

PLAN: JP/Rox Washington Street

Preserve. Enhance. Grow.



There were the following release dates for PLAN: JP/ROX

- July 15, 2016 First Working Draft
- September 20, 2016 Final Draft

The comment period for the final draft ended on 10/13/16 although we continue to hear your feedback and are available for clarification. On the following pages, you will find:

- Comments from individuals span pages 1-107
- Comments from groups span page 108 and onwards

PLAN: JP/Rox Washington Street

Preserve. Enhance. Grow.



The following public comments were received leading up to the release of the first working draft for PLAN: JP/ROX, and immediately following its first release (7/15/16) and second release (9/20/16).

- Comments from individuals span pages 1-83
- Comments from groups span page 84 onwards

General Comments

1. Affordability

- This discussion is ongoing, and we appreciate the BRA's willingness to revisit there numbers. However additional work is necessary.

2. Massing and Scale

- Proposed heights do not reflect existing context.
- Clarify triggers, location and depth of proposed setbacks (along Washington Street, at side streets, and where proposed buildings abut residential 3 story zones).
- Are proposed setbacks based on existing adjacent buildings or on adjacent zoning, or both?
- Clarify how wider sidewalks are accomplished on private property? Sidewalks width?
- Relationship of height and sidewalks to street width?

3. Commercial/Retail

- Is there anything being discussed about future small businesses in the area?
- Any zoning exclusion/limitation of chain businesses?

4. Open space

- Are there any designated green areas?
- Preservation of playing fields?
- Areas for new small parks?
- Trees and vegetation along the Washington corridor?
- Can we encourage seating areas in front of large residential buildings? Even a bench, properly designed and located, can send a powerful message.
-

5. Jobs

- Job policy for construction and permanent jobs?
- Is ground floor industrial in a new residential midrise feasible? Economical?

Density Bonus Illustrations

1. General Comments:
 - a. Illustrations need to consider more parameters (parking, retail) and more options (increased FAR but less height)
 - b. In calculating the value of the zoning change, consider that the base allowable envelope would only have residential on 2 floors, with parking on the first floor, and an FAR of 1.
2. *Poster Assumptions:*
 - a. Clarify assumptions. Are these assumptions for the purpose of this “illustration” only? Or are the assumptions (20,000 sf, 75% lot coverage) part of the recommendations?
 - b. *Assumptions: 20,000 SF site.*
 - Will this encourage developers to consolidate sites. In Egleston Square, they may be long and narrow.
 - Make it clear that parcels that will remain zoned residential 3 story cannot be merged with adjacent areas in the new Density bonus area.
 - c. *Assumptions: All housing all floors.*
 - Does this mean the illustration assumes all housing? This is confusing because the examples are Industrial and Neighborhood Shopping, and the proposed rezoning for those areas retain those uses at the ground floor.
 - The assumption for “all residential” should show parking, or at least an illustration for areas where below grade parking is not feasible at small or rocky sites. Even at .5 spaces/unit, it will change the calculations.
 - There should be an illustration for the ground floor retail (and parking), since this is the proposal for most of Washington Street.
 - d. *Assumptions: 75% lot coverage*
 - Is 75% the assumed base coverage, or the proposed RDA coverage?
 - Are you saying the proposed project would have a lot coverage of 75%, which is greater than the existing allowable coverage (currently limited only by FAR) ¹?
 - The illustration shows lot coverage increasing under the RDA. seems to imply that the existing zoning is does not allow full coverage of the site, and the RDA bonus would allow greater coverage.
 - This strategy could increase the number of units without adding height. Identify how many units are added by increasing the FAR, without increasing height.
 - e. *Assumption: Total gross SF incorporates deductions for upper floor setbacks*
 - What are the assumed setbacks? Where are the setbacks?
 - f. *Illustrations:*
 - How much of the increase is due to an increase in FAR, as opposed to height? There should be an example for those sites where the depth of the site does not accommodate a 6 story building –compare the existing 35 feet, 3 story, FAR=1 to a new RDA that is 45 feet, 4 stories, with an FAR of say 3 (75% lot coverage).

¹ No one representing the BRA at Workshop #5 was able to explain what the lot coverage diagram meant.

Transportation

1. General Comments

- a. Consider impact of moving deliveries and entrances to small side streets.
- b. Consider capacity of public parking lots and on street parking to accommodate proposed increases in resident cars, residential drop off /deliveries and retail delivery and customers.
- c. Consider impact of proposed bike lanes on delivery and parking capacity.
- d. Is there any suggestion of better and additional public transportation?
- e. Specific suggestions for traffic control and safety?
- f. Location of residential and commercial additional trash and dumpsters?
- g. Additional garbage collection?
- h. Potential for off street multi level parking lot?
- i. Street lighting (quantity, location, character, sustainable (full cutoff)

1. *Map*

- Boylston Street is not highlighted or discussed. It is a major pedestrian/vehicular connection from Washington Street to the Stoneybrook T, and beyond to Lamartine and Center Street. It is also subject to parking by people who drive here to take the T. Consider traffic, resident parking?

2. *Widened Sidewalks with landscaping/street furniture*

- How will this be accomplished? Washington Street is already too narrow. Will setbacks be required? Encouraged?
-

3. *Reallocate space to create bike accommodation (remove parking on one side)?*

- To be effective, this should be consistent along the length of Washington St.
- To be effective, parking, delivery and drop off needs to be addressed, otherwise the bike lane will be illegally blocked.
-

4. *Better On Street Parking Management*

- Be more specific on the goals...to allow short term parking for commercial clients? Resident only parking? Deliveries?
- Increased population without parking means more deliveries, taxis, ubers. Where do they stop?
- Washington Street slows to a crawl from Montebello to Columbus Ave at rush hour and on Saturdays...which are also when Merchants would like to attract customers. Double parking by deliveries and customers can bring traffic to a halt. Yet there is no discussion about providing more public parking lots, or better access and visibility to existing lots.
- The public lot on Washington near Stonehenge is too close to the intersection and interrupts traffic.
-

5. *Enhanced Public Spaces*

- Is this limited to renovation of existing spaces (Stonehenge/Peace Park)?

Urban Design Guidelines – Egleston Square

1. *Street and Block Patterns – Configure buildings and sites to maximize solar orientation, sunlight and minimize shadows.*
 - The proposed heights of 65 feet on both sides of Washington Street does not acknowledge that the conditions are very different. The ground level of residential areas north of Washington Street are significantly lower than those that are south of Washington Street, which means that the impact of shadows cast by new buildings on the north side of Washington will be significantly greater than new buildings of the same height on the south side. (Assuming one disregards the shadows cast on the street itself.)
2. *Area Circulation and Connections*
 - Setbacks at street level are required to provide more pedestrian/sidewalk area.
 - Consider bump outs at parking lanes to calm traffic and increase visibility for cars and pedestrians crossing Washington Street.
3. *Public Realm – Wider sidewalks*
 - How?
4. *Public Realm – Maintain and improve public parking areas that support local businesses.*
 - Existing public parking is not sufficient at present and will become more inadequate as the amount of retail increases, and the amount of street parking decreases (wider sidewalks, bike lanes, curb bumpouts, delivery/drop off zones like that at 3200).
5. *Views and Topography – Create site lines*
 - New tall buildings built without setbacks on side streets will block the view of residential properties. Even low building built without setbacks will make it difficult for cars existing on sidestreets, most of which do not have traffic lights.
6. *Views and Topography – Where possible, utilize grade changes for basement level parking*
 - None of the current proposals on Washington Street (3193 and 3353) take advantage of grade change for basement level parking, even though the grade change is more significant here than it is closer to Egleston Square.
7. *Building Height and Massing*
 - Proposed 65 foot height does not consider the shallow parcel depth of most of the areas along Washington Street., and the setbacks required to avoid overshadowing adjacent residential and commercial properties.
 - Clarify proposed setbacks – where and how much?
8. *Parking and loading*
 - Most parcels along Washington Street between School and Columbus are shallow and do not have access to a side or rear alley or road. 65 foot high buildings with no parking or off street deliveries?

AFFORDABILITY

This discussion is ongoing, and we appreciate the BRA's willingness to revisit there numbers. However additional work is necessary.

- * 4%/50% AMI is not sufficient, and nor is the new 20% set-aside recommendation
- * After sharing calculations, need more back-and-forth with community showing real responses and changes based on input
- * 30% goal for affordable housing is not sufficient: engage with community to determine correct goal
- * Need more analysis about solutions besides density bonuses:
 - Plans for how the City can assist non-profits to purchase land, and how much this could increase the percentage of deed-restricted housing
 - Making Arborway Yards 100% affordable
 - Amount of affordable housing that is feasible for developers if they apply for tax credits and receive tax breaks
 - Setting aside 70% AMI units for voucher holders, so that lower-income families can live there
 - Dollar amounts for what the City can commit to provide for affordable housing, and how much would be necessary to achieve various affordability goals
 - How additional City subsidies could help private developers build more affordable housing
 - How solutions (inclusionary requirements, density bonuses, tax credits, tax breaks, subsidies) can be adapted to support housing for families making 30% AMI and 40% AMI



JP/ROX Community Group Interactive Meeting Request

Todd Consentino [REDACTED]

Mon, Jun 27, 2016 at 11:57 AM

To: marie.mercurio@boston.gov, "info@bostoncyclistunion.org" <info@bostoncyclistunion.org>, linfo@livablestreets.info, bikeinfo@massbike.org

Todd Consentino

Boston, MA

Phone: [REDACTED]

Email: [REDACTED]

June 27, 2016,

Marie Mercurio, Senior Planner
Boston Redevelopment Authority
1 City Hall Sq., 9th Floor
Boston, MA 02210
Email: marie.mercurio@boston.gov
Phone: 617-918-4352

Dear Ms. Mercurio,

My name is Todd Consentino. I am a core member of JP Bikes and an active member of the Boston Cyclists Union. I live at 188 School Street, which is on the corner of School Street and Amory Street. I am within the scope of the JP/Rox Plan and live across the street from a couple of LI zoned properties with current 35 foot maximum height restrictions. Under the current JP/Rox Plan, it has been proposed that the zoning for these properties be changed from LI to some form of Residential zoning with a max height allowance of 65 feet. My main issue with this proposal is that the JP/Rox plan, as a whole and if implemented as it currently exists, will triple the population of our neighborhood without improving our neighborhood's infrastructure. This is unsafe and unacceptable.

It is my hope that the JP/Rox Plan will not require a minimum of one or two parking spaces to be created per unit of housing, in order that our neighborhood remains walkable and bikeable. Instead, please, use the space which commonly allotted for parking for more housing, more green space and protected infrastructure for vulnerable road users. Currently, Marbury Terrace has maybe 25 people living on it and is a lovely street which is heavily utilized as a walking and biking [Neighborway](#) for commuters and residents alike. I fear that adding dozens, possibly one hundred or more commuting cars to this street, in addition to more FedEx, UPS, and other delivery vehicles to this street will drastically alter the Complete Streets feel of our neighborhood. School Street, which is the natural connector to Washington Street, could use some traffic calming measures and a contra-flow or off-street cycletrack, as well. School Street is narrow. It is a residential street and we all have driveways. Reduce parking to one side only of School Street, instead of both sides of our street, and you will find the necessary space.

The Stony Brook Orange Line station abuts these properties. The Southwest Corridor is within a block of these properties. More motorized vehicles are not necessary, nor are they wanted in our neighborhood. Our sidewalks are narrow. I'd like to see them widened as part of this project, in order to accommodate the hundreds of new residents. It will become more dangerous to access Stony Brook Station and the SWC, if the JP/Rox plan is implemented as is, as it will more than likely rob us of our Neighborway access to Stony Brook Station and to the SWC. Protected bicycle facilities must be created to maintain or to improve upon the current level of service for children and adults who are currently able to safely utilize a scooter (the old fashioned, human powered kind, not the modern motorized one), a balance bike, a tricycle, walking, bicycling and well, you get the point, a variety of ways to safely access the SWC and Stony Brook Station via Marbury Terrace. The JP/Rox Plan, I fear, will turn our neighborhood into something similar to the Innovation District, but for housing, if infrastructure is not addressed prior to tripling the density of our neighborhood.

Please, don't tell me you'll figure this all out after the zoning has changed and the new housing has been built. That's not a plan. That's not acceptable. As part of Boston's 2030 Goals and Targets, the JP/Rox Plan needs to ensure that our streets are not made to be less safe for vulnerable road users. I'd like an opportunity to meet with you as a representative of JP Bikes and as a resident, as part of the Community Group Interactive Meetings, in order that these concerns may be addressed in advance of the upcoming Release of Draft PLAN JP/ROX.

Sincerely,

Todd Consentino

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| - JJJ
..... (•) |-----/(•)



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Wed, Jun 29, 2016 at 11:05 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 19

Form inserted: 6/29/2016 11:05:02 AM

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Document Name Path: /Planning/Planning Initiatives/PLAN: JP-Rox

Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: William

Last Name: Decaneas

Organization: None

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: Hi, I've been following the JP/ROX planning with interest. I have lived in the Stony Brook Neighborhood for 10+ years. I'm supportive of increased development along the Washington Corridor in my neighborhood. I would like to see mixed use development with an emphasis on residential and retail. I would like development to be family friendly and create green space, amenities and parking for the new residents. I also think there needs to be money set aside for infrastructure improvements (Roads and Transit) to handle an influx of new residents. Finally, I am strongly opposed to buildings taller than six stories in our neighborhood. I think building up to six stories along the corridor will provide ample new housing without significantly altering the fabric of our neighborhood. Beyond that height would be excessive and put an unfair burden on our neighborhood. Thank you, Will Decaneas



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Fri, Jul 15, 2016 at 4:48 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 20

Form inserted: 7/15/2016 4:47:58 PM

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: jeremy

Last Name: robertson

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I believe that building density along transportation hubs + corridors is smart, so creating housing near Forest Hills station makes sense. Traffic along the 2-lanes of Washington St between FH + Egelston Square is always bumper-to-bumper and there is ZERO bike infrastructure along this vital transportation route. Further, I see no indication that the MBTA can effectively plan for significant population changes, which is exactly what is being proposed here. It is fantasy to think that successful planning can be implemented without having a willing partner in the MBTA. Until that can happen, the only hope would be to build bike infrastructure along this route and hope for the best during the non-blizzard months.



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Sat, Jul 16, 2016 at 3:41 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 21

Form inserted: 7/16/2016 3:41:24 AM

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Sarah

Last Name: Freeman

Organization: Arborway Coalition

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I reviewed the draft, couldn't tell if my previous concerns have been addressed re: the Forest Hills section by the proposed Arborway Yard Bus Facility: 1. Any development along Washington St. needs to be compatible with the outcome of the Technical Mediation after the MEPA certificate required changes to the bus entrance & exit locations & green space along the Arborway. The technical mediation was led by the MA Office of Commonwealth Dev't & CLF and the consultants were Cambridge Systematics (transportation) & Hubert Murray (urban design). The outcome was that buses would enter via Washington St. & exit via Arborway. (If the Bus Facility is built elsewhere, this could be a moot point, but if it is built in this location, please be prepared.) 2. Re: Green buffer between Bus Facility & neighborhood: It has been shown in at least one draft. Plan, but not in all plans. Also, I support the goal of maximizing affordable housing. Thank you for considering these comments.



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Jul 18, 2016 at 7:48 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 22

Form inserted: 7/18/2016 7:47:45 AM

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Charles

Last Name: Creagh

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2: 6

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02478

Comments: As a daily bicycle rider and pedestrian, it is important to me that the importance of peoples lives are taken into account when planning roads, streets, sidewalks, traffic signals, signal timing, and so on. The creation of additional free of inexpensive on-street parking in front of or adjacent to all of these new and proposed developments will create considerable additional congestion. Please consider carefully the idea of protected bicycle lanes on some busy thoroughfares in the study area. Additionally, the signal timing on the Southwest Corridor bike path allows motorists turning left on a green light to experience direct conflict with cyclists heading from JP towards downtown Boston. I've seen a few collisions, and way too many close calls for what should be a low-stress, protected facility. Thanks for all your hard work, and remember to plan for the future of transportation today.



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Jul 18, 2016 at 3:41 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: David

Last Name: Warner

Organization: JP Local First

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I hope that a part of the process for approval of new business licenses and permits in this JP/Rox planning area will require a community hearing for chains and businesses where ownership resides outside of the state of Mass. We need to do whatever we can to facilitate and support a diversity of locally owned businesses going into new commercial spaces at the same time that non-locally owned businesses are held to the highest possible standard of transparency and accountability.



Marie Mercurio <marie.mercurio@boston.gov>

question about amory street redevelopment

irene s [REDACTED]
To: marie.mercurio@boston.gov

Mon, Jul 18, 2016 at 12:29 PM

Dear Marie,

Am I reading correctly that the Amory street development says it is RDA - 55 – 4 to 5 Stories / up to 55' - adjacent to existing 3 to 4 story buildings? When I look around I see 2 story mansard houses adjacent to this property. Can you please explain why the zoning says that it is 4 up to 5 stories adjacent to existing 3 to 4 story buildings?

Is it possible to reconsider this zoning? My neighbors and I are concerned that this building will not only overshadow our properties reducing sunlight, but also change the feel of the neighborhood which is already has become more crowded with condo conversions and new construction. We think that a max 3 story zoning with height limitations and design considerations to maintain the historic feel of the neighborhood would be good. I do like the space buffer between the properties as the old/current buildings are very close to the property line.

Another regard is the more building we have the more parking shortage we have and we really need some streets blocked off for resident parking (e.g 2 hour for non resident and resident M-F 8 to 6 pm). I'm not sure if that can go into the development report.

Will you be at the neighborhood meeting at the beginning of August? It would be great to get some clarification of these documents.

With warm regards,

Irene Shui
[REDACTED]
Jamaica Plain, MA 02130



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Jul 18, 2016 at 11:50 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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First Name: Irene

Last Name: Shui

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: The amory street development says it is RDA - 55 – 4 to 5 Stories / up to 55' - adjacent to existing 3 to 4 story buildings. I am immediately adjacent and live in a 2 story building (241 amory) so I don't think a 4-5 story building should be built adjacent to my property/ I'm not clear how the BRA could miss that most of the neighborhood especially the adjacent houses are all 2 story mansards built in the 1900. I think a 4-5 story building in that space would not fit the neighborhood. Already we have had a 3 story gargantuan building go up across the street which looks terrible among the mainly 2 story mansard houses and low profile 3 story buildings. Again all of the properties adjacent to the proposed redevelopment are 2 stories so can someone explain why the proposed zoning is for a 4-5 story building?



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Fri, Jul 22, 2016 at 12:03 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Bridget

Last Name: Galway

Organization: na

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2: [REDACTED]

City: Somerville

State: MA

Phone: [REDACTED]

Zip: 02145

Comments: Will there be a balance between the revitalizing of the community and affordable housing. I was a professional for many years creating artistic initiatives, as a way of using arts as a tool to empowerment. Now, because of the curve balls life throws at us, I am at the mercy of living off of disability. I am also an artist/writer. I have lived in many communities throughout my life known for having a strong artist foundation. I have had to move from each because of the gentrification of those communities. The powers to be do not seem to recognize how important it is to nurture artistic development in our society. Supporting the arts and artists more often than creates new artistic initiatives for youth and the community. I have lived in Somerville for 10 years, and I am seeing it happen here, and am concerned that at some point I may have to move from an apartment that I love. I am hoping this will not come to pass. I also hope you are taking my concerns into consideration when brainstorming on developing Roxbury/JP. Please keep me informed. I would like to be included on your mailing list regarding any affordable housing opportunities for people on section 8, especially if you plan to develop artist live/work space. I presently have a BRA artist certificate for such, would that also include Roxbury and JP, if such an opportunity comes available?



Marie Mercurio <marie.mercurio@boston.gov>

A Letter Regarding the JP/Rox Draft Plan

Todd Consentino [REDACTED]

Mon, Aug 1, 2016 at 3:27 PM

To: Marie Mercurio <marie.mercurio@boston.gov>

Cc: Boston Cyclists Union <info@bostoncyclistsunion.org>, bikeinfo@massbike.org, info@livablestreets.info, chris@jamaicaplainnews.com, Stefanie Seskin <stefanie.seskin@boston.gov>, Allyn <mayor@boston.gov>, chris.osgood@boston.gov

Todd Consentino
[REDACTED]

Boston, MA 02130

Phone: [REDACTED]

Email: [REDACTED]

July 27, 2016,

Marie Mercurio, Senior Planner
Boston Redevelopment Authority
1 City Hall Sq., 9th Floor
Boston, MA 02210
Email: marie.mercurio@boston.gov
Phone: 617-918-4352

Dear Ms. Mercurio,

I have read the JP/ROX Plan, which was made available on July 15, 2016, several times. I have attended a BRA presentation of the JP/ROX Plan at Livable Streets, in addition to several of the BRA's JP/ROX Plan meetings over the course of the past year. I applaud the BRA's efforts to plan for responsible development, which entails increasing affordability and density through zoning changes, building use changes and upgrades to infrastructure, while maintaining the character of our neighborhood. I do have some issues with the plan, as it currently exists. I will attempt to focus my critiques to my immediate neighborhood.

I live on the corner of Amory and School Streets, across from Marbury Terrace. The properties across the street from me, at 181 Amory Street and 76 Atherton Street, are currently zoned as Local Industrial (LI) with a max height restriction of 35 feet. The JP/ROX Plan is defined by several neighborhoods: Egleston, Jackson Square, Stony Brook, Green Street and Forest Hills. This makes sense, as these neighborhoods are different from one another in many ways. I find it odd that 181 Amory Street and 76 Atherton Street, which are located on the same block as Stony Brook Station, are included within the Jackson Square portion of the Draft Plan. The RDAs for Jackson Square and Stony Brook differ greatly. Page 150 of the plan indicates that there is a RDA-65 for Jackson Square and defines RDA-65 as "4 to 6 Stories / up to 65' - adjacent to existing 4 to 5 story and new buildings." Neither of the buildings I've mentioned on Amory or Atherton meet this hurdle, yet both are proposed to become RDA-65 properties. Would you identify the existing 4 or 5 story building which abuts these properties, please? There is only one RDA listed for Stony Brook, which I believe to be a more suitable neighborhood for the properties on Amory and Atherton Street. The RDA for Stony Brook is RDA-55. It is defined as "4 to 5 Stories / up to 55' - adjacent to existing 3 to 4 story buildings." RDA-55 more accurately fits these properties, as the surrounding housing stock is mainly comprised of single, duplex and three family housing stock.

On pages 60, 62 and 64, it is revealed that there is no recommendation to alter the zoning for the LI properties at 181 Amory or at 76 Atherton St. However, it is recommended that these properties be transitioned to Maker and Artist Live/Work properties. I think this is a good idea. If an RDA-55 or RDA-65 is established for either of these properties, would the increased density be required to fulfill the requirements of LI zoning with a use of Maker or Artist Live/Work space or would it be available to the non-Makers and non-Artists? It is my hope that any RDA derived density allowances at 181 Amory and 76 Atherton, would be subject to the parcels stated zoning and use. The JP parking recommendation for residential properties which contain 10 or more units is 1.5 spaces per unit. It is 2 spaces per 1000 feet for commercial. Would these LI/RDA properties exist as commercial or as residential? On page 180 of the JP/ROX Plan, the BRA states that it wishes to "establish a maximum parking ratio of 1 space per commercial 1,000 sf" and "per residential unit". [Parking spaces average between 170-330 sf per space, which will result in up to 17%-33% of any development being lost to parking spaces.](#) In a transit oriented development project, with a focus on density and affordability, this is reprehensible. If the main goal of this project is to increase both affordability and density within our neighborhood, then requiring parking is entirely counterproductive.

According to AAA, [the annual cost of owning and operating a motor vehicle in the United States is \\$8,558](#). That is not affordable, nor will it aid Boston in reaching its 2030 mode share goals. Since at least 2013, the City of Boston has stated that ["\(l\)ong-term, our goal is to reach 10% mode share by 2020 \(that is 10% of all trips in Boston will be taken by bike\)"](#). Adding hundreds more cars to our neighborhood, without adding more and better walking and biking infrastructure, is not going to help Boston to accomplish this goal.

Seeing as these properties, at 181 Amory and 76 Atherton, are on the same block as the Stony Brook Station and the Southwest Corridor Park/Pierre Lallement Bike Path (as well as abutting the proposed extension to the SWC), I believe these stated parking requirements are absurd and will change the fabric of our neighborhood. We should not have to petition against creating obscene amounts of new parking within a walkable and bikeable neighborhood, every time a new building project is announced. Every parking space that is required to be built takes away land that should be used for the stated goals of this project, which are to improve affordability and to increase density.

Prior to purchasing my home on the corner of Amory and School Streets, which is a two minute walk to Stony Brook Station and a 30 second ride to the SWC (but not as close as are either of the aforementioned properties), my wife and I spent three years searching within a two block radius of Stony Brook Station because we love how easy it is to walk and bike this neighborhood safely with our small children. 76 Atherton Street utilizes Marbury for access to its parking lot. Requiring 100 or more parking spaces be created at this location, in addition to the increased traffic from delivery trucks, would devastate the Complete Streets feel of Marbury Terrace. Currently, it is a quiet street. Pedestrians, bicyclists and children on scooters vastly outnumber motor vehicle traffic on Marbury. If you seek to turn 76 Atherton Street into a large housing complex, under the guise of LI, then I would like to see the driveway access to Marbury Terrace be eliminated, in order that we are able to maintain our [Neighborway](#) access to the SWC.

It is unfortunate that the City's antiquated zoning laws require more parking than is necessary within a walkable and bikeable neighborhood, yet require no efforts be expended to maintain the walkability and bikeability of a neighborhood. This needs to change, now. The BRA has the power to do so. I challenge the BRA to remove minimum motor vehicle parking requirements for transit oriented developments and to start requiring transit oriented concessions in these developments, such as mandatory Hubway stations, bike parking, wider sidewalks and protected bicycling infrastructure. The JP/ROX Plan, if implemented to the fullest extent of the current plan, will triple the density of the JP/ROX Plan study area, [resulting in up to 33% of the newly developed land being dedicated to parking](#). Our sidewalks do not currently meet the minimum widths for the identified Neighborhood Residential or Neighborhood Main Streets, as specified within the JP/ROX Plan. The plan and timetable for the widening of these sidewalks, in order to meet the Plan's recommended widths, is vague at best. At the Livable Streets meeting, the BRA implied that these sidewalks will most likely be widened to the minimum widths, rather than to the maximum widths, in order that free, curbside parking

be preserved at the behest of local business owners. It is my hope that the BRA will utilize any one of the many pre-existing studies which document [how local businesses benefit from the addition of wider sidewalks and protected bicycle facilities at the expense of parking](#), and the knowledge that Boston has adopted Vision Zero as a policy, as well as the results from the BRA's JP/ROX Plan focus group which overwhelmingly supports eliminating parking in favor of wider sidewalks and protected bicycle facilities, when it comes time to design and implement the walking, biking, parking and motor vehicle infrastructure within our neighborhood.

- On page 130 of the JP/ROX Plan, the BRA states connections should be enhanced between the Southwest Corridor and Franklin Park. I assume the BRA means pedestrian and bike connections, yet no bike/ped infrastructure improvements exist on the maps for the JP/Rox Plan between the Southwest Corridor and Franklin Park.
- On page 152 of the JP/ROX Plan, the Egleston Square Design Guidelines reference "new bike lanes, crosswalks, and connections to the Southwest Corridor", yet none of these ideas exist on the maps for the JP/Rox Plan. At the Liveable Streets meeting, the BRA stated that it intends to facilitate the creation of cycling facilities on Atherton, in order to improve connectivity between Egleston and the Southwest Corridor. Please, make these bike facilities two-way and protected. Please, update the maps to include this infrastructure, as well as to provide a timeline for implementation of this recommendation.
- Though not depicted on a map, page 133, fig. 90, depicts a conceptual drawing of an outdated bike lane, by Boston's latest standard. All new bike lanes should be parking protected, as they are on Beacon Street.
- Though not depicted on a map, page 133, fig. 89, depicts a conceptual drawing of cycletrack and it is exactly what we need here. Thank you.

In summary, I like that the BRA seeks to increase affordability and density, while maintaining the character of our neighborhood. I think requiring more parking spaces, while not requiring improvements to transit or to walking and biking facilities is a mistake which will negatively impact the ability of the JP/ROX Plan to maximize its goals of affordability and density, while maintaining the character of our neighborhood. I would like to see the BRA mandate traffic studies be conducted, which focus on transit, pedestrians and bicyclists, in order to assist Boston to fulfill its adopted Vision Zero mission and its 2030 goals, for every plan of this scale. Motor vehicles are only part of the equation and their use declines each year, while transit, walking and biking increase every year in our neighborhood (page 106 of the JP/ROX Plan). I'd like to keep it that way. Help us keep the character of our neighborhood in tact with a plan where safety is paramount and the plan is truly transit oriented while increasing affordability through increased density.

Sincerely,

Todd Consentino





Marie Mercurio <marie.mercurio@boston.gov>

LivableStreets Alliance JP/Rox Presentation

Mark Tedrow [REDACTED]

Mon, Aug 1, 2016 at 2:54 PM

To: marie.mercurio@boston.gov

Dear Ms. Mercurio,

I wanted to thank you and the rest of the Boston Redevelopment Authority staff who trekked across the river to present the draft JP/Rox plan. I appreciate the hard work and long hours that the BRA has spent in developing a plan to help create a more populous, livelier neighborhood while increasing mobility for residents. The robust public meeting schedule that the BRA has endured has allowed a great deal of community input and the city will be better for it.

As you heard, I, and the rest of the Advocacy Committee, are passionate about creating safe, convenient, connected transportation options that provide a variety of transportation choices for people that include walking, biking, bus and subway, bike-share, car-share and responsible private automobile use. I, and I'm sure other members, will be submitting recommendations and suggestions to the Advocacy Committee so that a thoughtful comment letter can be submitted to you.

It was very educational to learn about the base zoning code and how it effects parking ratios for new development.

I was very excited to see that the Commons at Forest Hills project (now rebranded as MetroMark) would include a bike lane on one side of Washington Street and that the JP/Rox plan includes a bike lane on one side of Washington Street. While I knew that sharrows had been painted on a portion of Washington Street in JP this past month, the photo in your presentation showed sharrows extending much further that I had realized. I have recently been very frustrated with the lack of coordination among city departments, even those who I understand have provided guidance with this project in expanding safe, convenient facilities for people on bikes. I know that the BRA has been supportive of expanding bicycle infrastructure on recent projects. I apologize for misdirecting my frustration with other city departments towards the BRA during Wednesday's meeting and hope that we can continue to work together in the future to create a better Boston.

Please note that while the above comments are my own and have not been approved by LivableStreets Alliance, I do know that LivableStreets Alliance does wish to continue meeting and engaging at this level with the Boston redevelopment Authority.

Sincerely,

Mark Tedrow

On Wed, Aug 3, 2016 at 4:37 PM, Kamran Zahedi <kzahedi@urbanicaboston.com> wrote:

Hi john.

It was nice seeing you today . I think it should also be some DENSITY BONUS based on the buildings energy performances. This can apply to all the neighborhoods. Just a thought.

Thanks

Kamran

URBANICA
DESIGN + DEVELOPMENT

Kamran Zahedi
Principal
142 Berkeley Street, Suite 402
Boston, Massachusetts 02116
T [617.654.8900](tel:617.654.8900)
F [617.654.8901](tel:617.654.8901)
www.urbanicaboston.com



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Aug 15, 2016 at 5:13 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 26

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First Name: jeremy

Last Name: robertson

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: Not including the area surrounding Forest Hills may have created much-needed focus for the Study, but it is to the area's detriment. Developers have recently proposed a large residential project at the corner of Washington St + the Arborway—they will benefit greatly from this site lying just outside the Study area...the Forest Hills neighborhood will, sadly, not. Generally, I feel that the improvement of biking infrastructure hasn't been given adequate emphasis. Adding bike parking at T stations is only part of the equation—bike posts are necessary up and down all of the corridors [Washington, Green, Amory, etc.]. More importantly, bike lanes are needed everywhere, even where parking would be reduced—it's the only realistic way to increase capacity to the transportation system at the rate necessary to keep up with JP's population increases. Maintaining the existing bike infrastructure is an absolute requirement—'sharrows' painted even a few years ago are now barely recognizable and far from functional.



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Tue, Aug 16, 2016 at 9:01 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 27

Form inserted: 8/16/2016 9:00:26 PM

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Document Name Path: /Planning/Planning Initiatives/PLAN: JP-Rox

Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Ronald

Last Name: Goldman

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I'm afraid this plan will increase population density excessively, particularly with 15 story buildings!! The resulting traffic and other adverse effects will be unbearable!! It seems that maximizing profits is the highest priority over quality of life. How much did real estate developers give to political campaigns? This looks like the payback on their investment. This is for the 1%. Make decisions for the 99%!!



jp/rox

Chris DeSisto <chris@maplehurstbldrs.com>

Tue, Aug 16, 2016 at 6:38 PM

To: Marie Mercurio <marie.mercurio@boston.gov>, John Dalzell <john.dalzell@boston.gov>, tim.davis@boston.gov

Hi. Thanks for hosting the meeting for small developers/builders to discuss the JP/Rox zoning effort. My \$0.02 below.

- RDA: Excellent idea. The community should exercise its voice on the broad concepts, but should not dictate the smaller moves. Planning and design should be the dominion of the experts. Nearly all projects are de facto RDAs anyway. However, the variance process is cumbersome, time-consuming and fraught w misunderstandings by community members. There must be latitude on the design, the program, the siting and the layout without triggering a variance.

- Predictability: very important. Currently, a developer may get a 6 story building approved or 4 stories. Maybe he will achieve a 1.5 FAR or a 3.5. Or perhaps an abutter may have the resources to mount a legal challenge and kill the project altogether. The spread of possibilities is too great. Creating predictability is far more important than several % points on the inclusionary zoning requirement.

- Affordability: a vital sell for the City and for the community. Developers are speculating on sites and many are overpaying. The cost to produce an affordable apartment is factored into the overall project, no different than the cost of a tub or a sf of oak flooring. If the % of inclusionary apartments increases, the price of the land decreases, bc all other costs are somewhat fixed. Once established, a developer will have no trouble adjusting.

-

- The quality and quantity of buyers for affordable condos is surprising low.

- Simplicity:

- 4 stories = 13% affordable (FAR 2.5), 5 stories = 19% (FAR 3.0), 6 stories = 25% (FAR 4.0)

- 0.5 parking spaces per residential unit within ¼ mile subway, 0.75 per unit betw 1/4 to 1/2 mile, 1.0 per unit > ½ mile

- 0.0 parking spaces per 1000 sf commercial within ¼ mile subway, 0.50 per 1000 sf betw 1/4 to 1/2 mile, 1.0 per 1000 sf > ½ mile

- No front yard required, 4' setback side and rear if no residential abutters (15' setback side and rear if residential abutters)

- Cooperation: the lack of cooperation betw developers and/or abutters continues to disappoint me. My abutter (landlord of Bikes Not Bombs) is peddling his site, a 7000 sf landlocked parcel. his site has many deficiencies, as does mine, some of which could be cure by mutual cooperation. Similar complaint applies to Mordi Levin's site and Craven's (City Realty) site. The prevailing mentality appears to be that there is a fixed pie and anything good for A must come at the expense of B. Neighbors also suffer from this faulty thinking. It is to the detriment of projects and results in poor design. The BRA is not going to fix this human flaw.

- Community: Occasionally, both the developer and community act ingenuously to create a project. More frequently, the developer is on his own to battle the neighbors until both are bloodied and then the City brokers a deal. Likely, the City does not establish parameters early in the process and provide more leadership bc of fears the community will feel bullied. Hopefully, the RDA will alleviate the distrust and set standards, which can be well understood by all.

- Design: too little time is spent on design. many projects reflect expedient design and material selection, and weak execution. Perhaps we can allocate more time on working the design and less on arguing about the unfair "process" or onerous trash pick-up or why the sea is boiling hot.

· Investment: there is considerable risk and exposure for a developer, espec a small one. the City and community should not bail us out bc we overpay for a site or make poor development decisions. Conversely, we can not be squeezed so much there is no profit or no funds to pay for solar installations, or quality materials or granite benches. What harms us most is the inordinate amount of time required to birth the project. It's very costly to carry a site and it's equally costly to incur numerous delays.

- ROC: i prefer ROI to evaluate the financial success of a project. A developer bemoans a ROC of 10% bc there is too much risk and effort required. The \$5m project takes 3 years and yields a margin of \$500,000. If the project required \$1M of equity (20%), the ROI = 50%, or 16.6% annually. Shorten the gestation period of the project to 2 years and the ROI = 25% annually. Very good. Extend the project to 4 years and the ROI = 12.5%, which may leave little left after satisfying investors or if the developer does not take a healthy fee at closing (a luxury most small for-profit developers don't enjoy).



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Fri, Aug 19, 2016 at 11:40 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Susan

Last Name: Elsbree

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Boston

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: The plan looks great! I attended several of the meetings and the City/BRA team did a great job soliciting input from a very diverse group of people, with competing interests. My biggest hope for the area is for ANY community benefits to go to upgrading facilities at English High School. We spent many nights in the school's outdated, unwelcoming, aging facility. The young people who attend school there deserve facilities that inspire them to learn, grow and be proud - currently, that is not the message we are sending them. I'm all for new developments and increased growth in the TOD area, please make sure that we help the under-funded BPS facilities, and give our young scholars an academic institution that illustrate we value them and their futures. Susan Elsbree, [REDACTED] JP



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Sat, Aug 20, 2016 at 8:40 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 29

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First Name: RUBEN

Last Name: VAN LEEUWEN

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2: [REDACTED]

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I appreciate all of the hard work that the BRA staff, community groups and community members have put into this document. There is a lot of information in the draft and much of it I can support, but I have focused my attention below on questions and concerns that I have. By focusing this way, I do not mean to belittle or down play other parts. Thank you, Ruben. • I'm seeing two main changes that this document proposes: 1) changing the names of areas (e.g., local industrial to neighborhood shopping), which seems to allow for mixed use; and 2) inclusion of density bonus. Otherwise, there are many suggestions with varying level details. • I'm seeing a goal of at least 30% new housing being "income restricted/affordable" (p. 65), but the density bonus seems to have a goal of 17%. I feel like I'm missing something. What is it that I'm missing? I am now seeing that on page 83 where the 30% goal comes from. This will change, though, as more privately owned land is developed because they will not build at 30% affordable, so the actual amount of affordable housing will be less than 30%. • I support a higher amount of affordable housing that is affordable to a large range of families with varying incomes.; higher than proposed in this Draft. • I would like to see an acknowledgement that Green Street between Amory and Washington Streets has a narrow width between buildings on opposite sides of the street (this includes the width of the sidewalks and the street). Because of this narrow width, there is less flexibility with traffic flow, semi-public space use, width of sidewalks, parking, and visibility while turning onto Green Street from side streets. In addition, potentially taller buildings on this strip of Green Street would feel more daunting because of the narrow street width. • On page 75, there are a lot of "policy supports" being worked on by the Office of Housing Stability, but we are being asked to support changes without guarantees that the city will follow through on these suggestions. • I don't understand the Total Resulting Affordable Units graph on page 81. Where do those numbers come from? I would need to see evidence that expecting developers to provide affordable housing at a greater rate would "cool the market." Also, I would need to see what information and the structure of the study to really believe that the statement is true or at least defensible. Right now, I don't believe it just based on it being written down. • I don't understand the inclusion of the Arborway Yards as a source of subsidized affordable housing. Is this a project

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that is in process? What parcel of land is being discussed? The Arborway bus yard? I didn't know that there were development plans. Is it something else that I'm missing? • I have a concern about the lack of transportation plans given the current level of development and the projected increase in development. On page 106, there is an indication that the "share" of people driving is down, but this does not state that less people are actually driving. As the population in the area grows, the number of cars on the road will increase. In addition, increased number of pedestrians, bikers and T riders will also increase. What are the specific plans for accommodating them as well? • In the recommendation section for Transportation and Connectivity, there are a lot of sections that need further study and many uses of the word "should." I would like more specifics before I feel confident that this area can handle the increased number of people. • I'm interested in the possibility of a municipal-like parking lot (like behind Bukhara's on Centre Street) on Washington Street between Glen Road and Williams Street that multiple businesses can use. • On page 132, I am confused how Green Street can accommodate things like seating given the challenges of the current width of the street. • This strip of Green Street is dangerous as a pedestrian, biker and driver do to the lack of sight lines, close two-way traffic, street parking, and vehicles trying to enter and exit sides streets. • On page 143, building set backs should begin after the floor of the lowest abutting residential neighbor. For example, if the lowest residential abutting neighbor is 3 floors at 36', then the developing building should have an increased set back of its 4th floor. This would be respectful to the current residents and allow for transition to a higher height. • I still think that 55' is too tall next to residential housing that is no more than 36'. I may be more amenable if the set back began at the height of the shortest direct abutting residential neighbor and more amenable if more of the housing would be affordable.



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Sun, Aug 21, 2016 at 10:38 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Allan

Last Name: Ihrer

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: For close to 2 decades members of the JP community have worked hard to see a positive outcome at the MBTA's Arborway Yard. They have done so as members/participants of the Community Planning Committee for the Arborway Yard (CPCAY), the Forest Hills Improvement Initiative (FHII), and the Jamaica Plain Neighborhood Council (JPNC). Along with the City of Boston and the MBTA, they crafted an MOU in which they set many performance goals for the proposed busyard. And they set achievement goals for the mitigation; affordable housing was the primary priority use. The community worked steadfastly with the MBTA to make sure its proposed Arborway Yard bus facility would allow these goals to be met. Then the community engaged in the Forest Hills Improvement Initiative and continued this. And now we've engaged in the JP/Rox planning process. At the Arborway Yard the important goal always remained; that it would be a site for a broad range of affordable housing. Achieving this critical goal is threatened by the BRA's plans for the Arborway Yard. Only half the units proposed for the site are affordable. At no point in time has this community identified market rate housing as a priority for this publicly owned site. This is especially true with the onslaught of market rate units in the area. The BRA is proposing a long tall wall of building on Washington St at this site. Many in the community, myself included, consider the wall to be atrocious and an affront to the community. The BRA is using the Arborway Yard site to meet its overall JP/Rox affordable housing commitment of 30%. This site is planned to hold 46% of all the affordable housing in the JP/Rox Plan. Disturbingly, the BRA has 50% of the units at the Arborway Yard being market rate units. Beyond displacing affordable units, this causes the building to be much larger than otherwise needed. Critically, the BRA's proposed Arborway Yard buildings, on Washington St., encroach on the proposed permanent bus facility. The JP/Rox plan eliminates the transit bus entrance, marshaling yards, and refueling facilities. This encroachment renders the facility unworkable. Beyond that serious problem, this particular bus facility would now cost between \$300 and \$500 million to build, and so most likely won't be built. Note; the community is working on options to ensure that a permanent bus facility does get built. Until a permanent bus facility is built, no development or housing of any sort happens at the Arborway Yard. Thus the BRA's JP/Rox Plan is drastically short of meeting its affordable

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housing commitment to the community. Some in the community call its housing component, "Potemkin Village Affordable Housing". The BRA needs to ensure its plan does not make a permanent Arborway Yard bus facility unworkable. The BRA and the City of Boston need to work with the community to ensure a quality permanent bus facility is built, and the long awaited/promised mitigation lands are tendered to the community. The BRA, and the City of Boston, need to live up to their commitment to the community that the Arborway Yard will be used solely for affordable housing, and the other priority uses identified by the community. Sincerely, Allan Ihrer



**MOU Impact Mitigation Lands, +/- acreage
Community = 10.5**

**Includes 1.25 +/- acres of City of Boston
Poleyard**

**MassDOT / MBTA Lands, +/- acreages
Bus Facility + Employee Parking = 7.5
Courthouse Parking = 1.0**

Green lines denote landscaped buffer

Zoning

No fan of Stan Hatoff's gas station and my sense is that most of the nearby property owners / residents consider it a bad neighbor / nuisance use. Rezone please!

