sprinter van will park in the designated loading zone and remain there for approximately 15 minutes. The product will be physically carried into the store in a non-descript plastic bin through the rear entrance located in Graffiti Alley. While the product is carried from the sprinter van to the store, the driver will remain in the van. The registered marijuana agent that hand-delivers the product to the on-site manager of the Western Front, LLC facility is responsible for executing the manifold, participating in the inventory and communicating with the cultivation center that the delivery has been completed. Other than parking in the designated loading zone and walking into the rear entrance, all loading activity occurs within the facility itself.

The refuse and service area are also located in parking lot at the rear of the building. This area is used by several of the neighboring businesses, is decrepit and has presented an on-going challenge to the City and the community. Western Front, LLC will re-landscape the flower bed and plantings in an attempt to beautify the area. As stated above, all marijuana or marijuana infused products that are waste must be stored on-site and returned to the cultivation center for proper disposal. The shared dumpster will be occasionally used by Western Front, LLC but the refuse produced by this use is very minor.

**(c) The building and site have been designed to be compatible with other buildings in the area and to mitigate any negative aesthetic impacts that might result from required security measures and restrictions on visibility into the building's interior.**

The building construction and proposed use are consistent with the Urban Design Objectives outlined in the K2C2 Study and set forth in Section 19.30. Western Front, LLC has invested considerable time and resources to design a boutique Cannabis Retail Store with design elements that will reflect the rich culture and history of Cambridge. Western Front, LLC believes that this facility will complement and improve the aesthetics of the surrounding neighborhood. The design will shield from the public view the entirety of the sales area and regulated material, while also engaging the community with art displays that will be visible through the existing clear glass windows on the front facade. The proposed lighting and security measures will be sensitively placed, in compliance with the recommended standards of the Draft Outdoor Lighting Ordinance provided to the City Council by the City's Lighting Task Force, to provide a safe yet unobtrusive means of surveillance for the appropriate and most sensitive portions of the building and building sites. In addition, the design and use of the proposed facility will be consistent with and maintain the form and character desirable for the Central Square neighborhood.

**(d) In retail areas, the location and design of the Cannabis Use will not detract from the sense of activity with opaque, unwelcoming façades at the ground floor. Where interior activities must be screened from public view, such areas should be screened by transparent, publicly accessible active business uses where possible. Opaque façades should be minimized, and where they are necessary they should include changing public art displays or other measures to provide visual**

**interest to the public.**

Because Western Front, LLC is a locally owned and operated cannabis company (The entire Board of Managers, namely, Marvin Gilmore, Dennis Benzan and Omowale Moses, were all born and raised here and all attended and graduated from the Cambridge Public Schools) there is an intimate understanding of the special character and vibrancy of Central Square. Western Front, LLC recognizes the need to create a street façade that engages the sidewalk, street and pedestrian corridor despite the CCC restrictions on visibility into the interior. Accordingly, Western Front, LLC proposes to create a secure waiting/education area immediately inside the main entrance on Massachusetts Avenue that will be visible through the existing clear glass windows. The waiting/education will display local artwork that celebrates the historical significance and many accomplishments of the minority community in Cambridge and will provide opportunities for street activation. The retail area, where cannabis products are displayed, will be located behind the artwork displayed on the dividing security wall. The artwork on the building's east wall, known as "Graffiti Alley", will remain protected from damage during renovation. The proposed alterations to the property are shown on the Plans attached hereto and incorporated herein by reference.

**(e) If the proposed Cannabis Retail Store or Cannabis Production Facility is not proposed to include a Medical Marijuana Treatment Center, it will nevertheless provide programs to assist qualifying patients within the city or neighborhood who are registered through the Massachusetts Medical Use of Marijuana Program in obtaining services under that program.**

Western Front, LLC will provide whatever assistance that it may lawfully provide to assist qualifying patients in Cambridge to access services through the Medical Use of Marijuana Program.

**Requested Special Permit Relief per 10.43**

**Pursuant to section 10.43 of the Cambridge Zoning Ordinance, special permits will normally be granted where provisions of this ordinance are met, except when particulars of the location or use, not generally true of the district or of the uses permitted in it, would cause granting of such permit to be to the detriment of the public good because:**

- a. It appears that requirement of this Ordinance cannot or will not be met.**

With the requested Special Permit, the Project will meet all requirements of the Ordinance.

- b. Traffic generated and or patterns of access or egress would cause congestion, hazard, or substantial change in established neighborhood character.**

Western Front, LLC respectfully submits that its proposed use of this property will not disturb the existing right of way, pedestrian access, and will not cause a serious hazard to vehicle or pedestrian traffic. Traffic generated and patterns of access or egress will not cause congestion, hazard, or substantial change in the established neighborhood character. Central Square is a vibrant, bustling neighborhood that has historically been the center of Cambridge's cultural, commercial and social services industry. Although the neighborhood has been the site of some recent redevelopment, the Western Front, LLC proposed

Cannabis Retail Store will be designed, constructed and operated to be consistent with both the established and emerging character of the neighborhood. The entire retail space will occupy 2,027 square feet, with a portion of that dedicated to display of artwork that celebrates the historical accomplishments the minority community in Cambridge and that highlights the diversity of the neighborhood. The education/intake area will allow customers to enter the facility and will prevent any loitering outside the facility (which will be strongly discouraged). After valid government issued photographic identification is produced and verified, customers will pass through a secure door into the education/intake area that leads to the retail floor. Patrons will be fully inside the facility while being educated about the WF product line before they enter the sales area where transactions take place. Educational and instructional materials will be available and disseminated along with information about restrictions on public consumption, dosage, abuse and resources for help.

