

December 22, 2025

Chrystal Kornegay  
MassHousing  
One Beacon Street  
Boston, MA 02108-3110

**Re: 231-239 Elm Street, Somerville | PEL Application**

Dear Ms. Kornegay:

On behalf of Davis Square Elm Holdings, LLC (the “Proponent”), I am pleased to submit the enclosed Chapter 40B Project Site Eligibility (“Site Eligibility”) Application for the proposed redevelopment of the subject parcels at 231-249 Elm Street, 243 Elm Street, 245 & 249 Elm Street, 6-8 Grove Street, and 12 Grove Street (collectively, “the Site”). The proposed development will provide 502 units of rental multifamily housing, with 25% of units restricted to households at or below 80% Area Median Income. Our proposal reflects several years of robust engagement with the community, City officials, and other stakeholders regarding the redevelopment of the Site.

This development will kickstart the much-needed revitalization of Davis Square. Current conditions in the broader Davis Square neighborhood are very challenging, with residents frequently expressing concerns over public safety, drug use, homelessness, and commercial vacancy. This viewpoint was summarized in November of 2024 by a long-time Somerville resident, who stated that “[u]nfortunately, now we have backslid in the last 10 to 15 years as both Union Square and Assembly Square have taken off, and Davis Square is now seeing more than 15 empty storefronts...Davis used to be the flagship square in the city, and it’s anything but that now.”<sup>1</sup> The arrival of 500+ new residents and 13,000 square feet of revitalized retail space on this site alone can generate significant progress towards the next revitalization of Davis Square.

The proposed development is also well aligned with Somerville’s current planning and policy goals, which call for significant development of new housing units, as well as new types of housing units. As set forth in the City’s Comprehensive Plan document, “Somervision 2030”, the City set a goal of 6,000 new housing units, of which 1,200 would be permanently affordable by 2030. The City’s subsequent Plan update, “Somervision 2040”, makes a clear statement about the City’s housing goals and needs, recognizing the issues of changing demographics and the types of housing needed, saying that: “For Somerville to be a lifelong community, it needs housing for all stages of life. This relates to the size of units, but also their location, type of building, and accessibility to name a few. Somerville has a fairly monotonous housing supply of 1, 2, and 3-family wood frame homes. We need to strive to create different types of housing suitable for the different stages in life, even if that does introduce differences in our housing stock.”<sup>2</sup> To accomplish these goals, the City proposed reviewing its zoning map to examine opportunities in places with good transit access “like Davis and Porter Squares” and, overall, stressed the need to “continue to increase the supply of housing as a key strategy for containing costs.”<sup>3</sup> With the Red

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<sup>1</sup> <https://www.wgbh.org/news/housing/2024-11-13/davis-square-business-owners-say-the-areas-backslid-they-hope-a-new-housing-plan-could-help>

<sup>2</sup> Somervision 2040, page 48.

<sup>3</sup> Somervision 2040, page 49.

Line approximately 500 feet away from the Site, there are few locations that present a better opportunity for transit oriented development.

Davis Square also needs more affordable housing and based on available information, it appears very little affordable housing has been produced in the Davis Square Neighborhood over the past 15 years. The chart below from the City’s website shows that the entire City has never created more than 98 affordable housing units in a single year since 2011, and total affordable unit production is less than halfway to the City’s goal of creating 1,200 affordable housing units.<sup>4</sup>

Affordable Housing Unit Creation Over Time



Looking at the Davis Square Neighborhood housing production of 53 total new housing units from roughly this same period, (assuming 20% of these units were affordable – i.e. 11 units), it is evident that Davis Square is far behind the rest of Somerville in creating affordable housing. Looking forward, if the City wants to keep its affordable housing production goal, the City would need to construct approximately 78 affordable units per year from 2021-2030, representing an approximately 54% annual increase in affordable housing production over the 42 unit-per-year average from 2011-2020. Given current market conditions, this increase in production seems out of reach. However, with a single building at this Site, Davis Square has the opportunity to add 126 new affordable housing units. Moreover, by creating 25% of the units within the Project as permanently affordable, the Project also exceeds SomerVision’s 2040 goal of having 20% of the City’s housing stock be affordable.

We realize that the proposed density and building height is bold, however, the severity of the housing crisis necessitates bold solutions. We have employed a first-class design team to craft a massing approach that minimizes visual impacts, respects the existing fabric of Davis Square, and integrates into the neighborhood. The proposed redevelopment is designed to respect this existing fabric of Davis Square with a low-rise, three-story podium, while generating density in a 26-story tower that is set back from the street wall. The podium will reinforce the street scale and pedestrian level engagement, which will feature a variety of retail uses and formats. The building will not include on-site parking, a feature that is also aligned with the sustainability goals of Somerville, and reflective of the exceptional transit access to the Red Line. The project will continue to evolve based on the project review process and public feedback and will only improve in its integration into the existing neighborhood fabric.