Dimensional / Setback

Generally supportive of proposed heights but feel that much more needs to be done in terms of massing and upper floor / height setbacks to provide for more interesting architectural forms and character and to avoid the "Soviet bloc" – type look of large, relatively uniform rectangular buildings. In RDA 155 would like to explore flipping the current design around so that the private open space sits atop a podium that fronts on Washington Street with taller portions of the building significantly set back.

Feel strongly that non-storefront/non-active ground floors (e.g., residential) fronting on Washington Street should be subject to substantial landscaped setback requirements.

Establish a 2-story minimum height for all new construction / substantial rehab that fronts on Washington or Green Street.

Affordability

Would urge the BRA to push the envelope on inclusionary zoning and see growing evidence that privately-funded, unsubsidized development can achieve 20% affordability, particularly where more development certainty is provided.

Transportation & Public Realm

More crosswalks on Washington St., including mid-block (top of my wish list along w/ more attractive lighting).

Improve the safety, comfort and impression of Washington Street by installing more attractive, traditional-looking and pedestrian-scale lighting.

Would like to see some spaces carved out for a few, more substantial, large-canopy trees beyond the usual short-lived street tree.



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Aug 22, 2016 at 4:39 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Brian

Last Name: Murray

Organization: Resident - Parkside

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I love the emphasis on public art, greening and streetscaping. What, specifically, can the BRA do to encourage and catalyze more public art and greening (living walls perhaps?) in the study area, especially in future bicycle transit areas such as Atherton and Green Streets? Love the emphasis on maximizing units, while maximizing feasible affordability. In terms of future public process for project approval, it seems that the new public meeting process might just become a repeat of the old process, with the same typical voices spending their evenings battling it out, over and over, in neighborhood community venues. It seems a major point of the JP / Rox study was to streamline an approval process that developers and residents could anticipate and count on, rather than agonizing over each particular project over and over?? Thanks so much, You guys are doing a great job! Brian Murray p.s. Stepbacks on mid-rise building upper floors rock! (Where possible of course). p.p.s. Living walls!!

Let us start with an alignment of priorities.

The BRA has a city-wide planning initiative underway to promote Mayor Walsh's stated goal of 53,000 new housing units by 2030. The BRA has stated that they want to make the development process more predictable, and to streamline the approval process.

From the neighborhood perspective, the residents requested a plan that would establish defined planning requirements for projects, so that the needs and expectations of the community would be addressed by the developers, in lieu of the current adversarial process so prevalent in the recent Article 80 submissions.

What is really missing from these two approaches is a definition of the ultimate impact on the neighborhood. The current draft of the JP/Rox plan lists 2579 households in the study area (p.68). In addition to this number, there are projects listed on the BRA website from Forest Hills to Jackson Sq. that are "in the pipeline" that total 1000 units. These projects are not included in the projected totals delivered in Workshop #5 of the current study.

Also not included in the current study is the synopsis of development scenarios presented to the community in March 2016, and subsequently revised. Originally reported in Workshop #5 as 3461-3717 units, the revised totals are now 2835-3407 units. Some members of the advisory group object to these goal numbers, and requested a range that reflected development on a more moderate scale. While we have heard that the BRA has produced these numbers, they have not modeled them, or presented them as alternate design scenarios.

We are concerned here, because the BRA has expressed the opinion that these are "ultimate" build-out numbers, and that this density is unlikely to be achieved. To this we respond that developers are proposing projects outside of the "development scenario" locations, such as 3353 Washington, and are speculating on other properties not included in the plan. At the rate we are going, there will be proposals for hundreds of more units in areas not envisioned by the planning process.

Some members of the AG, and we are not unanimous on this point, feel that the process deserves a lot more consideration, and that concurrent plans must be formulated for traffic, transportation, health impact studies, and infrastructure improvements. While the BRA has said that there is vast inter-disciplinary cooperation in this study, they have also stated that there is no funding for these studies. These issues **MUST** be studied prior to the rezoning of JP/Rox. How else does the City and BRA assess the impact of development on quality of life? Planning, by its very definition, should lead before development.

And so this is the first point. The BRA should be open and transparent with the community regarding the anticipated quantifiable impact of this rezoning exercise. Since the BRA has not included these numbers in the draft, they must be added somewhere within the draft.

Let's examine the Community Priority Statements on p. 22 of the draft.

Number one on the list is affordability. We have plenty of people who are advocating for this issue, so let me limit my remarks to this: If the City does not hold private development to a higher level of affordability, they will find themselves with 85% market rate, and 15% affordable at 70% AMI, and they give no indication of a plan for funding the remainder. Developers must learn to partner in creative ways to achieve higher percentages at deeper affordability. If this slows development, it will also slow displacement. The BRA has already approved 3193 Washington, but did not hold the developers to the listed affordable guidelines for lower AMI, as described in the JP/Rox Plan. The rampant speculation indicates that the burgeoning market will accommodate additional affordability.

Secondly, does this plan "guide growth that strengthens community and respects the physical character of the existing residential areas"? In a neighborhood that is flanked east and west by predominantly 3F-4000 zoning, and which contains significant numbers of triple-deckers and three-story bowfront apartments, very similar in character to the Back Bay and South End, we would expect a similar architectural expression to be promoted, one that kept the relative density, open space and skyline intact.

The BRA and developers point to historical anomalies such as the Franklin Brewery (U-Stor-it), and to the BHA housing towers as precedent setting examples, instead of examining the historical fabric of the city and the local area.

Jamaica Plain has a huge canopy of mature trees visible in the photos on p.10 and 23. This is character, and it is this type of character that makes the neighborhood so wonderfully livable. If we sacrifice the sky and trees for density throughout the neighborhood, in what are vaguely described as transit oriented developments, we are destroying the character of the neighborhood, not preserving it.

Third, the Community Priority Statements call for innovation and variety in job and business opportunities. The plan is so focused on housing and density that it does not look to the mix of businesses and services that are required to make a self-sustaining community. Ground floor retail is a good idea, but what is the retail? How do the buildings get serviced. If we are looking to establish local retail, there should be loading docks, service alleys, a separation between delivery and clientele, a front and back door to these spaces. Washington St. is already a crowded two lane street, double-parked at most of the commercial spaces. A proliferation of one-story retail stretched along the block does not address the need for neighborhood shopping areas. These should be diversified, spread throughout the neighborhood, with walking distances similar to those accessing the T. Thirty years ago, there were smaller markets that were driven out of business by the big box grocery chains. Big boxes mean big parking lots, smaller markets can be transit oriented. An examination of local retail areas should include how the patrons shop, is it daily, weekly? On-line and delivery? Quick hits at bodegas and load up on staples on the weekend? Where is the marketing aspect of this plan?

“Smart growth” is only smart if it serves the needs of the community. If we want fewer cars on the streets, we have to deliver more services locally. This includes working spaces as well as retail. Neighborhoods must be viewed as local microcosms, with access to the city via transit, access to services and jobs via local commuting. The aggregation of housing without neighborhood services leads to more traffic, not less.

Fourth, there are several priorities regarding transportation...enhance connections, safer streets and sidewalks, active vibrant streets and public places. The implementation strategies for these priorities are empty words. The city’s Complete Streets program is ambitious, but not very effective in a neighborhood where streets and sidewalks are already established. Widening sidewalks along commercial streets might be achieved with buy-in from commercial developers, but residential properties already have front yard requirements, that would limit sidewalk increases to reductions in the street width. The question has been asked by both residents, and the Livable Streets group, “How are you planning to increase sidewalks?” Similarly, there is a strong advocacy of bicycle usage and infrastructure improvement in the Plan, citing a proposed goal of a four-fold increase in bicycle mode splits by 2030. But without studies by BTM, there is no proposal for multi-modal improvements on Washington and Columbus, only an extension of the SW Corridor bikeways. The pilot program for Slow Streets is a single exception, in that it is both planned and funded.

When it comes to open space, the draft plan retreats from the proposals put forth in the design scenarios. In those scenarios, there were significant Public Open Spaces shown amid the developments, notably at Green St./Washington St. and at Jackson Sq. With no mechanism suggested for the taking/giving/negotiation of these spaces, the plan now calls for private open spaces with semipublic connections. This is interesting, since the proposals now before the BRA request zoning variances from the required open space. For projects already approved by the BRA, such as 3200 and 3193 Washington St., open space is restricted to private decks, balconies and enclosed yards. There is no public open space component to these projects.

And then there are the implementation strategies.

The RDA concept is designed to result in bigger, bigger buildings. These projects require larger sites, and there are few sites that meet these criteria. Most of Eggleston Sq. is composed of small parcels, without enough frontage or depth to build even the currently allowed 45 foot height. Developers will assemble parcels, driving up land prices, similar to the dynamics associated with 3200 Washington St. This is an inflationary proposal.

The RDA guidelines include the word “MUST” four times in the discussion of stepbacks at the street face and at side and rear yards, and yet the BRA has stated that these guidelines will not be mandatory. The BRA approved 3193 Washington without requiring adherence to these guidelines. When questioned on the issue, the BRA stated that enforcing the guidelines would have resulted in one fewer unit in the development. And so the BRA favored the financial outcome of the developer over the abutting property owners, who will be crowded and shadowed by this building as long as it stands.

In recent community meetings, we have been encouraged by statements from the BRA. “No building on Green St. should be more than four stories” (at Union Ave.). “The BRA will remove the RDA 55 zone abutting historical 2-story mansard houses” (at Brewery). “There will be no changes to the current 3F-4000 and 2F-4000 zoning areas” (at ESNA and Parkside). These statements are not reflected in the current draft. It has been noted that the current RDA outlines at Green St. show RDA 55 and RDA 65, that a portion of the 3F-4000 zone of Brookside now falls under an RDA 65, and that Stony Brook has an RDA 55 adjacent to existing historic houses. Revise the plan to reflect this information given to the community.

Reading through the Urban Design Guidelines for each area is a mass of confusion. The Jackson Sq. area is covered with RDA designations that extend beyond the proposed development scenarios. Will there be restrictions on these RDA’s to protect the existing masonry buildings that line Columbus and Bragdon from speculative development? The RDA seems to be a blunt instrument, not suited to “surgical” development. Indeed, without higher/deeper affordability requirements, this seems to be a giveaway to developers, especially if they are not held to the current MFR zoning requirements for yards and open space.



Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Aug 22, 2016 at 4:27 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Henry

Last Name: Barbaro

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Boston

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: "Affordable housing" has been used as a sort of euphemism for denser development, which means some in-fill, but mostly taller and wider multi-family buildings. The citizenry must be made aware that, by creating a much more crowded neighborhood, there will likely be a palpable loss in our small-scale city feel, along with the sense-of-place for the existing residents of the JP/ROX area. General Comments Overall, I believe that the benefits of such an aggressive development plan, for existing residents of the Study Area and beyond, will not exceed the negative impacts due to traffic/congestion, population density, loss of community character, more noise and crime, and poorer air quality. Moreover, I see virtually no mention or analysis of these potential adverse effects from dramatically increasing housing densities within the Study Area. This Plan is essentially proposing, and facilitating, an unprecedented development project throughout the Study Area. Such a drastic proposal warrants far more study to determine its full range of consequences, especially in terms of traffic impacts and quality-of-life issues. The Plan does not acknowledge that population density directly affects the quality of life for those who live in the area (or any other area). I think most would agree that, especially during the traffic congestion of peak travel hours, high-density living is not necessarily best for one's peace-of-mind. It appears that business owners, developers, and realtors will be the primary beneficiaries of this Plan, and that the negative impacts will be distributed amongst the citizenry-at-large, i.e., passing on negative externalities where the indirect costs of development are passed on to the community. The Affordable Housing Paradox The premise is that the current residents of JP/ROX like it here and want to stay, and not be forced out due to high housing costs. So the City's answer is to facilitate massive changes to the area's housing stock with lots of tall and wide apartment buildings, and dramatically change the community character and quality-of-life for those living here. Doesn't this Plan diminish the reasons why citizens enjoy their lives here (e.g., community character, neighborhood connections, contact with Nature/open spaces, low crime and noise)? To argue that this Plan addresses the affordable housing problem is short-lived at best. As supply goes up, then prices come down, then more folks want to move in, then supply becomes tighter, then prices go up again. It's an endless cycle that has been around for decades. It seems that

"affordable housing" is being used as a noble, albeit short-lived, goal to make those citizens involved in this process feel better about acquiescing to enormous changes to their neighborhoods. "Build it and they will come." This Plan goes beyond just meeting housing demands — it will induce housing growth. Yes, people are moving to the cities (all throughout the world), but especially in areas where land use policies create (short-term) lower housing costs. Traffic Congestion Traffic impacts to collector roads such as Washington Street, Amory Street, Tremont Street, and Columbus Ave., as well as Melnea Cass Blvd. which is a critical connector to I-93. Traffic studies are absolutely warranted as part of this Plan, like any major development proposal, before the proposal is approved, and housing densities are significantly increased. What are the current trends in traffic and level-of-service in and around the Study Area? Traffic congestion seems to be worsening even before this Plan's drastic increase in residential development. The Plan recommends studying street improvements at some indefinite point in the future (p. 116-120). Shouldn't this happen before housing densities are proposed to be significantly increased? Conclusions/Recommendations The Plan is clearly biased toward facilitating dramatic growth in this region, with little mention of the adverse impacts of such growth. Rather, the Plan should read more like an Environmental Impact Report, where all the consequences of the project are objectively addressed. Aside from more shops and some other amenities, JP/ROX will become an incrementally less desirable place to live with greater housing densities and more traffic, noise, and crime, and less community connection. The Plan should acknowledge these concerns. Future residential development should focus on abandoned and/or under-utilized non-residential areas for proposed multi-family buildings. How was the height of 15 stories decided upon? (The proposal for 15-story buildings was never mentioned at the 12/10/15 meeting I attended.) Nothing in the JP/ROX neighborhood comes close to this. Buildings this high far exceed the character of JP/ROX neighborhoods, and should be reduced to no more than six stories. The Plan should include conceptual drawings that compare full build-out with existing conditions. This housing initiative should include traffic studies for the surrounding collector streets before housing densities are proposed to be significantly increased. Otherwise this Plan has a high potential of imposing misery (e.g., traffic congestion, travel delays, higher accident rates, air quality degradation, noise) on the area's residents. If BRA's primary intention is to assist low-income residents of the JP/ROX area (and throughout Boston), then as a first priority there should be a plan to overhaul all of the City's institutional housing projects. The living conditions in these housing complexes are horrendous. How can one have peace-of-mind, or be a productive worker or citizen, living in that environment? The City needs to prioritize redeveloping its housing projects (e.g., into "scattered-site" lower-density housing), which would help the low-income residents who are here now, rather than serve those who may come sometime in the next 15 years.

To: MarieMercurio
From: Henry Barbaro
Re: PLAN: JP/ROX
Date: 8/22/16

As a resident of Jamaica Plain, I greatly appreciate the opportunity to be involved in the planning process for the future growth of the JP/ROX neighborhood. In fact I attended one of the Community Workshop meetings at the English High School (on 12/10/15).

There were "break-out" tables, and the groups were making suggestions on zoning changes. However, I don't feel as though the magnitude of this Plan, and the full extent of proposed changes to the JP/ROX neighborhood, was fairly represented at that particular meeting.

I observed that "affordable housing" was used as a sort of euphemism for denser development, which means some in-fill, but mostly taller and wider multi-family buildings. It was never mentioned that by creating a much more crowded neighborhood that there would be a palpable loss in our small-scale city feel, along with the sense-of-place for the existing residents of the JP/ROX area.

One participant stood up during the meeting and proclaimed that he could no longer afford to live in JP. But does he yearn for living in a six-story apartment building? It's doubtful. He probably wants to live in a single to three-family house where he knows his neighbors, and is connected to the street, has a backyard, and has some contact with Nature. But if he winds up renting an apartment on the 5th floor of a large apartment building, why does it matter that it be in Jamaica Plain? He could find that type of living just about anywhere in the greater Boston area. Unfortunately, these types of massive residential buildings, along with their dreary living conditions, seriously impact any kind of "neighborhood character."

After attending this meeting, I have done my best to follow BRA's planning process. In that spirit I am providing the following comments regarding the Draft "PLAN: JP/ROX," dated 7/15/16.

General Comments

The Mayor's aggressive housing plan is to facilitate building 53,000 dwelling units throughout Boston in the next 15 years. What is the goal for housing units within the JP/ROX study area?

Overall, I believe that the benefits of such an aggressive development plan, for existing residents of the Study Area and beyond, will not exceed the negative impacts due to traffic/congestion, population density, loss of community character, more noise and crime, and poorer air quality. Moreover, I see virtually no mention or analysis of these potential adverse effects from dramatically increasing housing densities within the Study Area. This Plan is essentially proposing, and facilitating, an unprecedented

development project throughout the Study Area. Such a drastic proposal warrants far more study to determine its full range of consequences, especially in terms of traffic impacts and quality-of-life issues.

The Plan does not acknowledge that population density directly affects the quality of life for those who live in the area (or any other area). I think most would agree that, especially during the traffic congestion of peak travel hours, high-density living is not necessarily best for one's peace-of-mind.

It appears that business owners, developers, and realtors will be the primary beneficiaries of this Plan, and that the negative impacts will be distributed amongst the citizenry-at-large, i.e., passing on negative externalities where the indirect costs of development are passed on to the community.

The language of the Plan tends to be subjective, vague, and rather convoluted. This document should use clear easy-to-understand terms. Examples are included below under "Specific Comments." The Plan could be improved with thorough editing in order to achieve a more clear and objective "voice."

The Affordable Housing Paradox

The premise is that the current residents of JP/ROX like it here and want to stay, and not be forced out due to high housing costs. So the City's answer is to facilitate massive changes to the area's housing stock with lots of tall and wide apartment buildings, and dramatically change the community character and quality-of-life for those living here. Doesn't this Plan diminish the reasons why citizens enjoy their lives here(e.g., community character, neighborhood connections, contact with Nature/open spaces, low crime and noise)?

To argue that this Plan addresses the affordable housing problem is short-lived at best. As supply goes up, then prices come down, then more folks want to move in, then supply becomes tighter, then prices go up again. It's an endless cycle that has been around for decades. It seems that "affordable housing" is being used as a noble, albeit short-lived, goal to make those citizens involved in this process feel better about acquiescing to enormous changes to their neighborhoods.

"Build it and they will come." This Plan goes beyond just meeting housing demands -- it will induce housing growth. Yes, people are moving to the cities (all throughout the world), but especially in areas where land use policies create (short-term) lower housing costs.

The Plan also should mention one of the reasons why rents are going up -- the reduction of rental stock due to turning traditionally two, three, and six unit apartment buildings into condominiums.

Traffic Congestion

Traffic impacts to collector roads such as Washington Street, Amory Street, Tremont Street, and Columbus Ave., as well as Melnea Cass Blvd. which is a critical connector to I-93. Traffic studies are absolutely warranted as part of this Plan, like any major development proposal, before the proposal is approved, and housing densities are significantly increased.

What are the current trends in traffic and level-of-service in and around the Study Area? Traffic congestion seems to be worsening even before this Plan's drastic increase in residential development.

The Plan recommends studying street improvements at some indefinite point in the future (p. 116-120). Shouldn't this happen **before** housing densities are proposed to be significantly increased?

Quality of Life and Sense-of-Place

Aside from the temporary effects of reducing the rate of housing costs, how does this Plan to facilitate massive building of residential dwelling units enhance the quality of life for today's residents of the JP/ROX area? One thing we know -- huge apartment buildings will further disconnect residents from neighborhoods, yards, street level activity, and to the natural environment. Community character will suffer in proportion to the level of population density.

Specific Comments re: the Draft PLAN

Executive Summary, Page 4: The phrase "To capture the benefits of growth" seems to refer to more shopping opportunities and more activity in general. The Plan should do more to describe the wide array of negative impacts from growth.

Executive Summary, Plan Recommendations, Page 8: The Plan neglects to fully explain and describe how dramatic increases in development and residential density will "improve the overall quality of life for [existing] residents" of the JP/ROX neighborhood.

Executive Summary, Sustainable Development, Page9: The Plan should include an analysis of the greenhouse gas emissions caused by increased traffic delays and congestion.

Page 129-133: The conceptual drawings are good, but should be compared with drawings of existing buildings. Note: the height of the conceptual buildings depicted in Fig.85 are needlessly cut off.

Pages 150-166: "Greater heights create a gateway." This is certainly a subjective viewpoint. In my opinion these monolithic buildings more resemble walls than gates.

Page 186: What are “wind mitigation” measures, and how would they be implemented?

Page 186: The creation of a “canyon effect” (e.g., less sun/sky, more wind) with a corridor of tall buildings next to sidewalks seems to run counter to promoting pedestrian use.

Page 187: What is “vertical green infrastructure”? Are these noise barriers? Trees do little for mitigating noise and air quality impacts.

p.192: The Plan states that new development will create a new sense-of-place. This seems to imply that one does not exist today.

Overall, the Plan's use of the term "open spaces" is misleading. According to the Plan, open spaces are only places where people can congregate, rather than places for “retreat” to restore peace-of-mind and rejuvenate (which is what “open space” typically implies).

Conclusions/Recommendations

The Plan is clearly biased toward facilitating dramatic growth in this region, with little mention of the adverse impacts of such growth. Rather, the Plan should read more like an Environmental Impact Report, where all the consequences of the project are objectively addressed.

Aside from more shops and some other amenities, JP/ROX will become an incrementally less desirable place to live with greater housing densities and more traffic, noise, and crime, and less community connection. The Plan should acknowledge these concerns.

Future residential development should focus on abandoned and/or under-utilized non-residential areas for proposed multi-family buildings.

How was the height of 15 stories decided upon? (The proposal for 15-story buildings was never mentioned at the 12/10/15 meeting I attended.) Nothing in the JP/ROX neighborhood comes close to this. Buildings this high far exceed the character of JP/ROX neighborhoods, and should be reduced to no more than six stories.

The Plan should include conceptual drawings that compare full build-out with existing conditions.

Compare the number (% too) of people living in large multi-family buildings now versus at full build-out in the JP/ROX area. If there's a wide difference, then this speaks to significant changes in community character and quality of life.

This housing initiative should include traffic studies for the surrounding collector streets **before** housing densities are proposed to be significantly increased. Otherwise this Plan

has a high potential of imposing misery (e.g., traffic congestion, travel delays, higher accident rates, air quality degradation, noise) on the area's residents.

If BRA's primary intention is to assist low-income residents of the JP/ROX area (and throughout Boston), then as a first priority there should be a plan to overhaul all of the City's institutional housing projects (e.g., Bromley-Heath). The living conditions in these housing complexes are horrendous. For example, in nice weather, there are youngsters during all time of day and night buzzing around in loud mini-bikes, motorcycles, and "low-riders." There are other forms of constant noise such as fireworks, loud music, car alarms, and screeching tires. And the residents are essentially on their own, and are unwilling to raise objections for fear of retribution and/or due to an ineffective police presence. How can one have peace-of-mind, or be a productive worker or citizen, living in that environment? The City needs to prioritize redeveloping its housing projects (e.g., into "scattered-site" lower-density housing), which would help the low-income residents who are **here now**, rather than serve those who may come sometime in the next 15 years (as is asserted in the JP/ROX Plan).

Thank you for this opportunity to comment on this critical blueprint for the future. Please let me know if you have any questions.

Henry Barbaro

[REDACTED]

Jamaica Plain, MA 02130

[REDACTED]

To: Marie Mercurio, John Dalzell, Lara Merida & Tim Davis (BRA); Devin Quirk (DND)
From: Sarah Horsley, Plan JP Rox Advisory Group
Date: August 22, 2016
Re: Feedback and recommendations on City of Boston's Plan JP Rox, July 15th Draft

Important Note: These thoughts and recommendations come from Sarah Horsley in her capacity as a resident and individual, not from Boston Tenant Coalition. BTC will submit comments at a later date.

- 1) **Stop claiming Plan JP Rox is a “community led” process, unless the community gains true partnerships and decision making.** If the City of Boston is really committed to doing planning differently, it must commit needed resources and be willing to work with community members as partners. Despite the BRA's claims to the contrary, the Plan JP Rox process has *not* been a process “deeply rooted in the community.”

Several AG members outlined concerns early in the JP Rox process, in a letter to Brian Golden and John Barros on December 16, 2015. The following concerns remain unanswered:

- The City never committed the resources or expertise necessary (1) to reach a broad cross section of residents or (2) to educate residents new to these issues on the basics of development and planning so that people feel informed and confident to participate.
- The process has only very minimally engaged households who will arguably be the most impacted – residents who work two jobs, seniors, Spanish speakers, people of color, working class, and very low-income people.
- Finally, while the BRA has incorporated feedback from residents and advocates, decision-making is clearly not vested in the community, but rather at the BRA Board / Administration level.

For true community-led planning processes, the City can look to models like that in the City of Seattle, where the city administration worked hand in hand with community partners for a deeper and more effective community based planning process. Moreover, closer to home, there are numerous community based organizations in Boston (and in JP itself!) who have expertise in outreach, community education, and community planning. For a truly community based planning process, The City should have allocated resources to contract with these organizations to do outreach, education, and engagement.

- 2) **Developments during 3 months** – I would like to see moratorium on new projects until Plan JP Rox and the new zoning are complete. If that is not possible, new developments should at least meet current guidelines of proposed plan (13% IDP, 4% density at 50% AMI etc)
- 3) **Affordability & preventing displacement** - Lower income residents and residents of color are already being forced out of the study area by rising rents, and without a strong commitment on the City's part, it is only going to get worse. We must ask ourselves who is this housing being built for and who are we (re)developing the City for? More specifically, I strongly recommend that the City:
 - a) **Raise the overall goal: While a 30% affordable goal sounds good, it is not enough. We need a higher goal, not only to prevent displacement, but also maintain the current income & racial/ethnic diversity.** That could be through some combination of: raising base

IDP to at least 25% of units (matching the JPNC's requirement), strengthening the density bonus, or helping CDCs to build or acquire more units.

In order to increase the number of CDC-built affordable units, the City should: require that 75-100% of the units on Arborway Yard be affordable. *Publicly owned land should be used for public good.*

- b) **Include sequencing & make the Arborway Yard more than a promise: To prevent displacement, we must build as many CDC (non IDP) affordable units before permitting most IDP/private developments.** I laud the City for the rental acquisition program and willingness to help CDCs to acquire publicly owned land for affordable housing. However, if we truly want to prevent displacement of *current* residents, we have to build the majority of affordable units *before* (or at the same time) as private developers are building the market units. Otherwise, rising rents will force current families out.

The City's proposal to count the Arborway Yard as 46% the promised 1034 units of affordable housing throws the whole Plan JP Rox into question, because the current timeline is so uncertain. The original MOU was signed by the community, the City and the MBTA in 2001 and the T seems to have no plans to honor its commitment anytime soon. I attended the August 17th meeting with the MBTA on this issue. Despite residents and elected officials strongly urging the T to hand over the land, the MBTA declines to act, claiming they cannot hand over any land now, in case they need flexibility later to develop their permanent bus facility. The \$300 million needed to create the permanent bus facility was removed from the 2008 budget and has not yet been re-added, despite advocacy by residents and elected officials.

If the City chooses to include Arborway Yard in Plan JP Rox, the Walsh Administration and the City Council must push the State/MBTA to agree to an immediate and definite commitment and timeframe to hand the land over.

- c) **Deepen overall level of affordability and ensure sufficient new units for families at/below 50% AMI.** The affordable units currently proposed by the BRA include a vast majority of IDP & other units that are at 70% or 60% AMI. This will not prevent displacement of the approximately 433 households at or below 50% AMI, that we are all most concerned about. Nor will it preserve a true range of income diversity going forward.

From what I understand of the July draft Plan JP Rox, the estimated number of units that will be at or below 50% AMI would be about 212, including ~193 density bonus units and ~52 CDC units currently in the pipeline. (In addition, the City has indicated that the majority of units at Arborway Yard, etc. would be at or below 60%AMI. But we do not know how many of these will be at or below 50% AMI and the timeline for Arborway Yard is very uncertain, as noted above.)

I remain very concerned that there will not be enough deeply affordable private or CDC units. **The City must explore ways to enhance depth of affordability, including:**

- requiring or aggressively urging private developers to set aside a certain number of IDP units for Section 8 or MRVP voucher holders.
- expanding the Acquisition Program (aka “land banking”) – continue to provide funding to help non-profits purchase occupied buildings and land.

- when appropriate, working with private developers to acquire and rehab occupied (or vacant) units and turn them over to nonprofits as part of their IDP obligations (vs. doing on site units).

- d) **Ensure density bonus truly delivers new units &/or deeper affordability** – I am pleased to see that in the density bonus at least, the City has reflected the community’s demand for more deeply affordable units. However, I still remain concerned that there will not be enough deeply affordable private or CDC units (see above).

The BRA has indicated they believe it unlikely that developers will cash out of the density bonus requirement. However, if developers do cash out of IDP or density bonus requirements, I want to make sure that the community gains new units or much deeper affordability. For example, a private developer putting IDP/density funds toward the General Heath Square development is *not* helpful because that development will happen anyway. A positive alternative would be these funds going into rental acquisition, including preserving existing tenancies such as 26 School St.

- 4) **Crucial Missing Pieces** – I am troubled that the following analyses are not yet available for the community. We cannot complete a thorough review of the draft plan without them:

- a. **analysis of racial impacts of development (displacement, resegregation, etc.)** The July Draft Plan JP Rox includes only passing mention of the disproportionate racial impact of this scale of market-rate development. The City must deepen its commitment to analyze and address the racial (in)justice aspects of this plan, especially in light of HUD’s new Affirmatively Furthering Fair Housing policy and Mayor Walsh’s signing onto the Government Alliance for Racial Equity (coming out of the Racial Equity Summit in May).
- b. **analysis and proposed solutions to address land speculation** – Both affordable housing advocates and private developers have warned the City that land speculation is allowing landowners and investors to demand inflated prices. Developers’ ability to deliver affordable units is then constrained, because they seek to make a return on the inflated price they paid for the land.

The City needs to factor speculation into its analysis and put into place policies that regulate the amount that landowners/investors can demand for land. In addition to affordability requirements, these policies can put downward pressure on land prices and enable developers to deliver more affordability. For example: *tax-increment financing*, by which the increase in property taxes is used to float bonds which are spent on solutions for affordable housing (& affordable commercial space) rather than going into the City’s general fund.

- c. **analysis for condo / homeownership**, in particular the proposal for percentage of affordable units and depth of affordability (IDP & density bonus).
- d. **workforce development** – While the Jobs & Business section offered some ways to help Latin@ businesses stay in Egleston Square, the City’s analysis & plan for workforce development is crucial to address inequality and displacement from the wage/income side as well as the housing side.
- e. **thorough analysis of impacts on traffic and parking, health, and public infrastructure**

5) **Improve accuracy and accessibility of information & recommendations in the Plan.** In particular:

- a. The **Executive Summary** must give the full set of recommendations for each of the six framework areas, and a better overview of all the areas listed in the table of contents.
- b. In the **Planning Workshops & Outcomes** chapter, several outcomes sections do not capture the rich discussion and lack of consensus on certain issues. For example, the Housing & Affordability Outcomes from the Planning for People Workshop on page 36 does not offer a complete summary. I urge the BRA to include in an Appendix the full list of Housing/Affordability Questions & Answers that the small groups generated. Similarly, the Planning for Places Workshop Outcome on page 43 about Jackson Square & Forest Hills is misleading. As an Advisory Group member and participant, I did not get the sense that “overall the density & height ... were acceptable.” In fact, I heard the opposite, along the lines of “6-8 stories is one thing, but the proposed ~15 stories is way too high.”
- c. In the Framework chapter, the City introduces the concept of a Residential Development Area (RDA) Plan. **However, there is not sufficient information about the lower amount of public input entailed with an RDA Plan, compared to the current Article 80 and Zoning processes.** The City must help stakeholders understand the proposed RDA Plan process and the amount of community process it entails.

August 22, 2016
Boston Redevelopment Authority
One City Hall Square
Boston, MA 02201
Attention: Marie Mercurio, Project Manager

Subject: Response to BRA August 22, 2016
RE: July 15 DRAFT PLAN JP/ROX

Dear Marie

Attached are detailed comment on the Plan JP/Rox for your consideration, and hopefully incorporation, into the final draft in September. First however, I would like to offer a few general comments to put my comments into context.

First, I must express my dismay with regard to the overall content and approach. Although I realize that a tremendous amount of work has gone into this project on the part of both the BRA and the Community, I worry that this document does more harm than good. Rather than provide a guide to direct developers towards to a scale, character and affordability that is appropriate to each neighborhood, the draft Plan continues to emphasize the desire on the part of the city to build as much as possible wherever possible without regard to the existing fabric and diversity of the neighborhood.

There is no discussion about infill construction – 3 or 4 story buildings on smaller parcels – even though this approach was suggested in the ULI story over a year ago, and even though this scale of project can add considerable housing at less cost and without the destabilizing impact of large scale projects. The BRA push for large scale projects of 50 to 100 units at 6 stories simply encourages developers to pay more for parcels – driving out alternate projects by CDC – and then use the high cost of land as part of their justification for higher rents and less affordability, scale and open space.

Similarly, proposing RDA zoning for a subdistrict appears to be based on the scenarios for the largest building that might fit in one part of the district, rather than zone based on what is appropriate throughout the subdistrict, encourages developers to overbuild the entire area. If the goal is to give developers more predictability, then height limits should reflect the appropriate height for the entire subdistrict. If one parcel is appropriate for greater height, then it should either be subject to a variance process, or the RDA zoning must include mandatory limits on setbacks and step backs so that the allowable height reflects the size of the lot, width of the street and abutting residential conditions. Otherwise developers will surely start with the assumption that the maximum height is as of right whenever affordability requirements are met, but that design guidelines are discretionary.

Related to this is the issue of design guidelines. The BRA has often said that the implementation will include 3 approaches: zoning requirements, guidelines and recommendations. However, based on the BRA review of recent projects, we have little confidence that the BRA will enforce the guidelines for setbacks, stepbacks, and the yet to be defined Open Space requirements. Some consideration should be given to including a maximum FAR within RDA zones.

Response to BRA August 22, 2016
RE: July 15 DRAFT PLAN JP/ROX

Second, I believe the affordability requirements are not sufficient, and request additional discussion, and more transparency on the underlying costs and calculations. Additional strategies are required, especially incentives for public/private partnerships because the public/CDC have no way of meeting the BRA's goal for them in the absence of additional funding and in the face of competition for land from private speculators.

The report indicates that "Arborway Yards project is envisioned to fill this gap" between private contributions and the 30% goal. Even if this strategy was feasible in the foreseeable future, locating half of the required affordable housing in one location creates a ghetto, rather than continuing the legacy of socially and economically mixed communities that JP treasures.

Third, I would also like to register my concern that there will be little time to review the revised draft – which will include the first version of any totally missing content – and no opportunity to review a final draft that includes feedback on those same missing items.

Please let me know if you have any questions about the following comments.

Susan Pranger, AIA, LEED BD+C



Attachment: Detailed list of comments

Detailed comments on Plan JP/Rox 2016 draft of 7/15/2016				Susan Pranger 8/23/2016
			Key	
			E	Edit to spelling or grammar, typographic errors
			C	Clarification requested or suggested.
			S	Substantive changes
Page	Para	Bullet	Type	Comment
				Refer to additional comments from ESNA dated 8/22/16. As co-author, I support all of the stated positions. Following are additional comments from my individual review of the draft.
4	1		E	"increase to by over 90,000 persons"
5			C	Label Egleston Square on map
6	1		E	" With That , Plan JP Rox..."
6	2		S	"will be another area of investment" <i>Investment by who? The city?</i>
				"new and complementary tools could both increase both the amount of deed-restricted affordable units and decrease the household income levels at which those units would be affordable" <i>I don't think our goal is the increase the income level at which the units are affordable.</i>
6	3		C	"The BRA and DND, and all participating...."
6	3		E	
7	1	3	C	"to relive overall pressure on rents and housing prices , while"
				"appropriately updated zoning....for approval by the Community , the BRA...." <i>Won't the community have an opportunity to review and approve the zoning changes designed to implement these changes!?</i>
8	1		S	<i>Add spaces between words "and through" and "community development"</i>
8	4		E	<i>Add spaces between words "business, encourage" and "through training"</i>
9	1		E	<i>"..include open space (private and semi-private" - so there is no requirement for public open space on site, or contribution to open space off site?</i>
9	3		S	<i>Add spaces between words "green buildings", "and heat", "effect; to" and "conserve natural"</i>
9	4		E	<i>Where is a recommendation for maintaining the built residential, green (trees) character of the neighborhood"</i>
9	3		S	<i>Clarify that the Guidelines are at BRA discretion, or better yet include language that they are mandatory.</i>
10	2		S	<i>Add spaces between words "BRA/City interdepartmental", "and heat", "effect; to" and "conserve natural"</i>
10	4		E	
10	4		C	"The BRA....implementation plan is outlined in a table that" <i>The plan is not a table.</i>
				<i>"whether the recommendation is a policy or a guideline" Clarify what you mean by recommendation, policy and guideline.</i>
10	4		C	<i>Who makes the decision, and is there community input.</i>
10	5		C	<i>Who is "we"? The BRA? The City?</i>
				<i>"The raising of the Boston-Providence tracks..." For those of us who don't know the history, clarify if "raising" means construction or elevating. Clarify where this is - along SW corridor or along Washington Street?</i>
14	3		C	<i>"The neighborhood continued to urbanize" Clarify what neighborhood - JP, the SW corridor area, the Plan study area?</i>
14	3		C	<i>ADD mention of the Extra Storage brewery building.</i>
14	3		C	
15			C	<i>ADD dates to maps.</i>

Page	Para	Bullet	Type	Comment
				<i>mixes benefits and losses. "...taken down. As a result, the corridor that once was shadowed by the elevated rail was open to daylight and deprived of its defining element of transportation infrastructure. On the other hand, the corridor that once was shadowed by the elevated rail was open to daylight."</i>
16	4		C	<i>"challenge principles of threaten to decrease affordability" Or clarify what you mean by principles of affordability.</i>
16	4		E	<i>"Today's challenge...." looks like a conclusion. Make it a new paragraph?</i>
18			E	<i>Graphics are cut off</i>
19			E	<i>Graphics are cut off</i>
19			E	<i>Spelling/typo in 1970-80 text "activits" should be "activists"</i>
20	1		C	<i>"reportedly unpleasant." If you are going to make a statement like this, explain where and what you mean.</i>
21		5	E	<i>In "Mixed use" fix spelling of "attrative" and "activit"</i>
21		6	E	<i>In Density, change "by don't creater canyons at Boylston and Fenway" to "but don't create canyons like Boylston Street in the Fenway"</i>
21		8	E	<i>Spelling - change "allies" to "alleys" - although I suppose we could use some <i>back allies</i> as well!</i>
22	2	3	E	<i>Add spaces to "Mobility&Connectivity"</i>
26	1		C	<i>"every each Community Workshop" A subtle but important distinction. With the exception of Marie and John, all the staff (the same staff) were not at every meeting, however 15-20 staff were at each meeting.</i>
28	3		C	<i>Clarify "Specific opportunities that were realized from the PLAN JP/ROX process:" Clarify. "realized" can be "became aware of" or "caused to happen". Maybe "specific goals were accomplished throughout the Plan JP/Rox Process"? Although some would argue that the last two have not been accomplished yet.</i>
29				<i>I did not review pages 29 - 49.</i>
51			E	<i>Check map highlight. It appears to include residences on Chilcott and Iffley.</i>
52	1		E	<i>"everyone knows the "car wash" or and "Hat Offs" as a local icon. icons" These are two different places.</i>
52	1		C	<i>"Some people may not know" What is the purpose of this? Who are you referring to - residents, visitors?</i>
52	2		C	<i>"Green Street....wants to be has the potential to be a livelier.."</i>
52	2		C	<i>"one can arrive at a different entrance" Different from what? Little know? Pedestrian rather than vehicular? Clarify or describe.</i>
54	1		C	<i>Acknowledge context - largely single family homes; note BHA senior housing ("round house")</i>
54	2		C	<i>"recreation within just a small area of near the station"</i>
54	3		C	<i>"on Bragdon and Ernst Streets, which connect to and along Columbus Avenue"</i>
54	4		C	<i>"along the west side of Columbus Avenue in Jackson Square do not cater themselves contribute to a lively pedestrian environment on the west side. " or "do not lend themselves to "</i>
55			C	<i>Add captions</i>
56	1		C	<i>"On the east side of Columbus Avenue, Academy.."</i>
56	1		S	<i>"generous setbacks ...and auto oriented naturedo not support more of these uses" Clarify. You are discussing why they don't work, but not whether they are needed or desirable, or could be better supported or designed.</i>

Page	Para	Bullet	Type	Comment
56	2		C	"This number may increase be slightly higher as mixed use category makes up 4% of the acreage, whereby with residential uses are typically located on the upper floors of commercial uses" <i>"May increase" sounds like residential use will increase, but I think you mean the number is higher now.</i>
56	3		C	<i>"existing land use breakdown suggests includes 13 acres of open space" Also, define what you include as "Open space"?</i>
57			C	<i>Public, private? Parking lots?</i>
			C	<i>Given rapid changes, add a date to this map</i>
58	1		C	"Land uses allowed by the The existing zoning varies greatly from the actual existing land use described above previously . "...while 34%...is zoned for industrial, only 13% is used for those purposes. This difference leaves a lot of private and public land underused..." Clarify how the land is being used. Differential between land that is not being used, and land that is used for industrial but could be better used. What is the link between "not being used as zoned, industrial" and "land underused".
58	2		C	<i>Given rapid changes, add a date to this map</i>
60			C	<i>include a summary of the SPECIFIC recommendations from this section in the Executive summary</i>
60	1		S	NOTE that artist live work should remain Industrial to allow work. "To further illustrate each illustration, the potential site and building area was calculated." <i>Two points here: first, the calculation for each scenario, as well as the totals, are not included anywhere in this plan and should be. Similarly, any revisions to the scenario and calculation should also be included. Second, While it is true that all scenarios may not be 'maxed out', it is also true, but not made clear, that additional development of similar scale would be allowed within the entire RDA, not just in the highlighted scenario areas. This section should include a range of potential future development that includes the max build out of the entire RDA. perhaps by using a max FAR.....</i>
61	2		C	Clarify that changes in use and height are not required, only allowed.
61	2		S	<i>"After vetting these development scenarios with the community" implies that the community has approved these scenarios, when in fact there is much concern over the proposed scenarios height and density. It would be more accurate to say "After presenting these development scenarios to the community"</i>
			S	<i>"envisioning a livelier pedestrian and bike friendly street" - This statement is unclear at best and misleading at worst. Are you recommending bike paths? Wider sidewalks? Slower traffic? No parking? Certainly the projects being approved do not accommodate bicycles off street, and if anything add to the vehicular conflicts by adding curb cuts. If you are going to include it in this section as a recommendation, then you should at least include acknowledgement of potential strategies or trade-offs, pending a traffic study. It would be irresponsible for the BRA to approve the proposed project at Green and Washinaton Street while painting a future scenario for the street that is totally at odds.</i>
61	4		S	<i>"The new NS Green Street zoning subdistrict would still have a base height of 35'" Please clarify - the existing zoning for NS indicates 45 feet/FAR 2.0. Do you propose that NS-Green will be different than the existing NS-Egleston? If not this should be LC not NS. It is also critical that the base FAR remain at 1.0. Second, acknowledge that the RDA height proposed is much higher 55' and 65".</i>