Additionally, this site is approximately 100 steps from the Central Square MBTA Red Line Station, there are 7 MBTA bus lines that connect in Central Square and there are four Blue Bike Stations within a 5-minute walk. Although Western Front, LLC expects that most customers will walk or use other non-automobile modes of transport, Massachusetts Avenue provides on-street metered parking and Cambridge Municipal parking lot No. 5, which is adjacent to the rear of the building, has 82 spaces and allows 2-hour parking for \$1.25 per hour between 8:00 a.m. and 6:00 p.m. There are also four additional municipal parking lots within walking distance. This is a highly transit-oriented site. For additional information regarding transportation impacts, see the Transportation Logistics Plan prepared by Howard Stein Hudson, and attached hereto as Exhibit A.

**c. The continued operation of or the development of adjacent uses as permitted in the Zoning Ordinance would be adversely affected by the nature of the proposed use, or**

The proposed use is retail only, with an emphasis on customer education. Western Front, LLC is a locally-owned cannabis company that has been certified as an Economic Empowerment Applicant. The Board of Managers is committed to setting the standard for operational excellence, not only within the Equity Programs established by the CCC, but within the entire cannabis industry. Accordingly, there are no applicable adjacent uses that will be developed or adversely affect the nature of the proposed use. There will be no packaging, repackaging, cultivation or processing activities of any type occurring at this site.

**d. Nuisance or hazard would be created to the detriment of the health, safety and/or welfare of the occupant of the proposed use or the citizens of the city, or**

No nuisance or hazard will be created that will affect the health, safety, or welfare of the occupant of the proposed use or the citizens of the City of Cambridge. In November of 2016, nearly 80% of Cambridge voters approved Question 4, the ballot initiative to legalize the adult use of marijuana. In July of 2017, Chapter 55 of the Acts of 2017, *An Act to Ensure Safe Access to Marijuana*, was adopted with requirements that people from communities that have been disproportionately harmed by marijuana law enforcement are included in the new legal marijuana industry. These programs were developed in responses to evidence which demonstrates that certain populations, particularly Black and Latinos, have been disproportionately impacted by high rates of arrest and incarceration for marijuana and other drug crimes

as a result of state and federal drug policy. Criminalization has had long-term ill effects, not only on the individuals arrested and incarcerated, but on their families and communities. Although Cambridge was not one of the 29 cities designated as an area of disproportionate impact, the city has established a regulatory scheme that prioritizes Economic Empowerment Applicants such as the Western Front, LLC. Moreover, since Cambridge first adopted its zoning in 2013, a vast majority of all city officials, department heads, community activists and elected officials have devoted an extraordinary amount of time, effort, and thought to developing standards to apply to this emerging industry in Cambridge.

- e. **For other reasons, the proposed use would not impair the Integrity of the district or adjoining District, or otherwise derogate from the intent and purpose of this Ordinance, and;**

The proposed Western Front, LLC Cannabis Retail Store will not impair the integrity of the District or the adjoining District because it is located within the designated zoning area, Business B (BB), and its use will not be apparent to the public way. Additionally, the design plan allows for patrons to quickly and safely enter the facility and remain in an intake/educational area until they are assisted by a registered marijuana agent. This area will also provide an opportunity to display artwork that will celebrate the historical accomplishments of the minority community in Cambridge and, because the exterior windows will remain clear glass, this design element will enhance the pedestrian corridor along Massachusetts Avenue by offering a dynamic interaction with the streetscape in Central Square. Finally, the overall security plan provides a proven approach to safe and efficient entry and egress and establishes significant deterrent measures to prevent any noticeable nuisances associated with this emerging industry from occurring.

- f. **The new use or building construction is inconsistent with the Urban Design Objectives set forth in Section 19.30**

The building construction and proposed use are consistent with the Urban Design Objectives outlined in the K2C2 Study and set forth in Section 19.30. Western Front, LLC has invested considerable time and resources to design a boutique Cannabis Retail Store with design elements that will reflect the rich culture and history of Cambridge. Western Front, LLC believes that this facility will complement and improve the aesthetics of the surrounding neighborhood. The design will shield from the public view the entirety of the sales area and regulated material, while also engaging the community with art displays that will be visible through the existing clear glass windows on the front facade. The exterior façade will be gently renovated, with particular attention paid to restoring the historical integrity of the building. The cornices above the second floor windows will be re-centered and the exterior will be painted in historical hues. The proposed lighting and security measures will be sensitively placed, in compliance with the recommended standards of the Draft Outdoor Lighting Ordinance provided to the City Council by the City's Lighting Task Force, to provide a safe yet unobtrusive means of surveillance for the appropriate and most sensitive portions of the building and building sites. In addition, the design and use of the proposed facility will be consistent with and maintain the form and character desirable for the Central Square neighborhood.