We extensively studied precedent projects that added high-density developments into low- and mid-rise locations. We focused on two projects, both within 3 miles of our site, illustrating effective

<sup>4</sup> <https://www.somervision2040.com/progress/>

implementations of this strategy (Prospect Union Square and Market Central Square). Prospect Union Square is located two miles from our site and shares a similar neighborhood context and density (25-stories, 450 units). Like the Davis Square Site, Prospect is ideally located in the middle of the square. The Davis Site is ringed by mid-rise, commercial, and civic space districts and streets, and therefore it does not immediately abut any low-rise residential development areas on any side. In fact, when comparing the amount of Urban Residential and Neighborhood Residential zoned areas within an approximately 600-foot radius of the Davis Square Site with The Prospect, the Davis Site has a similar zoning and development context, if not slightly better (*See figure below*). In short, the Site is well positioned within the existing and proposed urban fabric for a high-rise residential building in a way that most areas of Somerville are not, and in fact is similar to Union Square in its ability to have a high-rise residential development incorporated into its midst with direct adjacency to a transit node.

1. 50 Prospect Street



2. The Site



Below is a summary of relevant metrics for the proposal:

**Location:** The Site is located in the heart of Davis Square and includes seven tax parcels with the following addresses: 233, 241-243, 245 & 249 Elm Street, and 6-8 & 12 Grove Street. Existing improvements include one and two-story buildings that are near the end of their useful life, with commercial, retail, and parking uses.

**Program:** 502 total units, consisting of studios, one bedrooms, two bedrooms, and three bedrooms. The building's ground floor includes over 13,000 square feet of retail space. There will be no onsite parking.

**Affordability:** Of the 502 units, 25% will be affordable units for households at or below 80% AMI.

80% AMI			Market		
Unit Type	# Units		Unit Type	# Units	
80% AMI	Studio	69	Market	Studio	206
80% AMI	1 BR	38	Market	1 BR	114
80% AMI	2 BR	6	Market	2 BR	19
80% AMI	3 BR	13	Market	3 BR	37

**Building Typology:** The building is anchored by a three-story podium base, establishing continuity with surrounding mixed-use buildings. The tower element is set back from the street to reduce its visual prominence, particularly at key public nodes and sightlines.

**Site Control:** The Proponent controls the site via a long-term ground lease with a purchase option.

**Zoning & Historic Designations:** The Site is currently zoned Commercial Core (CC-4) and allows for Commercial and Retail uses. The site is not located within a Historic District or designated as a Historic Place or Landmark.

**Surrounding Land Uses:** Nearby land uses include the following zoning classifications: Mid Rise Mixed Use, Commercial Core, Urban Residential, Neighborhood Residential, Fabrication, Commercial Business, and Civic. Given its urban location, there is a wide variety of uses proximate to the site, including: restaurants, shops, banks, office, grocer, multifamily residential, surface parking, MBTA station, theater, and a city park.

**Public Transportation:** *MBTA Rail Lines* (distance from site): Red Line (0.1 miles), Green Line B (0.6 miles), Green Line C (0.6 miles), Green Line D (0.6 miles), Green Line E (0.6 miles), Fitchburg Commuter Line (0.5 miles). *MBTA Bus Lines* (distance from site): #96 (0.0 miles), #94 (0.0 miles), #90 (0.0 miles), #89 (0.0 miles), #88 (0.0 miles), #87 (0.0 miles)

**Existing Utilities and Infrastructure:** The Site is currently well served by utilities, including public sewer/drain lines in Elm Street (42") and Grove Street (28"), water mains in Elm Street (12" low pressure & 12" high pressure) and Grove Street (8" low pressure), electricity by Eversource in Elm Street and Grove Street, and natural gas in Elm Street (8") and Grove Street (12").

We look forward to kicking off the formal review process and continuing a collaborative review process with all stakeholders. Thank you very much.

Sincerely,



**Andrew Flynn**  
Founder and Chief Executive Officer  
Copper Mill

cc: Edward Augustus | Executive Office of Housing and Livable Communities  
Mayor-Elect Jake Wilson | City of Somerville  
Mayor Katjana Ballantyne | City of Somerville  
Katherine Miller | MassHousing