Page	Para	Bullet	Type	Comment
61	4	S		<i>The new Green street subdistrict RDA should be no higher than 4 stories, with step backs above the 3rd floor, consistent with the projects recently approved by the community. Green street has several historic 3 story buildings that define its character. It also is a very narrow street, oriented east to west so that tall buildings would leave the street in constant shadow. Given that height will be limited, it is critical that the underlying zoning remain at 35'/FAR 1.0 so that increased affordability is triaaered at that lower threshold.</i>
63	1	E		
64	1	C		<i>"The following maximum heights and FAR for the zoning subdistricts in the Study Area would remain the same." clarify. What following heights? And I assume you mean only as base. Clarify "except as allowed by RDA", OR are you referring to the residential districts, that will not change? clarify</i>
64	2	S		<i>Provide new proposed % and AMI asap - certainly before the next draft. Also provide the percentage as well as the AMI.</i>
64	3	C		<i>"One mechanism to become eligible for a density bonus is if a project is subject to Article 80 Large Project Review, or opts into Article 80 Large Project review and goes through the existing zoning variance process" If this is independent of the RDA, isn't a variance also required?</i>
65	5	S		<i>"Approval of a RDA Plan" - Clarify, are you talking about approval of the overall RDA plan, or are you talking about individual developer proposals for an RDA plan. Either way, confirm that the BRA board meeting "public hearing" will allow public comment, which has not been the case in the past. We have found that the BRA board is not aware of the details of the project, and that both developer concessions, compliance with the "developing guidelines" and the lack of community support have all been omitted or misrepresented by the developer and/or BRA representative at past hearings.</i>
68	1	S		<i>"increased by 11% since 2014". My experience has been that rents in Egleston Square have increased much more dramatically. Is the 11% figure for JP as a whole (if so, say so). What is the increase in Egleston Square?</i>
68	2	S		<i>As an introduction to a section titled "who is at risk of displacement?" this paragraph only talks about who is NOT at risk. ADD "The remaining low income households who are either currently rent burdened, or are paying below market rate rents, are most at risk of displacement as rents rise."</i>
68	3	S		<i>Acknowledge these numbers are for the whole study area, families in Egleston Square have a much lower income; many of these families make below \$30,000.</i>
70	1	C		<i>Do these figures include persons outside the study area, but impacted, i.e. between Washington Street and Franklin Park, and between Columbus and Westminster?</i>
71	2	S		<i>Implying that only 433 unit (302 rental) are required to avoid displacement is grossly misleading. First, as rents increase, the number of persons who are rent burdened will increase. Second, the units that are produced will be available to a city wide lottery. The odds of this 302 households winning the lottery is unlikely unless priority is given to local residents.</i>
72	1	S		<i>include a summary of the SPECIFIC recommendations from this section in the Executive summary</i>
72	1	E		<i>Graphics will be cut off.</i>
73	1	C		<i>Add captions</i>

Page	Para	Bullet	Type	Comment
76	4	S		"publicly owned land that could potentially be redeveloped into housing" <i>This statement is grossly misleading. Almost all of this land is not available for housing, and is serving other needs. The majority is Arborway Yards, which is not really available. So basically there is no viable plan for CDC to contribute significant new housing if private developers continue to outbid them. and refuse to partner with them.</i>
77		C		<i>Make corrections to the map. Previously designated state land that is now private (corner of Washington and Columbus?)</i>
78	2	C		<i>"13% of all units in projects over 10 units"</i>
78	2	C		<i>Clarify "Massachusetts legislation for City of Boston's Zoning Enabling Act"</i>
78	3	S		<i>Should have some lower AMI; also specify percentage. If a lower AMI is not feasible for condo projects, then additional percentages should be considered. Otherwise there may be a disincentive to build rental units.</i>
79		S		<i>65 feet is too high for several locations, including but not limited to the corner of Washington and Green Street, and for Washington Street from Egleston to Montebello. If there is one parcel (i.e. Wallgreens) within the area that could accommodate greater height, the RDA either has to have mandatory step backs and FAR to manage the overall massing, or those exceptions should be required to go through a more rigorous Zoning process, not assumed to be "as of right". A step back above 3 stories should be mandatory wherever new projects abut existing residential. Step backs and heights along the street should reflect the variation in width, or lack of width of streets, and whether there are opportunities for parking and deliveries.</i>
80		S		<i>The illustrated project does not provide deeper affordability (lower AMI) because it is condo units. Also, it does not meet the proposed RDA guidelines for setbacks or setbacks. If the excuse is that "units will be lost", then no project would be required to meet the guidelines.</i>
81	1	S		<i>At this point, I believe the affordability requirements are not sufficient, and request additional discussion, and more transparency on the underlying costs and calculations. Additional strategies are required, especially incentives for public/private partnerships because the public/CDC have no way of meeting the BRA's goal for them in the absence of additional funding and in the face of competition for land from private speculators.</i>
82	2	S		<i>"Arborway Yards project is envisioned to fill this gap." Even if it was feasible in the foreseeable future, locating half of the required affordable housing in one location creates a ghetto, rather than continuing the legacy of socially and economically mixed communities that JP treasures.</i>
83		E		<i>"IDP @70% AMI..." I think the numbers need to shift to the right - they are in the wrong column</i>
83		C		<i>"BHA Amory Street" Do these numbers represent the net increase (don't count the existing units that are being rehabbed/replaced)?</i>
84		S		<i>"Acquisition Opportunity Program" I have heard that the amount per unit available is not sufficient to meet the gap between what a CDC can offer and the offers from Private Developers. If so, the amount needs to be adjusted.</i>
84	3	C		<i>"to be preferentially award awarded..." Is this policy allowed? Or proposed and subject to city/state/HUD approval?</i>
84	3	C		<i>"who are at risk of displacement" Who decides who is at risk, and using what criteria?</i>
85	2	C		<i>"build 20% smaller...units" smaller than what? Is this program currently in place? If so, provide a link.</i>

Page	Para	Bullet	Type	Comment
88	1	1	C	<i>The percentages are confusing. Are they a percent of all business? It is hard to reconcile the bullets with figure 58 because the descriptions are different, and one is number and the other is percentage...maybe add a percent column to figure 58 so that you can see how the highlights on page 88 relate to the chart on page 89.</i>
89			C	<i>See note for page 88. Also, since many of the new retail spaces being proposed are less than 1,000 sf, could the category for <2,500 be broken down into < 500, <1,500, <2,500?</i>
90	2		E	<i>"it stands at only \$31,158"</i>
90	2		C	<i>Median incomes vary considerably between Egleston Square and other areas of the Study Area. Could these numbers be broken down, or at least be broken out for Egleston Square?</i>
90	3		C	<i>"Major employers in the area..." Do we know how many of these available jobs go to people in the area of JP/Rox, or in JP as a whole?</i>
94	2		C	<i>"and existing businesses may struggle"</i>
94	2		C	<i>"Collection of data ...would substantiate or alleviate concerns about business displacement." Consider rewording. It seems unlikely that data will alleviate concerns, however it might substantiate extent of displacement and provide information that would assist in developing anti-displacement strategies.</i>
95	2		C	<i>"Local Development Challenges" This missing section is very important. Can the BRA make it and other missing parts available before the next draft? At least to AG members?</i>
96	2		C	<i>"..just over 10% of businesses...reported this condition" Which condition? 10% do not have a lease, or 10% do?</i>
97	1		C	<i>CLARIFY "Business support organizations (BSO) intermediate between firms and these inputs provide businesses with technical assistance and training? Access to capital, information and talent? Be more specific.</i>
98	1		C	<i>"as business generates employment and neighborhood identity, and may also provide local services."</i>
98	1		C	<i>CLARIFY "However, preservation of industrial areas within this vision of creativity and innovation may not align with existing uses, e.g. auto-related business activity." for example "However, preservation of existing industrial uses, e.g. auto-related business activity may not align with this vision of creativity and innovation,"</i>
98	1		S	<i>"If industrial owner/landlords tenants are pressured (by increases in taxes or changes in zoning, opportunity) or incentivized (by market forces, opportunities to sell or develop at higher returns) to sell property or and do not renew leases, they or their tenants will may need support with relocation." Note: Clarifying this is one thing, but I am alarmed by the prospect that this seems to be suggesting that businesses will be pressured to sell in response to rezoning.</i>
100	1		S	<i>"Residents might benefit from access to good permanent jobs with a livable wage in management or maintenance of housing or projects, or within new commercial developments, and or in new businesses in new residential or commercial developments. Good jobs include good wages and benefits, and predictable hours." Be more specific...refer to ESNA email re jobs for additional language/suggestions.</i>
102	2		C	<i>Clarify "...hard decisions are being forced for sale of property" maybe "rising property values and taxes are forcing hard decisions about whether to sell their property."</i>

Page	Para	Bullet	Type	Comment
102	2	C		clarify "For businesses that rent their property, industrial use may not support lease renewal as new property owners instead develop residential units." maybe "Tenant businesses may find their leases are not renewed as Owners chose to sell or develop their properties for residential use."
102	2	S		"Without education or support...industrial uses may relocate to areas outside of Boston" <i>It is not clear what you are saying here. Should the City support businesses if they want to stay in place, or tenants who want to relocate within the neighborhood, or are you expressing a desire that they relocate but stay in Boston???? It also seems like you could differentiate or acknowledge different goals...auto businesses that provide services to the neighborhood vs. companies that provide jobs to local residents and or desire proximity to the city. This is a rich and important topic.</i>
103	3	S		"...regulation could be used to encourage occupancy." <i>This is important, as there are landlords who have left property vacant for years holding out for higher rates, to the detriment of the community. Is there a way to "use regulation to encourage occupancy"? How?</i>
103	3	E		" solve for cash flow issues"
103	4	E		"would be welcomed by new businesses"
104	1	C		"Support Workforce development" <i>This missing section is very important. Can the BRA make it and other missing parts available before the next draft? At least to AG members and to the JP Jobs Coalition?</i>
106	1	S		<i>Is there any corresponding data on car ownership, ideally by area? Parking in Egleston is much more of an issue than some other areas. We don't dispute that more people are taking the T or bicycling, but what impact has this had on car ownership?</i>
106	3	S		<i>Include the flip side - limited bus service on Washington Street, grid lock on Washington Street from Egleston to Forest Hills, and concern over air quality due to stop and go on Washington Street and on the new Arborway...</i>
104	1	C		"Transportation" <i>This missing section is very important. Can the BRA make it and other missing parts available before the next draft? At least to AG members? It will be critical that the BRA balance long term goals of smart growth advocates with immediate, creative and short term strategies to meet the concerns of local residents who are living with the existing congestion. Tie increased affordability to decreases in parking. Reducing parking in developments will not automatically reduce cars, it will push them onto side streets unless other measures are put into place. (Resident parking, no resident permits for TOD projects. shared use of existing commercial lots. public lots."</i>
107		C		<i>Confirm bus routes. You appear to be showing the defunct JP shuttle.</i>
108	5	C		"without eyes on the street, shade or appropriate buffering."
112	5	S		<i>"All new developments that are large projects....will have their parking determined by..." What about parking for smaller projects? The Plan proposes "max 1" - what is the process for determining the actual ratio for RDA projects? It appears that the BRA is dodging the question by deferring the decision to the BTG and future BRA discretion.</i>

Page	Para	Bullet	Type	Comment
114	4		S	<p><i>There is a big gap between the preferred and the minimum. Also, these same requirements are used for every neighborhood. There should be specific guidelines that respond to the conditions and needs of different neighborhoods and of Washington vs Columbus, Amory and Green, etc.. What is a Neighborhood Residential Street? Chilcott? Boylston? This section appears to be straight out of Complete Streets and needs more clarity and specificity about how it is applied, and how it transitions to existing sidewalks in both residential and commercial areas. The guidelines should discuss how this works together with setbacks and buffers to maintain a continuous sidewalk along commercial and residential streets with increased setbacks at</i></p> <p><i>his tall buildings</i></p>
116	6		C	<p>What does "parking should be shared by developments" mean? There should be a minimum parking ratio, and required mitigation for anything less than 1.0 in terms of restricting on street parking or increasing affordability. Also, how will parking be priced for affordable units?</p> <p>"Additional study...this study should consider: shrinking lanes....." This language is exactly the same for every neighborhood and street. Even if it is not feasible to make recommendations before the study, the aspirations should be specific to each neighborhood. It is ridiculous to suggest shrinking lanes where roads are narrow. The potential loss of parking on one side of Washington, or other streets, for bike lanes is all the more reason to require parking within projects and not allow</p>
118	2		S	additional pressure on reduced amount of street parking.
120	1		S	see comment on page 118.
128	2		S	<p>"The following section is entitled "Recommendations" because its intended use is a guide for both....." <i>Rethink this. Does this statement apply to all the other sections that say Recommendations? Are you saying this is a suggestion, but has no funding? I understand the need to make a distinction between recommendations for developers and recommendations that are out of the control of zoning, but calling them both recommendations, and having that word mean different things in different places is confusing and misleading.</i></p> <p>"Large development programs that seek to fulfill open space requirements through private, walled spaces will not be permitted." I agree and support this statement, but it is undermined by what you said on the previous page that "recommendations" are just a guide. This requirement needs to be explained and quantified, as there currently are NO public or semi-public open space requirements defined. Recent developments use private courtyards, roof top gardens and balconies to meet this requirement.</p>
129	1		S	"...Active open spaces should be located adjacent to businesses to provide mutually beneficial attraction to the area." I agree, but note that this is Egleston Square, where lots are small. This requirement is at odds with suggested setbacks of zero to 10 (which means zero). There needs to be a specific requirement for open space or buffers AT GRADE.
130	2	5	S	
132	2	1	S	<p>"Concentrate active retail along Green Street" I agree with this recommendation, but note that the proposal for 3353, probably the largest potential project, puts the residential entrance and adds a second vehicular entrance on Green Street.</p> <p>"Consider maximum lot coverage requirements in order to promote the creation of open space." YES, YES, YES...but space</p>
135		7	S	needs to be usable/visible.
135		8	S	Both are needed. It is unclear where they will go, unless the city offers one of their tiny city owned properties.

Page	Para	Bullet	Type	Comment
137	2	2	S	"warm/cool community rooms" buildings with more than 40 (20?) unit, especially those with small units, ought to have a minimum amount of community space/lobby, somewhere for residents to meet.
140	2		E	"environmental"
143			S	Refer to ESNA comments and previously submitted diagrams. Provide additional diagrams to show other conditions - change in grade, conditions at narrow streets like Green Street. Setbacks should be presented in concert with requirements for sidewalks and buffers. Step backs should respond to abutting conditions - street use, width, height of adjacent residential zones. Stepbacks should be more substantial i.e. 45 degrees (10' back, 10' high). RDA should not indicate that 6 stories is appropriate if the majority of the property in the subdistrict is too narrow to provide these setbacks and still reach 6 stories. In Egleston Square, 6 stories is NOT ACCEPTABLE and is NOT IN SCALE with the adjacent neighborhood character; 5 stories is only acceptable if the neighborhood is convinced that the affordability bonus is as large as is feasible.
145			E	Washington Street, Amory Street, Columbus/Seaver, Boylston, Green Streets should be highlighted. If I, as a professional and a local resident, struggle to find these streets every time I look at this plan, others will too.
147			S	Parking and Loading There should be some provision for trash pick up, deliveries and dropping off residents and visitors.
148	1		E	With all these people without cars, we don't want ubers double parking on Washington Street!
150	1	4	C	grammar "Envisioned as the neighborhood...., enhance Jackson Square should be enhanced with new..."
151				"Improve and widen Dimock and Amory Streets" how?
152	3		E	Figure 99 - Residential should have a buffer along Columbus. Manage parking and drop off to avoid existing double parking conflicts.
152	3		S	"and the surrounding community."
154	1		S	"new bicycle connections" where and how? Not shown on 153. Acknowledge trade offs.
154	2		S	Essentially, this maintains the existing city owned parking and existing open space. All the more reason that private developments must step up to provide open space and parking.
159			S	Egleston Square - Eliminate 65 feet on Washington south of Columbus, if necessary subdivide district to allow greater height north of Columbus. 55 feet is only acceptable with mandatory step backs and maximum feasible affordability.
161			S	55 feet is excessive adjacent and across from historic 2 story mansard homes on Amory.
168	2		S	If you are going to propose a bicycle lane, at least acknowledge that this will require elimination of parking or of one lane of travel.
168	2		S	"projects within the existing an FAR up to 2.0 and that are proposing...." Do not move the threshold above the existing FAR.
168	2		S	That will allow density to double without providing any additional benefit.
168	2		S	"Under the density bonus...condominiums" Move this sentence to the end of the paragraph.
168	2		S	"For any FAR that exceeds 2.0 the existing base FAR, 25% of units..." The density bonus requirements should be triggered by exceeding the EXISTING FAR. The 25% number needs to be backed up with assumptions and calculations. Comparable requirements should be defined for condo projects. If the AMI cannot be lower, evaluate whether the percentage should be higher.
169			S	Should the percentage be the same for Bonus Rental vs Bonus Sales? Do not incentivize Sales over Rentals.

Page	Para	Bullet	Type	Comment
170			S	<i>Include estimate of potential build out. Identify the potential maximum based on the RDA zones, not just development scenarios. To say that all the scenarios are unlikely to be built, while excluding substantial areas of potential development, is somewhat ingenuous.</i>
173	5		E	add / to 1 4 to make it 1/4
174	6		S	<i>"Revisit density bonus every two years.." I agree that this is appropriate but the procedure and or benchmarks should be clear so that it does not change without community agreement of policy.</i>
174	11		E	dissabled disabled
175	6		C	<i>"Recommended minimum open space..." where is this located in the Guidelines in the body of the report?</i>
175	8		C	<i>"through new public realm improvements and wayfinding."</i>
176	1		E	define DIF and TIF and add to list of abbreviations

TO: Marie Mercurio, Senior Planner II
John Dalzell, Senior Architect
Cecilia Nardi, Planner I

DATE: August 23, 2016

FROM: Michael Littman, Advisory Group Member

SUBJECT: PLAN JP/ROX First Draft Comment Letter

General Comments

I would like to start out by saying I think this is a great start for the first draft report of the Plan JP/ROX document. I think the plan does a good job laying out the process for the many people that might pick this plan up years from now who weren't actually involved during the past year. The plan is organized in a clear manner, describing the area's history, the feedback from the neighborhood, the recommendations of the plan, and then the implementation of the plan. While I believe there is a lot of unnecessary information in the plan and makes the document extremely long and tedious to read through, I think this information is necessary because without it some people would want it.

This document should serve as a resource for residents to bring to meetings and point directly to sections asking how the future development and implementation complies with this plan. The recommendations Table on pages 172-193, do just that. This is the meat of the report, what everyone that read the entire thing is waiting for. My most significant recommendation would be to break up that table better. Create a separate table for all topics and split them up by time frame. This is especially useful in transportation when people want to see what can be done quickly versus what can be a long term project. It just feels a little too mashed together. Would you be open to making this table 11x17?

My comments are pretty general and I mostly focused on the Transportation sections. I read the LivableStreet Alliance letter and that is where my more specific comments would go. I knew they would do a good job addressing specific implementation concerns.

Parking

I wanted to include some general ideas on how to address parking better in the report because obviously it's a hot topic and I think in general people don't understand how to make the most of the parking that is available. As we have heard people want more parking, in a neighborhood that is probably the easiest to park in the entire city. Additionally by building more parking, we are generating more auto use, and driving up cost of construction. Below are some ideas I've had to address the parking needs:

- Shared parking – In a large mixed-use development it is easy to create shared parking, because of the scale it is easy to build in some cushion, however in a tight neighborhood, there is little room for error. If we can create a true shared parking model in Jamaica plain then it could potentially be used throughout the city.
 - Residential Permits – This obviously restricts commuters from parking in the neighborhood for free to use the T, and should be done at minimum ¼ mile surrounding all train stations.
 - Employee Permit Street Parking – When residential parking enforced, then employees of businesses could take some issues, and one thing we need to do is make sure to keep the business owners happy. If there is a way for business owners to get a certain amount of permit parking slips then they can provide on-street parking near their stores. These spaces should be close to the commercial districts, however should not be located along the major streets.
 - Business owners could also get guest parking permits they can give to patrons, especially helpful for salons that take appointments or massage parlors or the like.
 - Metered Parking – Should be installed on all major roadways in the commercial districts. Helps with turnover while generating money for the city. 85% occupancy is the target for successful street parking.
 - Consider striping spaces that don't have meters, sometimes a curb between two driveways can fit 3 or 4 cars but because people park in between potential spaces, one might get lost. Residential spaces should not be striped at 20 feet per space, they can fit tighter at 16-18 feet.
- Zipcar/car sharing – Lots of research shows that it decreases auto ownership by 8-15 vehicles/shared car introduced.



- Affordability – Zipcar can be a great tool for affordability. If you qualify for affordable housing, I'm sure a lot of extra money goes into owning and maintaining a car (if they have one). If developers can give Zipcar passes to the affordable units then they can potentially build less parking. Market rate housing can put Zipcar to good use as well. Hubway passes are already subsidized for those in need.
- On-Street Zipcar spaces – I see it's in the plan but I don't think JP has reached the density yet but it doesn't mean it can't go in the plan. I wonder how well these are working throughout the city.
- Bike Parking – Needs to go in the plan. We should encourage all retail to have bike parking outside the shops. Currently there is only info about covered secure bike parking (which is also private). One of my biggest pet peeves is not being able to park my bike in a bike rack, because then I need to lock it to a sign post and feel bad doing so.
 - Consider taking one street parking space and replace with a large bike rack (can probably fit about 10-12 bikes in it). Shop owners will see that they get full and more close parking translates to more customers.
- No Residential permits for new housing – First of all is this even legal? Can it be enforced? I've heard many conflicting opinions and we put it in TAPAs all the time. If new buildings are providing extremely low parking ratios and unbundling parking from units, then it's extremely important that the residents can't get free on-street permits. When buildings have the low ratios people think that the people that don't get parking spaces park on the street. The plan needs to clearly state that this is not the case and people in these buildings will not be eligible for permit passes.

Signalized Intersections

Signalized intersections cause most of the issues when it comes to traffic. In the Netherlands they rarely install traffic signals because of how inefficient and dangerous they are. When people see green lights they tend to forget about other people. Pedestrians rarely obey walk signals and forget about bicycles. There really only needs to be a few signals in the entire study area (this wouldn't include pedestrian signals along Columbus Avenue).

- Columbus/Washington,
- Columbus/Centre, and
- Washington/Arborway, and
- Washington/Forrest Hills Street (mainly because of the geometry.
- Washington/Green/Glen (maybe but I don't really think it's necessary).

You might think I'm crazy for suggesting this but there are better treatments at the other intersections than a signal. As I've mentioned they are dangerous, and expensive, and cause major pedestrian and bicycle delay (if obeyed), and transit delay. I think a general comment in the plan should be "eliminate all traffic signals where it's possible." I understand BTM won't like all their signals being removed. Or at the very least extend the late night emergency flash operation on some of them (9 p.m.-7 a.m.). Treatments for these intersections include all-way stops, raised intersections, roundabouts, and half closures (i.e. no thru or left turns).

At the signalized intersections that remain cycles should be less than 90 seconds and ideally 60 seconds. Pedestrian phases should be concurrent and on recall. LSA letter addressed some of these concerns.



Additional comments

Executive Summary

- Page 5 – Can also include a map of where JP is compared to Boston.
- Page 7 – Something relating to public transit should be part of the goals.

Framework

- Page 65 – Table can use some work – Add a title,

Table 1. Current Zoning...

Zoning Code	Maximum Height/FAR	
	Jamaica Plain	Roxbury

- Page 85 – Low income renters – could be a chart to make it easier to understand.
- Page 70 – Chart change Households to Household Incomes
- Page 79 – Add a Key

TRANSPORTATION AND CONNECTIVITY SECTION

- First paragraph I think you could include a chart when mentioning mode share goals. Also note what it is now and what the goals are, not just car decrease by 10% etc...
- Page 107 – Bus routes are incorrect. I can provide further assistance if needed.
- Page 108, all the existing issues are too specific, describe the area in more broad terms.
- Page 110, discuss bike parking at stations and lack of parking at retail areas.
- Page 112, I would spend a little more time describing signalized intersections and the all-pedestrian phase. Parking section needs to be expanded because this is a really big topic. I think something we can do here it really try and describe why parking generally gets overbuilt in private lots and is in demand on-street. Also don't even include the Zoning minimums, BTD maximums are used as the standard. Describe what a maximum is.
- Page 114 – What other documents will be produced? Will there be an official transportation study?
- Remove the last paragraph about sidewalk widths, just reference complete streets guidelines.



Response to the 1st Draft of the JP/Rox Development Plan

Michael McLellan [REDACTED]
To: marie.mercurio@boston.gov

Tue, Aug 23, 2016 at 10:20 PM

To whom it may concern,

I am writing to you in regards to the JP/Rox development plan. While I'm not opposed to the idea of well-planned and thoughtful development of the community, from what was put forth by the BRA at the meeting with the Parkside Neighborhood Association last week it is clear that this development plan is anything but. This plan is very clearly that of developers looking to cash in on a spike in the JP/Rox housing market with very little concern for the potential harm it would cause to the people and the character of the community most affected. From the census data provided by the BRA at the meeting, more than 50% of the population of these neighborhoods is below the median income level of the city, yet these prospective developments are only proposing to provide a small fraction of affordable housing while the rest will be at market rate, rates which have become increasingly unaffordable for Boston's middle-to-lower class families. That less than 70% of the Egleston Sq.-Forest Hills community could afford to live in these new developments is a slap in the face of the citizens who made this neighborhood so desirable in the first place. At the community meeting, Bryan Glascok of the BRA mentioned how, at a previous meetings, members of the community have emphasized how important the light industrial zoning was for maintaining jobs. My question is: who will work those jobs if working-class citizens cannot afford to live in the community?

What's more, the lack of investigation or study into the impact on transportation and infrastructure this influx of population would have on the neighborhood is frankly appalling. The plan would more than double the population of an already densely populated neighborhood. With the loss of the Casey Overpass, a structure built to allow for the *bypass of Washington and South St. traffic* (in the 1950s, when the population was a fraction of what it is currently!), the once-quiet cross streets off Washington have become a thoroughfare for commuters looking to escape the congestion of Washington St.

The BRA provided numbers, saying that 44% of the current population commutes via public transportation. I wonder how this number breaks down when accounting for income demographics. Will 44% of these 2500+ new development households also commute via public transportation or will they resort to their cars when they discover that the MBTA does not have the capacity, nor the plan, to support them? Will this percentage drop when lower income families, families who may not be able to afford a car, are pushed out of their neighborhood? Even being generous and assuming that only 80% of these new households own a car and that 50% of those that do use public transportation, this plan would still put over 1,000 cars on the already gridlocked streets. This also does not take into account that "public transit" includes buses, which would have to be increased to accommodate the new population (again, no plan from the MBTA to do so). This plan would be catastrophic for an already heavily burdened infrastructure.

This plan has also been very poorly advertised, seemingly trying to fly under the radar of the community it most affects. Again using the numbers provided by the BRA, 33% of the households in the prospective development area predominantly speak Spanish. That only a portion of this JP/Rox plan has been made available in Spanish is an embarrassment.

However, as I mentioned above, we as a community are not opposed to well-planned and respectful development. We would like to see the city protect its lower income families as provide more affordable housing, housing that the current members of the community could actually afford. We would like to see the city hold developers to residential zoning regulations, providing appropriate setbacks and stepbacks, and, importantly, green space. We would like lower density developments with appropriate study given to impact on infrastructure. The JP/Rox plan has not met these requirements.

The current JP/ROX development plan is an ill-conceived, poorly planned attempt by the city to cash-in on one of its jewel communities with complete disregard for the interest and well-being of the people that built it. If it proceeds, it will isolate the working-class families, the voting population that works so hard to preserve this neighborhood's integrity. With 2017 elections on our mind, we will be closely monitoring how the mayor treats his constituency.

Sincerely,
Michael McLellan [REDACTED]
Jamaica Plain MA 02130
7 years in Jamaica Plain, 29 years in Boston

Comments on Content of Plan JP/Rox Draft1 07/15/2016

(The comments are in ###/ page/paragraph/line number order of Draft1)

Executive Summary

1. 6/1/1 How and where is the shared commitment expressed? See comments at 170/ and 171/
2. 6/3/9-11 Seems to suggest household income levels are to be increased but shouldn't they be decreased?
3. 6/4 Goal not yet achieved as many areas of Plan are unclear.
4. 7/1/Bullet 7 Affordable housing should not be the only public benefit considered in the Plan.
5. 8/1/1 Plan should have only provisional approval pending community review of zoning proposals.
6. 8/3/5 For Green St, Plan currently proposes changing form and zoning, not just uses.
7. 10/4 Nice words but there is no commitment of budget and staff by these agencies/ departments to implement the plans and actions. See comments at 170/ - 171.
8. 10/ The Implementation Strategy contains no periodic progress reports to or meetings with the community or with the Jamaica Plain Neighborhood Council to monitor progress and revise the Plan over time.

Planning Context

9. 20/1 Recognize that new development needs to fit into community fabric, not forced into it.
10. 22/1/Bullet 2 and 35/1/Bullet 2 These bullets recognize different areas (plural) and there should be recognition that solutions will differ in response to each area.
11. 22/3 This paragraph ought to recognize neighborhood quality of life and liveability.

Workshops & Outcomes

12. 31/ The best comment was left out: "Keep JP wierd!"
13. 39/Bullet 5 It would be more appropriate, useful, and respectful to look at it the other way round of stepping-up from base heights.

Framework

14. 50/2/Bullet 7 The Plan dwells only on affordable housing to the exclusion of any other public benefit.

15. 52/2 Also note that:

- Green Street was the commercial hub of JP before businesses gravitated to Centre St.;
- five historic buildings, including the first apartment hotels, remain but are now repurposed;
- a nearby industrial building on Amory was repurposed for social and community services;
- the tree-lined Union Avenue neighborhood of two and three story residences is just off Green;
- the Brookside residential neighborhood to the north of Green has artist lofts and co-housing.

Refer to the memo "Summary of the August 9 BRA-UANA Meeting" for further details on neighborhood characteristics.

16. 52/3 There is no mention here about the 30-or so breweries that were once located in this area, nor of the extraordinary and transformative day and nighttime uses at the Brewery complex, including the tourist destination of Sam Adams.

17. 58/1-2/ This section is misleading because it implies there are no residential uses today on industrial land which is not the case.

18. 60/2/7-8 Vetting sounds as if there was extensive discussion and change but the BRA changed little of what it first proposed.

19. 60/4 There are nodes extending up along Washington and across to Glen.

20. 60/4 The subdistrict should be changed to LC, not NS, as discussed in the "Summary of the August 9 BRA-UANA Meeting".

21. 64/1-2 The wording acknowledges that affordable housing units are one such public benefit of a density bonus but affordable units are the only benefit that the Plan considers. It is short-sighted not to consider a broader sphere of public benefits that could be available for JP/Rox to capture and how these would be measured in the way housing units are.

22. 64/3-4/ So small projects under Article 80 are ineligible for density bonus or do they just need to file an RDA Plan? Where is an RDA plan actually explained?

23. 64/ 5 and 80/1

- How does an RDA process differ, if at all, from the Article 80 process?
- Where is the role of the JPNC and its Zoning Committee in this process?
- Is a public BCDC review part of the process?
- Public hearings and public testimony are quite different and is the latter to be permitted as it ought?
- Is the Mayor's sign-off before or after ISD review, and if before is it a provisional approval?

24. 65/1 The 30% goal hinges on the ABY and other assumptions so there ought to be a qualifier to the statement. IDP plus Bonus won't achieve the 30%.

25. 65/1/7 When will Appendix X be available and will there be ample time for community review?

26. 70/Figure 45 What is the distribution of the 302 at-risk renters by number of current bedrooms?

27. 78/2/9 What were these options pre- and post- 2015?
28. 79/ The maximum height along Green and nearby Washington and Amory should be 45'. See detailed explanation in the "Summary of the August 9 BRA-UANA Meeting".
29. 80/1/ See 64/5
30. 80/2/2 It is also the community's preference to see balance in benefit tradeoffs. Also, it sounds as if a developer can withhold his 'motivation' to extract even greater community concessions.
31. 80/Figure 52 Inclusion of this rendering and caption makes it seem that the whole building conforms to the Plan when the Plan is not yet completed and it further implies that this is what new development should look like. Plan JP/Rox should be free of such sub-text.
32. 81/ Figure 51 is difficult to interpret even after hearing several explanations, and the text is not particularly helpful. A serious rewrite and re-illustration are needed. One question now: if 30% is a disincentive why isn't the default to the existing IDP?
33. 82/ and 83/ Showing affordable housing numbers only for the Study Area begs the question of who gets the "credit" for affordable housing in JP but outside the Study Area. Also, the goals are city-wide but the PlanJP/Rox process feels as if a big burden falls onto the Study Area.
34. 91/ and 92/ The text ought to address the nature of low-paying jobs in the Study Area.
35. 103/1 How can leakage be stemmed when most current businesses cater to an income demographic very different from the market-rate demographic of so much new construction, and when new affordable units are but a fraction of new market-rate units?
36. 103/2-4 Plan JP/Rox has ignored a consultant's sage advice given a year ago of the need for concentration for successful retail such as exists along Centre Street. Plan JP/Rox is gung-ho for ground floor retail in all the new buildings linearly strung-out along the long Corridor, with the likelihood of few shops per block.
37. 103/ What is Plan B if and when ground floor retail remains vacant?
38. 108/1/3-4 It sounds so nice, like strolling through Back Bay, but the many people demonstrating walking are mostly not doing so for a pleasant stroll but to get someplace to/from home.
39. 108/1/4-9
--'not particularly wide' doesn't begin to suggest the reality of narrow, substandard sidewalks;
--it's not just for wheelchair access but, among a long list, for baby carriages, and for two people to safely pass each other;
--turn the thought around in that the streets already accommodate trees, posts, poles and a host of other pedestrian obstacles--it's just the pedestrians that the street can't accommodate because the usable width is as low as 3'-4';

40. 108/1/7-10 Green has sidewalks of 7'-8' *only* in isolated locations; the median width from curb edge to property line on the south side of Green is 6'9" and on the north side it's just 6' with the medians very close to the bottom end of the range. Green is not an atypical street.
41. 108/2/2 Should note that these cut-throughs act as a relief valve for Washington and that there are only a very few streets for east-west travel.
42. 108/3 and 110/1 Add that pedestrian and cyclist lanes, even if differentiated, unsafely merge into and share a single curb-cut and cross-walk at street crossings.
43. 110/6 How much of this ridership is to/from the Study Area?
44. 110/7/7-9 Are these boarding numbers for the Orange Line alone or do they include bus boardings?
45. 112/1 Misleading as three of the routes only skirt one edge of the Corridor and mostly serve people outside the Corridor. Only one, Route 42, traverses much, but not *all*, of the Corridor.
46. 112/1 Note that no east-west bus routes cross the Study Area toward downtown JP; to go by public transport means taking the 42 or Orange down to Forest Hills and a transfer to the 39.
47. 112/4/3 These demands are not just at the intersection but radiate onto the several streets into and out of the intersection.
48. 112/ Add a paragraph discussing the Study Area's dearth of municipal parking lots (cf. Fig.73).
49. 114/4 At 7' frequent street obstacles along the sidewalk reduce effective passage to 3' or 4' (see comments above at 108/1).
50. 116/3 What about vehicular wayfinding, too? Some streets *still* do not have street name signs.
51. 116/4/5 Not simply restoration but should be broad community input re route and frequency. Old route was infrequent and primarily served a limited community.
52. 116/5/6 Acknowledge need for sufficient time for pedestrians to cross.
53. 118/1 No mention of turning lanes and turning signal control to/from Washington to/from side streets.
54. 118/2 Yes, further study, but in meantime, private developments abound.
55. 120/4 See comment at 108/3.

56. 122/1 Saying 100 acres is true but misleading when it includes tiny portions of the Arboretum, Bussey Brook Meadow, and FH Cemetery, as the distance to these spaces is only to their entrance rather than significantly reaching into their heart.
57. 126/2/7-11 Sentence sounds too wishful and rosy, ignoring issues stemming from density, and the effect on business viability from income disparities among building residents.
58. 130/10 Egleston Y needs serious reconstruction, refurbishment, soundproofing, meeting space, expansion to effectively accommodate present uses, let alone future activities. Is there a public benefit here?
59. 132/ Green St character should be rephrased as: historic commercial business district with social and community services, multi-family residential and some light industrial
60. 132/ Green St Recommendations receive short shrift. Many of the recommendations under other areas also apply to Green, including: canyon wall mitigation; respect for and refection of the residential character of the neighborhoods behind Green, Washington, Amory; better street crosswalks and curb extensions;
61. 134/ Recommendations Bullet 1 Should read: *Widen and* maintain sidewalks...; Depending on perspective as well as navigable sidewalk width, street amenities are just as easily street obstacles and impediments.
62. 134/ Recommendations Bullet 3 Sure, but not every property is a corner lot, and there are no service alleys in JP.

Implementation

63. 140/1/7-8 Provide or refer to the numbers for present and future demand; what timeframe covers the future?; how is future demand satisfied if the present stock is doubled and presumably occupied in the nearer term?
64. 140/3/3-4 "These guidelines are not intended to create uniform, predictable, formulaic architecture." To be applauded but developments now underway and proposed are rather globalized, formulaic architecture with only small variations on a theme and that could be anywhere. Suggest adding a last sentence to this paragraph:
"Rather, these guidelines encourage architectural innovations and designs that also draw upon and complement the historical character, fabric, and context of the neighborhood."
65. 142/5/4 Cluster open spaces in a central location but not if this reduces rear or side yard green buffering of adjacent properties.
66. 142/6/1-3 Something awkward here. Does it mean that *if* existing trees > 6"D are to be replaced then it's at a 2:1 ratio?
67. 143/ - 146/ and Figure 94 For a fuller discussion of problems, please refer to the separate memorandum "Summary of the August 9 BRA-UANA Meeting".

68. To be respectful of neighborhood character and scale, stepbacks must begin no higher than the base zone maximum height, with further stepback of each upper floor; the stepback depth should be a minimum of 10' and preferably 15' to assure that massing visually recedes. Without successive stepbacks, a tower is created rather than a gradual transition.

69. To be respectful to 3-story residential neighborhoods, especially in the Green and nearby Amory and Washington areas, an RDA-45 (45'4-stories) must be allowed. Even if true, It is misleading to say an RDA-55 would be 4 or 5 stories, and an RDA-65 would be 4, 5, or 6 stories. When this gets codified, it won't be as a range but only as the maximum height. A developer isn't going to propose anything less than maximum. It has been said in conversation that BRA staff will determine a specific project's appropriate height within an RDA-55 or an RDA-65. That the BRA would require a height lower than code maximum is patently unbelievable and probably unenforceable.

70. 144/3 Reinforcing street wall conditions creates an undesirable canyon effect, especially on narrow streets.

71. 144/4 Side and rear setbacks should recognize need for green buffers with existing buildings.

72. 147/Parking Bullet 1 Impossible for buildings not on a corner lot. Also, it would push entry/exit noise into adjacent residential areas.

73. 147/Parking Bullet 3 Insert ...screened and landscaped along all property lines.

74. 168/ Overview The text is difficult to grasp and should be rewritten, perhaps with bullets instad of paragraphing.

75. 169/ Figure 117 This visual explanation needs to be reconceived. The pseudo mathematics doesn't work and is just plain silly. The value capture is in unit percentage, not \$. The "equation" is unbalanced by ignoring the 3:1 ratio of 75% market-rate units. How do units add up to parallelogram acreage? Anyone know the conversion factor of acres to square feet? Hint: It's more than 10,000. And the icing is the oh-so-subtle subtext of 5 golden dollar signs. In the chart, the third column header is mislabelled.

76. 170/ Overview:

170/2/ 6-7 So is funding for short-term recommendations assured?

77. 170/2/10 If the BRA is only helping to coordinate the Plan who is taking the lead? There may need to be a new mechanism outside any agency/department.

78. 170/ Just how will the community and the JPNC be notified of Plan progress and by what process(es) will they be involved in reviewing the progress and revision of the Plan? What are the remedies if the recommdations either are not or are incompletely or wrongly being carried out? Is there some type of Plan Progress Review Board?

79. 171/ Do any of the Policies (P) have the force of law? Do the departments and agencies at municipal and state levels each have a book of their policies publicly available for

consultation? Or a website with these policies? Are they current? Is there transparency? Similarly, what of guidelines?

80. 170-171/ A long list of other departments. The BRA should arrange a community meeting with these departments to present and discuss with the community their take on PlanJP/Rox recommendations and timelines, their department's commitment of staff and funding resources, their department's processes for community participatory involvement and feedback.

81. 172/ - 193/ My comments on the Recommendations Table (aka Implementation Action Plan) will be submitted as a separate document.

Alan Benenfeld
August 24, 2016

WaterMark

Development, Inc.



John Dalzell, Marie Mercurio et al,

August 24, 2016

I want to commend you both on what has been a very difficult task. I know housing is an important goal and you have done yeomen's work during the community outreach in JP/ROX.

I remain very concerned for the existing and future non-profit, social service office space along Amory St and our section of Columbus Ave. I believe use changes forbidding social service and office use is wrong, unfair and bad city planning. I urge you to avoid a complete zoning change to MFR in this district. Off the top of my head, from our building to Green St. station I count the following established social services:

- Aids action
- JRI
- Horizons for Homeless Children
- Vinfen
- Community Servings
- Harvard Legal Services
- Ethos
- Arbor counseling
- Bay Cove
- Friends of Children Boston
- JPND
- The brewery (many small non profits & Mikes gym and Bella Luna & ULA)



These uses integrate well with the existing housing all around them. They complement the neighborhood providing street life, jobs and services for the community. It is possible to encourage and achieve multifamily housing on some sites without discouraging future development of this important use. **You should create a hybrid zoning area that is NI/MFR. The Neighborhood Institutional Zone on this strip would mimic the FAR and other zoning of the MFR but would allow the continued integration of strong nonprofit, social service users.** I understand the hope to gently move on from INDUSTRIAL uses here, but I believe you can create a zoning area which still allows office & social service uses as well as housing. These uses complement each other by creating day to night street life and strong community uses.

WaterMark Development, Inc.

Lee Goodman



JP/Rox Comments

Andrea Atkinson [REDACTED]
To: Marie Mercurio <marie.mercurio@boston.gov>

Thu, Aug 25, 2016 at 2:52 PM

Dear Marie,

Thank you for the work you are doing to hold community meetings about the JP/Rox Plan. Apologies for the delay on these comments, I hope they can still be considered.

The JP/Rox Plan has the potential to create a vision for JP and Roxbury, and for Boston as a whole, that would position Boston as a model city for equity, sustainability and success.

Many goals of the plan are desirable, namely maintaining the neighborhood character, development without displacement, supporting local business and building to LEED-ND standards. That said, there is currently not a robust action plan in place to ensure that these goals are met. In addition, there are critical elements of the plan that will act in opposition to these stated goals. Below, please find a few thoughts on creating a more sustainable and just JP/Rox plan.

Support for the Latino Community

Quote from a community member - "There was a shooting on the corner of Montebello and Washington many years ago. At the time, there were three white people living on the block. Within the month they had all moved out. But we stayed, and we worked together to clean up the community. And now they want us out."

The Latino community of Egleston Square has already been fractured by rising housing costs. Many latinos who still consider the area home come to the area each evening after work, before they make their way to the place they sleep, in an area they can now afford, but which is not "home" to them.

The plan should intentionally support the best interests of the existing community by actively supporting existing and long-standing community members and small businesses and taking into account those who have lived and worked in the neighborhood for decades and have built it into what it is today.

Affordability

If the majority of new development is market rate (which is currently an average of \$2000 for a two bedroom apartment, meaning that a household would need to make \$84,000 to afford housing at 35% of their income) in an area where 67% of the population makes under \$75,000 per year, this will effectively wipe out the population that created this vibrant and now extremely desirable community. Let's create housing to reflect the existing demographic of Boston and the future demographic of an equitable Boston.