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TO:	Dennis Benzan Tim Flaherty	DATE:	July 15, 2019
FROM:	Ian McKinnon, P.E., PTOE Andrew Fabiszewski	SH PROJECT NO.:	2019115.00
SUBJECT:	Transportation Analysis – 567 Massachusetts Avenue, Cambridge, Massachusetts		

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*Howard Stein Hudson (HSH)* has prepared this transportation analysis for the proposed Cannabis Dispensary at 567 Massachusetts Avenue (the Project and/or Site) in Cambridge. This transportation assessment was prepared to address the requirements for Cannabis Retail Stores outlined in the Draft Transportation Logistics Plan Guideline and will cover:

- Site Context;
- Expected frequency of client and employee trips to the site;
- Expected modes of transportation used by clients and employees; and
- Expected impact on parking supply.

Recreational dispensaries are a relatively new land use in Massachusetts and are not well-documented in terms of trip generation patterns; therefore, the trip generation estimates were evaluated based on information provided by Western Front LLC (the Applicant) and compared to existing dispensary survey data. Demand at the store could be initially higher than average before decreasing as more competition opens and the excitement of the new land use decreases.

## Site Context

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The Project site is currently occupied by an approximately 1,679 square foot (sf) building that currently serves as a restaurant. The proposed Project involves the renovation of the existing building for a recreational retail cannabis dispensary. The Project site is conveniently located within a one-minute walk of Central Square Station, which provides connections to the Massachusetts Bay Transportation Authority (MBTA) subway Red Line as well as connections to several bus routes. The transit connections within a short walk of the Project are outlined in **Table 1**. The Applicant intends to fully subsidize MBTA passes for employees to encourage non-vehicular travel options.



*Table 1. Transit Connections*

Transit Service	Route Description	Service Duration	Peak Hour Headway (min)	Weekend Service	Weekend Headways (min)
Red Line	Alewife – Ashmont/Braintree	5:13 a.m. – 12:30 a.m.	4-5	5:15 a.m. – 12:30 a.m.	7
1	Harvard/Holyoke Gate – Dudley Station via Mass Ave	5:10 a.m. – 1:40 a.m.	10	5:10 a.m. – 1:40 a.m.	10-20
47	Central Square – Broadway Station	5:15 a.m. – 1:31 a.m.	10-15	5:00 a.m. – 1:40 a.m.	32-45
64	Oak Square – University Park or Kendall/MIT	5:31 a.m. – 1:26 a.m.	20-30	5:20 a.m. – 1:29 a.m.	60-75
70/70A	Waltham – University Park	5:11 a.m. – 1:04 a.m.	3-15	5:40 a.m. – 1:09 a.m.	10-35
83	Rindge Avenue – Central Square via Porter	5:10 a.m. – 1:20 a.m.	20-25	5:10 a.m. – 1:04 a.m.	20-40
91	Sullivan Square – Central Square via Washington St	5:15 a.m. – 1:08 a.m.	30	5:00 a.m. – 1:05 a.m.	25-30
CT1	Central Square – Boston Medical Center via MIT	6:00 a.m. – 7:42 p.m.	21-24	N/A	N/A

Source: MBTA.com,

There are four BLUEbikes Stations within a five-minute walk of the Site, generally located along Massachusetts Avenue. Altogether these four stations have capacity for 58 bikes. There are bike lanes in both directions along Massachusetts Avenue in front of the Site. There are 19 bicycle racks with capacity for 38 bikes within 100 ft of the entrance on the sidewalk in front of the site and covered bicycle racks with capacity for 24 bikes in the lot behind the Site. The bicycle racks along Massachusetts Avenue are well utilized; however, observations indicate that during peak times the usage in the covered bike racks behind the Site was 38% on June 12<sup>th</sup>, 2019.

Close to the Site is Municipal Lot 5, Municipal Lot 6, and Green Street Garage which provide public parking options for patrons of the Site. Metered on-street parking is also provided on the roadways surrounding the Site. The Site Context map is provided in **Appendix B**.





# Trip Generation and Operations

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## Facility Operations

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Based on information provided by Western Front, the planned weekly hours of operation will be 9:00 a.m. to 9:00 p.m. everyday. These hours will be set by the City in the Host Community Agreement and are subject to change. Service to the building will occur from the side entrance in Graffiti Alley. The delivery/service vehicles will utilize the existing loading space behind the building in Municipal Lot 5 to lessen the possibility for impacts along Massachusetts Avenue. Loading observations that were conducted concurrent with the parking observations indicate that there is ample loading space available in Lot 5. The side entrance will be restricted access, providing access to employees and deliveries only.

## Service Area

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As of the writing of this memo, there are 23 recreational dispensaries currently open or imminent in the Commonwealth of Massachusetts, with 36 more that have provisional approval, and 111 pending applications in the permitting process. When this Site opens, there will likely be several recreational retail dispensaries open in the Cambridge and Boston area. It is also anticipated that there will be another dispensary directly in Central Square when this location would be able to open.

The congestion and traffic generated by individual locations that was seen during the initial wave of dispensary openings will continue to decrease as more retail establishments open for business. The service area for the Project will be largely dependent on competition in the area as other dispensaries open. When the market is more saturated, the operations at the dispensary will likely only serve local trips more akin to a convenience or package store.

## Mode Share

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The only existing dispensary in the Boston area at the time of this memo is New England Treatment Access (NETA) in Brookline. To establish how patrons to that site traveled, a mode share survey was conducted in April 2019 during the p.m. peak hour. The mode share results of the survey are presented in **Table 2**.



*Table 2. Mode Share Survey*

Location	Vehicle	Transit	Walk	Bike
NETA	52%	29%	16%	3%

As shown in **Table 2**, there is a 52% vehicle mode share, transit mode share is 29%, and 19% walk/bike mode share. These mode shares will be applied to the dispensary client person trips to establish trip generation for each mode. While dispensary mode share data is being used for the trips, it is likely that the close proximity to transit, walkability, and bike facilities near the Site will work to decrease the vehicle focused mode share.

## Client Trips

With a saturated retail cannabis market, Western Front projects that they will service approximately 175 clients per day. This would correspond to about 350-person trips per day (175 entering and 175 exiting). Client visits are expected to occur throughout the day with the peak time likely occurring from 10:00 a.m. – 12:00 p.m. and 5:00 – 7:00 p.m. Peak client activity during these time periods is anticipated to be about 25 clients per hour, or up to 50-person trips per hour (25 entering and 25 exiting).

At 52% vehicle share, it is estimated that there will be approximately 182 client vehicle trips (91 entering and 91 exiting) per day. Approximately 26 client vehicle trips (13 entering and 13 exiting) are anticipated during the p.m. peak hour. The remaining 48% for transit/walk/bike will have approximately 168 person trips (84 entering and 84 exiting) from these modes per day. Approximately 24 person trips (12 entering, 12 exiting) from these modes will occur during the p.m. peak hour

## Staff and Delivery Trips

Western Front will have approximately six to ten full-time staff and six to ten part-time staff. It is estimated that there would be approximately six to twelve employees on site at any given time. Shift schedules are expected to range from 8:00 a.m. – 4:00 p.m., 10:00 a.m. – 6:00 p.m., and 2:00 p.m. – 10:00 p.m. It is estimated that there would be approximately 14 unique employees working on-site throughout the day. Therefore, employees are expected to generate about 28 person trips (14 entering and 14 exiting) on a typical day.

Staff parking will not be provided on or around the Site and employees will be encouraged to utilize non-driving commuting options. Employees will receive subsidized transit and/or BLUEbikes passes



to encourage alternative modes of transportation. The great transit connections to the Site should lead to high transit use by employees. Employees that live in non-transit accessible areas and are reliant on cars will be encouraged to drive to transit to make the final connection to the Site.

Service and delivery activity for the proposed Site is expected to be minimal and occur no more than once per day relating to products, money, or trash. These deliveries are randomized by the Cannabis Control Commission (CCC) but are unlikely to occur during the peak hours.

## Combined Project Trip Generation

When combining patient, staff, and service/delivery trips, the Project is expected to generate about 378 person trips per day (189 entering and 189 exiting). During the busiest hours, the site may generate approximately 50 person trips per hour (25 entering and 25 exiting). The daily, a.m. and p.m. peak hour person trips are broken down by anticipated mode in **Table 3**. The dispensary is not open to customers during the a.m. peak hour so the trips during this time period will be employees commuting.

*Table 3. Trip Generation*

Direction	Vehicle	Transit	Walk	Bike
<i>Daily Trips<sup>1</sup></i>				
Enter	91	62	30	6
Exit	91	62	30	6
<b>Total</b>	<b>182</b>	<b>124</b>	<b>60</b>	<b>12</b>
<i>a.m. Peak Hour Trips<sup>1</sup></i>				
Enter	0	4	1	1
Exit	0	0	0	0
<b>Total</b>	<b>0</b>	<b>4</b>	<b>1</b>	<b>1</b>
<i>p.m. Peak Hour Trips<sup>1</sup></i>				
Enter	13	7	4	1
Exit	13	7	4	1
<b>Total</b>	<b>26</b>	<b>14</b>	<b>8</b>	<b>2</b>

1. Based on information provided by Western Front.



## Parking

On-street parking occupancy data was collected during the times outlined in the Draft Cannabis TP&T Guidelines to determine the existing parking conditions and how it relates to the Project parking needs. The data collection was performed on June 8<sup>th</sup> and June 12<sup>th</sup> 2019 and consisted of streets that are within approximately 500 ft walk to the Site. The data collection is detailed in **Table 4** and **Table 5**. Parking that is not viable for dispensary customers, such as permit only parking, was not included in the tables.