Coordinated Efforts

Throughout the process, we have heard that the plan is what it is because there was not funding for elements of the plan to make it better - for example, a transportation and parking study or more engagement of the Latino community. Boston is a city with the resources to make this possible - an innovative Housing Lab, countless universities from which to draw information and human power, potential funding from developers interested in benefiting financially and foundations interested in making Boston the most sustainable and just place possible.

The intersection of JP and Roxbury is an excellent place to create an agenda of equity, sustainability, and success - it is currently a very diverse area, it is seen as one of the greatest neighborhoods in the US and the community has already shown it's resourcefulness in holding and supporting these ideals. We have the tools to make the JP Rox plan a blueprint that supports us all. Let's use them!

Dear Neighbors:

We appreciate the work both of the BRA and our UANA neighborhood association on the PLAN JP/Rox Proposal. The diversity of the neighborhood extends to the housing stock which is a mix of styles, periods and density. However, the City of Boston needs significantly more density located near public transit in order to meet the needs of today's workforce. In the Boston 2030 meetings we attended, adding housing near public transit was a common thread.

Therefore, we take issue with two significant themes in the UANA proposed response:

1. That affordability can be achieved without density

If new housing is limited to four stories with setbacks, it may not be possible to build in any affordable units. Indeed, density is the friend of affordability if done well.

The character of Washington Street might be improved if a variety of heights were encouraged. What if the occasional building had a corner that was 8 stories, offering a visual interruption to four or five stories at the same level? If all the Article 80 multiunit buildings are the same height, the effect will be architecturally monotonous and uninviting.

2. The statement that, "Transit oriented design is inappropriate for this neighborhood."

Everyone in our neighborhood lives close to one of the best MBTA lines in Boston. People can walk to the station at Green Street in five minutes from everywhere. We know whether it's running or not because we can hear it. If this neighborhood is not appropriate for transit oriented design, we wonder what neighborhood is.

Given our concerns, we cannot support the letter as drafted. We understand it's late in the process and that these points may not be reflected in the final submission. In that case, we're happy to send our feedback directly to the BRA.

Sincerely,



Fwd: Contact Us Submission: # 2473 // Planning

Lillian Mensah <lillian.mensah@boston.gov>

Tue, Sep 6, 2016 at 1:00 PM

To: Marie Mercurio <marie.mercurio@boston.gov>, John Dalzell <john.dalzell@boston.gov>, Cecilia Nardi <cecilia.nardi@boston.gov>

Hi,

This comment came in through the general website.

—— Forwarded message ——

From: [REDACTED]

Date: Fri, Sep 2, 2016 at 9:26 PM

Subject: Contact Us Submission: # 2473 // Planning

To: BRWebContent@boston.gov, catherine.sullivan@boston.gov, lillian.mensah@boston.gov

CommentsSubmissionFormID: 2473

Form inserted: 9/2/2016 9:25:45 PM

Form updated: 9/2/2016 9:25:45 PM

Document Name: Contact Us

Document Name Path: /About Us/Contact Us

Origin Page Url: /about-us/contact-us

First Name: Brendan

Last Name: Killian

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

Subject: lillian.mensah@boston.gov:Planning

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: To whom it May Concern, I am an artist living and working in Jamaica Plain. I am fortunate enough to have one of the few studio spaces available at 128 Brookside Ave in the midst of what was, (formerly), a thriving Arts community in the Brookside/Amory street area of Jamaica Plain. As I'm sure you are aware, this area is currently undergoing a great deal of speculation and development. As a result my fellow studio-mates, neighbors and myself are growing increasingly concerned at our future prospects here. To compound my concerns I recently attended several neighborhood meetings at which my fears where confirmed in the form of a significant development project currently in the planning stages at the site of the building next to ours, (120 Brookside Ave), which will displace up to 30 Artists and Musicians. I have lived in Jamaica Plain since the 80's and, like many, have watched it evolve in mostly positive ways

from which my business has benefited, but it has reached a point where it's untenable for individual's like myself who's livelihood depends on affordable accessible work space & housing. This community is an integral part of the work I do in so much as over the several decades that I've lived here I've built up a network of patrons and customers that would be difficult to replicate in a different location. My sales come almost exclusively through the local independent business' where my work is displayed and I have devoted a great deal of energy and resources to maintain and build on those relationships. In turn, independent Artist's and Craftsman like myself offer the community a vibrancy, diversity and creative energy that add to the overall quality of life in any urban area like Jamaica Plain. Two articles that appeared in the August 26th issue of the Jamaica Plain Gazette directly address this matter. The first, titled "BRA releases draft of Plan: JP/Rox" describes the city's development plans for the area in question. Informative, but ultimately a cause for increased alarm for my neighbors and myself. The second article, "Harnessing the creativity of Boston's artists to build a better city," describes the Mayor's plan, ("Boston Creates"), to insure the well being of the city's Arts community. As much as I appreciate the effort, and am interested in exploring the possibilities these programs offer, the issue of displacement and the threat it poses to my livelihood is my greatest concern. This letter is part of an effort to let my presence be known and an attempt to gain information regarding resources that may be available to aid in our efforts to remain in the community. Thank you for your time and consideration. Sincerely, Brendan F. Killian



Lillian Mensah

Planning Assistant

[617.918.4338](tel:617.918.4338)

BRA/EDIC

One City Hall Square | Boston, MA 02201

BostonRedevelopmentAuthority.org

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Marie Mercurio <marie.mercurio@boston.gov>

Comments on JP/Rox Plan

Felicia Kazer [REDACTED]

Sat, Sep 10, 2016 at 9:02 PM

To: marie.mercurio@boston.gov

Dear Marie,

I am a resident of Plainfield street in Jamaica Plain and a member of the Stony Brook Neighborhood Association. I want to express my deep support for the feedback the SNA has given to the BRA regarding the JP/Rox plans. Please see a summary of these comments here:

<https://drive.google.com/file/d/0B4OwhXSecttpWUxQUmo0MFUwclE/view>

With all of the development happening here, I am concerned that if this is not thoughtfully planned, our neighborhood will be at risk of losing its wonderful neighborhody feel. Please do everything you can to strongly consider and carry out each of the SNA's recommendations.

Thank you,

Felicia Kazer
[REDACTED]

Jamaica Plain, MA 02130

Dear Marie Mercurio ~

I am writing in full support of the feedback you have received from the Stonybrook Neighborhood Association in regards to the developments planned/proposed for the Washington St. corridor in the JP/ROX Draft #1.

It is truly important and essential for you to consider their requests & advice in order to uphold the health and cooperation that we have within this unique and beautiful neighborhood.

I have included their requests/advice here (although I'm sure you have already this draft) as if these words were my own because I too agree with their requests and hope that you will review them

once again with a clear and open mind to hear the valuable benefits we are planning for our community. ~~what we are asking you to consider.~~ Thank you for your time and all your work in making better neighborhoods for our future. Cheers ~ Gretchen



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Mon, Oct 10, 2016 at 3:26 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 34

Form inserted: 10/10/2016 3:26:34 PM

Form updated: 10/10/2016 3:26:34 PM

Document Name: PLAN: JP/Rox

Document Name Path: /Planning/Planning Initiatives/PLAN: JP-Rox

Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Ruben

Last Name: van Leeuwen

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2: [REDACTED]

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I appreciate all the hard work that has already gone into this draft and I don't want it to go to waste. Unfortunately, I do not currently support this plan. First and foremost, the concern over affordable housing has not been sufficiently addressed. Representatives of organizations that advocate for people who are potentially priced out of this neighborhood should be invited to help redraft a creative solution. We have an opportunity to utilize a great body of knowledge (people resources and research) to better our community while supporting current residents. We should not pass it up. In addition, while I do want there to be more housing, I am concerned that current residents are being asked to trust that the city will properly prepare for the results of the increased number of people living in the area, like traffic (auto, biking and pedestrian) issues, disparities in height/density between current residential units and proposed units, and the likelihood of pricing out of some/many current residents and businesses. If the current proposal is accepted as is, then there is very little chance that these issues need be addressed again, so let's do it right this time. Thank you, Ruben



Marie Mercurio <marie.mercurio@boston.gov>

JP/Rox Planning project

Irene [REDACTED]
To: Marie.Mercurio@boston.gov

Tue, Oct 11, 2016 at 9:39 PM

Dear Marie Mercurio,

Thank you for coming out about several weeks ago to talk about the JP Rox Draft. Although we do notice that in this 'FINAL DRAFT' changes have been made to address our concerns (thank you) we are still concerned about some of the points and would like to emphasize the heights provision that says allow for increased heights in strategic areas.... As direct abutters to one of the planned areas we would like to re-emphasize that:

The neighborhood is filled with 2 story mansards. The tallest building should be 3 stories (not 4 stories)
The building should respect existing neighborhood scale
Step-backs and set backs are crucial
Set backs for new construction should match the existing residential zoning 13' front setback, 10' side setback, 20' rear setbacks.

We understand the need for affordability, but we don't think building above the scale of the neighborhood to add a few affordable units is the solution. The area to be developed on Amory street is relatively small.

We noticed on the ballot there is an initiative for the community preservation act which will fund affordable housing. Perhaps looking to these alternatives could be helpful.

In addition to height we are also worried about density and noise in the area. Many of the houses on Amory street already do not have parking. Also Amory street does not have residential parking and it is extremely difficult to park during the day. The street is relatively narrow and services a fair amount of traffic. As such, we can only park on one side of the street (and during street cleaning parking is even more tight). The plan does not take this into account when it recommends that areas near transit will need even less parking. To compound the issue, currently, people from outside the neighborhood take the few spots available early in the morning and do not leave until after work because they use our neighborhood **to park for transit** or other activities (like using the park, etc).

Currently the businesses in the area that is proposed to be developed do not use any street parking as they are relatively low volume and also have a large parking lot. However, residents would surely use parking. JP is far enough from the city center that a car is extremely helpful for many of us in our daily lives. We do NOT agree with the recommended maximum of 0.75 spaces per unit in large projects and maximum of 1.0 spaces per unit for other residential. Despite being close to transit, we think that there should be 1 parking space per studio/one bedroom and 1.5 to 2 parking space for each 2 or higher bedroom for new developments. We appreciate the note that the city 'will explore' options for adding residential permit parking, but we think this should be a stronger recommendation—that in areas close to transit, the city will provide residential parking for residents with some guest spaces. It would be helpful to have limited guest passes for contractors and short term guests. Two hour parking without a permit from 8 to 5 with permit holders exempt could allow ample time for people to visit local businesses and prevent people from other neighborhoods from parking in the limited spaces all day to use transit..

As it is, it is hard to get plumbers and contractors to agree to do work if you are in a unit without offstreet parking. Building compact living without parking requirements on our already narrow street will further make it difficult for the already crowded situation.

We thank you for the changes that you already made to the plan and we hope you consider that adding height is not necessarily the only solution to improving affordability. We like many others moved to JP to have a neighborhood feel. We do not want to live in an area that is overbuilt and over dense—otherwise we could have chosen to live in a studio downtown. We enjoy our old mansard houses and the character of the neighborhood.

Best,

Irene Shui and Elias Chiriac



Marie Mercurio <marie.mercurio@boston.gov>

Plan JP/Rox

ivanna bergese [REDACTED]

Tue, Oct 11, 2016 at 4:04 PM

To: "Marie.Mercurio@boston.gov" <Marie.Mercurio@boston.gov>, "John.Dalzell@boston.gov" <John.Dalzell@boston.gov>, "Cecilia.Nardi@boston.gov" <Cecilia.Nardi@boston.gov>

Hello,

I am writing to you as a concerned resident of Jamaica Plain. As a White Latina woman I have many reservations about the new plan. I personally have only lived in JP for a little over a year but have been involved in the community for about 15 years now. I have also attended a couple of the Plan JP/Rox meetings.

I already find that there has been an overwhelming increase in rentals that have made it very difficult or impossible for many residents to continue to live here. I feel the new plan is a road to displacement of lower income and working class people along with People of Color in the community. Jamaica Plain has been on the path to gentrification for various years now, as are many neighborhoods in Boston and around the U.S. It would be sad to see it continue as it would affect the core of the community and literally displace lives.

I applaud and agree with the mission statement, plans and suggestions that City Life/Vida Urbana have offered. It is especially at times like these that it is important to not only listen to the community but to act accordingly as well. That also means acting before new zoning passes and buildings are erected, if not, it's too late.

Thank you for your attention to this matter.

Ivanna Bergese

Resident on Williams St. of Jamaica Plain



Marie Mercurio <marie.mercurio@boston.gov>

Feedback on BRA's JP/Rox plan

Jonah Rapino [REDACTED]

Tue, Oct 11, 2016 at 9:14 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, Cecilia.Nardi@boston.gov

I have lived in Jamaica Plain for 16 years and I wholly and completely reject Plan JP/Rox and stand with the displaced and disenfranchised people and businesses of Jamaica Plain, Roxbury, plus South Boston, Dorchester, et al.

I have attended many meetings and read and learned about much of this plan and I think it is basically the nail in the coffin of gentrification.

Menino/Patrick and now Walsh/Baker, and the other State and Local politicians have had almost no regard or wish to put in proper fair housing protection for the working class and lower income people of Boston and instead have opened the floodgates of our city to greedy developers and high tech workers without regard to how this would affect the people actually living in here.

Instead of land banking, housing vouchers, applying for Federal Grants, and a myriad of other (proven to work by other cities in the US) strategies and actions to help protect residents and create more fair housing, we have corporations like GE coming in and hundreds (if not thousands?) of new luxury apartments and condos being built or renovated to suite their needs.

Despite some of the small concessions to the community, the BRA's plan will enable massive displacement and gentrification to happen as quickly as possible.

First off, why is there no recognition of the people that have already been displaced and a plan for how to bring them back to neighborhoods that they were ostensibly kicked out of?

Next, the BRA says they want to bring 30% affordable housing to the 100% total of new housing. But what we need is 70%
fair housing within that 100%.

Here is one of the worst parts of it. To get this magical 30% affordable housing the BRA will give developers the right to build higher than three story buildings and add more units (and potential millions dollars of profit) if they promise to make some of the units affordable.

The average median income that is being used as a marker against percentage discounts for *quote* affordable housing is grossly inflated beyond what people actually make in the areas of gentrification and the then "affordable" housing will go to people from areas outside these neighborhoods who can actually afford these "affordable" rates, both speeding up the displacement, creating more densely packed neighborhoods, and making developers richer.

Also, almost half of the "affordable" housing that the BRA is talking about adding in JP/Rox is in the MBTA yard by Forest Hills T Station - and yet there has been no promise that this will even happen within the next, 2, 5, 10

or who knows how many years. And if it even happens at all, it will be concentrated all within that area and won't actually be affordable to most of the people living in these neighborhoods anyway.

One of the other deplorable facts is the almost all of the current budget for affordable housing comes from the developers themselves and not from the City or the State. We are already beholden to the developers, so how could there ever be a plan that didn't meet all of their needs and line their pockets?

Please erase this horrible plan JP/Rox and other plans and start over. We need to block new development, and have the powers that be understand that they are bleaching out all of the deeply rooted families and the culture, diversity, arts, spirit, flavor, and history of our neighborhoods in favor of the upwardly mobile.

Please postpone your vote on the plan, continue to meet with the people and neighborhood associations of the affected areas, and convince Marty Walsh and the other powers that be that there is so much more to be added to this plan for it ever to be considered fair to anyone but the rich.

Jonah Rapino

JP 02130



Marie Mercurio <marie.mercurio@boston.gov>

Feedback on plan

Bev [REDACTED] Wed, Oct 12, 2016 at 2:36 PM
To: Marie.Mercurio@boston.gov, John Dalzell <john.dalzell@boston.gov>, Cecilia.Nardi@boston.gov
Cc: Liz@electlismalia.com, Matthew O'Malley <matthew.omalley@boston.gov>, andrew.baldizon@boston.gov, Jullieanne Doherty <jullieanne.doherty@boston.gov>

Good afternoon

I wish to provide my thoughts re the final draft of the JP/Rox plan.

While the subdistricts have been designated 2F, 3F I think many regions have mixed housing. My 2 story home, along with my nearby neighbors, is in a 3F subdistrict. We will be abutting a 5 story project if approved, however my home is not just behind but below this proposal. I believe the topography of the area into which a new project is being integrated must be factored. To preserve the scale and character of existing neighborhoods, a finer zoning tool that can discriminate a localized area might ensure a more respectful blend of existing buildings with new development.

I would like to see new buildings use step-backs that start at the existing residential roof heights (2 story or 3 story) and continue step-backs as they rise to their proposed height. This would help decrease their apparent massing and allow some variety.

In addition I would like set-backs to remain as they currently exist: residential zoning 13' front setback, 10' side setback, 20' rear setbacks.

Finally I agree with many community members who want new buildings that target 20% affordability with deeper affordability levels of close to 50% - 60% AMI

Sincerely

Beverly MawnLion

Sent from my iPhone



Marie Mercurio <marie.mercurio@boston.gov>

RE: JP/ROX

Rachel [REDACTED]

Thu, Oct 13, 2016 at 11:44 AM

To: Marie.Mercurio@boston.gov, John.Dalzell@boston.gov, Cecilia.Nardi@boston.gov

[Attached is my letter in opposition to the current JP/Rox plan.](#)

To John Dalzell, Marie Mercurio, Cecilia Nardi,

I am writing in opposition to the JP/Rox plan. I feel that the neighborhood's voices have not been heard in this process. In spite of all the meetings held, the plan never adequately addressed our concerns.

The amount of affordable housing is just not enough and the current definition of affordable is not really affordable for the people living and working in the community. Displacement will occur. A community without income diversity, is ultimately not a place anyone wants to live. Who are all these wealthy buyers anyway? The 1%? Foreign investors? We may need housing in Boston but it's not high end housing that we need.

The 5-6 story buildings you are proposing to zone are too tall and too dense for the existing community's quality of life, health and safety. Buildings of that height will block light and air. Overcrowding will lead to noise, pollution and traffic congestion. Buildings should be no more than 4 stories, so they mirror the design and current character of the neighborhood. The buildings be aesthetically designed, have decks and be green / solar to improve the quality of life. Green space, trees and landscaping need to be mandated into the designs for mental and physical health. Dumpsters need to be hidden from view and be carefully placed so pick up noise does not disturb residents or disrupt traffic flow.

Our public transportation has been proven inadequate for the existing people let alone adding the proposed 4000 new riders to the T. "Transit oriented development" is impractical at this current time until the T is upgraded. More parking is needed and should be underground, to make room for green space.

Wide landscaped sidewalks of 15 feet are should be required to accommodate all the new pedestrians foot traffic and give the street more space. Planned bike paths on Washington Street and the cross streets joining the existing bike path on Amory St. need to be built for safety. Bike racks and zip car spaces need to be included.

Buildings need to have real affordable retail to ensure that store fronts don't sit empty as so much of the JP retail is currently. It is not acceptable for 4000 new people to shop on Center St. there just isn't enough room or parking. The Washington Street area needs to become a new shopping district. This will require a municipal parking lot, as people from further away will be wanting to shop there as well. Landscaping is necessary around parking lots.

As it stands now, I can't support the JP/Rox plan. I believe that a balance of more affordable housing and greener, more livable buildings of no more than 4 stories can be achieved. This might require developers with more conscience and less greed. We need to think outside the box. Jamaica Plain and is much better than this plan and should be an example of real forward thinking development.

Rachel Paxton

[REDACTED] Jamaica Plain, MA 02130

Rachel Paxton

<http://www.rachelpaxton.com>

[REDACTED]
[REDACTED]
Jamaica Plain, MA 02130



JP:Rox.odt

15K



Marie Mercurio <marie.mercurio@boston.gov>

JP/Rox FINAL DRAFT plan

Sheila Gallagher [REDACTED]

Thu, Oct 13, 2016 at 9:21 PM

Reply-To: [REDACTED]

To: marie.mercurio@boston.gov, john.dalzell@boston.gov, matthew.omalley@boston.gov, julie.burros@boston.gov, liz.malia@mahouse.gov, julianne.doherty@cityofboston.gov

Marie Mercurio and John Dalzell
BPDA
One City Hall Plaza
Boston, MA

October 4, 2016

Dear Ms. Mercurio and Mr. Dalzell,

I am writing to provide comments on the JP/ROX Final Draft plan. As a practicing, professional visual artist with a studio in the Green Street area, as well as a 20 year resident of JP, my comments are focused on the preservation of artist work space in the district. The plan acknowledges the need to preserve these uses, and even cultivate more space for artists, but the specific zoning proposals and Urban Design goals do not yet support this goal.

I agree with the Community Priority Statement that we should "Support artistic, civic, cultural, and community assets." It is also noted that "Through the PLAN: JP/ROX process, residents noted their desire to maintain these [independent and small] businesses for jobs while also keeping the light industrial character and heritage along Amory Street," and I agree with this sentiment. And further, the plan points out that, "a number of residents express demand for the preservation of light industrial zoning and the revitalization of those zones' usage. Innovative uses that would reflect the community's vision include artist and maker spaces and co-working spaces for entrepreneurs and small businesses. Active and engaging streets in existing light industrial areas, combined with more density in the industrial corridor were expressed as ways to preserve the historic fabric of these areas." These are well-articulated goals, and I fully endorse them.

As the proposed zoning changes stand now, they will not support these goals. More specifically:

- The proposal to allow upper floor residential uses in Light Industrial areas will all but guarantee displacement of artists, most of whom occupy upper level studios. This provision will incentivize developers to leave a ground floor "industrial space" empty, while using the loophole to place residential above. This is in direct contradiction to the goal of maintaining industrial uses including artist studios.
- The urban design diagrams (page 152) are showing continuous residential edges along Brookside – **this is in direct contrast to the LI zoning.**
- Allowing RDA's in the LI subdistricts will also imperil the artist studios. Given that PDA's require a full acre, the 10,000sf minimum for RDA eligibility is simply too small. As there are special provisions for affordable housing, there should be for the preservation of artist and light industrial uses as well. The zoning could require the developer to demonstrate that their project does not diminish those uses, and should also add to those uses. If there are no specific criteria in the zoning for permitting through an RDA, there will not be any

accountability beyond the usual community meetings. The zoning language should refer to the plan and its goals so that RDA proponents and the BPDA plan can be held accountable.

More generally, artist uses are very fragile, and there must be more focus on preservation, and less on creation of space, which the market will never be able to afford. The damage is already happening – our neighbors at 130 Brookside are being kicked out, and the new property owner intends to develop a residential property. Once the property is developed, those uses are never coming back. Our building (128 Brookside) is now feeling vulnerable. If the new zoning is truly effective, this type of displacement will not be able to continue.

The artists, craftspeople, light industrial producers (like Carlyle) and event producers are an important part of the community. We have the most vibrant open studios, we participate in our larger neighborhood (this doesn't happen in Readville or Hyde Park) and we are professionals working for our livelihood (we are not hobbyists!). We need space to work if we are going to continue to contribute to the economy and social fabric of JP/Rox. For almost 15 years I have been employing young artists and recent college grads as studio assistants. These young artists live in JP, create art in JP, contribute to retail and social life in JP. They want to stay, but if there is nowhere for them to make art or work for other more established artists they will leave. Many of them are already going to Lowell, Providence and Worcester. Boston and particularly JP can't afford to lose its young creative class. The new zoning will need more teeth if there is any chance of artists not being washed away by residential uses.

Finally, I feel compelled to mention the Arts masterplan, Boston Creates. The first two goals of the plan are (underline added):

1. Create fertile ground for a vibrant and sustainable arts and culture ecosystem.
2. Keep artists in Boston and attract new ones here, recognizing and supporting artists' essential contribution to creating and maintaining a thriving, healthy, and innovative city.

In its rebranding, the BPDA has promised a new era of *comprehensive* planning. If the JP/ROX plan is to align itself with other parts of city planning, like Boston Creates, it will take the threat to artist uses in our district very seriously and close the loopholes in the proposed zoning.

Sincerely,

Sheila Gallagher

Studio:

[REDACTED]

Jamaica Plain, MA 02130

Residence:

[REDACTED]

Jamaica Plain, MA 02130

[REDACTED]

[REDACTED]

cc.

Councilor Matt O'Malley

To: Marie Mercurio
From: Henry Barbaro
Re: PLAN: JP/ROX
Date: 10/13/16

Please accept the following as my comments on the Final Draft of the JP/ROX Plan (dated 9/20/16), as compiled by the Boston Planning & Redevelopment Agency (BPDA).

On 8/22/16 I submitted a five-page letter regarding the First Draft JP/ROX Plan (dated 7/15/16). My letter contained about 25 separate comments. Five of those were selected to be entered into BPDA's "Questions, Comments, & Suggestions" matrix. The BPDA has not responded to date to any of my comments regarding the Draft Plan or to any of the hundreds of other comments submitted by concerned citizens. This total lack of responsiveness, and disregard for citizen feedback, by the BPDA has left me skeptical and resentful. It also makes writing and submitting another comment letter seem pointless, in light of what appears to be another meaningless public comment period. After all, how genuine are BPDA's efforts to gather public input when the BPDA Board vote is only one week away (10/20/16)? That leaves scarcely little time to review and incorporate any comments, right?

Please note that, in light of the fact that every comment from my 8/22/16 letter still remains unresolved, I am re-submitting my previous comments for this Final Draft of the Plan (see addendum).

General Comments

I learned a new saying recently – "The cake has already been baked," which means that some result is a forgone conclusion. This metaphor aptly describes the efforts of the BPDA to gather public input for the JP/ROX development plan. For months, the BPDA has "engaged" with the neighborhood residents at a variety of public meetings, of which I attended three. The fact that these exchanges have amounted to little more than being fed scripted responses to questions, along with the expedited public comment periods for the Draft and Final Plans, has led many to see the whole process as a sham. (Sure, let's talk about the "cake," but keep in mind that the recipe cannot be changed because it has already been baked.)

The process of writing and adopting the Plan should resemble that of an environmental impact report, in two respects: 1) the Plan should identify any adverse impacts that may be caused by the proposed full-build development and should explain how those adverse impacts can be avoided, minimized, or mitigated, and 2) the BPDA should respond to each comment that was submitted as part of the public comment period. For BPDA to combine comments into categories, but still not respond because there are too many comments, is an unacceptable approach for a government agency.

The Plan proposes enormous changes to both Jamaica Plain and Roxbury by recommending zoning that will more than double the housing units and by extension the population between Forest Hills and Jackson Square. This Plan goes beyond just meeting future housing demand – it will induce greater demand. Although there have been many protests about the Plan not providing more "affordable housing," it has many other problems. The Plan has no analysis of traffic impacts or impacts to tax-funded public services such as police and fire protection. Building heights conflict with adjacent neighborhoods and create a "canyon effect," including two zones reserved for 15-story residential towers.

Furthermore, the JP/ROX Plan could constitute grounds for an “Environmental Justice” complaint. Relative to Boston’s overall racial and ethnic composition, the JP/ROX study area has about 70% more residents of Hispanic or Latino origin. And the BPDA is proposing zoning changes that allow massive new multi-unit buildings, including 15-story towers, which at full build-out would more than double the housing density in this area. It is extraordinary to have a government agency allow for this magnitude of change upon a neighborhood. And, even though the Plan emphasizes the need to prevent the displacement of households, there is no indication of how many existing residents will be displaced when their homes are razed to make way for large residential buildings. It seems unlikely that these drastic changes would be recommended for a neighborhood with fewer minority residents.

Although I deplore the tactics of the BPDA to railroad this Plan through to adoption, with virtually no meaningful deliberation on its content, I appreciate the opportunity to comment.

Henry Barbaro

[REDACTED]
Jamaica Plain, MA 02130

[REDACTED]

-- Addendum to Final Draft Comments (10/13/16) --

To: Marie Mercurio
From: Henry Barbaro
Re: PLAN: JP/ROX
Date: 8/22/16

As a resident of Jamaica Plain, I greatly appreciate the opportunity to be involved in the planning process for the future growth of the JP/ROX neighborhood. In fact I attended one of the Community Workshop meetings at the English High School (on 12/10/15). There were "break-out" tables, and the groups were making suggestions on zoning changes. However, I don't feel as though the magnitude of this Plan, and the full extent of proposed changes to the JP/ROX neighborhood, was fairly represented at that particular meeting.

I observed that "affordable housing" was used as a sort of euphemism for denser development, which means some in-fill, but mostly taller and wider multi-family buildings. It was never mentioned that by creating a much more crowded neighborhood that there would be a palpable loss in our small-scale city feel, along with the sense-of-place for the existing residents of the JP/ROX area.

One participant stood up during the meeting and proclaimed that he could no longer afford to live in JP. But does he yearn for living in a six-story apartment building? It's doubtful. He probably wants to live in a single to three-family house where he knows his neighbors, and is connected to the street, has a backyard, and has some contact with Nature. But if he winds up renting an apartment on the 5th floor of a large apartment building, why does it matter that it be in Jamaica Plain? He could find that type of living just about anywhere in the greater Boston area. Unfortunately, these types of massive residential buildings, along with their dreary living conditions, seriously impact any kind of "neighborhood character."

After attending this meeting, I have done my best to follow BRA's planning process. In that spirit I am providing the following comments regarding the Draft "PLAN: JP/ROX," dated 7/15/16.

General Comments

The Mayor's aggressive housing plan is to facilitate building 53,000 dwelling units throughout Boston in the next 15 years. What is the goal for housing units within the JP/ROX study area?

Overall, I believe that the benefits of such an aggressive development plan, for existing residents of the Study Area and beyond, will not exceed the negative impacts due to traffic/congestion, population density, loss of community character, more noise and crime, and poorer air quality. Moreover, I see virtually no mention or analysis of these potential adverse effects from dramatically increasing housing densities within the Study Area. This Plan is essentially proposing, and facilitating, an unprecedented development project throughout the Study Area. Such a drastic proposal warrants far more study to determine its full range of consequences, especially in terms of traffic impacts and quality-of-life issues.

The Plan does not acknowledge that population density directly affects the quality of life for those who live in the area (or any other area). I think most would agree that, especially during

the traffic congestion of peak travel hours, high-density living is not necessarily best for one's peace-of-mind.

It appears that business owners, developers, and realtors will be the primary beneficiaries of this Plan, and that the negative impacts will be distributed amongst the citizenry-at-large, i.e., passing on negative externalities where the indirect costs of development are passed on to the community.

The language of the Plan tends to be subjective, vague, and rather convoluted. This document should use clear easy-to-understand terms. Examples are included below under "Specific Comments." The Plan could be improved with thorough editing in order to achieve a more clear and objective "voice."

The Affordable Housing Paradox

The premise is that the current residents of JP/ROX like it here and want to stay, and not be forced out due to high housing costs. So the City's answer is to facilitate massive changes to the area's housing stock with lots of tall and wide apartment buildings, and dramatically change the community character and quality-of-life for those living here. Doesn't this Plan diminish the reasons why citizens enjoy their lives here (e.g., community character, neighborhood connections, contact with Nature/open spaces, low crime and noise)?

To argue that this Plan addresses the affordable housing problem is short-lived at best. As supply goes up, then prices come down, then more folks want to move in, then supply becomes tighter, then prices go up again. It's an endless cycle that has been around for decades. It seems that "affordable housing" is being used as a noble, albeit short-lived, goal to make those citizens involved in this process feel better about acquiescing to enormous changes to their neighborhoods.

"Build it and they will come." This Plan goes beyond just meeting housing demands -- it will induce housing growth. Yes, people are moving to the cities (all throughout the world), but especially in areas where land use policies create (short-term) lower housing costs.

The Plan also should mention one of the reasons why rents are going up -- the reduction of rental stock due to turning traditionally two, three, and six unit apartment buildings into condominiums.

Traffic Congestion

Traffic impacts to collector roads such as Washington Street, Amory Street, Tremont Street, and Columbus Ave., as well as Melnea Cass Blvd. which is a critical connector to I-93. Traffic studies are absolutely warranted as part of this Plan, like any major development proposal, before the proposal is approved, and housing densities are significantly increased.

What are the current trends in traffic and level-of-service in and around the Study Area? Traffic congestion seems to be worsening even before this Plan's drastic increase in residential development.

The Plan recommends studying street improvements at some indefinite point in the future (p. 116-120). Shouldn't this happen **before** housing densities are proposed to be significantly increased?

Quality of Life and Sense-of-Place

Aside from the temporary effects of reducing the rate of housing costs, how does this Plan to facilitate massive building of residential dwelling units enhance the quality of life for today's residents of the JP/ROX area? One thing we know -- huge apartment buildings will further disconnect residents from neighborhoods, yards, street level activity, and to the natural environment. Community character will suffer in proportion to the level of population density.

Specific Comments re: the Draft PLAN

Executive Summary, Page 4: The phrase "To capture the benefits of growth" seems to refer to more shopping opportunities and more activity in general. The Plan should do more to describe the wide array of negative impacts from growth.

Executive Summary, Plan Recommendations, Page 8: The Plan neglects to fully explain and describe how dramatic increases in development and residential density will "improve the overall quality of life for [existing] residents" of the JP/ROX neighborhood.

Executive Summary, Sustainable Development, Page 9: The Plan should include an analysis of the greenhouse gas emissions caused by increased traffic delays and congestion.

Page 129-133: The conceptual drawings are good, but should be compared with drawings of existing buildings. Note: the height of the conceptual buildings depicted in Fig.85 are needlessly cut off.

Pages 150-166: "Greater heights create a gateway." This is certainly a subjective viewpoint. In my opinion these monolithic buildings more resemble walls than gates.

Page 186: What are "wind mitigation" measures, and how would they be implemented?

Page 186: The creation of a "canyon effect" (e.g., less sun/sky, more wind) with a corridor of tall buildings next to sidewalks seems to run counter to promoting pedestrian use.

Page 187: What is "vertical green infrastructure"? Are these noise barriers? Trees do little for mitigating noise and air quality impacts.

p.192: The Plan states that new development will create a new sense-of-place. This seems to imply that one does not exist today.

Overall, the Plan's use of the term "open spaces" is misleading. According to the Plan, open spaces are only places where people can congregate, rather than places for "retreat" to restore peace-of-mind and rejuvenate (which is what "open space" typically implies).

Conclusions/Recommendations

The Plan is clearly biased toward facilitating dramatic growth in this region, with little mention of the adverse impacts of such growth. Rather, the Plan should read more like an Environmental Impact Report, where all the consequences of the project are objectively addressed.

Aside from more shops and some other amenities, JP/ROX will become an incrementally less desirable place to live with greater housing densities and more traffic, noise, and crime, and less community connection. The Plan should acknowledge these concerns.

Future residential development should focus on abandoned and/or under-utilized non-residential areas for proposed multi-family buildings.

How was the height of 15 stories decided upon? (The proposal for 15-story buildings was never mentioned at the 12/10/15 meeting I attended.) Nothing in the JP/ROX neighborhood comes close to this. Buildings this high far exceed the character of JP/ROX neighborhoods, and should be reduced to no more than six stories.

The Plan should include conceptual drawings that compare full build-out with existing conditions.

Compare the number (% too) of people living in large multi-family buildings now versus at full build-out in the JP/ROX area. If there's a wide difference, then this speaks to significant changes in community character and quality of life.

This housing initiative should include traffic studies for the surrounding collector streets **before** housing densities are proposed to be significantly increased. Otherwise this Plan has a high potential of imposing misery (e.g., traffic congestion, travel delays, higher accident rates, air quality degradation, noise) on the area's residents.

If BRA's primary intention is to assist low-income residents of the JP/ROX area (and throughout Boston), then as a first priority there should be a plan to overhaul all of the City's institutional housing projects (e.g., Bromley-Heath). The living conditions in these housing complexes are horrendous. For example, in nice weather, there are youngsters during all time of day and night buzzing around in loud mini-bikes, motorcycles, and "low-riders." There are other forms of constant noise such as fireworks, loud music, car alarms, and screeching tires. And the residents are essentially on their own, and are unwilling to raise objections for fear of retribution and/or due to an ineffective police presence. How can one have peace-of-mind, or be a productive worker or citizen, living in that environment? The City needs to prioritize redeveloping its housing projects (e.g., into "scattered-site" lower-density housing), which would help the low-income residents who are **here now**, rather than serve those who may come sometime in the next 15 years (as is asserted in the JP/ROX Plan).

Thank you for this opportunity to comment on this critical blueprint for the future. Please let me know if you have any questions.

Henry Barbaro

Jamaica Plain, MA 02130

Boston Community Ventures

Marie Mercurio, Senior Planner
Boston Planning and Development Authority
One City Hall Plaza
9th Floor
Boston, MA 02110

Oct. 13, 2016

Dear Marie☐

As a longtime local developer with a strong commitment to the future of the Jamaica Plain and Roxbury neighborhoods, and in particular to the area specified in the JP/Rox planning area, Boston Community Ventures is grateful for the thoughtful and determined effort that the Boston Redevelopment Authority (Boston Planning and Development Authority) undertook to reach its new Framework for Housing. We appreciate the many hours invested in listening to a myriad of different perspectives and outlooks and the lengths the BRA took include all members of the Jamaica Plain and Roxbury communities.

With experience in the neighborhood, we understand the challenges of securing affordable housing for residents at all income levels and ensuring population diversity. While the Framework for Housing document accurately concludes that, ☐In the long term, rents will only moderate when the supply of housing meets or exceeds housing demand,☐ there are many obstacles to creating that supply in a short period.

The Framework embraces the laudable and ambitious goals for our neighborhood of doubling the number of affordable and deed-restricted units, assisting those at risk of displacement, expanding the supply of market-rate housing, and promoting home ownership.

In particular, the goals include adding more than 1,000 units of affordable housing, with an emphasis on helping residents earning 50 percent or below of the area median income.

Many of the multiple strategies outlined, such as increases in subsidies and use of subsidies, and making underutilized land available, are promising. But the creative expansion of the Inclusionary Development Policy to include incentives for modest increases in density is a change we believe will have significant and relatively quick results. Subsidies have played a role in making housing more affordable and will continue to do so, but we believe tying an increase

in deed-restricted affordable housing to simultaneous increase in the number of market-rate units is a most promising solution to the excess demand.

Many civic-minded and committed groups have varying ideas about goals and methods for solving the long-standing housing problem that affects us all. We think the City's commitment to ensure that at full buildout no less than 30 percent of the new housing constructed in this area is affordable housing is reasonable, commendable, and achievable. We hope that this document becomes a blueprint for guiding development and becomes the basis for constructive dialogue between neighbors, abutters, and developers.

Sincerely,

Boston Community Ventures, Inc.

October 13, 2016

John Dalzell, Marie Mercurio
Boston Planning and Development Agency
City Hall

RE: Comments on Plan JP/Rox 9/20 Draft

Dear John and Marie

I fully support the comments on the 9/20 draft that you will have received from the Alliance of Neighborhood Associations.

In reviewing comments I gave you previously on the earlier 7/15 draft, I find that there are several issues of concern that remain unaddressed in the 9/20 document. These are briefly outlined here and I am happy to discuss any of them in more detail.

First let me say that I am pleased to have learned from conversations on 9/30 that the Green Street LI subdistrict designation will be changed to a more befitting LC and not to NS.

Initially, I was also pleased to see that the 9/20 document changed height from 55' to a more appropriate 45' in several of the LI districts adjoining Green Street. Only very recently when details on parcel map overlays were made available did it become clear that long-standing neighborhood concerns over height of parcels on Washington that border parcels on Union were only partially addressed as some were reduced to 45' and others left at 55'. This is an inconsistent, incomplete response to addressing strong neighborhood concerns. Also unaddressed is the canyonization of Green Street itself at 55' and 65'. The proposal (page 131) for mid-rise clusters on neighborhood cross streets

The **Design Guidelines** in the 9/20 document were unclear and incomplete.

- I understand that they are undergoing change. Not having seen the changes, I refer you to the following documents for details of neighborhood concerns regarding **Height, Setbacks, Stepbacks, Sidewalks, and Bordering Transitions**: Neighborhood Alliance Letter (10/13); Summary of the August 9 BRA-UANA Meeting (9/23); and the UANA Response to the 7/15 Draft (9/25).
- Many neighborhoods would take issue with the conceptualization on Page 131 of mid-rise clusters on narrow cross-streets as well as the phalanx lining local arterials.
- Page 130, paragraph 3 has a new phrase at the end which is weak. Explicitly strengthen the meaning by saying:rather they provide the envelope to encourage architectural innovation and designs that complement a neighborhood's historical character, fabric, and context.
- Under Open Space (page 132) and Edge Conditions (page 138) and in the Recommendations Table specify that rear and side property lines bordering a residential neighborhood should have green buffers of trees and shrubbery along the line.

Implementation of Recommendations: Unaddressed concerns (page 160-161) are:

- If the BPDA only helps coordinate the Plan, who takes the lead?
- Is a new mechanism outside any one agency or department needed, such as a Plan Progress Review Board? How will communication with/from so many agencies be made effective?
- Where and what is the role of the JPNC?
- How will the community and the JPNC be periodically notified of Plan progress and by what ongoing processes will they be involved in reviewing the progress and revision of the Plan?
- What are the remedies if the recommendations either are not or are incompletely or wrongly being carried out?
- Where is the stated shared commitment to the Plan actions from each of the many agencies/departments?

- Where is the commitment of funds and staff resources by these agencies/departments to implement actions?
- With emphasis placed on policies and guidelines, do municipal and state agencies (including the BPDA) have up-to-date books or websites of their policies and guidelines that are publicly accessible and transparent?

RDA Process (page 125 and others):

- The BPDA has been asked at many meetings to spell out in detail the process and timeline for RDA review and approval and to compare it with the Article 80 process. The flow chart in the 9/20 document does not achieve that.
- Where is the role of the JPNC and its Zoning Committee in this process?
- Distinctions between public hearings and public testimony are still not clear.

Public Benefits:

The Plan dwells specifically on affordable housing as the public benefit (page 36). As important as that it is, it is to the exclusion of acknowledging any other public benefit possibilities that JP/Rox could capture.

Transportation:

- On page 84, line 5: Most streets do not have wide sidewalks period. Saying *particularly wide* misleads.
- SCP (page 84): Cycle and pedestrian lanes that merge at curb-cuts and cross-walks is an unmentioned safety issue but is addressed as a recommendation on page 97.
- Existing Bus Transit on page 87 is unchanged and misleading. Three of the four routes traverse the Corridor along only one edge; only Route 42 actually traverses *through* most of the Corridor, and it is often delayed. There are no east-west cross routes from the Corridor to downtown JP
- The dearth of municipal parking lots in the Corridor remains unmentioned and unaddressed.
- Sidewalks of a 7' minimum might be ok only if there were no other 'impediments' such as trees, poles, benches within the space which reduce effective passage to only about 3'-4'.
- Are-wide recommendations don't mention vehicular wayfinding.
- Washington St recommendations (page 96) don't mention need for turn lanes to/from side streets.

Quality of Life and Livability:

- Although they might be inferred, you'd be hard pressed to find these terms explicitly in the Community Priority Statements section (page 22) or in any of the workshop summaries and outcomes (pages 192ff), yet they are often used and found in neighborhood commentary on the drafts.
- Page 193 still omits the best comment that drew wide recognition and applause: 'Keep JP Wierd'. If nothing else, it adds levity to the document and succinctly captures the flavor and character of JP.
- That Page 201, Bullet 5, refers to a 'step-down' rather than a 'step-up' approach is very telling and reveals a perspective that does not start from the neighborhood perspective.

Neighborhood Character: (page 26-28, and 104-111):

- Many neighborhoods have commented that their characterization has been given short shrift in these descriptions and the 9/20 document does little if anything to rectify that. Refer to neighborhood comments on 7/15 draft and neighborhood meeting comments.
- Funny how mitigating an urban canyon effect along quite wide Columbus Avenue is recommended (page 105) but very narrow Green Street isn't protected from canyonization.
- Neighborhood-wide rec for service entrances off of primary roads (page 110 and page 139) ought to acknowledge absence of service alleys in JP and that not every building is a corner building; bringing noise onto residential streets is not desirable either.

As always, I'll be happy to respond to any questions.