*Table 4. Parking Occupancy, Wednesday June 12<sup>th</sup> 2019*

Street Name/Lot	Time	Regulation	Occupied Spaces	Total Spaces	% Occupancy
Bishop Allen Drive	10:00 AM	2 Hr Meter	33	42	79%
Essex Street	10:00 AM	2 Hr Meter	9	9	100%
Norfolk Street	10:00 AM	2 Hr Meter	10	10	100%
Douglass Street	10:00 AM	2 Hr Meter	3	5	60%
Massachusetts Avenue	10:00 AM	1 Hr Meter	21	22	95%
Brookline Street	10:00 AM	2 Hr Meter	7	7	100%
Municipal Lot 5	10:00 AM	2/4 Hr Meter	76	79	96%
Municipal Lot 6	10:00 AM	4 Hr Meter	35	37	95%
Green Street Garage	10:00 AM	Public Lot	254	269	94%
<b>Total</b>	<b>10:00 AM</b>		<b>448</b>	<b>480</b>	<b>93%</b>
Bishop Allen Drive	12:00 PM	2 Hr Meter	36	42	86%
Essex Street	12:00 PM	2 Hr Meter	6	9	67%
Norfolk Street	12:00 PM	2 Hr Meter	10	10	100%
Douglass Street	12:00 PM	2 Hr Meter	4	5	80%
Massachusetts Avenue	12:00 PM	1 Hr Meter	21	22	95%
Brookline Street	12:00 PM	2 Hr Meter	7	7	100%
Municipal Lot 5	12:00 PM	2/4 Hr Meter	73	79	92%
Municipal Lot 6	12:00 PM	4 Hr Meter	33	37	89%
Green Street Garage	12:00 PM	Public Lot	263	269	98%
<b>Total</b>	<b>12:00 PM</b>		<b>453</b>	<b>480</b>	<b>94%</b>
Bishop Allen Drive	3:00 PM	2 Hr Meter	31	42	74%
Essex Street	3:00 PM	2 Hr Meter	9	9	100%
Norfolk Street	3:00 PM	2 Hr Meter	10	10	100%
Douglass Street	3:00 PM	2 Hr Meter	1	5	20%
Massachusetts Avenue	3:00 PM	1 Hr Meter	19	22	86%



Street Name/Lot	Time	Regulation	Occupied Spaces	Total Spaces	% Occupancy
Brookline Street	3:00 PM	2 Hr Meter	3	7	43%
Municipal Lot 5	3:00 PM	2/4 Hr Meter	51	79	65%
Municipal Lot 6	3:00 PM	4 Hr Meter	21	37	57%
Green Street Garage	3:00 PM	Public Lot	153	269	57%
<b>Total</b>	<b>3:00 PM</b>		<b>298</b>	<b>480</b>	<b>62%</b>
Bishop Allen Drive	5:00 PM	2 Hr Meter	32	42	76%
Essex Street	5:00 PM	2 Hr Meter	7	9	78%
Norfolk Street	5:00 PM	2 Hr Meter	10	10	100%
Douglass Street	5:00 PM	2 Hr Meter	2	5	40%
Massachusetts Avenue	5:00 PM	1 Hr Meter	20	22	91%
Brookline Street	5:00 PM	2 Hr Meter	3	7	43%
Municipal Lot 5	5:00 PM	2/4 Hr Meter	53	79	67%
Municipal Lot 6	5:00 PM	4 Hr Meter	12	37	32%
Green Street Garage	5:00 PM	Public Lot	135	269	50%
<b>Total</b>	<b>5:00 PM</b>		<b>274</b>	<b>480</b>	<b>57%</b>
Bishop Allen Drive	7:00 PM	2 Hr Meter	39	42	93%
Essex Street	7:00 PM	2 Hr Meter	7	9	78%
Norfolk Street	7:00 PM	2 Hr Meter	8	10	80%
Douglass Street	7:00 PM	2 Hr Meter	5	5	100%
Massachusetts Avenue	7:00 PM	1 Hr Meter	20	22	91%
Brookline Street	7:00 PM	2 Hr Meter	7	7	100%
Municipal Lot 5	7:00 PM	2/4 Hr Meter	75	79	95%
Municipal Lot 6	7:00 PM	4 Hr Meter	18	37	49%
Green Street Garage	7:00 PM	Public Lot	173	269	64%
<b>Total</b>	<b>7:00 PM</b>		<b>352</b>	<b>480</b>	<b>71%</b>



*Table 5. Parking Occupancy, Saturday June 8<sup>th</sup> 2019*

Street Name/Lot	Time	Regulation	Occupied Spaces	Total Spaces	% Occupancy
Bishop Allen Drive	12:00 PM	2 Hr Meter	39	42	93%
Essex Street	12:00 PM	2 Hr Meter	9	9	100%
Norfolk Street	12:00 PM	2 Hr Meter	8	10	80%
Douglass Street	12:00 PM	2 Hr Meter	5	5	100%
Massachusetts Avenue	12:00 PM	1 Hr Meter	22	22	100%
Brookline Street	12:00 PM	2 Hr Meter	4	7	57%
Municipal Lot 5	12:00 PM	2/4 Hr Meter	66	79	84%
Municipal Lot 6	12:00 PM	4 Hr Meter	19	37	51%
Green Street Garage	12:00 PM	Public Lot	150	269	56%
<b>Total</b>	<b>12:00 PM</b>		<b>322</b>	<b>480</b>	<b>67%</b>
Bishop Allen Drive	3:00 PM	2 Hr Meter	38	42	90%
Essex Street	3:00 PM	2 Hr Meter	9	9	100%
Norfolk Street	3:00 PM	2 Hr Meter	9	10	90%
Douglass Street	3:00 PM	2 Hr Meter	5	5	100%
Massachusetts Avenue	3:00 PM	1 Hr Meter	22	22	100%
Brookline Street	3:00 PM	2 Hr Meter	4	7	57%
Municipal Lot 5	3:00 PM	2/4 Hr Meter	62	79	78%
Municipal Lot 6	3:00 PM	4 Hr Meter	15	37	41%
Green Street Garage	3:00 PM	Public Lot	185	269	69%
<b>Total</b>	<b>3:00 PM</b>		<b>349</b>	<b>480</b>	<b>73%</b>
Bishop Allen Drive	7:00 PM	2 Hr Meter	36	42	86%
Essex Street	7:00 PM	2 Hr Meter	9	9	100%
Norfolk Street	7:00 PM	2 Hr Meter	10	10	100%
Douglass Street	7:00 PM	2 Hr Meter	5	5	100%
Massachusetts Avenue	7:00 PM	1 Hr Meter	21	22	95%
Brookline Street	7:00 PM	2 Hr Meter	0	7	0%
Municipal Lot 5	7:00 PM	2/4 Hr Meter	63	79	80%
Municipal Lot 6	7:00 PM	4 Hr Meter	17	37	46%
Green Street Garage	7:00 PM	Public Lot	170	269	63%
<b>Total</b>	<b>7:00 PM</b>		<b>331</b>	<b>480</b>	<b>69%</b>

As shown above, on-street parking is well-utilized near the Project, ranging from 57% to 94% occupancy on the weekday during the hours studied, which corresponds with 27 to 206 available spaces. On Saturday June 8<sup>th</sup>, the parking ranged from 67% to 73% occupancy, which corresponds to



between 131 and 158 available spaces. During the peak demand periods, it is anticipated that approximately 13 clients per hour will arrive at the Site via private vehicle. Western Front expects the average service time within the facility to be about ten minutes and will utilize methods such as online preordering to ensure these times are feasible. Assuming generally ten-minute service times, client parking demand is projected to be about three to eight spaces depending on arrival patterns. Client parking demand could also be lower depending on the number of clients that arrive via transportation network company (TNCs) services such as Uber and Lyft and the use of transportation demand management (TDM) strategies to market the Site as a transit-oriented store. Parking spaces will not be available for employees, who will be encouraged to use other means of transportation to reach the Site.

## Loading

During the parking utilization study, the loading areas near the Site in the Municipal Lot #5 was also studied. The loading areas included the two large spaces adjacent to H-Mart and the two designated loading parking spaces along the south side of the lot. Delivery trips to the Site will be conducted by vehicles that are van sized or smaller so it is anticipated that the loading parking spaces will be the only ones that are needed to serve the Site. Observations indicate that this loading zone has capacity during the study times as shown in **Table 6**.

*Table 6. Loading Occupancy*

Street Name/Lot	Time	Day	Occupied Spaces	Total Spaces	% Occupancy
<b>Municipal Lot 5 Loading Parking Spaces</b>	10:00 a.m.	Wednesday	0	2	0%
	12:00 p.m.	Wednesday	0	2	0%
	3:00 p.m.	Wednesday	2	2	100%
	5:00 p.m.	Wednesday	2	2	100%
	7:00 p.m.	Wednesday	0	2	0%
	12:00 p.m.	Saturday	0	2	0%
	3:00 p.m.	Saturday	1	2	50%
	7:00 p.m.	Saturday	0	2	0%



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## Transportation Demand Management (TDM)

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The Applicant will work to encourage alternative modes of transportation to access the Site. The Applicant is willing to commit to the following TDM measures to ensure that the potential impact to the surrounding roadways is minimized:

- Fully subsidize MBTA passes for employees;
- Implement a pre-order system to reduce in store time for customers;
- Provide BLUEbikes memberships to employees;
- Provide secure, long-term bicycle parking for employees;
- Have an air pump and bicycle repair tools available for employees and customers;
- Provide lockers for employees that walk or bike to work;
- Promote transit and bicycle options online and in marketing material to inform clients and employees of non-vehicular travel options;
- Designate a Transportation Coordinator (TC) to oversee and administer the implementation of TDM measures;
- Conduct employee and customer mode share surveys to provide updates to the City on request for the ways people are traveling to the dispensary; and
- Provide a contribution to the City toward transportation improvements.