Sincerely
Alan Benenfeld





Marie Mercurio <marie.mercurio@boston.gov>

JP/Rox Comments - delay vote on Plan JP/ROX

Jonathan McCurdy [REDACTED]

Thu, Oct 13, 2016 at 6:13 PM

To: Marie.Mercurio@boston.gov, John Dalzell <john.dalzell@boston.gov>

Cc: Sonia Chang-Diaz <sonia.chang-diaz@masenate.gov>, liz.malia@mahouse.gov, Matt O'Malley <matthew.omalley@cityofboston.gov>, "snainjp@gmail.com Committee" <snainjp@gmail.com>

Ms. Mercurio and Mr. Dalzell,

I am asking the BRA/BPDA to remove the vote on Plan JP/ROX from the October 20 agenda, and asking for **real negotiations** to increase the plan's 30% affordability commitment and decrease the plan's \$50,000-60,000 income levels for affordable housing (on average) – and to negotiate with the Keep it 100% for Egleston group regarding their plan for 70% affordability with an average income level of \$35,000.

The Keep it 100% for Egleston group represents the voice of lower income Bostonians and those that want to ensure housing for all, which is often shut out from “improvements” to our neighborhoods. Delaying the vote and negotiating with Keep it 100% for Egleston will bring us a step closer to an equitable process.

Thank you,

Jonathan McCurdy

--

Jonathan S. McCurdy

[REDACTED]
Jamaica Plain, MA 02130
[REDACTED]



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Fri, Oct 14, 2016 at 12:29 AM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 38

Form inserted: 10/14/2016 12:29:43 AM

Form updated: 10/14/2016 12:29:43 AM

Document Name: PLAN: JP/Rox

Document Name Path: /Planning/Planning Initiatives/PLAN: JP-Rox

Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Matthew

Last Name: Tschiegg

Organization: Resident

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2: [REDACTED]

City: Boston

State: MA

Phone: [REDACTED]

Zip: 02131

Comments: I ride on the southwest corridor every day. It is an amazing transit option for people with bikes. Please consider putting raised crosswalks along the paved pedestrian path to discourage cars from driving fast on the crossing streets. Brookline does a nice job here: <https://goo.gl/maps/pretwcZBWaw>



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Thu, Oct 13, 2016 at 4:32 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 37

Form inserted: 10/13/2016 4:32:47 PM

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Document Name: PLAN: JP/Rox

Document Name Path: /Planning/Planning Initiatives/PLAN: JP-Rox

Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Sue

Last Name: Cibulsky

Organization: Stonybrook Neighborhood

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: I urge BPDA to postpone the hearing and vote on Plan JP/Rox scheduled for October 20 in order to engage in additional negotiations and two-way communication with the neighborhoods covered by this plan. Although the plan contains some elements that are supportive of the neighborhoods, there are many aspects with which residents are uncomfortable. The greater density that the plan would allow would be a huge increase for which we have not received assurance that infrastructure would be similarly expanded (i.e., transportation, retail, and other services). Design elements for new developments also do not sufficiently mitigate the increased massing and density of buildings allowed by the plan. BPDA says it wants to preserve the character of the existing neighborhoods, but what I see in this plan is potential for enormous change in the character of my neighborhood - the Stonybrook neighborhood near Forest Hills. Building heights, setbacks, stepbacks, sidewalks, street widths, and the use of limited outdoor space are all of concern to me as currently defined in the plan. Please postpone a vote on the current version of the plan and engage in negotiations with neighbors and/or explain why BPDA is insisting on certain details of the plan.



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Thu, Oct 13, 2016 at 3:38 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

CommentsSubmissionFormID: 36

Form inserted: 10/13/2016 3:37:44 PM

Form updated: 10/13/2016 3:37:44 PM

Document Name: PLAN: JP/Rox

Document Name Path: /Planning/Planning Initiatives/PLAN: JP-Rox

Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Brian

Last Name: Murray

Organization: Parkside Neighborhood Association

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: There is unfortunately no consensus amongst the Parkside Neighborhood Association members about the JP Rox Final Draft. I, for one, think the JP / Rox process has been very thorough, and unusually inclusive. The main administrators have bent over backwards to hear community voices, and modify the plan accordingly. The MAJOR purpose of rezoning is to help resupply the city's housing stock. Of all possible approaches, increasing supply has been the most efficacious tool for stabilizing rent and housing prices. With tens of thousands of more residents expected in the next few years, we MUST keep ahead of the curve, and resupply, if we want to avoid nightmarish San Francisco and NYC scenarios. The JP / Rox process has done a solid job juggling both local and metro concerns. While these concerns, in any particular patch of the Boston area, are not always overlapping, measures such as density bonuses, setbacks, and inclusive affordability take local concerns into account while addressing obvious inventory shortfalls that plague the metro region. Although there are only about 6-10 members of the PNA that have enough time and interest to meet regularly, there are some that erroneously claim to speak for the entire neighborhood. I can assure the BRA that many neighbors in Parkside enthusiastically support development of sadly underutilized areas, as a matter of basic common sense, to boost housing stock, and to make the neighborhood safer and more convenient for all current and future residents. Can the Orange Line handle more ridership? Probably; and with a greater tax base in Boston with further development, hopefully someday we will enjoy new systems that can handle more cars and passengers, as has been discussed with the Red Line. Can the city water mains handle more housing units in JP? I have no idea, and neither does any other PNA member. I think this question is best left to the experts (architects, engineers, etc.) I'm pretty sure this is a routine contingency accounted for in the design and construction process. JP Rox is using sensible tools to DOUBLE the number of affordable units in the area, which is fantastic. Can JP Rox save 100% of current residents from displacement, which may occur WITH or WITHOUT any new zoning in the area? Of course not. Unfortunately the forces of supply and demand, and the right of landlords to sell their units in the marketplace, will continue with or without the BRA, and is still placing pressure on every housing market, from Somerville, to Newton, to Roxbury. I am thoroughly

convinced though, that the JP Rox process, and the resulting rezoning of the area, does far more to alleviate this pressure on the local area, than exacerbate it. And indubitably, and most importantly, from a metro perspective, greater supply in many parts of Boston will do nothing but help the situation, citywide. I think folks need reminding that the primary obligation of the BRA is not to appease every local incumbent in every corner of Boston (it cannot, nor should not); its charge is to look out for the city as a whole, and manage these difficult changes as best it can. As every city in history, Boston is an organism that grows and shifts, and changes. Good job. Keep it up. Brian Murray JP Resident since 2004 Boston Resident since 1993 Parkside Neighborhood Association Member Public School Teacher



Marie Mercurio <marie.mercurio@boston.gov>

Planning Comment Submission: PLAN: JP/Rox

kentico@cityofboston.gov <kentico@cityofboston.gov>

Thu, Oct 13, 2016 at 3:36 PM

To: John.Dalzell@boston.gov, Marie.Mercurio@boston.gov, BRAWebContent@boston.gov

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Origin Page Url: /planning/planning-initiatives/plan-jp-rox

First Name: Henry

Last Name: Barbaro

Organization:

Email: [REDACTED]

Street Address: [REDACTED]

Address Line 2:

City: Jamaica Plain

State: MA

Phone: [REDACTED]

Zip: 02130

Comments: Mayor Walsh seems to have learned about more than just climate change during his recent trip to China. Apparently he also learned how to apply an authoritarian approach to land-use decisions. I am referring to the JP/ROX development plan which is being rushed to adoption by the Boston Planning & Development Agency, while citizen concerns are largely being ignored. The JP/ROX Plan proposes enormous changes to Jamaica Plain and Roxbury by recommending zoning that will more than double today's number of housing units and population density between Forest Hills and Jackson Square. Although there have been many protests about the Plan not providing enough "affordable housing," it has many other problems. For example, the Plan is not supported by any traffic impact studies. Proposed building heights conflict with adjacent neighborhoods and create a "canyon effect," including two zones reserved for 15-story residential towers. And even though the Plan emphasizes the need to prevent households from being displaced by high housing costs, there is no mention of how many existing residents will be displaced when their homes are razed to make way for large new multi-unit buildings. For months, BPDA has engaged neighborhood residents at a variety of public forums. The meetings were designed to give the appearance that the BPDA cares about the concerns of neighbors. But since then, there have been expedited comment periods for the Draft and Final Plans and, according to the BPDA, they have no intention of responding to the hundreds of comments submitted by City residents. By disregarding the concerns of the citizenry, the Mayor's approach has all the elements of authoritarian decision-making. Furthermore, the JP/ROX Plan could constitute grounds for an "Environmental Justice" complaint. Relative to Boston's overall racial and ethnic composition, the JP/ROX study area has about 70% more residents of Hispanic or Latino origin. And the BPDA is proposing zoning changes that allow massive new multi-unit buildings, including 15-story towers, which at full build-out would more than double the housing density in this area. It is extraordinary to have a government agency allow for this magnitude of change upon a neighborhood. And, even though the Plan emphasizes the need to prevent the displacement of households, there is no indication of how many existing residents will be displaced when their homes are razed to make way for large residential buildings. It seems unlikely that these drastic changes would be

recommended for a neighborhood with fewer minority residents. Rather than have these critical quality-of-life decisions made by the Mayor, the BPDA, and a handful of special interests, the future of this area should be determined through a much more democratic and transparent process, where everyone has an equal voice and is allowed to participate in a meaningful way. It is my sincere wish that, through legal appeals, the BPDA will ultimately fail to impose this high-density development plan on the residents of JP and Roxbury. And that, come November 2017, Mayor Walsh will have to answer to voters for his exclusionary approach to making neighborhood decisions.

Attendees: Jacob Meunier, Chiara Cipriano, Jeff Dietrich, Todd C, Charlie Denison, Stacy Thompson (LivableStreets), Louisa Gag (LivableStreets), AdiNochur (Walk Boston), Jackie DeWolfe (LivableStreets), Andrew Farnitano, Becca Wolfson (BCU), Andreas Wolfe, Chris Batson, Michaela Rudis, Parker James, Gabe Distler, Rob O'Connor, Mark Tedrow, Michael Litman, Sophie Schmitt, Phil Mirmov (LivableStreets), Dan Thomas? (10), BRA-Cecelia Nardi/Marie Mercurio/Jim Fitzgerald/Josh Weiland

Introductions: name, where you're from, what is your favorite cereal?

JP/ROX Plan: Goal is to give the BRA feedback on transportation component of plan

Presentation:

- Overview, mobility workshop, recommendations, discussion, next steps
- Interdepartmental - working with Vineet, Stefanie, Alice Brown, etc.
- Overview
 - 2 Plans - South Boston and JP/Rox
 - To address housing, and because there has been such desire for development
 - Get plan in place while development is going on
 - 44% of households commute via public transportation, 10% walk/bike to work
 - Housing affordability has been the number one issue for this neighborhood plan
 - This meeting kicks off road show
 - Suggesting about 3000 new housing units for study area
- Mobility & Connectivity Workshop
 - Brief presentation, and then breakout sessions in small groups
 - Flash survey - what modes of transportation do you take to get x places, and how would you prefer to get around in a perfect world?
 - Aspiration: walk/bike/subway
 - Favorite places / challenges / opportunities
 - Participants were asked to design ideal roadway - allowed people to understand tradeoffs (ie. What would cycle track mean for parking/sidewalk/travel lanes?)
- Citywide planning initiatives
 - Complete Streets: Better streets - more accommodating for all modes
 - Go Boston 2030: citywide transportation plan - writing action plan now
 - Vision Zero: action item from Go Boston 2030
 - Slow Streets Pilot: Stony Brook neighborhood (half in JP/ROX plan study area)
 - GreenLinks: getting people around the city on non-motorized forms of transport
 - Boston Bike Network Plan –includes recommendations for areas within JP/ROX Plan area
 - Orange Line improvements: new vehicles (in 2019?), slightly larger, will be able to run more often - increase capacity
 - Focus40: MassDOT's planning effort for MBTA
- Recommendations in Plan
 - Area-wide recommendations - built off city-wide policies
 - Apply Complete Streets to all improvements

- Expand on Stony Brook Slow Streets work - build Slow Streets toolbox
- Ped/Bike safety, Ped/Bike wayfinding
- Signal coordination efforts reduced to 25 mph benchmark
- Connecting to neighboring areas/links/etc.
- Transit
 - Mobility Hubs: consolidating transit options in one place, ex. T station
 - Boston Drives- dedicating curbside parking to carshare
 - Unbundle parking from units

Area-specific/corridor-specific recommendations

Columbus Ave: important for buses, useless median, need to do formal design/further analysis

Washington St: not as wide as Columbus (60' vs. 80')

EglestonSq: room for improvement - curb extensions, maybe get rid of median and 1 through

lane

Local neighborhood streets: neighborhood Slow Streets / traffic calming measures

SW Corridor Park - build connections on E side of Orange Line

Discussion:

- BRA: Parking is a sticking point for some people
- Question: Any discussion about changing regulation? Is parking overused or hard to find?
 - BRA met with EglestonSq Merchants Association: parking is a need for businesses, they wanted BRA to build parking garage, upset about development of municipal parking lot
 - This is an educational opportunity –pose the question to them: what else can we do with this money besides build a parking garage?
 - Also - meters can be a tool outside of downtown, in village centers
 - Issue: people using residential side streets to park and then get on Orange Line
 - If residential stickers weren't free, this issue would be better dealt with
 - First step, before metering: add 2 hour parking limits
- Question: how comprehensive is parking data?
 - That data collection hasn't been done yet - should do occupancy, turnover, license plate surveys
- Question: Parking ratio? Zoning requires one thing (which are too high), zoning is determined by Article 80. If we got a parking ratio of .7 in Roslindale, not next to Orange line - this can be better!
 - Can't contradict base zoning code
 - Can this plan be reflected in updating zoning? Yes. these will be translated into new zoning recommendations (but still can't contradict base zoning)
- Base Zoning:
 - Separate parking article within Base Zoning that is city-wide
 - Process going on now to change Base zoning - Article 23 for Parking
 - Zoning amendments are common
 - New zoning that comes out of this will be Neighborhood Zoning, can't contradict Base Zoning
 - 55 JP, 50 Roxbury - applicability clause: can't supersede
 - Who is this determined by? BRA is planning agency. BRA can amend zoning, zoning must be approved by Zoning Commission - there is a community process before it reaches Zoning Commission
- You can get zoning variances - very common in City of Boston
- Article 80 - small/large project review process

- Large project: over 50,000sqft
 - Small: over 20,000 sqft or 15 units
 - Community process is part of this
 - Large project reviews are hyper-local, and a lot of neighbors come to them, are worried about losing on-street parking
- LivableStreets is not anti-development, we're pro-density, have been weighing in more on development conversations
 - How can we tell a new story about density - create livable communities without congestion?
- Question: implementation - how can we do things quick, cheap, temporary - is it working, should we continue with trend? Then - make permanent.
- Question: BRT corridor planned along Columbus Ave along Orange Line - but none on Washington St. Why not Silver Line extension from Dudley through Forest Hills?
- Question: Plans have gotten less specific/certain in South Boston Plan that's farther along. What commitment can you make to serve the x number of people who wish they could bike?
- Question: Timeline and implementation? Policy changes could help reduce conflict around parking. Can early-process policy changes be used to take commuter spots off - leverage into design phase?
- Question: Where will extra sidewalk space come from? Parking or my yard?
- Question: Early implementation/testing - commitment to testing changes in a quick timeframe like bike lanes and bus lanes?
- Question: No more sharrows(because I want a bike lane or cycle track)! Queue jump lanes - far side bus stops are better and safer for people on foot because they daylight the crosswalks.
- Question: What capacity can you use these Plans to identify newer/better policies to be implemented city wide? Example - how can we push to have low parking/unit?
- Question: Where will buses from bus yard on Washington St go? It would be bad if they had to drive farther to get to their route.

Summary/Response:

- Implementation / timeline?
 - Chart at the end of the Plan with timeline - short/medium/long term
 - Short term: 0-3 years, etc.
 - BRA loves cheap + fast
 - Difficult to implement pilots - but talk of doing more, like the parking protected lane on Beacon St. Slow Streets is a pilot
 - BRA: Will take pilot infrastructure back and talk about it
- How can we use this plan to be visionary for the rest of the city?
 - We are doing a transportation plan city-wide. This is a land-use plan. This may not be the right place to be pushing those policies.
- Concrete recommendations?
- How will you expand sidewalks?
 - Quoting City's Complete Street guidelines - these are aspirations
 - BRA: Where we can, we're trying to get 7ft
 - BRA: We would never take land away from someone to wider the sidewalk, maybe would take parking away
- Next steps: How can LivableStreets be helpful?
 - One comment letter of feedback - comments, recommendations: within the next 2-3 weeks -- Andreas will be point on this.

- Fine to outline explicit, immediate action items. Example: maintenance items that we can do ASAP
- 2nd draft coming out by third week of September
- Will have to be approved by BRA board - by October hopefully
- Come to review meetings. Come to development meetings.

Stonybrook Neighborhood Association Small Group Meeting 7/28/16

- The BRA Urban Design Plan for Stonybrook/Forest Hills is better and more visionary than the actual plan for 76 Stonley. Residents liked what was in the planning document for the site of 76 Stonley because it actually showed open space, for which the proposal is not providing enough.
- How can the guidelines/plan help us make sure that development sites do not get completely maxed out (i.e., LI zoning has no real setbacks or open space requirements)? We need to have open space in each development site.
- Roads need to be completed and up to standard for Stonley/Stedman to accommodate any more future development. Private developers have to bear the costs of this infrastructure in industrial sites. How to get the infrastructure going before more development happens?
- Questions about affordable housing and the Arborway Yard. Does it have to be there (at least the bus facility/parking)? Why are the concepts 15 stories tall? What were the justifications? Other very tall buildings in Jamaica Plain have massive set-backs. Can you guarantee us that here? A fifteen story building right up against the sidewalk on Washington Street would not be appropriate.
- How does JP/ROX match up with the agreements and the past work of the CPCAY? Why would we plan anything in advance of knowing what the MBTA's plans are?
- Praise for any short-term improvements to the Arborway Yard. Likes the plan. Had been to several meetings and feels like the BRA incorporates a lot of the feedback that was given. Interested in knowing what the disposition process would be like for the first potential piece of land that could be given to the City for housing.
- Housing supply/demand question. Is it really true that if you increase supply, demand and prices will decrease? If so, where are examples where this is happening. Small local landlord noted that rents are now starting to decrease after an increase for 4-5 years.
- Lotus Avenue. The BRA put three family houses on her private land. What do these drawings in the plan mean? Will the BRA acquire her land for new development (Eminent Domain - NO!).
RESPONSE: All illustrations in the plan are CONCEPTUAL for stimulating discussion. Any omissions of property or development on private property were not real proposals and will be corrected in the second draft.
- How will transit infrastructure sync up and meet the needs of future growth?
RESPONSE: Inter-departmental group includes MBTA. Ongoing discussions with Mark Boyle from the T. New cars coming online in 2018 to decrease headway from 6 to 4 minutes.
- This area shouldn't have to take the brunt of so much development. Fifteen stories will add more cars to roads, more riders to the T. With LAZ parking lot going away, that's 300 more cars on our streets. We are a commuter neighborhood unlike the other focus areas.
- If you are keeping the base zoning in much of the Stonybrook neighborhood (industrial), how can we assure that setbacks and open space will be incorporated into new proposals (LI zoning has minimal setback requirements and no open space requirements). How can the plan guarantee that?

RESPONSE: Do folks want to move land out of LI and into a 3F subdistrict? There would be no RDA eligibility in 3F, and therefore no possibility for any additional affordable housing. Do they want to mark up a zoning map to show us what they might recommend for zoning subdistrict changes and we'll take it under consideration.

- Talked about the possibility of a short BRT lane at the end of Washington Street to maximize regular traffic flow. Positive response from this but they wanted more details.
- Very excited about the potential to extend the SWC and change ownership from MBTA to DCR for the parcels behind the new mixed use development on the east side of the ROW Orange Line cut. Glad this is a strong recommendation in the plan.



STONYBROOK NEIGHBORHOOD ASSOCIATION

Jamaica Plain, Mass 01230 | snainjp@gmail.com | sna-jp.org

Brookley • Burnett • Dungarven • Forest Hills • Gartland • Kenton • Lotus • Meehan
Plainfield • Rockvale • Rossmore • Shurland • Stedman • Stonley • Washington • Williams

SNA RESPONSE TO PLAN: JP/ROX DRAFT # 1

Page 39, Outcome – Workshop 3 (As written, with our suggested edits in **red**):

- Greater height at gateway districts of Jackson Square and Forest Hills
- Maintain certain land uses (LI) in order to preserve jobs
- Focus retail at Jackson Square and Egleston Square, **as well as at Green Street and Forest Hills.**
- Transition heights to the scale of the existing neighborhoods, stepdown approach
- Keep ground floor retail along Green Street **and Washington Street between Green St. and Forest Hills**

Page 43, Outcome – Workshop 5 (As written, with our suggested edits in **red**):

- Green Street: strengthen retail corridor along Green Street to create more vitality and increased pedestrian activity, step back height to respect adjacent residential neighborhood.
- Forest Hills: **Heights of 5 to 6 stories** were generally considered acceptable along Washington Street.

COMMENT: While 5- to 6-story buildings along Washington Street may be acceptable to Forest Hills area residents, we do not believe that residents are supportive of 13- to 15-story buildings. Unlike other neighborhood corridors outside the city's downtown where these building heights exist (e.g. Boylston St. in the Fenway), Washington Street is relatively narrow with only two travel lanes. In this context, buildings this tall, where they occupy substantial portions of the street frontage, have the potential to create a tunnel effect.

The height proposals in Workshop #5 are also a concern when considering how the resulting significant increase in density and activity could impact the existing neighborhood:

- The BRA development scenarios suggest 1,000-1,300 new residential units in the Forest Hills area, which will be in addition to the 1,000 units already planned/under review/under construction within a half mile of the SNA neighborhood.
- While the Stonybrook Neighborhood Association (SNA) supports sustainable density, the current plan does not appear to reflect the limits on capacity dictated by supporting infrastructure, particularly considering:
 - a) Washington Street cannot be widened, nor can any of the streets that connect to it;
 - b) Protected cycle tracks may not fit in the existing street width;
 - c) The upcoming 25% increase in capacity on the Orange line does not likely match what will be needed to fully address the expected increase in residents and visitors; and
 - d) Although many projects proposed and under construction in the area (Commons at Forest Hills, 3521-9 Washington Street project, Parcel U on Hyde Park Avenue, etc.) are transit oriented, there will undoubtedly be a gain of car traffic and public transit/bicycle traffic comprised of those living in, working in, and visiting the area.

- The SNA would like clarification about whether the Casey Arborway project traffic planning accommodated for the increase in population resulting from multiple 14-15 story buildings.

Page 52, NEIGHBORHOOD CHARACTER & LAND USE CONTEXT

AS WRITTEN:

Forest Hills / Stonybrook Neighborhood

In the Forest Hills / Stonybrook Neighborhood area, development along Washington Street is changing the landscape. Low-intensity, auto-oriented uses on large sites along the west side of Washington Street are being converted to multi-family 5-story mixed-use developments. East of Washington Street is a tight-knit enclave of three-family homes (“triple deckers”) with intermittent one-, two-, four-, and six-family dwellings. The neighborhood desires safer streets for people to walk or bike. Doyle’s is a beloved neighborhood anchor, and everyone knows “the car wash” or “Hat Offs” as a local icon. Some people may not know that the 527-acre Franklin Park, the largest park in the City of Boston, lies just beyond the residential area in Forest Hills.

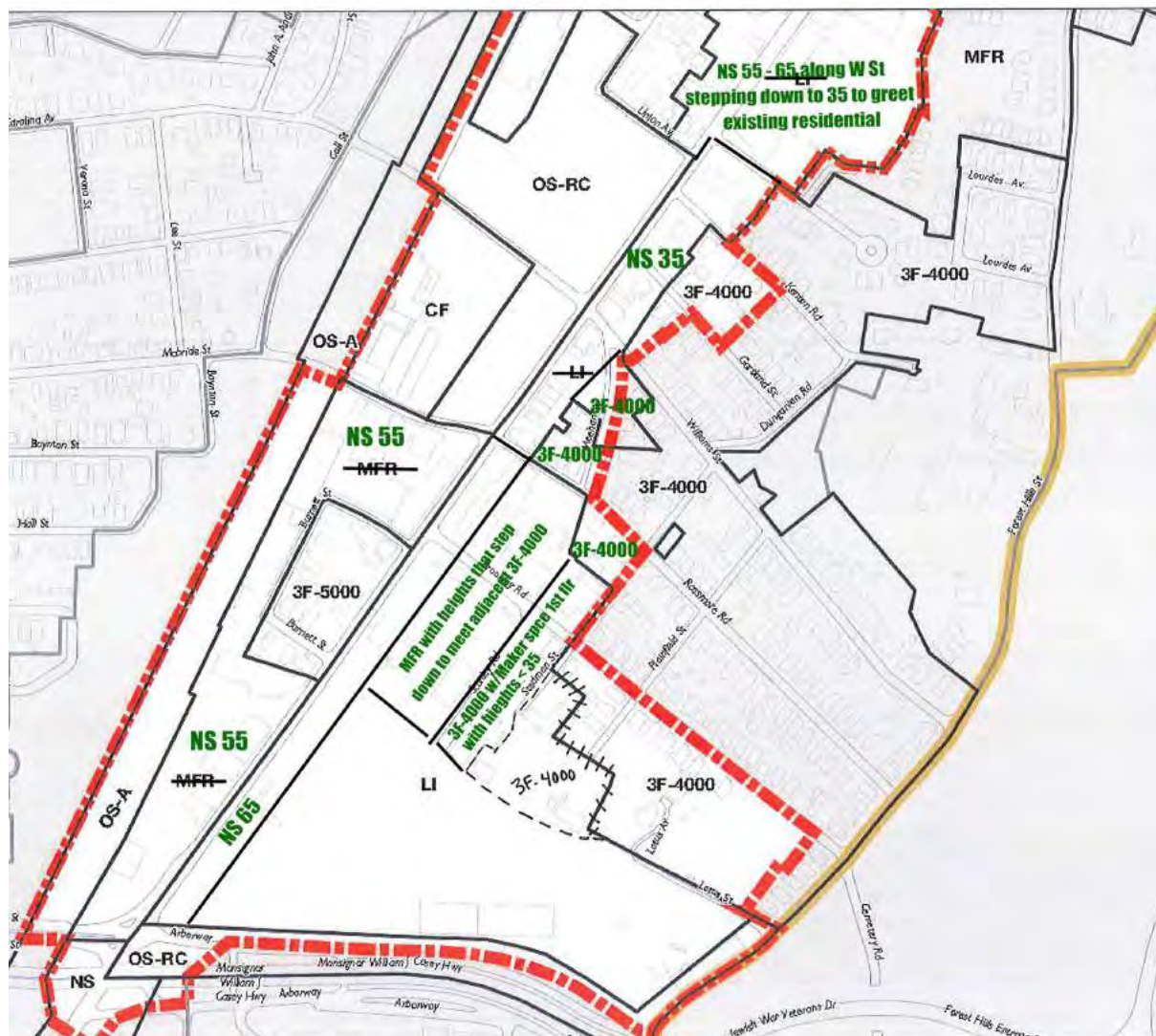
**PLEASE DELETE THE REFERENCES TO THE CAR WASH AND HAT OFF’S
AND CHANGE TO:**

Forest Hills / Stonybrook Neighborhood

In the Forest Hills / Stonybrook Neighborhood, development along Washington Street is changing the landscape. Low-intensity, auto-oriented uses on large sites along the west side of Washington Street are being converted to multi-family 5-story mixed-use developments. East of Washington Street is a tight-knit enclave of three-family homes (“triple deckers”) with intermittent one-, two-, four-, and six-family dwellings. This multicultural and economically diverse neighborhood desires pedestrian-oriented commercial and community uses that enliven the streetscape and better provide for needed community goods and services that are currently lacking in the southern end of Washington Street. Residents hope to encourage high-value uses that take advantage of the neighborhood's proximity to a major transit line. They also want safer and more attractive streets. Doyle’s is a beloved neighborhood historic icon and the 527-acre Franklin Park, the largest park in the City of Boston, lies alongside the residential area.

*****Important note to document authors:*** Residents of the Forest Hills / Stonybrook neighborhood do not want their neighborhood characterized by a gas station and a car wash. Hatoff’s is a blighted, poorly maintained property/business that is a constant source of trash, noise, fumes, light pollution, traffic, and sometimes unwanted behavior. Its multiple curb cuts make walking or cycling past the site a hazard. Meantime, the car wash is a retail operation that brings hundreds of additional cars into the neighborhood and contributes to traffic gridlock on Washington Street. These auto-oriented uses don't fit into neighboring residents’ vision for Washington Street.

Page 61, Proposed zoning changes - MAP of zoning changes requested by the SNA:



The SNA requests the following modifications to Figure 35, map of proposed changes to zoning subdistricts:

- The MetroMark, Flanagan & Seaton properties be changed from LI to NS 55;
- Any property along Stedman and Plainfield Streets currently zoned LI should be changed to 3F 4000, with the caveat that residents are not opposed to makerspace on the first floor of new construction.
- The west side of Washington from Forest Hills to Green Street be changed from LI to NS 55-65, except when abutting 3F 4000. When the latter condition exists, NS 35.
- Stedman Street - 3F 4000
- All current single family, 2-family, and 3+ family residential be preserved or changed as needed to reflect current use.

Forest Hills residents want a neighborhood shopping (NS) subdistrict with allowable building heights of 55 ' - 65' (stepping down to 35' adjacent to 3F 4000) along the southern end of Washington Street in the Forest Hills area, with ample ground-floor retail along with residential and office uses above. Retail on the first

floor creates a more enlivened streetscape and prevents “dead” stretches of sidewalk at night, especially important on Washington Street, which currently possesses this undesirable quality.

Residents envision a mixed-use, form-based approach, with minimum heights of two full stories for all new or redeveloped buildings on Washington Street, along with broader use of form-based zoning in the study area. Residents request that the NS designation be broadened to include ground-floor personal services (such as the existing yoga/massage studio and Keegan’s service station) with professional services/office uses above.

****IMPORTANT NOTE regarding Stedman Street:** The BRA’s proposed development scenario, which calls for 100 new housing units spread across a cluster of 5-6 story buildings along Stedman Street between Rossmore Road and Brookley is grossly inappropriate for this narrow residential side street. Please note that where Stedman Street currently has sidewalks, cars cannot pass going in opposite directions. The same condition will exist on Stedman between Rossmore and Brookley Road once sidewalks are installed. The street includes a heavily used City of Boston “tot lot” at the corner of Stedman and Rossmore Road. This is a 3F 4000 residential area. While neighbors are not necessarily opposed to makerspace on the first floor of new construction on Stedman, they want to reduce the number of proposed housing units consistent with 3F 4000 zoning. Also note that a development proposal currently underway for 76 Stonley, which backs to Stedman Street, already adds 28 new units to this narrow street.

Page 94, ISSUES: Unmet Community Needs

COMMENT: Egleston Sq is not the only area the study with unmet needs for goods and services. Washington Street south of Williams has a dearth of businesses to meet the needs of a rapidly growing neighborhood, most importantly a moderately-sized grocery store. See page 6 of SNA survey for needed/wanted businesses: <http://bit.ly/1XTim1A>.

Page 103, Encourage Affordable and Accessible Commercial Space

PLEASE ADD:

Establishment of an affordable retail rental fund for small businesses (modeled on the BRA’s Inclusionary Development Program fund for affordable housing) that would assist small businesses in accessing affordable commercial space.

Page 110, Bicycle Network Existing

PLEASE ADD:

- Wherever possible create protected cycle tracks instead of lanes or sharrows. Widening the road to accommodate them, or creating defined bike paths within wider sidewalk areas will help achieve safer bicycle infrastructure.
- Consider eliminating parking on one side of street for bike lane.

Page 114-116, Study Area-Wide Recommendations

“In order to foster cycling throughout the Study Area, the City will take advantage of every opportunity to add to the bicycle parking supply...”

PLEASE ADD:

- Publicly accessible bicycle racks, as well as bicycle-friendly storage options such as common bike sheds or garages that can accommodate secure bicycle storage in residential developments. Larger developments shall include long- and short-term public sheltered bike storage options.

“The City is committed to work with the MBTA to improve reliability on the Orange Line and bus routes.”

PLEASE ADD :

- A requirement that developers of high density housing (or for other types of projects in excess of 20,000 square feet) along Washington Street contribute financially to the maintenance of or capital improvements to the MBTA Orange Line.

Page 118, Washington Street Recommendations

“Additional study should be undertaken to evaluate how Washington Street can be a pleasant place for all modes, both to move along and to cross. This study should consider...better on-street parking management.”

PLEASE ADD:

- Metered, short-term parking on Washington Street.
- Creation of a metered municipal parking lot behind an existing or new building on Washington Street.
- Also, consider residential parking stickers for existing small-scale housing to prevent large TOD project residents from parking on the street instead of renting spaces inside their buildings. Discourages car owners from moving into TOD projects.
- Also, consider widening Washington Street each time a new development is proposed/designed. Developers would give up parcel edges to widen street, add cycle track, widen sidewalk, preserve parking, etc. Eventually full blocks could turnover (Arborway Yard for example) and as a result Washington could accommodate more of this ped/bike friendly infrastructure in the far future.

Page 122: OPEN SPACE / PLACEMAKING / PUBLIC REALM

General suggestion: Please consider making a distinction between “Green Space” and “Open Space” and increase requirements for each. Unpaved, planted, green areas do a lot more for the environment and for the people who use the space than porches, balconies, and patios or other non-planted open spaces.

Page 123 map: Please label Minton Stable Community Garden

PP 132-134, Recommendations for Forest Hills

As written:

Character: neighborhood gateway and transportation hub

Please change to:

Character: A dense, predominantly 3-family residential neighborhood. Washington Street's mostly industrial character is at the forefront, but is rapidly changing over into large-scale residential/retail mixed use. Serves as a neighborhood gateway and transportation hub.

Recommendations (As written, with our suggested edits inserted in **red**):

- Enhance connection to MBTA station as a walking, biking, public transit center.
 - Expanded Southwest Corridor (more facilities and more connections from Washington Street to Green Street)
 - Enhance pedestrian use on Washington Street by widening sidewalks and including more amenities. Create active entrances and edges directly on Washington Street. Buffer sidewalks, space permitted, from faster moving car traffic.
 - Concentrate active public and semi-public spaces adjacent to active retail and services uses. Concentrate these open spaces at major entry points to signal a 'gateway.'
 - Parking entrances, loading docks, and service entrances should be configured to minimize impacts to **Washington Street** ~~Columbus Avenue~~ and adjacent properties. The building shape and roof line (i.e. massing and edge) should be varied to mitigate the urban canyon effect. **(Correct mistaken reference to Columbus)**
 - Public access routes to better connect Stonybrook Neighborhood and Washington Street.
- (COMMENT/QUESTION: Does the BRA mean pedestrian rights of way? Residents feel that they have plenty of connections to Washington Street.)**
- Strategize new and enhance existing programs at Franklin Park to increase visitability
 - Provide better connections from the residential areas to Franklin Park. **PLEASE ADD: improve the pedestrian crossing at Williams and Forest Hills Street by creating an unobstructed path directly to entrance from both western corners, via diagonal crosswalk or raised intersection.**
 - Preserve and activate MBTA ROW behind new development **along Washington Street between McBride and the Forest Hills T Station** as a continuation of the Southwest Corridor **(Reworded to improve accuracy.)**

P 135, Neighborhood-Wide (As written with our suggested edits inserted in **red**):

- "Spaces for public art from local artists and interesting architectural expression create a diverse mix of neighborhood identities for different activity nodes." **ADD: developers of projects of a certain size will be required to make financial contributions to a BRA fund for public art. The city should work with Boston Creates to establish a percent for art program.**
- "Consider maximum lot coverage requirements in order to promote the creation of on-site open space." **ADD: "and green space" (See note above for page 122.)**
- "New community garden space **and/or** dog park space." **PLEASE CHANGE to "and." We need both.**

Add new bullet:

- Establish a requirement for street trees and financial support for planting and maintenance of public street trees or landscaped setbacks. Tree selection should promote species with a robust canopy to provide shade and urban heat island mitigation. Plant selection should avoid harmful invasive species.

Page 136-137, SUSTAINABLE DEVELOPMENT & GREEN BUILDINGS

Recommendations: Green Infrastructure

“Minimize the area of paved surface so that it is no greater than necessary to meet the needs of existing and new uses”

PLEASE ADD:

- Encourage use of permeable pavers or other permeable surfaces if areas must be paved.

Page 140, URBAN DESIGN GUIDELINES: Area-Wide

QUESTIONS:

Are the Urban Design Guidelines for all development or just RDA?

Will residents have a voice in the review and establishment of design guidelines?

Public Realm

PLEASE ADD:

- All lighting, whether on building exteriors, in private or public parking areas, or in open spaces, and street lighting should be fully shielded and dark-sky compliant. Historic Boston street lamps and most of the new LED street lights are not compliant.
- Improvements to existing streetscape conditions with new/re-aligned curbing, wider landscaped sidewalks, pedestrian-scale dark-sky-compliant street lighting, street furniture, and enhanced paving. Improvements to be coordinated and implemented with the district-wide streetscape plan. New and existing streetscapes should be beautified and continually maintained.
- Formula architecture will be prohibited.
- New development/redevelopment will be required to provide direct egress to and from the public way for all ground-floor space fronting on the primary public way. No ground-floor facade or portion thereof fronting on the primary public way shall extend for more than 25 feet along such frontage without a building entrance.
- Ground-floor spaces fronting on the primary public way will be reserved for small-scale neighborhood businesses, with a requirement for the express, conditional approval of the community if in excess of 1,500 sq. ft.
- To facilitate improvements to the design of new and existing buildings and the public realm, developers will be required to provide high quality planning, design, construction, materials, and structured community design review, perhaps through the creation of an organized Washington Corridor Design Review Board established in collaboration with the BRA/City of Boston.
- New development/redevelopment will be required to make improvements to existing streetscape conditions with new/re-aligned curbing, wider landscaped sidewalks, pedestrian-scale dark-sky-compliant street lighting, street furniture, and enhanced paving. Improvements to be coordinated and implemented with the district-wide streetscape plan. New and existing streetscapes should be beautified and continually maintained.
- Where possible and appropriate (e.g. unavoidably blank walls), murals/public art and/or vertical landscaping should be used to enliven a project's building exterior, as well as its public space. Applicants for new development should be required to enhance the associated public realm by sponsoring public art.

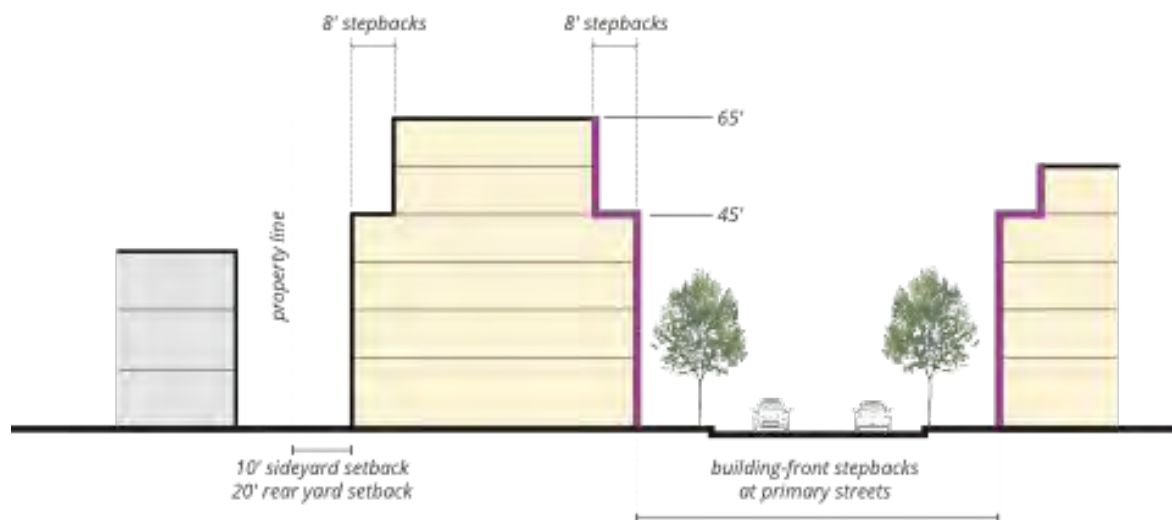
- New development/redevelopment will be required to provide substantially transparent ground-floor commercial facades fronting on commercial streets (i.e. at least 75% glass), allowing pedestrians to see into and through these spaces, establishing strong visual connections between internal activity and external street life.
- Security during non-business hours must be addressed primarily through thoughtful, full cutoff lighting, alarm systems, and other visually unobtrusive means. Roll-down window security devices should be prohibited.
- Building facades and related exterior architectural elements (including windows, doors, and decorative fencing), particularly those at the ground-floor level, should be made from high quality, durable, preferably natural materials.
- Lower-quality, synthetic, or highly manufactured materials generally associated with low-cost construction, such as vinyl siding, should not be used, unless otherwise expressly approved in consultation with applicable neighborhood organizations.
- Where applicable, any fencing should be not simply functional but decorative, high quality and made from solid, durable wood or metal, such as cast iron, as opposed to more easily damaged, non-decorative fencing materials such as pressed aluminum, vinyl, chain-link, etc.
- Utilities:
 - All new utilities should be placed underground.
 - Existing utilities should be placed underground where appropriate.
 - Utility panels, boxes or other elements that are required to be visible and easily accessible should be located outside the sidewalk's clear/walking zone, and where possible integrated into the building's façade.
 - Where it is infeasible to bury existing utilities, they must not be relocated to the advantage of new development and the expense/detriment of abutting property owners and residents.

Page 142, Open Space and Landscaping:

See note above for page 122.

PLEASE ADD:

- Establish a minimum square footage for porch/balconies so they can actually be used (i.e. can they fit a small table and two chairs?).
- Replacement tree should be equivalent or better than tree removed in terms of ability to provide shade.
- Healthy, significant specimen trees of a certain age, size, height or type (to be determined by Boston Parks Dept) must be evaluated before removal, and removal must be permitted by Boston Parks. Need to preserve significant healthy trees.



THESE SETBACKS ARE INADEQUATE ESPECIALLY NEXT TO EXISTING 3-STORY RESIDENTIAL.**

****THE SNA AGREES WITH THE EGLESTON SQ N.A.'S SETBACK DIAGRAMS:**

<https://drive.google.com/file/d/0B4OwhXSecttpX0NiRE1FaEpFdzg/view?usp=sharing>

Page 143:

“Building Height, Scale and Massing PLAN JP/ROX first seeks to preserve the scale and character of the existing residential Two-Family (2F) and Three-Family (3F) subdistricts by reinforcing the current land uses, height limitations, and dimensional requirements.”

***** SPECIAL REQUEST:** The SNA requests that the Plan: JP/Rox corridor **study edges be better defined and tightened up so they do not include any areas currently zoned as residential (3F-4000, 3F-5000, etc.).** Many small residential houses in our neighborhood are currently included in the study area, and the SNA is concerned that they could be rezoned for a different use, allowing for larger scale/increased density, and providing the opportunity for developers to buy these houses, demolish them, and replace them with projects out-of-scale with the existing residential neighborhood.*******

Page 144

AS WRITTEN in the BRA draft plan:

Building Street Front Setbacks should generally reinforce existing street wall conditions while ensuring appropriate sidewalk widths and buffer areas to support new and existing uses. In locations where the public right of way is too constrained to allow minimum sidewalk widths, new buildings should be setback to allow for wider sidewalks. See Transportation and Connectivity recommendations and Boston Complete Street guidelines for minimum and ideal width dimensions.