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## Opening Plan

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Prior to the opening date, the Applicant will furnish a detailed opening plan for management of the grand opening. As other dispensaries open prior to this Site, market conditions will dictate the level of management that is needed to ensure a smooth opening. Some measures that will be considered by the Applicant for the grand opening include:

- Appointment only scheduling;
- Marketing to caution customers against driving to the opening and making them aware of the non-vehicular options for coming to the Site;
- Police detail to manage the curb outside the Site; and
- Additional staff on Site to manage queues and process customers.





## Summary

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Overall, the Project is expected to have a minimal impact on the surrounding roadways, particularly when the market is saturated. It is anticipated that another dispensary, 541 Massachusetts Avenue, will be open prior to this establishment, further working to reduce the impact of this Site. The Applicant will work with the City to implement measures to reduce the number of customers that take private vehicles to the Site. Through the TDM program, the Applicant will incentivize employees to seek alternative commuting options that will not degrade neighborhood parking. Parking around the Site is well-utilized but there is availability at most times of the day, particularly in the Green Street Garage during the p.m. peak times. The proximity of the Site to the Central Square MBTA station and the availability of bicycle facilities will help lower vehicular demand to the Site. The attached Cannabis Retail Stores Summary Form (**Appendix A**) provides information and data detailed in the memo.



HOWARD STEIN HUDSON

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## Appendix A

### Cannabis Retail Stores Summary Form



### Cannabis Retail Stores Summary Form

<b>Project Site:</b>	
Store Address.	567 Massachusetts Avenue
Total floor area of store (including sales, back of house, other).	1,679 sf
Retail sales area (including customer waiting areas).	1,023 sf
Maximum customer capacity – sales area.	14
Maximum customer capacity – waiting area.	4
<b>Employees:</b>	
Number of full-time employees (total).	6-10
Number of part-time employees (total).	6-10
Maximum number of employees on-site at one time.	12
<b>Employee mode shares:</b>	See Table 2
% single-occupancy vehicle (SOV) (including ride-hailing):	52% (to make connections to transit or other)
% high-occupancy vehicle (HOV):	0%
% public transit:	29%
% walk:	16%
% bike:	3%
% other:	0%
<b>Customers:</b>	
Number of customers per day.	175
Maximum number of customers expected at any one time.	25 peak hour
<b>Customer mode shares:</b>	See Table 2
% single-occupancy vehicle (SOV) (including ride-hailing):	52%
% high-occupancy vehicle (HOV):	0%
% public transit:	29%



% walk:	16%
% bike:	3%
% other:	0%
<b>Transit Availability:</b>	
List the public transportation services within ¼ mile of the site, including type (subway, bus, bike share), walking distance, and frequency.	See Site context figure and Table 1
List the duration and frequency of public transit services for weekdays and weekends.	See Table 1
<b>Auto Parking Availability:</b>	
List public parking facilities within 500 feet of site (with addresses/locations, distance, and number of spaces) and parking occupancy for minimum one weekday (e.g., minimum 10 am, 12 pm, 3 pm, 5 pm, 7 pm), and minimum one Saturday (e.g., minimum noon, 3 pm and 7 pm).	See Table 4 and Table 5 in Memo
Estimated peak parking demand needed for employees.	0
Estimated peak parking demand for customers.	3-8
Number of employee parking spaces on-site.	0
Number of customer parking spaces on-site.	0
Number of employee parking spaces off-site (describe location and distance from site).	0
Number of customer parking spaces off-site (describe location and distance from site).	27-206 spaces depending on day and time, available on-street/garage parking within 500 ft of the Site
<b>Bicycle Parking Availability:</b>	



Number of Employee long-term bicycle parking spaces on the Project site.	The Applicant is providing long-term bicycle parking space for 2 bikes within the storage area of the Site						
Number of Customer short-term bicycle parking spaces on the Project site.	0						
Number of public bicycle parking spaces within 100 feet of the main entrance of the site.	The Applicant is proposing to utilize the existing bicycle racks in front of the Site along Massachusetts Avenue and the covered racks behind the Site for customer short-term bicycle parking. (Approximately 31 bicycle racks within 100 ft of the main entrance)						
<b>Loading and Delivery:</b>							
Address of proposed Loading and Delivery Service Location (note whether it is on-street or off-street).	84 Bishop Allen Drive – loading is proposed to occur in the 2 loading designated parking spaces along the south side of the lot						
List the types of loading and delivery trips that will service the site (e.g., product delivery, cash pick-up, refuse collection) and expected number of trips per week for each type.	Expected up to 1 loading/delivery trips per day of product delivery, cash pick-up, and refuse collection. (up to 7 trips per week)						
<b>Project Trip Generation:</b>							
Daily, Morning and Evening Peak Hour Employees and Customer trip generation by mode.		Employees			Customers		
		Daily	Morning	Evening	Daily	Morning	Evening
	SOV	0	0	0	182	0	26
	HOV	0	0	0	0	0	0
	Transit	22	4	0	102	0	14
	Walk	4	1	0	56	0	8
	Bike	2	1	0	10	0	2
	Other	0	0	0	0	0	0