● RDA Building Front Setback:

1. Residential – 10' to 15' to buffer ground floor uses.

2. Main Street / Active Commercial – 0’ to 10’ to provide opportunities for outdoor seating. ****0’ would not provide opportunities for outdoor seating.**
- RDA Building Side and Rear Yard Setbacks:
 1. Residential – Side 10’ / Rear 20’.
 2. Main Street / Active Commercial – Side 0’ to 10’ / Rear 20’.

Side and Rear Yard Setbacks should be sensitive to existing abutting uses and buildings while supporting new uses and building conditions.

RDA Building Step-Backs should ease transitions between new and existing buildings and reduce the overall massing of new buildings.

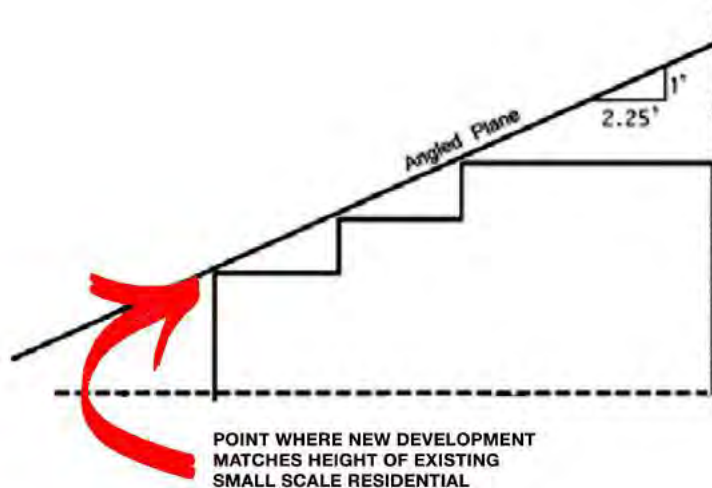
- Front Step-Backs (street facing):
 1. Buildings over four stories / 45’ must include at least one step-back, at minimum 8’ deep and across 80% of the front / street facing façade, additionally,
 2. Buildings over six stories / 65’ must include a second horizontal step-backs at 65’, at minimum 8’ deep and across 100% of the front / street facing façade
- Side and Rear Yard Step-Backs:
 1. Buildings over four stories / 45’ must include at least one step-back, at minimum 8’ deep and across 100% of the side and rear facing façades, additionally,
 2. Buildings over six stories / 65’ must include a second horizontal step-back at 65’, at minimum 8’ deep and across 100% of the side and rear facing façades.”

RESPONSE:

The Stonybrook Neighborhood Association disagrees and requests the following setbacks and stepbacks:

- New developments abutting existing housing in residential zones (e.g. 3F-4000), shall, at minimum, have the same residential setback and height requirements for the side(s)/portion(s) of the new building(s) facing the existing abutting residential building(s). New developments should only step up in height in excess of the height of the abutting residential zone at a gradual, context-sensitive distance (generally a minimum of 22.5’) from the plane of the new building’s abutting elevation.
- In general, the angled plane or skyplane created by the gradual upper-floor height setbacks should be consistent with the angle of a diagonal line that rises 1’ relative to the horizontal plane of the top of the new building’s residential-abutting elevation for every 2.25’ in distance along that horizontal plane and away from the top of this abutting elevation (in the opposite direction of the existing residential)
- In addition to requiring upper-story setbacks as outlined above for portions of new developments abutting small scale housing, building height for portions of new development fronting on Washington Street shall not:
 - Exceed 42’ within a depth of 10’ from the front setback;
 - Exceed 52’ within a depth of 20’ from the front setback; or
 - Exceed 69’ for any other portion of the building not further restricted by height setbacks associated with proximity to an abutting residential property;

Exhibit B from the SNA Washington Corridor Vision Document:



Page 145, Figure 95,

Please see comments and map above concerning proposed zoning changes, page 61.

The SNA requests the following modifications to Figures 35 and 95, map of proposed changes to zoning subdistricts, and Recommended RDA zones:

- The MetroMark, Flanagan & Seaton properties be changed from LI to NS 55;
- Any property along Stedman and Plainfield Streets currently zoned LI should be changed to 3F 4000, with the caveat that residents are not opposed to makerspace on the first floor of new construction.
- The west side of Washington from Forest Hills to Green street be changed from LI to NS 55-65, except when abutting 3F 4000. When the latter condition exists, NS 35.
- Stedman Street - 3F 4000
- All current single family, 2-family, and 3+ family residential be preserved or changed as needed to reflect current use.

Page 164 – 167, Urban Design Guidelines for Forest Hills

Area Character and Future Vision

Area Uses (As written with our suggested edits inserted in **red**):

- Washington Street Corridor – anchor the Stony Brook neighborhood with new mid rise **and high rise**-mixed use buildings with active community serving retail and service business uses at street level along Washington St.
- Artist / Maker Live Work Area – cluster alternative live work **3-story** building types along Stonley Road and Stedman Street. **(BRA should partner with the City and BostonCreates initiative to fund such spaces.)**
- Neighborhood Residential Area – reinforce existing residential uses along **Brookley**, Stedman and Plainfield Streets.
- **Southwest Green** Corridor **Extension** – expand the Southwest Corridor Park with new linear park space along the east side of the **MBTA** rail corridor between Forest Hills and McBride Street.

Stonybrook Neighborhood Association PLAN: JP/Rox feedback, 08.22.16

P. 165 map is missing second access point to new SWCP extension on Burnett Street south.

Please see:



Page 166

Area Circulation and Connections (As written with our suggested edits inserted in **red**):

- Enhance vehicular circulation with new roadway network and connections:
- Extend Lotus St from Forest Hills Street to Washington Street ****COMMENT: Residents are concerned that this will just continue cut-through traffic in our residential areas.**
- Extend existing street network at Stonley Road, Stedman, and Plainfield Streets
- Widen Washington Street between the Arborway and McBride Street to allow for wider sidewalks, **cycle tracks, and** a prioritized bus lane.
- New pedestrian and bicycle facilities in expanded SW Corridor Park.
- Add pedestrian connections from Washington Street to new Green Corridor.

PLEASE ADD:

- **Add more crosswalks or other pedestrian-crossing friendly infrastructure in regular intervals along Washington Street.**

Page 166, Building Height and Massing

AS WRITTEN:

Envisioned as a neighborhood gateway, the Forest Hills / Stonybrook area has the support** and potential for a small cluster new high-rise buildings while ensuring an appropriate transition to the existing neighborhood.

****PLEASE NOTE: We believe that most SNA members do not support the proposed high-rise buildings.**

AS WRITTEN:

In addition to building massing, setback, and step-back requirements, three maximum building height categories define specific RDA Zones as follows:

- RDA - 55 – 4 to 5 Stories / up to 55' - adjacent to existing 3 to 4 story buildings.

The SNA membership requests this be modified to say “no higher than 35’ adjacent to or across from existing 3 story buildings and no higher than 45’ adjacent to existing 4 story building.”

- RDA - 65 – 4 to 6 Stories / up to 65' - adjacent to existing 4 to 5 story and new buildings.
- RDA - 155 – 7 to 15 Stories / up to 155' - adjacent to new buildings.

OUR RESPONSE:

To restate the SNA’s position on high-rise buildings in the Forest Hills neighborhood, as articulated in our Washington Corridor vision document submitted to the BRA in April 2016:

Unlike other neighborhood corridors outside the city’s downtown where these building heights exist (e.g. Boylston St. in the Fenway), Washington Street is relatively narrow with only two travel lanes. In this context, buildings this tall, where they occupy substantial portions of the street frontage, have the potential to create a tunnel effect.

The height proposals are also a concern when considering how the resulting significant increase in density and activity could impact the existing neighborhood:

- The BRA development scenarios suggest 1,000-1,300 new residential units in the Forest Hills area, which will be in addition to the 1,000 units already planned/under review/under construction within a half mile of the SNA neighborhood.
- While the SNA supports sustainable density, the current plan does not appear to reflect the limits on capacity dictated by supporting infrastructure, particularly considering:
 - a) Washington Street cannot be widened, nor can any of the streets that connect to it;
 - b) Protected cycle tracks may not fit in the existing street width;
 - c) The upcoming 25% increase in capacity on the Orange line does not likely match what will be needed to fully address the expected increase in residents and visitors; and
 - d) Although many projects proposed and under construction in the area (Commons at Forest Hills, 3521-9 Washington Street project, Parcel U on Hyde Park Avenue, etc.) are transit oriented,

there will undoubtedly be a gain of car traffic and public transit/bicycle traffic comprised of those living in, working in, and visiting the area.

SNA COMMENT ON ARBORWAY YARD:

The MBTA's Arborway bus yard is a major challenge to the BRA's plan to add hundreds of residential units in several high and mid-rise buildings along Washington St. The bus yard cannot be developed until a permanent bus facility is built, which apparently is unlikely to happen in the foreseeable future. Furthermore, some of the BRA's proposed buildings encroach on the MBTA's proposed permanent bus facility. Since proposed affordable residential units on this site account for a large percentage of the BRA's total proposed affordable units for the JP/Rox Plan, the SNA recommends that the BRA acknowledge this limitation and perhaps provide a contingency plan.

RECOMMENDATIONS TABLE

P. 173, LAND USE:

- ADD: Promote Washington Street between Forest Hills Station and Williams Street as neighborhood shopping corridor

P. 175, Housing Strategies: "Prioritize City and BRA owned land for the creation of low and moderate income subsidized housing."

- ADD: State-owned

P. 176, JOBS AND BUSINESS: "Ensure resources and support of existing organizations that support small businesses, e.g. Main Streets and CDCs"

- ADD: Establishment of and funding for a new Main Streets Association for Forest Hills (Washington Street and Hyde Park Avenue) in order to support and connect existing and new businesses located south of the Egleston Square Main Streets zone.

P. 193, URBAN DESIGN AND PUBLIC REALM:

"Consider a requirement of shadow studies for any development over 4 stories (?)"

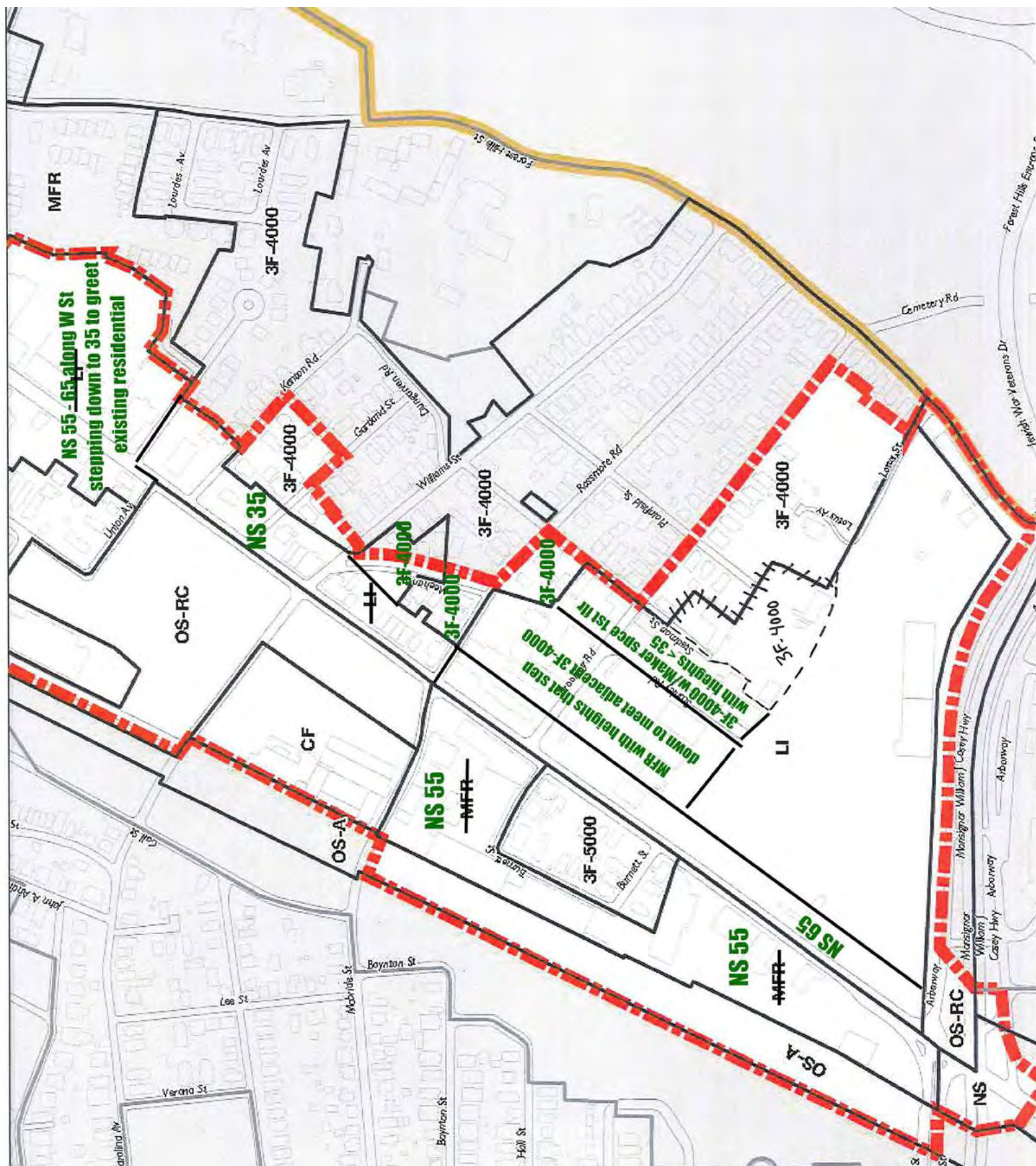
- CHANGE TO **REQUIRE**

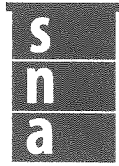
P. 193, URBAN DESIGN AND PUBLIC REALM:

"Consider setbacks (i.e., top story steps back from streetwall) and setbacks (ground level) for developments abutting lower-density 2 and 3-family areas found in between the main study areas of Washington Street and Columbus Avenue"

- CHANGE TO **REQUIRE**

Finally with regard to Development Coordination & Planning, the SNA requests a mandate that developers who purchase more than one abutting or adjacent lot be required to draft plans/proposals for all properties purchased or in play by that developer or related combination of developers, disallowing variances for any project(s) to be reviewed or considered as individual lots/projects.





STONYBROOK NEIGHBORHOOD ASSOCIATION

Jamaica Plain, Mass 01230 | snainjp@gmail.com | sna-jp.org

Brookley • Burnett • Dungarven • Forest Hills • Gartland • Kenton • Lotus • Meehan
Plainfield • Rockvale • Rossmore • Shurland • Stedman • Stonley • Washington • Williams

HIGHLIGHTS OF SNA RESPONSE TO PLAN: JP/ROX DRAFT # 1

Note: Comments were submitted by a subset of the SNA Washington Corridor subcommittee due to time constraints.

Zoning Code

- The first draft of the PLAN detailed MFR (multi-family residential) and LI (local industrial) zoning for the portion of Washington Street that runs through and adjacent to the Stonybrook neighborhood. **The SNA vision for Washington Street calls for zoning that supports pedestrian-oriented commercial and community uses that enliven the streetscape and better provide for needed community goods and services that are currently lacking in the southern end of Washington Street.**
- The SNA subcommittee suggested a neighborhood shopping (NS) subdistrict along Washington Street, with allowable building heights of 55' - 65' (stepping down to 35' adjacent to/across the street from 3F 4000), with ample ground-floor retail along with residential and office uses above. A request was made to consider broadening the NS designation to include ground-floor personal services.
- Stedman St: The BRA's proposed development scenario, which calls for 100 new housing units spread across a cluster of 5-6 story buildings along Stedman Street between Rossmore and Brookley is inappropriate for this narrow residential side street. While neighbors are not necessarily opposed to makerspace on the first floor of new construction on Stedman, they want to reduce the number of proposed housing units and building heights to be consistent with 3F 4000 zoning.
- See map on page 3 for specific zoning change recommendations.

Heights, Stepbacks, and Setbacks

- The BRA is proposing 13- to 15-story buildings on Washington Street on land that is currently part of the MBTA bus terminal. **Heights of 5 to 6 stories may be generally acceptable along Washington Street, however we do not believe that residents are supportive of 13- to 15-story buildings.**
- **New developments abutting existing housing in residential zones (e.g. 3F-4000), shall, at minimum, have the same residential setback and height requirements for the side(s)/portion(s) of the new building(s) facing the existing abutting residential building(s).** New developments should only step up in height in excess of the height of the abutting residential zone at a gradual, context-sensitive distance (generally a minimum of 22.5') from the plane of the new building's abutting elevation.
- In addition to requiring upper-story setbacks as outlined above for portions of new developments abutting small scale housing, building height for portions of new development fronting on Washington Street shall not:
 - Exceed 42' within a depth of 10' from the front setback;
 - Exceed 52' within a depth of 20' from the front setback; or
 - Exceed 69' for any other portion of the building not further restricted by height setbacks associated with proximity to an abutting residential property.

Bicycle Network

- Wherever possible, create protected cycle tracks instead of lanes or sharrows. Widening the road to accommodate them, or creating defined bike paths within wider sidewalk areas will help achieve safer bicycle infrastructure.
- Consider eliminating parking on one side of Washington street for bike lane.
- Require publicly accessible bicycle racks, as well as bicycle-friendly storage options such as common bike sheds or garages that can accommodate secure bicycle storage in residential developments. Larger developments should include long- and short-term public sheltered bike storage options.

Recommendations for Parking

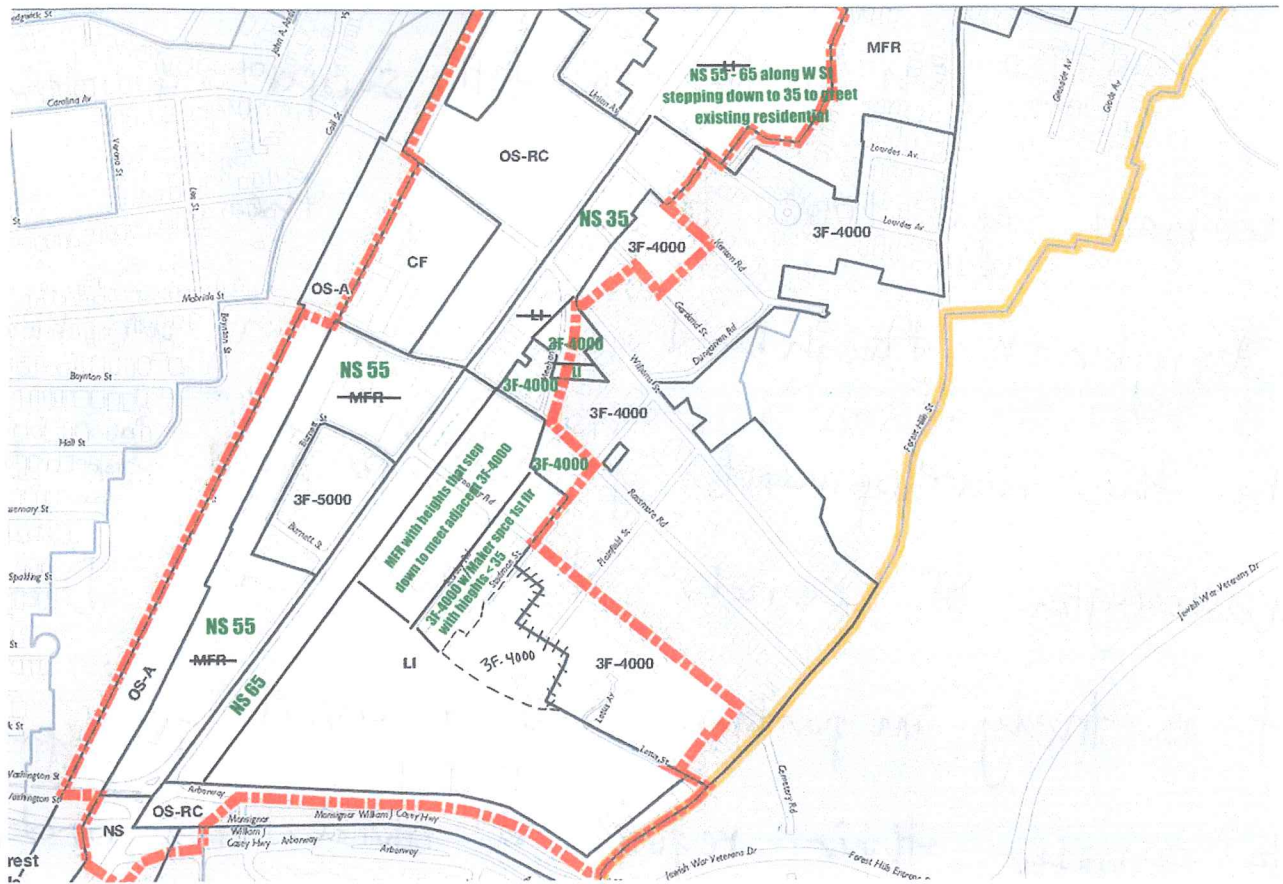
- Establish metered, short-term parking on Washington Street.
- Create a metered municipal parking lot behind an existing or new building on Washington Street.
- Consider residential parking stickers for existing small-scale housing.

Additional Recommendations

- Add more crosswalks or other pedestrian-crossing friendly infrastructure in regular intervals along Washington Street.
- Preserve and activate the MBTA right-of-way behind the new development along Washington Street between McBride and the Forest Hills T Station to continue the Southwest Corridor Park.
- Establish a requirement for street trees and financial support for planting and maintenance of public street trees or landscaped setbacks.
- Regarding the BRA recommendation that Lotus St be extended from Forest Hills Street through to Washington Street, we are concerned that this will just continue cut-through traffic in our residential areas.
- Incorporate all other elements of the Stonybrook Neighborhood Vision for Washington Street Corridor Development.

What's Next: BRA is currently reviewing feedback and will produce a 2nd draft of the plan.

MAP of zoning changes recommended by SNA Washington Corridor subcommittee:



- MetroMark and Flanagan & Seaton properties: change from MFR to NS 55;
- Any property along Stedman and Plainfield Streets currently zoned LI should be changed to 3F 4000, with the caveat that residents are not opposed to makerspace on the first floor of new construction;
- The west side of Washington from Forest Hills to Green Street: change from LI to NS 55-65, except when abutting 3F 4000. When the latter condition exists, NS 35;
- All current single family, 2-family, and 3+ family residential be preserved or changed as needed to reflect current use.

Developer Stakeholder Meeting | 8.3.2016

Notes – Miriam Keller

Assumptions

- Land Price
 - \$90/sf may reflect transactions, but is not what many of the participants are beginning to see in their negotiations, or in sales that are under contract (but not yet closed).
 - City Realty has been seeing as much as \$200-250/sf to get projects under agreement.
 - They would be willing to provide more data on this that reflects their experience.
 - Jeff has been seeing as much as \$150-200k/unit. This is roughly equivalent to \$300-400/sf in a 20-unit project on a 10,000sf parcel.
- Financing/Underwriting
 - Lending requirements are shifting as underwriters are leery of the construction market. Starting to ask for 10% vacancy with market-rate residential, as high as 30% “starting out.”

Policy

- Tax Credits
 - Would this policy push smaller private developers into competition with affordable housing developers for 4% tax credits? These are becoming increasingly competitive already.
- Rents
 - One potential impact of the DB policy would be to force developers to ask even higher “market-rate” rents to cross subsidize the extra affordable units.
- Land Prices
 - The policy will hopefully have an important impact on stabilizing land prices, because sellers and buyers can more accurately evaluate what could be built on any given site.
- Condos
 - It can be difficult to find qualified buyers for ownership units at IDP AMIs.
 - Using an average rather than maximum AMI for homeownership units (and for rental) could be that the market becomes broader, and it is easier to find qualified buyers.
- Competition
 - Concern that new density bonus developments will be competing for tenants with straight IDP developments, which potentially could afford to provide more amenities.
 - But it is unclear whether any IDP developments permitted in this area do provide extensive amenities.

Miriam Questions

- Would it be valuable to run a “model parcel” analysis that compares:

- Returns of a density bonus project; to
 - Returns of an as-of-right project?
- Are there any sensitivity analyses that would be valuable, maybe around:
 - Interest rates?
 - Construction costs?
 - Vacancy?

Brookside & Brewery Meeting | 8.4.2016

Notes – Cecilia Nardi

Comments

- 8' building setbacks are not enough, should start at 10'
- Setbacks should start at 35'
- Need additional setbacks for additional stories (e.g. setback between 4 & 5 stories and between 5 & 6 stories)
- Need to include more diagrams showing existing conditions and different building typologies (i.e., two-story mansards on Amory would be flush up against RDA 55' areas. How can you ensure compatibility between two very different housing types? Current urban design guidelines are not strong or detailed enough)
- What is the community process?
- Co-housing artist live-work should remain an LI subdistrict to preserve the "work"
- What types of programs are in place to ensure that businesses are not displaced. That was a big issue in the discussions.
- Need traffic studies -- can they be required in the RDA?
- Parking requirements are too low
 - Parking requirements should be tied to the size of the units
- Show the envelope of what could happen as of right in the RDA eligible areas
- Show what has been successful here
- Need more detail/assurances about transitions to existing residential neighborhoods
- Groups need direct access to developers, not sure how
- 100% Eggleston organizing a community vote in the fall to ask if the vision in the plan matches the community vision
- Negative quality of life impacts for added density. Won't more density bring crowding, rats, blocked views and crime?

Feedback from the 8/4/2016 BRA Community Meeting

Concerns from the Brookside / Brewery Neighborhoods of Jamaica Plain

GENERAL SUMMARY COMMENTS

On August 4th the Boston Redevelopment (BRA) Planning Staff met with the Brookside Neighborhood Association and the Brewery Neighborhood Watch (BNA / BNW) to get feedback on the BRA's 7/15 Draft of the JP / Rox Plan.

The Brookside neighborhood is a small economically and racially diverse residential and light industrial neighborhood with 2 and 3 story residential wood frame buildings interspersed with light industrial businesses. The neighborhood is ethnically and racially diverse with a history of progressive community involvement dating back to the I-195 highway protests of the 1960s.

The neighborhood believes that Section 3 of the draft BRA JP/Rox plan (Plan Workshops and Outcomes) does a good job capturing months of community input. We have had a positive impression of the hard work and sincerity of the BRA's Planning Staff. Our problem is that there are significant disconnects between the community input themes outlined in the Plan Sections 3 & 4 and the Implementation Strategies outlined in Section 5 of the draft plan. In short we don't think the implementation guidelines reflect the concerns of the neighborhoods as outlined in the same plan.

To reference our community's most consistent community themes (as quoted directly from the draft plan):

- *Promote new affordable housing and retail that support social and economic diversity of the area*
- *Guide growth that strengthens the community and respects the physical character of the existing residential areas*
- *Stony Brook and Green Street were envisioned as areas to be scaled to the current neighborhood character. Participants expressed the desire to preserve the interstitial one, two and three-family residential districts*
- *Transition heights to the scale of the existing neighborhoods, step-down approach*
- *BRA and the City have heard clearly from many people of Jamaica Plain and Roxbury that the central focus of the plan must be addressing housing affordability and preventing displacement of low and moderate income residents, particularly people of color.*

Unfortunately, a review of the JP/Rox Draft Plan's Implementation Strategies Section (5) reveals that the BRA's development priorities are not about "*preserving the scale of the existing neighborhoods*", nor "*addressing housing affordability*", nor "*preventing displacement*".

The implementation plan as presented in the Draft and at the Brookside meeting relies entirely on one solution, the construction of 5 story buildings with overly aggressive floor area ratios, minimal set-backs, no step-backs at all below the 5th floor and a preponderance of high-end market rate housing units. It is disappointing that the small Brookside neighborhood is being asked to accept this level of architectural brutality as the only available means to achieve a still yet to be defined extra margin of deeper affordability.

The overarching reaction in the Brookside / Brewery neighborhood to the BRA's development strategy for Brookside is shock, fear and indignation. We understand that density is one tool that can achieve additional affordability. We are also adamant about preserving the scale, character and affordability of our neighborhood. We insist that the City should adopt much stronger solutions for adding affordability beyond increasing density.

To date those guiding the BRA development policies that affect this neighborhood have shown no inclination, either in the draft plan implementation guidelines, nor in the development battles going on at 5 sites in this neighborhood, to embrace clearly articulated community needs and preferences. It's as if the BRA Planning Department and the BRA Development Department have different end goals. What the Brookside and Brewery Neighborhoods want is exactly what the JP / Rox plan calls for. We will continue to engage in a process that focuses on the goals of the JP / Rox Plan.

SPECIFICS

Green St. Neighborhood Shopping District

BNA / BNW supports the Neighborhood Shopping focus proposed by the BRA for Green Street. While we support the NS use on Green, we also feel the base building height should remain 35 ft. on Green Street. Our goal is not to limit construction on Green Street to 35'. Rather we wish to maximize the amount affordable units on Green Street. By maintaining the height limit at 35', Green Street could potentially gain an extra floor of affordability bonus footage.

Affordability

New housing across the City and Jamaica Plain/Roxbury should reflect the incomes of households who need affordable housing. The Mayor's housing plan estimates that 50% of the population growth will be households making less than \$50,000 a year but less than 15% of the new housing will be designed at those income levels. In the JP / Rox study area, 70% make less than \$75,000 a year. The current plan reverses this, with 70% high-end market-rate housing, where families need to make \$100,000 a year to afford a \$2500/month apartment. About 50% of households make less than \$35,000 a year, but less than 2% of new housing will be affordable to households making that amount.

The City is proposing that 30% of new housing is deed-restricted at an average of about 60% AMI, about half of that coming from Arborway Yard. The City should increase the 30% affordability goal and shift the income levels of affordable housing downward. It should make concrete commitments with numerical goals to the following solutions: (1) land banking to build non-profit affordable housing, supported by City funding, (2) strengthen private developer requirements, (3) set aside units for voucher holders, and (4) set a larger commitment for City funding beyond the current proposed \$35 million (about \$2.3 million a year).

We support calls to increase affordability in the JP / Rox study area using solutions that don't rely on a simplistic density v. affordability tradeoffs. Economic and racial diversity is a cherished defining characteristic of this neighborhood, it is something that is now at risk in JP and Roxbury as well as in Boston as a whole.

Existing Businesses

We ask that City Agencies are careful about coaching existing businesses to relocate off light industrial parcels in our neighborhood. Specifically, companies like Carlyle Engineering and Interstate Rental (between Brookside and Amory Streets) have traditionally provided well-paying entry level jobs for young people in the neighborhood. These properties are not empty lots. They have historically provided stable employment and job training to local young people.

Amory Street / Stonybrook

Amory Street residents raised concerns about proposed planning changes that allow for 5 story buildings at 267 Amory Street (J&M Brown Co.). These building are proposed in the midst of an existing community of 2 story mid-century mansard brewery workers housing. This historic scale should be retained and accentuated.

Set-backs

With a goal of preserving residential scale, we propose new construction setbacks abutting existing residential buildings as follows: Front yard setback should match the existing adjacent buildings but not less than 15'. Rear yard setbacks of 20' from the property line. Side yard also 15' from the property line.

Step-Backs

New building elevations facing the front, rear or side of an existing residential building should match the allowable existing 35' height limit then step in an angled plain or sky-plane back 15' for each floor above that 35' height.

First floor front elevation

First floor elevations facing the street need to be active and articulated fascades that maximize landscape and greenspace with transparent portals to create a vibrant active streetscape. Avoid blank walls, elevation open to parking and parking screen walls at front elevation.

Design Guidelines

See Document, Stonybrook Neighborhood Vision for Washington Street Corridor Development (Adopted April 11, 2016) for detailed suggestions for neighborhood scaling.

Parking

Parking should be underground and not be visible at first floor level. Parking should be provided at not less than one car per unit.

Thank you,

Brookside Neighborhood Association

Brewery Neighborhood Watch

ESNA Meeting | 8.8.2016

Notes – Cecilia Nardi and Marie Mercurio

Revised 8.21.16

General Comments

- Include "affordable" in the vision statement
- On the maps that show proposed zoning changes and RDA footprints, highlight and identify Washington St., Amory St., Boylston St., Green St., and Columbus Ave.

Urban Design Subcommittee

- Minimum sidewalk dimension requirement should be greater than 7' on main streets, should reflect current 9' existing conditions
- Have the sidewalk dimensions and building setbacks in the same section of the document, currently in separate sections
- Set backs at Side streets (even commercial) should be 10' minimum, not 0
- Respect two-story buildings with stepbacks
 - The guidelines currently have the stepbacks starting above four stories, where they abut residential neighborhoods
 - Stepbacks should not start higher than one story above the existing fabric
- Concern that if six stories is the maximum height, developers will expect this and will not respect the stepbacks; the stepbacks should be part of the RDA plan
- Change maximum height from 65' to 55'
- Include maximum lot coverage requirements
- Narrow, small parcels should not have tall buildings
- Current development proposals (mostly Small Projects now which do not require shadow studies) are not providing shadow studies, they should to demonstrate how proposals respect the neighborhood
- Where are there historic building considerations in the planning document? Why aren't there any recommendations to preserve older, historic buildings. No need to tear them down and start anew
- Previous survey done several years ago which asked the desired maximum height in the area and the result was a maximum of four stories
- Concern that there will be a canyon affect along the street, vary heights along the street
- Include an FAR limit in the RDAs
- What would be the total production number be and total affordable number be if maximum was four stories/45'?

- What would be the total production number be and total affordable number be if maximum was five stories/55'? And etcetera? BRA is not showing the numbers, so how can community make real decisions with what they want?
- Design requirements, such as set backs and step backs, need teeth and should be included in RDA Zoning requirements
- At the meeting, an informal vote of the attendees indicated the following:
 - 6 stories with proposed setbacks & stepbacks - acceptable to 1 person
 - 5 stories with proposed setbacks & stepbacks - acceptable to 1 person; however, acceptable to 10 more people if affordability was higher
 - 4 stories with proposed setbacks - 9 people thought this should be the maximum height

Transportation Subcommittee

- NBRA should create and commit to ~~eed to understand~~ strategies for funding and implementation
 - Piece by piece not desirable, need action plan
- Delivery and loading in the plan is recommended at the rear of buildings which does not respect abutting residential neighborhoods, brings all the undesirable things that come along with it to the residential areas. Recommendations should include delivery and loading on the side and front if appropriate. Each project will be unique based on location. It will depend.
- Why is the parking ratio recommendation static (1.0 space per unit)? Why doesn't it take into account the unit sizes (1 br, 2br, etc)?
- Since this will add more cars and traffic, want to understand what do we do about it?
- TAPAs are not well known even though they are public documents
 - Can there be more dialogue about these agreements? Can they be open to community review so they can weigh in on the mitigation efforts?
- Need explicit commitment to study traffic/parking
- Would like to see the silver line extended to the Study Area (i.e., Forest Hills)
- Need a list of short term and long term implementation actions, but especially short-term so all can see near term progress
- No resident parking permits for residents of projects with less than 1 parking space per unit
- Provide now a schedule and budget for short- and long-term transportation improvements
- Developers contribute to street improvements
- Street recommendations should reflect specific street conditions, e.g., Plan suggestion to "remove excess lanes" doesn't make sense for Washington St.

Good Jobs Subcommittee

- BRJP should apply to this area for any development greater than ten units
 - Breakdown should be 51% residents, 51% minority, 20% women (construction)
 - When we ask the question of whether there are people that can do these jobs, the answer is almost always "yes"
- Permanent jobs should have the same BRJP policy as construction jobs
- Need to promote first source hiring, have a real office near transit
- Consider promoting jobs through urban agriculture

Affordable Housing Subcommittee

- BRA repackaging the same policy, not adding more affordable housing, just changing the language (30% goal = doubling the amount of affordable housing)
- 2/3 of the study area is currently made up of people of color, BRA is proposing a future where 1/3 of the area will be people of color
- Average AMI now is about 60%, not enough
- We have been asking for the numbers, BRA is not asking enough from developers
- Thumbs down vote unanimous that the BRA's current proposals about affordability were insufficient.
- BRA has yet to convince the AG that the plan creates enough of the kind of affordable housing that is desired here (very very low income)
- What will be the effect of 25% affordable per project (feasibility)? You're telling us it can't happen but why? Where are the numbers?
- Building more expensive 'market rate' units raises the cost of existing housing. What is the real effect of slowing down the 'market rate' development? So much housing has already been built; a cool down may make it easier to develop affordable housing
- Some people continue to request a moratorium on development approvals until the Plan is completed.
-
- Why wasn't the developers meeting made public?
- Can Tim Davis and Devin Quirk be at the next AG meeting?
- City continues to be comfortable with the 30% affordable housing goal, and is not able to promise a larger affordable housing commitment at this time.
- There's little land available for nonprofits to purchase for affordable housing development..
- Private developers are outbidding the CDCs in property acquisition.
- Plan JP/Rox relies on the land at the Arborway Yard for much of its affordable housing, but that land is not available for the foreseeable future.

1. **Affordability requirements to trigger FAR bonus.**

Base zoning/existing FAR

P 64 indicates “There would be no changes to the base zoning heights and floor area ratios (FAR) ... with a few exceptions in Egleston and Jackson Square (45’ and 60’). ...The following maximum heights and FAR for the zoning subdistricts in the Study Area would remain the same.”

P 65 Figure 39.

MAXIMUM HEIGHT / FAR	JAMAICA PLAIN	ROXBURY
2F-4000	35' / 0.6	
3F-4000	35' / 0.8	
3F-5000	35' / 0.6	
MFR	35' / 1.0	45' / 1.0
LC	35' / 1.0	
NS-Egleston Square	45' / 2.0	45' / 2.0
NS-Jackson Square	60' / 2.0	
LI	35' / 1.0	
IDA	35' / 1.0	
CF		45' / 2.0

Figure 39. Current zoning subdistricts and maximum height and FAR (floor area ratio) in the Study Area.

Current IDP

P 78 “...The current Inclusionary Development Policy (IDP)... requires that 13% of all units in private market rate developments be deed-restricted affordable housing units..... triggered by the creation of 10 or more housing units and one or more variances to be obtained by the Boston Zoning Board of Appeal (ZBA).”

P 168 indicates that “one proposal being explored is that all projects with an FAR up to 2.0 and are proposing 10 units or more remain subject to...IDP..which requires 13% of units be affordable...” [In other words, projects could double the FAR without triggering the density bonus requirements.]

Density Bonus proposed in BRA draft 7/15/16

P64 “...A density bonus is where a developer opts to incorporate public benefits into a project, such as affordable housing units, and in exchange, the developer is allowed to create additional density in a development.

P 78 “...a density bonus will result in additional affordability, with a base affordability of 13% at 70% AMI, plus an additional set aside **[25% per p.169]** at 50% AMI (see Coordination of Development & Benefits on page 168).”

P 169 The percentage of affordability for units in excess of the base calculation, per the diagram on page 169 indicates that it will be 25%.

Questions for BRA:

- It appears that small projects (over 10 units, under FAR 2.0) can double the FAR in MFR, LC, LI and IDA zones while meeting only the existing 13% IDP requirement. Confirm.
- Would the 35' existing height still apply to projects with an existing FAR of 1.0 that increased FAR to 2.0 but did not provide an increase in affordability?
- If a project exceeds the FAR of 2, and the existing FAR is 1.0, is the bonus calculated on the units over the existing FAR of 1, or over a base of 2.0?
- In the absence of any requirement for open space, is there a maximum allowable FAR? Is the FAR limited only by sidewalk, setback and stepback requirements?

Comments:

The BRA has considered two formulas (1) 20% x the units over the existing base (1.0 or 2.0), or (2) 25% over a FAR of 2.0 (regardless of existing FAR).

- Either way, the total affordability for an individual project would never reach 20% for a project with a height of 65 feet or less. (An exception might be the 25% scenario for a building with a height limit of 15 stories.)
- At 25% over FAR 2 a medium size project (i.e. city realty/jackston glass) might end up with a comparable number of affordable units, but fewer at the lower AMI than it would at 20% over an FAR of 1. However, if the existing FAR is 2, then the 25% formula would result in more units. On large (15 story) projects, the 25% formula would result in more units.

2. TRANSPORTATION AND PUBLIC REALM (106-120)

Existing sidewalks

P108, Existing “ Sidewalks on Columbus Avenue are 8’ wide, and do not have street trees or extensive street furniture. Washington Street has sidewalks of 10’ with street trees. “

Recommendations from Plan JP/Rox 7/15/16 draft

P116 “Wherever possible, sidewalks on neighborhood streets should be a preferred **11’6” wide on Neighborhood Residential Streets, 16’6” on Neighborhood Main Streets** and never less than 7’ wide to allow for ample pedestrian space and street trees. “ *[Ask BRA to confirm this is measured from curb to first floor footprint of building]*

PARKING

P112 “ All new developments that are “large projects” (>50,000 s.f.) will have their parking supply determined through the Article 80 development review process, and with consideration of Boston Transportation Department policy parking ratio maximums. Figure 70 [p113] shows the current parking ratios for residential and commercial uses:

RESIDENTIAL			SPACES/ UNIT
<i>Jamaica Plain</i>	Zoning Minimums	1-3 units	1
		4-9 units	1.25
		10+ units	1.5
	BTD Policy Maximum		1
<i>Roxbury</i>	Zoning Minimum		1
	BTD Policy Maximum		1

COMMERCIAL			SPACES/ 1,000SF
<i>Jamaica Plain</i>	Zoning Minimum		2
	BTD Policy Maximum		1
<i>Roxbury</i>	Zoning Maximums	Office	1
		Retail	2
	BTD Policy Maximum		1

Recommendations from Plan JP/Rox 7/15/16 draft

P116 “Parking should be shared between developments. In line with BTD policy, we recommend the following **maximum** parking ratios for amended zoning.

Further parking ratio reductions should be encouraged based on proximity to transit

- Residential: 1.0 space per unit
- Commercial (retail/office): 1.0 space per 1,000 s.f.

Comment: No minimum parking percentage is specified/recommended.

STREETS [NO DETAIL!]

P118 Washington Street Recommendations “Additional study .. should consider:

shrinking excess lane widths; widening sidewalks with landscaping and street furniture; curb extensions; pedestrian crossing improvements; and better on-street parking management. “

p120 Egleston Square Recommendations: “Further study should ... consider: shrinking excess lane widths; eliminating excess lanes; widening sidewalks with landscaping and street furniture; curb extensions; pedestrian crossing improvements; separated cycle facilities; bus priority lanes; improved bus stops; improved intersection design; traffic flow improvements including signal upgrades/interconnection and better on-street parking management. “

Comment: There is no excess lane width, and not excess lanes unless parking is eliminated.

OPEN SPACE [NO DETAIL] PAGES 122-135

[BRA] Recommendations:

P128 “The following section is entitled “Recommendations” because its intended use is a guide for both public and private investment in the public realm, rather than a capital budgeting document. Public realm and open space improvements may result independent of development through direct public investment, as part of private development, or as a public investment undertaken in conjunction with private development”

Egleston Square

P 130 “Enhance existing private and public open spaces, including Peace Park and Egleston Square Stonehenge, to create a network of open spaces that stitches the area together.”

Neighborhood Wide

P135 Recommendations:

- “...respect the existing residential fabric by improving existing neighborhood parks and community gardens and creating cohesive commercial activities.
- “ Consider maximum lot coverage requirements in order to promote the creation of on-site open space
- “New community garden space and /or dog park space”

Comment: Recommendations for public space through public and private investment, but there is no mechanism to create new public space and no requirement for developers to provide open space on site.