## Response to Comments

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- The transportation analysis should include the exact dates and more information on the methodology for the various auto parking space/loading, and bike parking space surveys:
  - Page 2 of the Transportation Analysis said bike racks along Mass. Ave are well utilized. It should provide dates/times, etc.
    - June 8<sup>th</sup> and June 12<sup>th</sup> 2019 throughout the day during the parking observations
  - Page 2 said 38% of the covered bike racks in Lot 5 were used. Provide dates/times/weather conditions, etc.
    - Specific observation occurred June 12<sup>th</sup> 2019 5 p.m. – Weather was 70s and no precipitation
  - Table 4. (Parking Occupancy, Weekday). Provide exact dates of the parking occupancy study.
    - June 8<sup>th</sup> and June 12<sup>th</sup> 2019
  - Page 5 states parking data collection was performed in June 2019. Provide exact dates.
    - June 8<sup>th</sup> and June 12<sup>th</sup> 2019
  - Page 8 says on Saturday the parking ranged from 67% to 73%, however no specific date and Table was provided for a Saturday parking occupancy study.
    - June 8<sup>th</sup> 2019
  - For Table 4, the Municipal Lot 6 was under construction during June 6. Table 4 should note and/or clarify this.
    - Data was collected on June 8<sup>th</sup> and June 12<sup>th</sup> – Municipal Lot 6 was not under construction during this time, however it appeared Municipal Lot 4 was closed for construction during this time
  - Exactly how was the Green Street parking garage occupancy data obtained (provide exact date and methodology).
    - Parking data was collected concurrent with the other parking data on June 8<sup>th</sup> and June 12<sup>th</sup> – number of cars in the garage were counted relative to the number of spaces.
  - Page 3 indicated that site will utilize the existing loading space behind the building in Lot 5, however the Context Map-1 show the spaces behind the building are Handicap spaces. This should be clarified or corrected.
    - Mislabeled on the original context map – update is provided
  - Page 3 says there is ample loading spaces available in Lot 5. The Transportation analysis should justify this comment with data (i.e., dates of study and findings).
    - The table on page 9 highlights the Loading occupancy (June 8<sup>th</sup> & June 12<sup>th</sup>)
- On page 5, it is not clear how the trip generation estimated 378 daily person trips. All trip generation data and assumptions should be provided.
  - Trip Generation estimates are a combination of expected Employees and Patrons. The Employee trips are determined by number of employees, expected number on-site per day, and shift schedules.
  - ITE is not accepted for Cambridge Dispensaries and other MA retail cannabis stores that are operating are not good comparisons with respect to total trip generation due to the current lack of dispensaries in the state, trip generation was developed based on



- number of employees and customer estimates provided by Western Front. These estimates are derived from working with Revolutionary Clinics and are based on their business projections for a saturated retail cannabis market and scaled down to a boutique shop operations.
      - For comparison purposes – ITE rates for this shop result in 422 daily trips (211 enter, 211 exit) with a peak hour of 36 trips (18 enter, 18 exit)
- The transportation memo indicated that they conducted a survey at the New England Treatment Access (NETA) site in Brookline in April 2019. The exact date of the survey should be provided. The full survey and results should be provided, including how many responses to the survey.
  - The survey totaled 76 respondents with the following breakdown:
    - Motor Vehicle = 40
    - Transit = 22
    - Walk = 12
    - Bike = 2
- If the mode share surveys from the NETA site was used to assume trip generation for the proposed project, the transportation technical memo should explain why the mode shares at that location is expected to be similar to the proposed location.
  - In absence of other mode share and new land use, and in keeping with a conservative forecast of trip making, the NETA site data was utilized as outlined in the Draft Cannabis Retail Store Guidelines. The Proponent expects the transit rich location, marketing efforts, and TDM measures to limit the SOV trips to the proposed Site.
- Page 4 states that Table 2 shows the vehicle mode share for the **combined census tracts** is 52%. It is not clear if the mode share data is from US Census or from the patron and employee survey of the NETA site. This must be clarified.
  - This was a typo – Mode share was based on the survey data from NETA
- Table 3 has a footnote indicating data was provided by Western Front for p.m. peak hour trips, however it is not clear what data this refers to. Any and all mode share assumptions should be explained in detail.
  - Mode share assumptions are based on the NETA survey data
- According to the Transportation summary sheet, the a maximum of 12 employees are expected on site at one time. It also expects 52% will travel by single occupancy vehicle, It therefore doesn't make sense that the Summary Form also indicates that the estimated parking demand for employees is 0.
  - The final portion of employee trips to/from the Site are expected to be via transit/walk/bike. Employees commuting from transit inaccessible locations will be required to the maximum extent possible to drive to and utilize transit to reach the Site.
- Page 10 stated the Applicant will provide a contribution to the City toward transportation improvements. This statement is too vague.
  - The Proponent will make an \$800 contribution in lieu of installing bicycle racks outside of the Site. Any further contribution would need to be negotiated with the City.