DESIGN GUIDELINES (Pages 140-167; Eggleston Square Guidelines p152-155 attached)

P143 Design Guideline Diagram

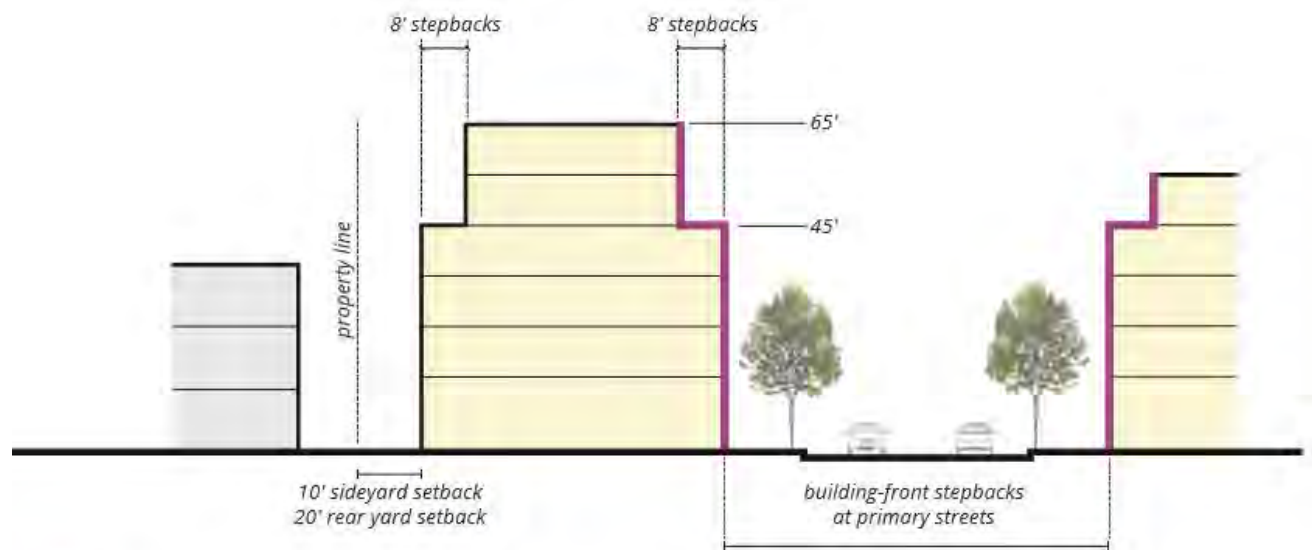


Figure 94. Diagram shows guidelines for stepping back height along main corridors, and to the existing residential neighborhood.

P143 "... In MFR, LC, NS, LI and IDA subdistricts, Residential Development Areas (RDAs) are being introduced ... housing on parcels 10,000 sf and larger."

P144 Setbacks (at ground level)

"...reinforce existing street wall conditions while ensuring appropriate sidewalk widths and buffer areas ...where the public right of way is too constrained to allow minimum sidewalk widths, new buildings should be setback to allow for wider sidewalks. ...

• **RDA Building Front Setback:**

1. Residential – 10' to 15' to buffer ground floor uses.
2. Main Street / Active Commercial – 0' to 10' to provide opportunities for outdoor seating. •

• **RDA Building Side and Rear Yard Setbacks:**

1. Residential – Side 10' / Rear 20'.
2. Main Street / Active Commercial – Side 0' to 10' / Rear 20'.

Question for BRA:

1. It is unclear if this refers to Residential Streets or Residential buildings
2. BRA to clarify that these are measured from property line, not curb.

3. Does setback only apply to ground/sidewalk level? If so, what is setback for upper floors at streets, and at side/rear yards?

Height and Stepbacks (upper levels)

P144 **RDA Building Step-Backs** should ease transitions between new and existing buildings and reduce the overall massing of new buildings.

- Front Step-Backs (street facing):
 1. Buildings over four stories / 45' must include at least one step-back, at minimum 8' deep and across 80% of the front / street facing façade, additionally,
 2. Buildings over six stories / 65' must include a second horizontal step-backs at 65', at minimum 8' deep and across 100% of the front / street facing.

P152 Egleston Square Urban Design Requirements

"In addition to building massing, setback, and step-back requirements, two maximum building height categories define specific RDA Zones as follows:

- RDA – 55 – 4 to 5 stories/up to 55' – adjacent to existing 3 to 4 story buildings.
- RDA – 65 – 4 to 6 stories/up to 65' – adjacent to existing 4 to 5 story and new buildings."

[Comment: It is not clear how the above criteria is applied in Egleston Square. With the exception of anomalies – Extra Storage, the Round House, and the unbuilt 3200 Washington, existing buildings are predominately 3 story, with a very few 4 story buildings, and no 5 story buildings. However the proposed plan below is predominately 65 feet.]

P155 Proposed Heights in Egleston Square

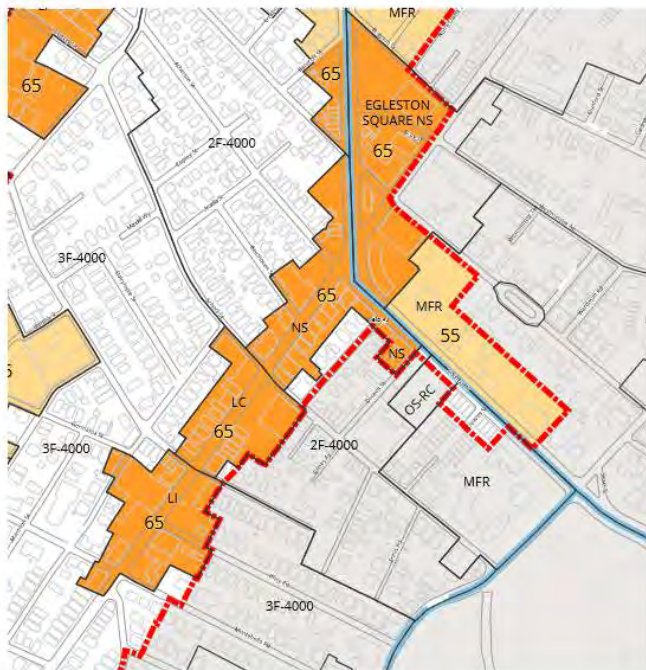


Figure 104. RDA Zones in the Egleston Square Focus Area reflect development scenario recommendations.



Marie Mercurio <marie.mercurio@boston.gov>

Questions on Draft Plan JP

susan.d.pranger [REDACTED]

Mon, Jul 25, 2016 at 8:45 AM

To: John Dalzell <john.dalzell@boston.gov>, Marie Mercurio <marie.mercurio@boston.gov>

P.s. figure 94 is misleading. It shows the existing 35, 3 story building higher than the first 3 floors of the new building, which seems unlikely. It should be 35', which would be lower.

Sent from my Sprint Samsung Galaxy S® 6.

[Quoted text hidden]

8/8/16
for discussion

Residential Side Street

Typical 7 ft Existing Sidewalk
Curb to Property Line

Proposed Sidewalk Width
BRA min 7', preferred
11' 6"

ESNA min 7' walk + 3
foot buffer at retail
Or 10' buffer at residential

Front Setback on Side street
BRA 0-10'
ESNA 3' at Retail;
10' to 15' at Residential use

Typical 9 ft Existing Sidewalk
Curb to Property Line

Proposed Sidewalk Width
BRA min 7', preferred 16' 6"

ESNA min 9' walk + 3 foot buffer at retail
Or 10'- 15' buffer at residential

REAR Setback
BRA 20' (OK?)

WHERE AND
HOW MUCH
OPEN SPACE?

SIDE Setback
BRA 0-10'
ESNA ??
OK abutting Retail;
10' abutting Residential

STEP BACKS AT ROOF

BRA

REAR: 8' above 4th story
FRONT: 8' above 4th story

ESNA

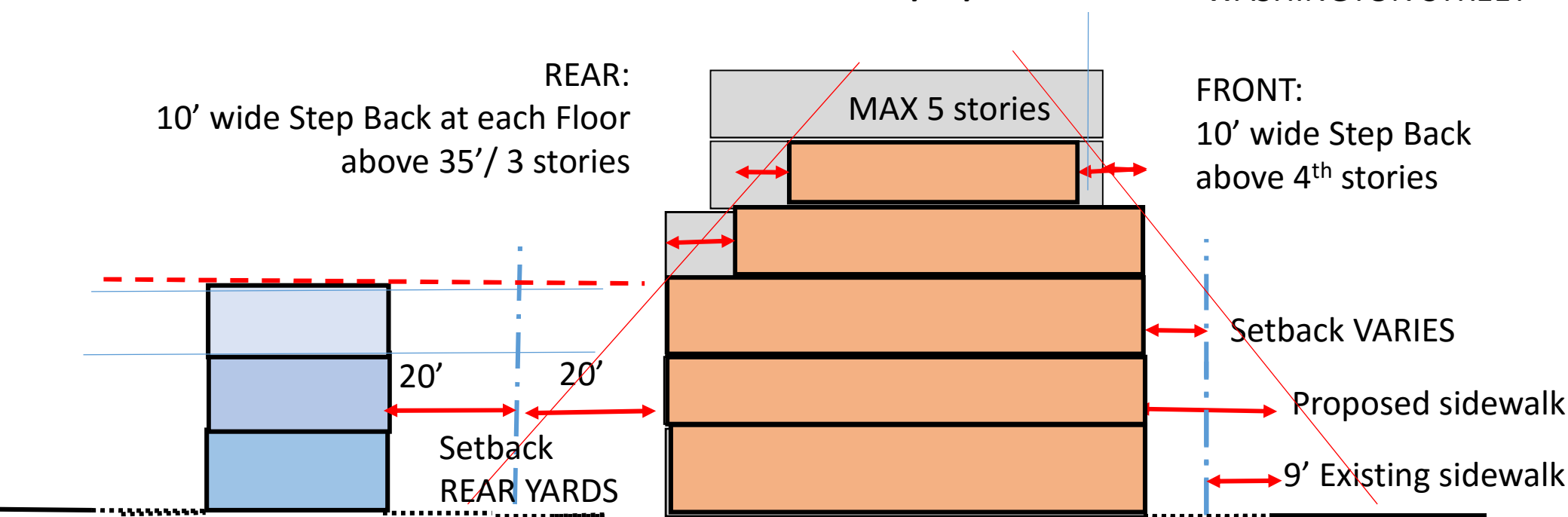
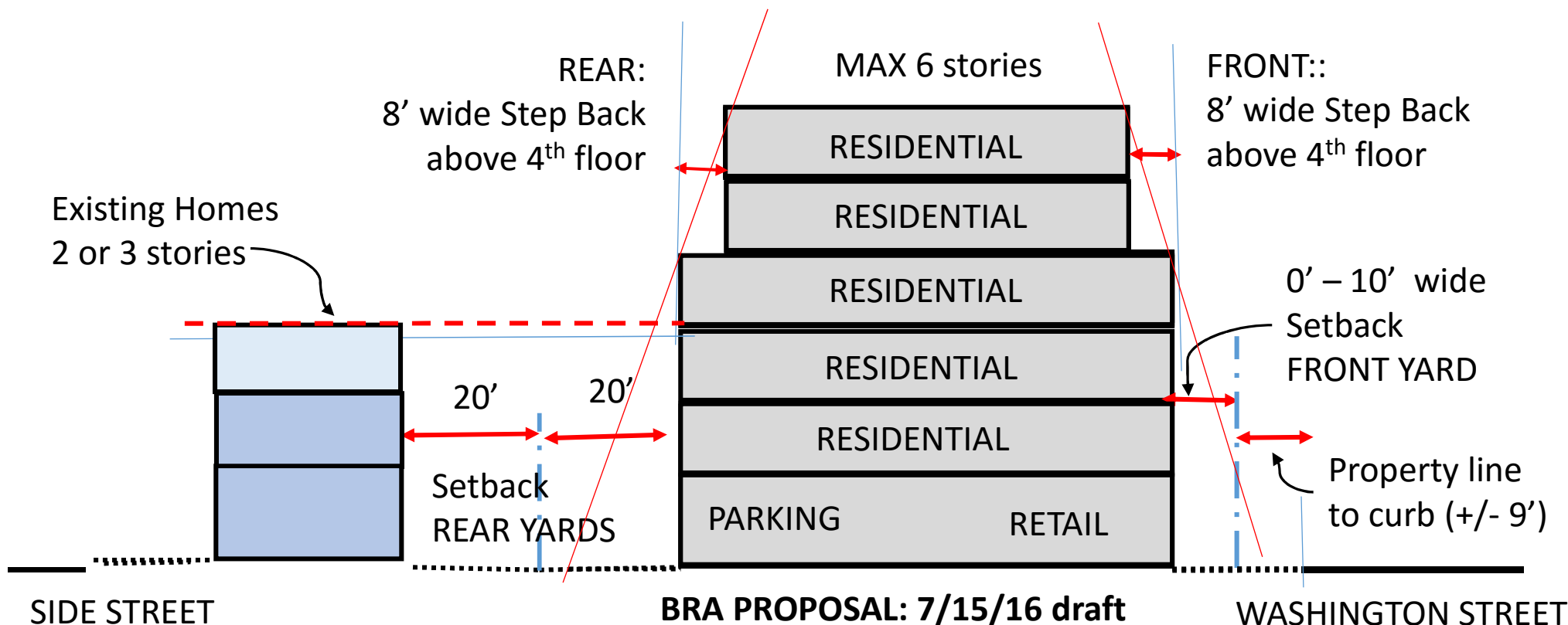
REAR - 10' above 3rd story
FRONT - 10' above 4th story

Front Setback on Commercial Street
BRA:

0-10' at Retail;
10' - 15' at Residential use

ESNA: Plus additional open space at entries

Washington Street



Transportation

Parking

Because this area is close to bus and train transit, projects are being approved with .5 parking ratio - 1 parking space for every 2 units. Developers of new construction believe many of their residents will not own cars.

Parking is already tough and will get harder with the addition of many new units. At the same time, the goal of less cars in the City is a good one. To help with the parking, the neighborhood may need consider permitted residential parking and timed and/or metered parking on Washington Street.

Developers of new buildings with .5 parking can help by:

- making arrangements for car and bike sharing. Owning a vehicle is expensive; one Zipcar can replace 10 personal vehicles. If developers can build less parking, then they can apply that money to street improvements and affordable housing.
- making sure their residents do not apply for residential permits
- including space in their building for off-street deliveries and drop offs
- contributing to street improvements
- making their Transportation Access Plan Agreements available to the public to view; this will lead to a more transparent process and allow neighbors to keep an eye on developers and make sure they are doing what they promised

Immediate improvements

Many transportation improvements are long term and costly, but there are some immediate improvements that can be made by the City. WalkBoston has a list of suggestions to existing walk signals, traffic lights, signage, and crosswalks that would make an immediate difference (list attached). Another set of improvements are also attainable, e.g., curb bump outs and street tables. Boston Transportation Department needs to fund and schedule these improvements.

Long term plan

With our population expected to double, we need an innovative, forward-looking people-moving plan. There are many excellent suggestions in Plan JP/Rox and in the community for transportation improvements, including the Silver Line extension from Dudley, a bus-only travel lane on Columbus Ave, improved bus lines, dedicated bike lanes, and better pedestrian access. But these only stay ideas on paper without a real commitment from the BRA and the City to make progress on the neighborhood's transportation goals.

WalkBoston additions to "Overall Policy Recommendations" section

- Make WALK signals concurrent with green lights/traffic flow and provide leading pedestrian intervals (also known as “pedestrian headstart”) at all concurrent signals so pedestrians get the WALK signal before the traffic light turns green
-
- Ensure that all WALK signals provide countdowns (also known as “pedestrian clearance intervals”) and sufficient time for pedestrians to cross the street, with total WALK phase times at major intersections (e.g. Washington St and Columbus Ave) calculated based upon a pedestrian walking speed of 3.0 ft/sec (as outlined in Section 4E.06 of the 2009 MUTCD)

WalkBoston additions to "Specific Infrastructure Recommendations" section

- Add bump-outs/curb extensions to narrow turning radii for vehicles turning right onto Washington St from Columbus Ave. In addition to calming traffic, this will also reduce crossing distances for pedestrians in the heart of Egleston Square.
-
- Add visual cues to slow northbound traffic on Columbus Ave coming downhill through Egleston Square at Washington St. These cues may include signage, flashing beacons, planters, etc.
-
- Add crosswalks with in-street pedestrian crossing signs across Columbus Ave between Washington St and Seaver St, and across Washington St between Columbus Ave and Dimock St, to enhance pedestrian connections to and surrounding Egleston Square. (Currently there are very few crosswalks across the major arterials of Columbus Ave and Washington St along the aforementioned roadway segments.)
-
- Fix WALK signal across Columbus Ave outside Walnut Park Apartments (between Weld Ave and Dixwell St) to provide regular WALK cycle (currently the wait for a WALK cycle is very long)
-
- Add a crosswalk with an in-street pedestrian crossing sign and potentially a speed table across Washington St at Beethoven St

August 22, 2016

Dear Marie and John,

Here are the comments from Egleston Square Neighborhood Association regarding Plan JP/Rox.

Attached please find ESNA's Recommendations presented at our meeting with you on August 8, 2016. These are the recommendations from the ESNA working committees that looked at different aspects of the Plan

Attached also please find our additions to your notes from the August 8 meeting.

ESNA remains very concerned that the Plan promotes growth at the cost of destabilizing the existing community. The density the Plan proposes is not being matched by the affordability required for our neighborhood. The affordability level proposed in the Plan does not meet the Jamaica Plain Neighborhood Council's long-held goal of 25%. Many community members feel the requirement should be even higher than 25%. The Plan's affordability level does not even meet the affordability offered by 3200 Washington Street, a project approved by the BRA last year, which offered a package that added up to 22%.

New housing across the City and Jamaica Plain/Roxbury should reflect the incomes of households who need affordable housing. The Mayor's housing plan estimates that 50% of the population growth will be households making less than \$50,000 a year, but less than 15% of the new housing will be designed at those income levels, and 1% will be designed for households making less than \$25,000 a year. This will leave about 50,000 households making less than \$50,000 a year, including 21,000 households making less than \$25,000 a year, without affordable housing.

In the Jamaica Plain/Roxbury study area, 70% make less than \$75,000 a year. The current plan reverses this, with 70% high-end market-rate housing, where a family needs to make \$100,000 a year to afford a \$2500/month apartment. About 50% of households make less than \$35,000 a year, but less than 2% of new housing will be affordable to households making that amount.

Other ESNA concerns include:

- The Plan's Design Guidelines, which are important in fitting new and bigger buildings among existing 2- and 3-story homes, are not mandatory and may not be required by the City. This month, the BRA approved a 5-story project at 3193 Washington Street that is 3 stories higher than the adjacent 3-story houses and does not follow the guidelines for setbacks and setbacks.

- The number of housing units in the area may be doubled without a commitment from the City to deliver the transportation improvements outlined in the Plan.

- New construction and new business growth provide an opportunity for employment for residents. Good jobs contribute to neighborhood stabilization. The Plan needs to require strong good-job requirements before approving development projects.

Sincerely,

Egleston Square Neighborhood Association's Recommendations for Plan JP/Rox Meeting 8.8.16

WHAT'S IN PLAN JP/ROX

ADDITIONS & REVISIONS NEEDED

Affordable Housing

Affordable Housing

Overall goal 30% of new units to be affordable

Private projects provide affordable units through inclusionary development plan and density bonus, averaging out to 17-18% affordable units at 50-70% AMI

Plan calls for 500 affordable units to be built at Arborway Yard

* Distribution of affordable units: an average of 55-56% AMI (most are at 60% AMI, some are at 50% and 70% AMI, and a small amount are at 30% AMI)

* No concrete goal for land banking in neighborhood

* About \$35 million in City cash subsidies, an average of \$2.3 million a year (not counting land value of Arborway Yard and 125 Amory St)

Increase overall plan goal

Require stronger affordability percentages with higher % of units and lower % of AMI

Availability of Arborway Yard is uncertain.

Shift distribution of affordable units to lower income levels

Set concrete goal for land banking

Increase city funding commitment for affordable housing

Transportation

Transportation

Parking maximum 1/unit or 1/1000 sq ft commercial space

Recommendations for improved streets and transit - no specific recommendations and no implementation plan

For parking less than 1/unit, mitigate: limit resident parking permits for project residents. Provide car and bike sharing
Require project provide delivery & drop off on site
Require developer contribution to street improvements
Make Transportation Access Plan Agreements available to the public

Set schedule and budget for signal, light, and traffic improvements that can be done now (Walk Boston & Livable Streets suggestions)

BRA commits to a timeline for comprehensive strategy for parking, street, and transportation improvement

Good Jobs

Good Jobs

Explore expanded City of Boston workforce goals, job standards, and career pathways

Include specific requirements:
Require developers to deliver good job access

spanning construction and permanent jobs for area residents - no implementation plan	<p>and wages on construction jobs - hire 51% residents, 51% people of color, 20% women, paid at union or strong residential construction rate</p> <p>Require developers to promote access to good permanent jobs for businesses located on their site - 51% residents, 51% people of color, 50% women, paid at livable wage</p> <p>Create a link between downtown jobs and the neighborhood by City providing one-stop, transit-oriented job centers at MBTA locations</p>
Design Guidelines	Design Guidelines
<p>RDA allowed height - 65' in Neighborhood Shopping, Local Convenience, and Light Industrial areas, 55' in Multifamily Residence areas</p> <p>Set backs, Front Residential - 10-15', Commercial - 0-10'</p> <p>Set backs, Side/Rear Residential - 10'/20', Commercial - 0-10'/20'</p> <p>Step backs Over 4 stories, 8' step back</p> <p>Sidewalks 7 feet minimum, wider sidewalks preferred</p>	<p>Clear and enforced set backs & step backs can help mitigate height, especially with abutting 2 & 3 story homes</p> <p>Clarify set backs for commercial & residential streets as well as commercial & residential buildings</p> <p>Step backs Over 3 stories, 10' step back</p> <p>9' minimum sidewalks Require setbacks if sidewalk is under 9' and at entrances</p> <p>Provide a minimum amount of public open space</p>

PLAN JP/ROX – First Working Draft Community Engagement

Union Ave Neighborhood Association Meeting

August 9, 2016

Introductions were followed by a brief BRA presentation on the current plan recommendations with a focus on urban design and Green Street corridor and area recommendations.

Presentation:

- At the December Community Workshop, participants identified areas “that are likely to change” and areas “where they would like to see change” as well as recommending potential uses, building types and building heights for the identified areas.
- Based on the community feedback, the planning team prepared Development Scenarios to represent those recommendations. These are not proposals; these are illustrations of ideas purposed to support community discussion.
- Green Street is understood as an important neighborhood connector linking Washington St to the SW Corridor, the Orange Line, and the Center Street.

Discussion / Comments:

Marie

- Concerned for the merits of Transit Oriented Development. Do we fully understand the impacts of density? Parking seems inadequate, “everyone will have a car”.
- Active development projects should adhere to the emerging JP / ROX recommendations. Some believe the BRA has OK'd the development project at Green and Washington St. and told the developer they “do not need to work with the community”.

Alan

- Asked for an explanation of recommended heights. The goal is to insure quality design and development that gradually transitions between existing and new buildings.

Edith

- Recommendations should respect the character, height, and density. Area buildings should be four stories.

Kathy

- Area buildings should be four stories. On street parking should be limited to 20 minutes. Concerned that street furniture might contribute to kids hanging out.
- There are 13 intersections between Washington and Amory Streets with cars coming in and out that creates a dangerous condition on Green Street.

Marie

- What is the benefit of new development in the area? What are the trade-offs. The value proposition needs to be explained.

Alan

- Provided an illustration of step-back recommendations (prepared by Sue Pranger) and recommending upper story 10' step-backs at third and fourth floors. Building should be four stories.
- Asked why area zoning was being changed to NS (Neighborhood Shopping), perhaps it should be LC (Local Convenience). Clarification – most of Green Street is Local Industrial (LI).
- Concerned about the narrowness of Green Street and that the addition of Bike Lanes would be unsafe. With school buses and two-way traffic using Green Street a traffic study is needed.

August 25, 2016

Union Ave. Neighborhood Association's response to the first (7/15) draft of the PLAN JP/Rox Proposal

BACKGROUND:

The Union Ave. Neighborhood Association (UANA) in collaboration with a number of neighborhood associations abutting the plan area now known as the PLAN JP/ Rox study area first requested the study under the previous administration. We all worked with the BRA staff to move the study forward under the Walsh Administration in the summer of 2015.

Since we have been in support of the planning process for years, the Union Ave Neighborhood Association is very invested in a successful outcome of the planning effort for our community. Like our colleagues on Brookside Ave, UANA is heartened by the early sections of the PLAN/ JP Rox draft document that describes the hard work and sincerity with which the BRA's Planning Staff and the community came together to engage in this planning process.

That is why in the late Spring, UANA joined with other neighborhood associations along Washington Street requesting that the BRA pause and extend the amount of time it dedicated to hearing feedback from the community the planning process would impact. The residents of the various neighborhood associations—those most impacted by the recommendations — wanted a chance to share their thoughts about the draft directly with the planning staff.

While UANA is heartened that the BRA agreed to the delay, Union Ave is deeply concerned that the feedback we have provided to date, both at the larger community meetings and workshops, as well as in the individual article 80 meetings for the 3 projects in our community brought forward during this process, are going unaddressed.

We remain hopeful that these concerns will be addressed not only in the final draft, but also in the Article 80 development projects currently underway.

ABOUT UANA AND ITS RELATIONSHIP TO PROPOSED VISIONING – PRIORITY STATEMENTS:

“Plan JP/Rox envisions a friendly, fun, walkable, safe, attractive and green community”

The Eggleston Square, Brookside Ave and Union Ave communities have played a unique role in the history of JP. Our community has an impressive history rich with commerce and invention, a diversity of building stock reflective of the rich history of Washington Street itself, a vibrant and engaged community, and a wealth of green space that includes Franklin Park, the Southwest Corridor, Franklin Park and the Zoo, and the Forest Hills Cemetery. We are part of a unique blending of commerce — of jobs and neighborhood associations which play an important role in creating this vibrant community — where businesses and the people who work in them live side by side, which now seems so desirable to developers and the new residents for whom they are building.

Union Ave is an economically and racially diverse residential area abutting Green, Washington and Amory Streets with their mix of light industrial and commercial buildings and residential homes. Much of the housing stock on Union Ave dates back to the Civil War era and the people who live here, have deep roots in the community. Until recently, 3 generations of one family

lived on the street and many of those who live here, made a commitment to the neighborhood more than 20 years ago. We moved into our neighborhood knowing that we would be living within a corridor that reflected a strong industrial flavor, not unlike the meat packing district in New York City, now the home of the much touted “High Line”.

Our housing stock consist primarily of 1, 2 and 3 story residential wood frame buildings; condos have been added to that stock beginning with the conversion of an old Civil War Barracks located near the Tennis Courts. Now, there are many condos along the street until you arrive at the two unique 4-story buildings that bracket Union Ave on Green Street. These buildings, once hotels are now single occupancy rentals.

Like other neighborhoods along the study corridor, Union Ave residents are proud of their history of progressive community involvement dating back to the I-195 highway protests which resulted in stopping the development of a highway and instead in the creation of the Southwest Corridor Park; including supporting English High School when violence erupted there in the ‘90s; and now working successfully with developers on Article 80 projects who want to enhance our community.

This residential enclave located between Amory and Washington Street — and often referred to as being on the “Doyle’s side” of JP — is a community and environment that is friendly, walkable and safe. And we do have fun.

Comments on the Plan JP/Rox DRAFT DOCUMENT:

Union Ave. believes that Section 3 of the draft BRA JP/Rox plan (Plan Workshops and Outcomes) does a good job capturing months of community input. However, these goals are frequently aspirational and are not reflected in the specifics and what we expected to see in the actual plan for Green Street.

“Guide growth that strengthens the community and respects the physical character of the existing residential areas”

The draft plan shows 6-story buildings at all 4 corners of Green Street, Washington Street, and Glen Road yet existing buildings are mostly 3-story or less with one at 4-story building. Six-story buildings are entirely out of context in our area.

Along Green Street, the draft document proposes a change in use that would allow for more excessive height on Green Street than is currently allowed. While subtle, this change of use will have a major impact on street life along Green Street and impact access from Union, Brookside Ave. Extension and Greenley Place.

Union Ave has said repeatedly and explicitly that buildings that abut this neighborhood should be built to NO HIGHER THAN 4 stories along the corridor so we are not surrounded!

“Union Ave., like Stony Brook and Green Street, were envisioned as areas to be scaled to the current neighborhood character. Participants expressed the desire to preserve the [interstitial] one, two and three family residential housing stock.”

The introduction of an RDA of 65 and 55 plus the subtle but significant proposal for a change of use on Green to NS which allows for an RDA of 55 — and which differs drastically from the

existing height under the LI designation or an LC designation in the code — would neither preserve nor provide a scaled transition between commercial and residential housing stock.

The rendering on the Area Specific Recommendations for Green Street neighborhood shows that Union Ave will be engulfed by 65 foot steel canyons—an era we thought was over when the Orange Line — which was at 1/2 that height — was taken down.

Again, Union Ave has said repeatedly and explicitly that buildings that abut this neighborhood should be built to NO HIGHER THAN 4 stories along the corridor so we are not surrounded!

“Promote new affordable housing and retail that support social and economic diversity of the area”

Currently, over 800 units have been permitted between Forest Hills and Green Street, with more in the pipeline; these developments are projected to have the minimum of “affordable” units. In fact, these units are not affordable to our neighbors who will be displaced by the current, unchecked market forces at work along Washington Street.

The City often talks about its desire to preserve the social and economic diversity of our neighborhood and of the city. Yet, we know that aspirations need concrete plans to balance the current market forces with the desire to preserve the diversity of small business and the racial and economic diversity all along the corridor.

The challenge is that the market forces we see today are in place because projects with the goal of introducing large amounts of market rate housing are going forward while the plan is being developed. These approved projects are introducing new residents into the neighborhood; these new neighbors need a household income of at least \$100,000 a year in order to afford the rent. On the flip side of the coin, the City has only recently created an office to assist those being displaced by the unchecked development whose income is often \$35,000 or less per year.

For the businesses in our community, no concrete plan has been outlined for how existing business will be preserved. No concrete plans have been developed to provide a viable mix of tenants for the proposed new commercial spaces. Each developer is encouraged and expected to develop an individual leasing strategy that assumes that the current unchecked market forces will continue and that there will be no major negative market correction. We have yet to see concrete plans that would support affordable retail that reflects the social and economic diversity of the area.

AFFORDABILITY

[The] BRA and the City have heard clearly from many people of Jamaica Plain and Roxbury that the central focus of the plan must be addressing housing affordability and preventing displacement of low and moderate income residents, particularly people of color.

While the BRA and City articulate a recognition of the community’s desire to see affordable housing, the many innovative options for addressing the need for truly affordable housing — like the infill housing done so successfully in the 90’s — are missing from this plan.

Specifically, we want the city to look at multiple development options around affordability, and to do so in concert with the community. The PLAN JP/ Rox should not rely entirely on a single solution — the development of “affordable units” by market-driven developers whose only response to the affordability, is the construction of 6-story buildings with overly aggressive floor area ratios, minimal setbacks, and a preponderance of high-end market rate housing units.

Density is only one tool that can achieve additional affordability.

The UANA is also adamant about preserving the scale, character, and economic diversity of our neighborhood. The current proposal creates the impression that one can build their way out of the affordable housing crisis; this is a false predicate. In actuality, this plan is creating “affordable” housing that the majority of people who currently live in the neighborhood could not afford. As the BRA has acknowledged, the average income in the neighborhood is roughly \$35,000. That is \$40,000 less than what the BRA suggest renters need to earn in order to be considered at low risk of displacement — an income of more than \$75,000 per year. The impact of the luxury housing on the community doesn’t even begin to put a dent in the need. With more than 35,000 people on the BHA waiting list, many in our city and in our neighborhood are already being forced to move to cities outside Boston, such as Brockton and Fall River! The City should adopt much stronger solutions for adding affordability beyond increasing height and density.

One of the most glaring examples of the disconnect between the Draft Plan and the community is the proposal by the BRA for a potential 200 units of housing and commercial space on a lot that is owned by BMS Paper. The BRA plan suggests that new development on this lot should include buildings that are 6-stories high.

The disconnect between what the community wants — both UANA and the owner — and what the Plan suggests be allowed in the new plan, is blatant. The BRA did not reach out and show its concepts (Figure 90) to the current owner of the site, BMS Paper, and so the BRA doesn’t know that as a long time neighborhood businessman — not a developer from outside our area — the owner wants to meet with the neighbors first then the BRA with ideas that reflect the height and density Union Ave. is suggesting. Again, it is important that zoning proposed reflect the community in which it is expected to be a part.

SPECIFIC CONCERNS AROUND AFFORDABILITY

New housing across the City and Jamaica Plain/Roxbury should reflect the incomes of households who need affordable housing.

The Mayor's housing plan estimates that 50% of the city’s population growth will be in households making less than \$50,000 a year. Yet, less than 15% of the new housing will be designed at those income levels.

And while approximately 50% of households make less than \$35,000 a year, less than 2% of new housing will be affordable to households making that amount.

In the JP / Rox study area, 70% make less than \$75,000 a year. The current plan reverses this, with 70% high-end market rate housing, where families need to make \$100,000 a year to afford a \$2500/month apartment.

The City is proposing that 30% of new housing is deed restricted at an average of about 60% AMI. The BRA is suggesting that almost half of the deed-restricted housing be developed at the Arborway Yard, a site for which we do not have control and that the MBTA has indicated that they are unwilling to cede control to the city or the community — even after more than 15 years of negotiation.

Therefore, the City should increase the 30% affordability goal and shift the income levels of affordable housing downward. It should make concrete commitments with numerical goals to the following solutions: (1) land banking to build non-profit affordable housing, supported by City funding, (2) strengthen private developer requirements, (3) set aside units for voucher holders, and (4) set a larger commitment for City funding beyond the current proposed \$35 million (about \$2.3 million a year).

We support calls to increase affordability in the JP / Rox study area using solutions that don't rely on a simplistic density v. affordability tradeoffs. Economic and racial diversity is a cherished defining characteristic of this neighborhood. It is a component of this community that the BRA has put at risk in JP and Roxbury as well as in Boston as a whole.

Design Guidelines:

The BRA has often said that the implementation will include 3 approaches: zoning requirements, guidelines and recommendations. However, based on the BRA review of recent projects, we have little confidence that the BRA will enforce the guidelines for setbacks, step backs, and the yet to be defined Open Space requirements. Guidelines must be more than recommendations—they must be enforced. Also, the historic building structure should be respected and reflected in forthcoming proposals — not dismissed with a mere passing reference.

Many of the current article 80 projects under review seem to be using the same architectural firms so the lack of creative, inspiring, and diverse proposals is disappointing. Please refer to the attached Union Avenue “Development Principles and Guidelines”.

Traffic, Parking, and Street Improvements: The Plan needs to lay out coordinated, integrated solutions to assure vehicle, bicycle and pedestrian safety and flow, solutions that make thoughtful best efforts to minimize downstream consequences. At the very least, the Plan needs to lay out next steps for a participatory community-involved process to achieve such integrated solutions. There are already a significant number of challenging blind intersections on Green Street between Amory and Washington. With the proposed increased density in the plan there will be the potential for increased sightline traffic hazards with additional cars and the potential of added intersections needed to address the increased density.

The need for parking by residents must be addressed according to needs of this community. Those who move to this area often have children and pets, and live a lifestyle that requires a car. Transit-oriented design is inappropriate for this neighborhood. Parking should be at no less than one car per unit. We suggest that parking should be either underground or not visible at the first floor level.

Setbacks: Street-level buildings with setbacks should not have upper floors cantilevered back to the property line and that canyonizes and overshadow narrow streets.

Stepbacks: Stepbacks of at least 10’ and preferably 15’ that begin no higher than the base Zone maximum height, with successive further stepback of each upper floor; if immediate abutting buildings are at a height lower than maximum then the stepback should begin at that lower height.

Sidewalk Width: Acknowledgment of substandard sidewalk width in this area, and of the

detrimental effects to safe pedestrian passage from the way a multitude of physical obstacles (some of which are called street amenities) are placed and which pedestrians must negotiate around. Proposals for increasing sidewalk width and ensuring pedestrian safety must have community review.

Density, Health, and Quality of Life: Questions about the effects of density on personal health and on neighborhood quality of life and livability were raised. At what point does growing gentrification and economic imbalance, height and density, become counter to the scale and character of a neighborhood it purports to improve? These questions are critical and surely residents have as much or more of a feel as anyone as to the answers.

In Closing:

We understand that zoning is a question of balance and tradeoffs. We believe that the BRA must form the final draft by engaging in a transparent and public process to reach this balance.

We understand that the larger city process is driven by the goals

1- to develop 53,000 additional units of housing by 2030; the size of the need for housing is predicated on a projected influx of people coming to Boston; and

2- to address what the city acknowledges as an affordable housing crisis due to gentrification and displacement that is accompanying this economic boom.

In less than 3 years, with close to 27,000 additional housing units in the development pipeline, the city is well on its way to achieving this historic goal. The aggressive nature of this development cycle has produced even greater gentrification and displacement — an unintended consequences.

This environment challenges the city and this community to ensure that the approximately 8,000 new units are truly affordable to our neighbors who we want to remain in our community.

Please take the amazing success that has been achieved to date as an opportunity to pause and re-examine the assumptions which so many have referred to as not having the outcomes desired.

Let us revisit the recommendations put forth in the DRAFT plan in light of the vast concerns raised by the neighbors/voters who live there.

There is such a great opportunity to pause and make this effort so much stronger. We hope you will join with us so we no longer have to be in this adversarial stance but rather find a better balance by working together.

Development Principles and Guidelines

1. A proposed development abutting a 2 or 3-story residential neighborhood must respect the character and scale of that neighborhood.
2. A 4-story building is acceptable provided the fourth story is noticeably set back on all sides. The building may be multi-use with ground-floor retail and residential above.
3. A mezzanine, which adds to the height but does not count as a separate story, is not acceptable.
4. The street facade should be setback from the property line to create a wider, safer, pedestrian-friendly sidewalk.
5. Setbacks from the property line on all other sides of the building must conform to the same setback codes for the adjoining residential area.
6. The setbacks on those sides abutting a residential property should contain a green buffer to soften the transition and reduce noise.
7. The design of the building, in form, material, and color, should be creative and innovative, and bring distinction to the street and neighborhood, and should reflect the neighborhood's historical character or be a contemporary interpretation of that character.
8. The design should wrap around all four sides of the building, especially if the non-street sides are the sides most visible to the neighborhood residences.
9. The design should incorporate art, murals, or sculpture to enliven the streetscape.
10. Retail uses in a multi-use residential building should serve the neighborhood, and be of a nature that extends into evening and weekend use that would light up and enliven the streetscape. Box and chain-store uses are not acceptable.
11. Parking should be available to residents, employees, visitors, and customers. The number of spaces should not be so limited as to cause added contention for street parking in the residential neighborhood, but neither should it measurably add to already-congested street traffic.
12. Ingress/egress of vehicles onto the site must have a flow and design that promotes both pedestrian and vehicle safety, doesn't block traffic or emergency vehicles, and provides for off-street deliveries and passenger pick-up/drop-off.
13. Bicycle and public-transportation use should be encouraged, even incentivized, but that cannot be to the exclusion of residential family need for vehicle ownership for employment, school, shopping, and other uses.
14. Trash bins should be enclosed within the building and sited such that noise (often early-morning noise) from trash pick-up vehicles would be at a remove from the abutting residential neighborhood.

15. Roof-top machinery, solar panels, etc., should be below the parapet line or otherwise screened.
16. External property lighting should be directed downward and away from abutting property.
17. A multi-unit residential building should incorporate: bicycle storage; other unit-dedicated storage; a room for resident meetings, receptions, or community use.
18. The rental or purchase price of a unit should accommodate the ethnic and economic character of the neighborhood, including units sized for families with children, and should meet or exceed neighborhood requirements for affordable and worker housing.
19. The livability of the neighborhood is critical to all of its residents and is reflected in its character and scale. The required proportion of affordable units should be achievable within that scale and without resorting to variances in height which destroy the livability and character of the neighborhood and which add to its gentrification.

6-16-2016

Summary of the August 9 BRA-UANA Meeting

I am summarizing the topics of conversation covered in the meeting between the BRA and the Union Avenue Neighborhood Association held on August 9, 2016 as part of the review of the Plan JP/Rox Draft July 15 report. The BRA invited more expansive feedback so this summary includes related issues that time precluded from presentation at the meeting. Expected outcomes are noted. These are followed by a detailed analysis and reasoning of the positions expressed. It does not include a summary of the BRA's opening presentation. The BRA has the thanks and appreciation of participants for holding this meeting. This summary is provided in hope that the BRA finds it helpful as work continues forward on the next draft of Plan JP/Rox. The BRA's feedback to, as well as further discussion with, the Union Avenue neighborhood is welcomed. This document is still working its way through the neighborhood association's processes and is subject to change and so at this writing it is not to be attributable to the UANA.

Expected Outcomes

The outcomes that are welcomed and for which there was strong consensus are:

1. Neighborhood Characterization: A better characterization of the larger Green Street neighborhood and acknowledging and addressing the effects that proposed changes to Green and nearby Amory and Washington have on the neighboring residential communities.
2. Height and RDA Overlay: The adoption of a respectful RDA-45 for Green Street and the associated nearby LI areas and nodes on Amory and on Washington that surround and enclose a 2F-4000 residential zone.
3. Setbacks: Street-level building setbacks without upper floors cantilevered back to the property line and which canyonize and overshadow narrow streets.
4. Stepbacks: Stepbacks of at least 10' and preferably 15' that begin no higher than the base zone maximum height, with successive further stepback of each upper floor; if immediate abutting buildings are at a height lower than maximum then the stepback should begin at that lower height.
5. Sidewalk Width: Acknowledgment of substandard sidewalk width in this area, and of the detrimental effects to safe pedestrian passage from the way a multitude of physical obstacles (some of which are called street amenities) are placed and which pedestrians must negotiate around. Proposals for increasing sidewalk width and ensuring pedestrian safety must have community review.
6. Subdistrict Name: If the subdistrict name is to change from LI, it should be to LC and not to NS. LC leaves base zone regulations intact (without relegating them to a footnote), it has little or no practical effect on the uses that could and do occur and for which the BRA will be seeking code recognition, it will maintain better community control in reviewing proposed uses, and it assures full 25% capture.

7. Residential Cluster Correction: Acknowledgment and resolution for residential clusters on Greeley and on Washington that either are now in or are being moved into a business subdistrict.

8. Traffic, Parking, and Street Improvements: The Plan needs to lay out coordinated, integrated solutions to assure vehicle and pedestrian safety and flow, solutions that make thoughtful best effort to minimize downstream consequences. At the very least, the Plan needs to lay out next steps for a participatory community-involved process to achieve such integrated solutions.

9. Density, Health, and Quality of Life: Questions about the effects of density on personal health and on neighborhood quality of life and liveability were raised. At what point does growing gentrification and economic imbalance, height and density, become counter to the scale and character of a neighborhood it purports to improve? These questions are critical and surely residents have as much or more of a feel as anyone as to the answers.

10. Balanced Incremental Approach: The BRA was urged to take a more balanced, slower approach in planning. Yesterday's plans did not foresee today's problems anymore than Plan JP/Rox will foresee tomorrow's. Planning should not halt but it must recognize that incremental steps allow for course corrections. The rush to develop will lock-in unintended consequences for 50 or more years. Historic examples abound; let's keep them history.

Detailed Analysis and Rationale

1. Neighborhood Characterization

The Plan is filled with references to respecting the existing characters, cultures, histories and identities of the several neighborhood areas, yet, unlike other areas, Green St is characterized in the Framework (p 132) only as a "neighborhood service district", an incomplete characterization intended perhaps to suggest the street should become a Neighborhood Shopping subdistrict; the Plan ignores the effect of this district on the closely abutting residential neighborhoods. In fact:

-- Green and nearby streets historically were, but no longer are, the commercial hub of JP; the neighborhood's pride in that history remains.

-- between Amory and Washington, five historic repurposed 4-story buildings from that era remain, and they cap the height of this area.

-- today, this short segment of Green actually is mostly residential with many residential units above ground-floor office and convenience retail space, and also has several 2 and 3 story homes and offices.

-- today, there are several light industrial businesses off Green along Brookside, such as Carlyle, that have long been a welcome part of the neighborhood, as have commercial establishments such as Schell Printing and BMS Paper on Washington; several social and

community service organizations such as Ethos close by on Amory and yet others, are an important part of the neighborhood fabric; these are all in buildings of three stories or less.

-- Green is a heavily-trafficked, narrow, bi-directional (and east-west connecting), three-lane street only three short blocks in length, with narrow, sub-standard sidewalks and build-out right to the property line, conditions which create an unsafe environment and a canyon wall effect.

-- the Plan concentrates its attention on Green itself and nearby portions of Amory and Washington alone and ignores the effect these streets have on abutting residential neighborhoods: the 2F-4000 on Union and Brookside Ext, and the 3F-4000 on Brookside and on Greeley.

-- Green St is the only public way into Union, Brookside Ext, and Greeley.

-- the small Union Ave neighborhood of two- and three-story homes is, with the exception of the EHS playing fields, an enclave entirely and closely surrounded by the existing LI subdistrict on Amory, Green and Washington.

-- the residential homes in this enclave have rear and/or side yards abutting the properties on the west side of Washington and the south side of Green.

As an outgrowth of working with developers over several years, the UANA developed a set of Development Principles and Guidelines that capture the vision and sense of what this community desires from developers. The Guidelines are attached.

Consequently, the residents of the Union Avenue neighborhood have deep interest in and serious concern about proposals in Plan JP/Rox regarding the height, density, set- and step-backs, and other transformations proposed for the immediately surrounding current LI district.

2. Height Transformation

The Plan proposes creation of two zones, RDA-55 and RDA-65, of height up to 55'/5- stories and 65'/6-stories, respectively, out of the current LI zone of 35'/3-stories which abuts the 2F-4000 and 3F-4000 residential zones of height up to 35'/3-stories. The transformation from 35' to 55' is nearly a 60% increase, and going to 65' would be an 86% increase in height. This is staggering, even bullying, disrespect to the character and identity of the neighborhood. The Plan has not yet, but should, propose and implement an RDA-45 of up to 45'/4-stories for the current LI zone, which is a significant but also respectful height transformation of 29%. In fact:

-- for the last several years, the UANA alone as well as together with the Brookside NA has worked productively with developers to achieve neighborhood-respectful multi-use projects that are only 4-stories in height, and that have significant stepbacks of the fourth floor which visually recede from both the streetscape and nearby 35' residences; notable in this regard are 3383 Washington ("the chicken place") and Bartlett Square I.

-- proposals from other developers for this neighborhood that were tall and densely massed engendered strong neighborhood opposition and have not come to fruition.

-- 55' is too high for very narrow, canyon-like Green St (some BRA staff have also voiced that sentiment); a 45'¹/₄-story height, however, is in keeping with the scale of both the existing historic buildings on the street and the surrounding neighborhood.

-- the west 'entrance' at Amory to this segment of Green is marked by the two recent four-story Bartlett Square projects (one built, one in development) opposite the single-story T station; the east 'entrance' at Washington is marked by the two-story E-13 police station with its clock tower; the clock-tower and the nearby popular Ruggiero's Market are "icons" of this neighborhood.

-- an RDA-65 is proposed along the east side of Washington which backs up to and is not respectful of yet other 3F-4000 residential neighborhoods in the Stonybrook area.

--the RDA-65 jumps across Washington at Green to encompass only a single parcel and one developer (Levin) on the southwest corner and then crosses Green to proceed northward; this Washington "jump" creates several problems:

---- the northern end of this node is at a substantially higher grade (by nearly two stories) and overshadows the 3-story residences in the valley behind it on Greeley;

---- at the corner of Green, the grade is not as high but there is still a grade change coming up from Union to Washington, so a 6-story building appears taller;

---- the BRA has suggested on several occasions that corner buildings are iconic place-makers and ought to be taller, implying that corner height equates to iconic; iconic is achieved by design, even for one or two story buildings; almost no one in this neighborhood believes there should be 6-story buildings at the Washington intersection that serves as entrance into this neighborhood, an entrance already place-marked by a two-story clock tower;

---- any RDA-65 in the Green Street segment of the corridor is an anomaly to the existing surrounding neighborhood scale and character, and an RDA-55 is not much improvement.

Consequently, an RDA-45 should be applied to the current LI along Green from Amory to Washington, and along the nodes extending from Green up and down along both Amory and Washington.

3. RDA Overlay Uncertainties and Capture Loss

The community strongly prefers establishment of an RDA-45 designation. The BRA notes that its proposals for RDA-55 and RDA-65 permit 4 or 5 stories and 4, 5, or 6 stories, respectively. A range generates only uncertainty for the community and for a developer. This is not acceptable.

-- The BRA acknowledged that zoning codification would not be a range as the Plan implies but would be only a single dimensional metric, namely the largest permissable which is 55'¹/₅-stories for RDA-55 and 65'¹/₆-stories for RDA-65.

-- Recent history shows that developers routinely propose more than the maximum permitted in regulations in hope that in the end they would be granted the maximum. The odds are low that a developer would propose less than the maximum.

-- BRA staff have said in conversation (not at the UANA meeting) that the BRA would decide whether a proposal for an RDA-55 should be 4 or 5 stories, and similarly for an RDA-65. This

leaves the community on the outside of such decisions. Recent history with several projects suggests that even when community comments are solicited that often they have little to no end-effect on BRA decisions.

-- If base zoning does in fact change to 45' under an NS designation, that critically affects the purpose of instituting an RDA. It would mean that the fourth floor would capture only 13% affordable units under the IDP and the 25% capture would not kick in until the fifth floor. The effect from this on current NS designations in Jackson and Egleston Squares needs examination.

-- The meaning of a 25% RDA capture is that a developer can build 3 additional market-rate units on the upper floors for each additional affordable unit. This is yet further gentrification of the community, and such ratios based only on height and density suggest there's little way out of the growing economic disparity. This also affects the nature, orientation, and viability of current and future area businesses.

4. Setbacks and Stepbacks, and Sidewalk Width

Setbacks and stepbacks help to transition between buildings and between zones. They cannot by themselves replace height as the primary consideration in setting the overall tone and scale of neighborhoods but they help considerably in softening the physical massing and presence of buildings from the streetscape and in contributing to neighborhood safety and friendliness.

-- The UANA did not discuss setbacks in any specificity in its limited meeting time with the BRA but that is not to detract in any way from their importance. This is a neighborhood with narrow streets, buildings that come right to the property line, and sidewalk widths that are not only substandard but also filled with all manner of pedestrian obstacles and impediments. Improvements widening the sidewalks per se and improvements that ease buildings back from the property line are highly desirable.

-- Side and rear setbacks are just as important as front setbacks.

-- Generally, the UANA does not look favorably upon building design where the street facade is setback but upper stories cantilever outward to the property line. Such design introduces a canyon effect, especially on narrow streets.

-- The Plan's setback dimensions for residential seem to follow existing code and should not be any less in dimension. It is not entirely clear how to interpret setbacks for main street/commercial. There are certainly more reasons than just outdoor seating for front setbacks, and if such use only serves a business and by so doing reduces the pathway, then what's been gained. More information about front setbacks is necessary.

-- The Plan's recommendations for stepbacks are not acceptable. Proposed buildings taller than base zoning must respect the base height as well as respect those buildings that do conform to the base height. Stepbacks must begin at the base height. In a 35' base zone, stepbacks would occur beginning with the fourth floor. Some residents would prefer stepbacks to occur at the height of the nearest neighboring building of at least two stories whose height is

lower than the base. In that instance, in a 35' base zone with a two-story neighboring building, stepbacks would occur beginning with the third floor.

-- The Plan's recommendation of 8' stepbacks is not acceptable. Stepbacks must be at least 10' and preferably 15'. The object is for the building's upper massing to visually recede. Color of materials can help with recession but nowhere near as much as stepbacks of noticeable depth.

-- Each successive floor above the first stepback must be further stepped-back.

-- The stepbacks must occur on all sides of the building. This is especially critical when the rear of a building abuts a residential zone. The rear and often the sides of a building are the parts most visible from the abutting neighborhood.

-- The stepbacks can be used as decks for units opening out to them. The stepbacks can also serve as areas for outdoor greenery that further softens the building.

-- As to sidewalk width the Plan claims (page 108) that "Green Street has sidewalks of seven to eight feet wide, ... wide enough for ADA accessibility". Not true! Measures taken from curb to property line along the south side of Green show a median width of 6'9" (ranging from 6'7" to 8'9"). Along the north side, the median width is a mere 6' (ranging from 5'8" to 7'8" at the Amory bumpout). For the statistically inclined, note that the medians in both cases are substantially closer to the low end of the range; in other words, the wider sidewalk is the exception.)

-- Many street impediments substantially constrict sidewalk width: for example, from the property line on Green the width reduces to 3'4" at a mail storage box and to 3'10" at a hydrant. These widths are substantially less than preferred widths of more than 11' and more than 16' on residential streets and commercial streets, respectively. With many existing buildings coming right to the property line how is it even possible to widen sidewalks in this neighborhood to be pedestrian friendly without removing a parking lane, which creates another set of problems.

5. Subdistrict Name Change

The Plan proposes changing the current LI (Local Industrial) to an NS (Neighborhood Shopping) district along Green and nodes extending from Green along Amory and Washington. The reasons for the proposed change to NS are not compelling and could leave the neighborhood with less zoning protection than it would otherwise have. The neighborhood opposes this change and prefers that the subdistrict either remain LI or be changed to LC (Local Convenience).

-- The reason proffered for an NS (page 60) is that it "would support and promote more commercial types of uses rather than industrial". There have been no new industrial uses coming into this neighborhood for years for reasons having to do with technology, the economy, and land costs. The LI designation has not been any deterrent to the new commercial and service uses that have have been growing in this and other LI neighborhoods. The LI designation has been no deterrent to 'forbidden' residential uses sprouting up all over in such districts. The neighborhood has no issue with the Plan's intent to recognize reality by changing

the designation from LI to a neighborhood business designation and strongly prefers that the designation be LC, not NS.

-- Although the Plan notes the proposed change as LI to NS, at the BRA-UANA meeting the BRA said that this district is already LC and should be changed to NS. No one before has ever referred to this area as other than LI as is shown on zoning maps.

-- There is little difference between LC and NS uses. The differences between LI and either LC or NS are much greater. The BRA already has among its recommendations the amendment of uses among all three designations, making them more equitable than now as well as making them all more amenable to 21st Century uses and commerce. In fact, if a business should need a variance to operate in an LC, it gives the community greater control over reviewing and approving the request. In practice, zoning committee hearings and reviews make the business more aware of community issues and lead to better operations for all concerned. The neighborhood supports business and does not oppose any business that is a good fit with the community's needs, character, and quality of life.

-- The most significant and worrisome distinction between LC and NS is the underlying change in base zoning -- 35'/3-stories/1.0-FAR versus 45'/4-stories/2.0-FAR. This codification is an unwarranted change to as-of-right designations to taller and denser along a street ill-fitted for such as-of-right. It takes away protections afforded the community through the zoning code. This community is the only community in the Study Area where such a name change changes the base zoning.

-- In the Plan, the BRA says that the new NS subdistrict would still have the same 35'/1.0-FAR as is in the current LI. There is no basis for such a statement unless the BRA intends to recommend a change to the zoning dimensional regulations. No such change appears among the Plan's recommendations. If such change occurred it would be codified as a footnote to the base NS zoning dimensional regulations. There is no guarantee that such a change would be approved. The community does not regard itself or its base zoning as a footnote. Changing the designation to LC would leave the base zoning intact.

6. Residential Cluster Exceptions

The BRA noted in its presentation to UANA that it did not take into account two-story dwellings in the Egleston area and some on Brookside and that it would be carving those out from the existing LI. Similarly, the BRA needs to address:

- the two and three-story residences on or near Greeley which are being removed from a 3F-4000 zone into the proposed business subdistrict;
- the cluster of three-story residences on Washington toward Union Avenue extension which are in the current LI and abut the 2F-4000 Union Avenue neighborhood.

7. Traffic, Parking, and Street Improvements

Traffic and parking issues dog all of the Study Area. There is especial and disproportionate strain in the Green Street area not just from narrow streets and sidewalks, the absence of bike lanes, the limited options for east-west travel, commuter parking, but also from the absence of

municipal parking, the absence of turn lanes, the absence of service alleys, constrained physical spaces for trash, deliveries, and snow removal, and the (very welcome!) presence of police and emergency vehicles getting to/from E-13. There are at least ten “intersections” (several of them blind) of streets, driveways, curb cuts, that feed in and out of Green Street along its very short three-block length from Amory to Washington. The neighborhood sees this strain increasing significantly. Plan JP/Rox suggests a number of interesting potential improvements for both pedestrian and vehicular safety. The real question is whether this Study Corridor in general, and the Green Street area in particular, has the street space within which to implement them. We want to see meaningful outcomes that will protect the safety of pedestrians, cyclists, and vehicles alike, that reduce congestion and contention, that limit or eliminate merges, that realistically recognize and provide for parking, and that promote reduced travel time for all modes. A tall order. What we don’t want are unconnected, isolated, or insufficiently thoughtful “improvements” leading to problematic consequences.

8. Density and Balance

The Green Street area is beginning to feel under siege from all of the development now occurring and proposed that substantially increases population and density along the Corridor. Concerns were eloquently expressed regarding the effects of increased density on health. The BRA acknowledged the issue and concern but could offer no studies or answers. Yet, this is a critical question, as are questions of impact on related quality of life and liveability. What is the potential for a larger population to become less healthy? What is the effect of growing gentrification and economic imbalance? When does height and density become counter to the character, scale, and liveability of a neighborhood that it purports to improve? Surely the residents of a neighborhood have as much or more of a feel for the answers as anyone.

Consequently, the BRA (and by extension the City) was asked to take a more balanced, even slower approach in its planning. Plans of yore did not foresee today’s problems. Plan JP/Rox is reacting mostly to today’s problems and cannot foresee tomorrow’s. That does not mean a halt to planning but a recognition that incremental steps allow for course corrections. If the JP/Rox Corridor is built too fast, the physical development and its unintended consequences will be locked in for 50 years and longer. One only needs to look at history and ask if Boston has such examples.

Alan Benenfeld

August 24, 2016



Marie Mercurio <marie.mercurio@boston.gov>

BRA Meeting with Green St Renters

Marie Mercurio <marie.mercurio@boston.gov>

Thu, Aug 18, 2016 at 11:42 AM

To: Benji Mauer [REDACTED]

Cc: helen matthews [REDACTED], Marcy Ostberg <marcy.ostberg@boston.gov>

thank you!

We will take the more refined version when you have them.

Great meeting - and thank you for excellent facilitation, Helen!

Marie

[Marcy, FYI!]

On Thu, Aug 18, 2016 at 10:53 AM, Benji Mauer [REDACTED] wrote:

Here are the raw notes. Marie, I think that we will be synthesizing the feedback into a letter or list of bullet points this Sunday.

- Introductions and ground-rules
- Intro from Homefries
 - Going over maps
 - Covering displacement in process map
 - Catlabs building:
 - 4 businesses
 - 6000 sq ft of shared artist studios
 - 2 residences
 - Covering likely future displacement
 - See handout
 - Covering proposed future development
 - See handout
 - Statistics
 - 75-100 private rental units
 - None of them deed restricted
 - Around 100 private renters
 - In planning area
 - 2/3 folks of color in planning area
 - 70% make less than \$75,000
 - 30% are affordable to those making less \$75,000
 - 50% of households in planning area making less than \$35,000/year
 - 2% of new housing is affordable to \$35,000/year
 - In census tract
 - ~33% are of european
 - ~30% latin american
 - ~20% african american
 - ~4% asian
 - Our census tract is one of the lowest-income in the JP/Rox planning area
 - Rumor has it that Union Green has been sold (because of code violations and sanitation issues)
 - Guessing for cost of a 1br
 - Guess \$1200-1800/mo
 - Mordecai proposed \$2100/mo
- JP/Rox BRA presentation
 - Many city departments involved
 - housing, jobs, transportation, public art, everything you want in this area
 - Introduced Marcy from Housing Innovation Lab
 - Overview of planning process (workshops)
 - Marie: It's been emotional, hard, but we need to get ideas out there for feedback

- Large study area
 - 6000 people,
 - 2579 households
 - 30% is deed restricted already
- Go over vision priority statements
 - 1st vision statement is affordability
- Go over development scenarios
 - Built up areas that are ripe for change or are changing
 - Heights from 3-15 stories (large heights in Jackson and Forest Hills)
 - Idea of 3,000 new units
 - “These are not proposals. These are not development projects”
- Go over development framework
- Existing land-use does not reflect current zoning
- Talked about density bonus (can build taller if there’s more deeply affordable units)
- Housing affordability section
 - Low-income private rental units most at risk (302 households)
 - 30% is the new goal (maintaining the additional 30% — about 1000 deed-restricted units)
 - How to do it?
 - Public funding
 - Private development requirements
 - Additional strategies
 - Question: Is there an onsite affordable requirement?
 - Feedback: Onsite is not required if they’re building according to zoning (no variances)
 - Feedback: 70% of AMI is not affordable
 - We heard that, and the density bonus is building in higher amounts
 - Larger amount coming from public housing (600 public, 400 on density bonus)
 - City has a limited amount of resources across the city (\$70,000,000 for public situation)
 - Feedback: 70m is inconsequential in this area of study
 - Feedback: There are 480 from Arborway Yard, but the MBTA is not budging and up in the air including to Liz Malia — so without that the 30% kind of poofs... about \$2m a year is coming from the city for affordable housing
- Q&A
 - Jonah: (paraphrasing) Is this mixed-use or some other way of doing this? It would be better if the affordability was weaved throughout
 - Marie & Marcy: This is our goal
 - Feedback: We need to create totally affordable units for a period of time so people who’ve built up this neighborhood so we can remain in this neighborhood. Even what’s considered affordable now, it’s not affordable. I would completely fight for people like me to remain in this neighborhood. I’ve been through other cycles of gentrification. This is the cycle of gentrification that is pushing us out. We’re also trying to make sure people have good wages. Restaurant owners paying employees \$18.00 an hour can’t find workers even in Dorchester who can work.
 - Marie: We’ve been meeting with developers about their bottom line. They’re running businesses too. We’re trying to understand the balance, and how much we’re able to push them before they say “we’re going to build elsewhere”
 - “We want them to go elsewhere” [laughs]
 - Marcy: This is very important feedback. Unfortunately we are in a capitalist system, so there are only so many levers we can pull. We can’t take land away, we can’t stop development. The idea is to encourage housing where it makes sense — not impacting the fabric where it exists.
 - Back and forth — Levers
 - 3 Glen: Have you done traffic studies? How many cars come in with the 3,000 units? It takes an hour to get to Roslindale.
 - Marie: Plan JP/Rox does not come with a traffic study. Washington doesn’t have a wide enough right-of-way to do a lot of work on
 - Marie: For small projects we don’t require a study, but we’re considering whether every article 80 study could require a traffic study, shadow study, etc.
 - George: Something about the amount of units
 - Our most recent model is showing 2100 in the spreadsheet. Cut down the tower at forest hills. So, 3000 affordable in the pipeline.
 - 3 Glen: What tools will be provided for renters to become homeowners
 - Boston Home Center has options (classes, etc), but prices are high
 - Marcy: We don’t yet have a solution for that
 - Marie: We just named a person for Office of Housing Stability
 - Marcy: City is working with Office of Fair Housing to create a preference in the lottery for people facing displacement (50% of affordable units)
 - Rooming house: How many units are you planning to build?

- Marcy: Has plan for 51,000 units citywide. In order to mitigate as much as possible, we're looking at building new housing... 49,000
 - George: Half of those 49,000 will make \$50,000 or less, but only a much smaller portion will be affordable to those folks
 - Marcy: Part of the idea of building more housing is freeing up housing at the bottom of the market
- Rooming house: Our rents go up each year, sometimes more than once a year
- Homefries: The supply and demand argument needs to be proven more clearly
 - Our block is experiencing a wave of displacement and it's the tip of the iceberg. The first wave is affecting commercial tenants
 - The second wave is going to affect tenants
 - The block needs to be stabilized and the BRA needs to do whatever it can to stabilize our block
 - Part of the problem with the 302 households most at risk doesn't take into account building clear-outs. They don't require rent-hikes in order to displace more people.
 - Creation of more affordable housing isn't preventing it. We don't have a way of preventing clear-outs.
 - Plan JP/Rox needs a back-up plan if Arborway Yard doesn't pan out.
 - A big part of the 30% is wrapped up in Arborway Yard, and there needs to be a back-up plan.
 - Could involve stronger affordability for private developers
 - Could involve facilitation of CDCs buying buildings (to add city funding)
 - There needs to be a coordinated area-wide effort in informing renters of their rights
- Marcy: Acquisition Opportunity Program — is one option
 - Homefries: It's not going to be enough. They can't purchase enough properties right now because of the cost.
 - There needs to be some kind of creative option to allow people to purchase
- Catlabs: Is the planning process affecting current developments? The cost of \$60-80/sq ft is only affordable to corporate entities
- Marie: JP/Rox is mainly guidelines. The things with teeth we hope to make into zoning
- George: An example: 3200 Washington (Jackson Glass) was approved and it didn't meet JP/Rox requirements
- Wrap-up
 - 2nd draft coming out soon
 - Want written feedback by August 22nd
 - Zoning amendments will have to go back
- Sunday 11am-1pm at 120 Brookside Ave to synthesize feedback
- Thursday 25th at 7:00pm — Movie night about displacement and redevelopment in Boston (South End and Mission Hill)
- Contact info for BRA people:
 - marie.mercurio@boston.gov
 - marcy.ostberg@boston.gov

--
Benji




Marie Mercurio

Senior Planner II

617.918.4352

BRA

One City Hall Square | Boston, MA 02201

BostonRedevelopmentAuthority.org



Re: Interpreter, etc. for Wednesday evening's meeting

helen matthews [REDACTED]

Thu, Aug 18, 2016 at 4:50 PM

To: Marcy Ostberg <marcy.ostberg@boston.gov>

Cc: Marie Mercurio <marie.mercurio@boston.gov>

Hi Marcy,

Thanks for getting in touch. Here is the link to the online, interactive version of the map of Green St. area displacement that I shared last night:

https://bostondisplacement.carto.com/viz/2f785b86-626d-11e6-9755-0e233c30368f/public_map

This map has 3 layers. You have to click where it says "Visible Layers" and then toggle the layers on and off.

The 3 layers are: **1)** Tenants (residential and commercial) that have already received an eviction notice and/or an unsupportable rent hike, **2)** Tenants (residential and commercial) that are facing displacement (i.e. likely will receive an eviction notice soon), and **3)** Proposed new high-end housing developments in the pipeline.

To see a pop-up profile of any dot or shape on the map, just click on that dot or shape.

The profiles for the properties on the map could use some elaboration, but the dots/shapes do capture the properties where displacement has happened/is pending in around Green St. in the JP/Rox redevelopment area. There may be more cases that are not publicly known yet - and/or more developments the community hasn't heard about yet.

Of the 11 addresses with cases of tenant displacement in this small area, all of them commenced in 2016. Three residential tenants have already left their home no-fault due to redevelopment (197 Green St., proposed City Realty development). Two more households are now facing no-fault eviction too (114-120 Brookside Ave., apparently another proposed City Realty development). I'm going to reach out to those tenants and pass along the DND info.

Could you please forward this to the folks you were speaking to at DND? Thanks for joining us last night,

Helen
Green St.

On Thu, Aug 18, 2016 at 12:02 PM, Marcy Ostberg <marcy.ostberg@boston.gov> wrote:

Hi Helen,

I just want to thank you again for setting up a great discussion yesterday. I was sharing the data you presented with others at DND and couldn't remember how you defined the green and red dots.

Also, can you pass along the information about the Office of Housing Stability to these individuals? I know they will want to support these homeowners in any way possible.

Website: <https://www.boston.gov/housing/office-housing-stability>

Phone: 617-635-4200

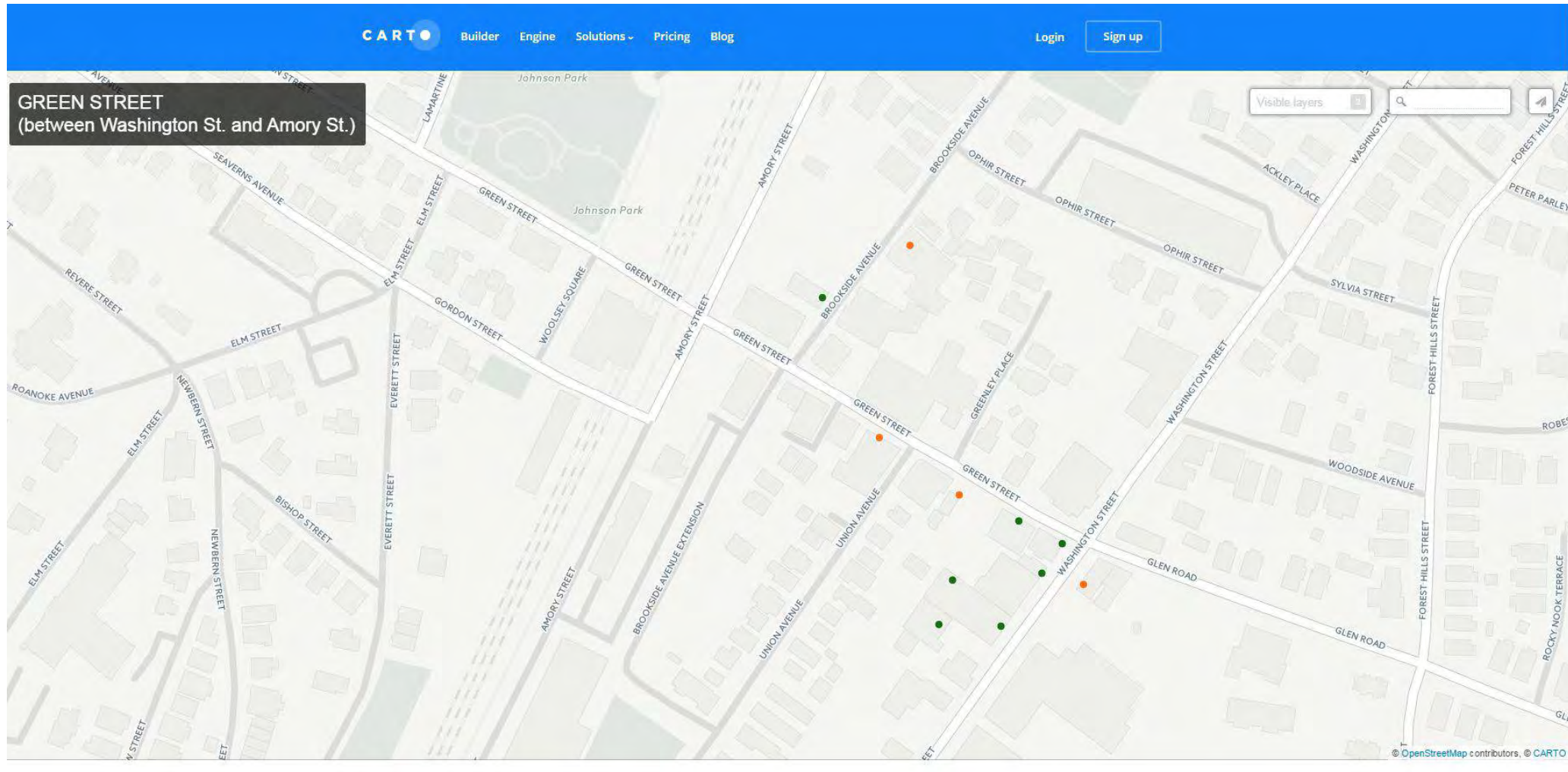
Email: rentalhousing@boston.gov

Thanks again,

Marcy Ostberg
Program Co-Manager, [I-Team](#) / Housing Innovation Lab
[Mayor's Office of New Urban Mechanics](#) City of Boston
617-635-0015 (Mayor's Office of New Urban Mechanics)
617-635-0259 (Housing iLAB/ DND)

@MarcyOstberg
<http://newurbanmechanics.org/boston/i-team/>
@newurbanmechs #housingiLAB #iteams

GREEN STREET RENTERS MAP PROVIDED BY HELEN MATTHEWS 8-18-16





Letter to BRA from Green/Brookside Renters Association on Plan JP/Rox

Benji Mauer [REDACTED]

Mon, Aug 22, 2016 at 6:27 PM

To: marie.mercurio@boston.gov, john.dalzell@boston.gov, brian.golden@boston.gov

Cc: rentalhousing@boston.gov, lydia.edwards@boston.gov

Letter to BRA from Green/Brookside Renters Association on Plan JP/Rox

Dear Ms. Mercurio, Mr. Dalzell, Mr. Golden and all involved in developing Plan JP/Rox,

There's a feeling among renters on Green St. between Washington St. and Amory St. that our block, as well as adjacent streets such as Brookside Ave. and Washington St., are under attack by speculators. This was expressed to the BRA in person at our recent August 17th, 2016 meeting. Right now, developers such as City Realty and Mordechai Levin are proposing new developments (on the corner of Green/Washington and on Brookside Ave.) that require the eviction of many current tenants, and this trend is likely to grow. We all worry about our buildings being sold and getting evicted, because some of our neighbors have been evicted already. The Plan JP/Rox process has not sought to actively include the voices of renters - especially low-income renters of color - who are the most at risk of displacement as a result of the policies in Plan JP/Rox. We, the renters in the Plan JP/Rox area of Green St., believe that:

- Plan JP/Rox must include a no-displacement policy. There are 10-11 recent or pending cases of tenants (both commercial and residential) being displaced on Green St. between Amory St. and Washington St. The situation is very urgent on our block.
- The BRA should put a moratorium on luxury developments. We need to create totally affordable projects for a period of time for people who've built up this neighborhood so we as renters can remain in this neighborhood. This is the cycle of gentrification that is pushing us out. After that moratorium and our neighborhood has stabilized, affordability shouldn't be created solely through large deed-restricted developments. It should be weaved into each development, throughout the neighborhood.
- All Article 80 projects should require a traffic study, regardless of size. Traffic volume is already a serious problem and will get much worse without studies and careful planning.
- The current resources for renters to become homeowners are not enough. The Boston Home Center is helpful, but we need monetary assistance to afford the current high home prices.
- The Office of Fair Housing should immediately put into place a preference in the lottery system for people facing displacement. If it can't be implemented citywide immediately, it should be done on our block immediately.
- "Affordable" in Plan JP/Rox should be defined by the median income of the households in the planning area. "Affordable" is not affordable to us. 70% AMI is not affordable. 60% AMI is not affordable. Even 50% AMI is not affordable to some of us. For instance, one renter on our block who sought to rent an "affordable" unit in the new development by Forest Hills could not afford to do so.
- All affordable units should be built on-site in new developments, even if the development is being built as-of-right without seeking zoning variances. Allowing developers to build the units required by IDP outside of the Plan JP/Rox zone will only contribute to the destruction of our community.

- The BRA's statistic of 302 households "most at risk" due to income is grossly under-estimated. Many renters who are at risk of displacement from building clearouts due to redevelopment are not represented in this number. In other words, rent increases are not required to push tenants out of buildings for redevelopment - tenants may simply receive an eviction notice, as we've already seen at 197 Green St. and 114-120 Brookside, for example. The BRA, together with the Department of Neighborhood Development, should identify buildings that are most vulnerable to "clear outs" and work pro-actively on stabilizing those buildings by facilitating their acquisition by non-profit developers.
- The BRA should remove the affordable housing units attributed to Arborway Yard from the 30% affordability goal for Plan JP/Rox, and stop claiming it as part of a displacement mitigation strategy. It's not clear whether any affordable units will be developed in the Arborway Yard in time to mitigate displacement in the planning area.
- Plan JP/Rox should include a concrete, viable backup plan equivalent to the number of units currently attributed to the Arborway Yard - via requiring stronger affordability from private developers on private land and/or securing greater city funding for affordable development and non-profit acquisitions.
- Plan JP/Rox should include a plan to facilitate the purchase of private land by JPND and Urban Edge to create more permanently affordable housing units.
- There needs to be a coordinated area-wide effort to inform commercial and residential renters of their rights and legal resources in multiple languages.
- The Acquisition Opportunity Program as it stands is a step in the right direction, but \$7.5 million is seriously insufficient and needs to be increased. In general, the City should make a concrete commitment to fund significantly more affordable housing across the city and in the Plan JP/Rox redevelopment zone. In addition, a new zero-interest or low-interest loan program should be offered using city equity.
- The BRA should facilitate and match-fund a cooperative housing purchase program.
- The BRA should support the full participation of the entire JP community in the development process
 - All future BRA Plan JP/Rox meetings should have interpretation.
 - The next draft of Plan JP/Rox should be translated into Spanish and be released at the same time.
 - All BRA Article 80 notices should be in English and Spanish.
 - All BRA Article 80 meetings should have microphones and PAs.
 - All BRA Article 80 meetings should have free, culturally appropriate food.

—
Benji

Parkside Neighborhood Small Group Meeting Notes - JP/ROX (8/18/16)

There were scenarios that showed up to 15 stories in March and May 2016 workshops, then have recently decreased height in scenarios down to 6 stories at Forest Hills and in several other areas leading to 2,100 units due to some community feedback. What about showing something in the middle (i.e., 10 stories)? Where does that leave it?

Transportation infrastructure (TRAFFIC) does not sync with projected new growth. Can a transportation study that looks at future capacity to meet project growth scenarios happen now before the plan wraps up?

PLAN: JP/ROX is not a plan - it's a vision. How does it have teeth that will hold developers to the recommendations (especially with urban design: setbacks, stepbacks, open space requirements, etc)?

Arborway Yard should be taken off the table for calculating future affordable housing growth and units. There is no certainty in the near future that the MBTA will release the 8 acres to the community. It is disingenuous to keep it included into projected affordable housing pipeline (i.e., find other ways/solutions to make up for those units such as through landbanking, city land disposition, private acquisition through city funds, etc)

Abutters to 3193 Washington felt that the project is just too big for the neighborhood, and a traffic study should have been conducted. Conversation around Small Projects requiring traffic studies like Large Projects.

Frustrations around BRA Development Review not in sync with BRA Planning (JP/ROX). The timing of proposals coming through while the planning is going on. We can not place a moratorium on development or just on luxury housing. No build option will not help the problem.

Will the revised setbacks and stepbacks that go into the second draft for PLAN JP/ROX be guidelines or requirements? What is the teeth there?

If RDAs have to go by zoning subdistrict, then yield on the side of lower maximum heights rather than higher maximum heights, especially if higher heights only work for a portion of the zoning subdistrict.

Push for more bike infrastructure. Discussion on where ideas are being discussed for more bike accommodations. Parking discussion. 1.0 maximum is not enough. All new projects are getting approved as "TOD" (0.5 parking ratio). We will see the effects of that. People need to understand the cost of building parking and need to be willing to pay for it if they are going to own a car. Less parking accommodations will hopefully alter commuting patterns although this is debated strongly.

Open space is mentioned in the plan, but again hope that they are not just guidelines and hope they can be requirements for private development. Require O/S in RDAs.

Should Local Industrial zoning in the base be changed to Multi-Family Residential zoning? The BRA heard the need and desire to keep local industrial uses in the study area (don't zone them out). The problem is that Local Industrial zoning does not come with adequate setbacks and open space requirements, and that is where many MFR proposals are going in. Thus, should Local Industrial requirements include stronger setback and open space requirements in case other uses than LI go there?

New development, "needs to respect its neighbors" in terms of height, setback/setback, shadow, scale, etc. Sixty-five foot heights do not work well on small parcels. Local Industrial parcels need setbacks for open space, etc when being developed for height/density. If developers can't do it, they should take it to the ZBA.

JP/ROX plan is not innovative enough. Look at other cities and see what innovative approaches they are doing to respond to the same issues (housing costs, displacement, fear of loss of diversity). Be more creative with the approaches and solutions.

August 19, 2016

Marie Mercurio, Senior Planner
Boston Redevelopment Authority
1 City Hall Sq, 9th Floor
Boston, MA 02210

Re: Draft PLAN: JP/ROX

Dear Marie:

LivableStreets Alliance, Boston Cyclists Union and WalkBoston appreciate the work the BRA has done thus far to ensure that neighborhood development in Jamaica Plain and Roxbury aligns with residents' wishes and is done in a sustainable way that preserves neighborhood character. However, our organizations believe that the policies and recommendations outlined in the BRA's draft plan can be improved. Washington Street is a high-density, transit-accessible corridor, with low rates of automobile usage and a high share of residents traveling via transit, bicycle and walking. The policies and recommendations outlined in the BRA's report should further advance these aspects of the neighborhood. Please find comments from the LivableStreets Advocacy Committee, WalkBoston, Boston Cyclists Union, and local residents below. Many of these recommendations align with work WalkBoston is pursuing in partnership with the Elderly Commission's Age-Friendly Boston initiative and other city agencies to improve safety and comfort for seniors and other vulnerable populations.

First, we would like to recommend general improvements for the area in the following categories: Policy Initiatives, Pedestrian Safety and Infrastructure, Bicycle Infrastructure, Transit Improvements, Placemaking and the Public Realm, and Parking. In addition, we recommend a number of specific infrastructure improvements throughout the PLAN: JP/ROX study area, which are detailed later in this letter.

Policy Initiatives

- Commit to Complete Streets, Vision Zero, and other policies and standards that the City of Boston has adopted – don't just aspire. Roadway design should prioritize pedestrians, bicycles, transit, and personal motor vehicles, in that order. Vehicular capacity/level of service should not trump other needs.
 - Page 120 of the draft plan mentions that traffic calming, improved sidewalk and pedestrian crossings, and bike facilities should be created "where possible." This statement does not go far enough and the words "where possible" should be eliminated from the final plan. Boston has committed to implementing Vision Zero, which requires that streets be engineered in ways that prevent vulnerable road users from being killed by motor vehicles when motor vehicle operators make errors. The term "where possible" implies that nothing will change on a street unless no parking spaces are lost and motor vehicle traffic speeds are not impacted.

- Implement fast and flexible programs for infrastructure that advance Complete Streets and Vision Zero goals. Use flex posts, paint and other inexpensive and temporary materials to demonstrate innovative roadway treatments such as physically separated bike lanes, curb extensions, and pedestrian plazas.

Pedestrian Safety and Infrastructure

- Improve pedestrian safety through appropriately configured WALK signals.
 - All WALK signals should be on automatic recall, unless there are streets with very low pedestrian volumes.
 - All WALK signals should be concurrent with traffic, unless there are high volumes of turning traffic or special circumstances (e.g. locations near schools or senior centers) that should be further reviewed.
 - All concurrent WALK signals should provide a leading pedestrian interval (LPI) of 6 seconds.
 - All WALK signals should provide countdowns that give sufficient time for pedestrians to cross the street. At major intersections the timing should be set to accommodate the MUTCD standard of a pedestrian walking 3.0 ft/sec. (MUTCD Section 4E.06, Paragraph 14)
- Establish an aggressive minimum standard for distance between crosswalks (signalized or not) and corresponding installation of new crosswalks at minor intersections and mid-block locations.
- Create landscaped pedestrian refuge areas where possible at unsignalized crosswalks.
- Install sidewalk bump-outs at all pedestrian crossings where appropriate for pedestrian safety.

Bicycle Safety and Infrastructure

- Determine feasibility of implementing separated bike lanes along all collector and arterial streets.
 - On page 133 of the draft plan, fig. 89 and fig. 90 depict two different conceptual drawings of bike infrastructure. We recommend the fig. 90 conceptual drawing of a separated bike lane.
- Create bike lanes/separated bike lanes, not sharrows, on major streets, and build as much as possible using paint on existing streets.
- Expand Hubway service and stations according to station density requirements and locations within a quarter mile radius of MBTA stations, including at transit hub Forest Hills MBTA Station.

- Bicycle and pedestrian access to the Southwest Corridor should remain as safe as it is today or be made safer.

Transit Improvements

- Study additional options for improving buses and expanding BRT. Options may include extending the Silver Line from Dudley through Forest Hills as an alternative to the BRT corridor planned for Columbus Ave.
- Use transit priority signals and far-side bus stops to provide better bus service, instead of queue jump lanes as currently recommended in the draft plan. Far-side stops are better for bus operations and also help to daylight crosswalks to oncoming traffic.
- Ensure that buses are accommodated if future development takes place at the Arborway Yard and either redesign or relocate bus operations. The memorandum of agreement between the City and the MBTA calls for building a permanent \$250 million facility to house 118 buses.

Placemaking and the Public Realm

- Install attractive, high-visibility, main-street-style, pedestrian-scale lighting to not only provide better illumination but to help visually narrow the street and signal to motorists that they are not on a high-speed arterial but in a village/neighborhood commercial center.
- Install attractive and coordinated benches/street furniture, parklets, public art and other placemaking features
- Minimize curb cuts through use of shared driveways and ensure that they have the tightest possible curb radii and level sidewalks.
- Create more robust incentives to encourage store owners to remove metal security covers for storefronts or to replace them with less visually obtrusive interior-mounted alternatives.
- Where appropriate, require setbacks for larger buildings to accommodate wider sidewalks and sidewalk cafes. Any residential or non-storefront, non-active ground-floor uses permitted to front on Washington St should require deeper, well landscaped setbacks, such as those along Marlborough St. in the Back Bay.

Parking

- Conduct a comprehensive neighborhood parking study to assess the proper regulations needed neighborhood wide.
 - Regulate on-street parking in business districts for 15% vacancy using a combination of time limits and metering to encourage turnover.

- Assess residential streets, especially near transit stations, for viability of resident parking zones. Permits could be required during the day if people from outside the neighborhood are parking there during the day. Make residential permits required during the day and/or during the night if overnight parking by non-residents seems to be an issue.
- Institute recommended parking ratios ranging from 0 to .7, consistent with research suggesting parking ratios of .5 to .7 spaces per unit in neighborhoods with similar mode share and vehicle ownership rates as this section of Boston. “Decoupling” usage of private parking spaces from specific residential units and encouraging commercial shared parking can further extend the usefulness of existing and proposed spaces.
- Provide enough loading/drop-off/pick-up zones to reduce/eliminate double parking.
- Explore maximums for off-street parking.
- Reducing parking would save residents more than \$8,500/year, which will aid the BRA’s goal of affordable housing. (This is based on the estimate that car ownership costs an average of \$8,500/year.)

In addition to these general recommendations, the plan should also address and mention specific infrastructure improvements to existing deficiencies, including the following:

- Create a road diet for Columbus Ave between Egleston Sq. and Jackson Sq.
- Add bump outs/curb extensions to narrow crossing distances and increase turning radii for vehicles turning right onto Washington St from Columbus Ave.
- Add visual cues such as rapid flashing beacons and other high visibility signage to slow northbound traffic on Columbus Ave coming downhill through Egleston Square at Washington St.
- Add and improve crosswalks throughout the study area.
 - Add raised crosswalks on all side streets along Washington and Columbus.
 - Add a crosswalk, preferably raised, with an in-street pedestrian crossing sign across Washington St at Beethoven St and across Washington St at Kenton Rd.
 - Add crosswalks with in-street pedestrian crossing signs across Columbus Ave between Washington St and Seaver St, and across Washington St between Columbus Ave and Dimock St, to enhance pedestrian connections to and surrounding Egleston Square. (Currently there are very few crosswalks across the major arterials of Columbus Ave and Washington St along the aforementioned roadway segments. New crosswalks may be located at side streets or midblock, depending on the circumstances.)

- Fix the WALK signal across Columbus Ave outside Walnut Park Apartments (between Weld Ave and Dixwell St) to shorten wait time and provide regular pedestrian phase. Currently the wait for a WALK cycle is very long even when the button is pushed.
- Widen the sidewalks on Amory Street from the Brewery Complex to School Street to a minimum of 8’.
- Establish wayfinding and pedestrian/bicycle links connecting and directing people from the Southwest Corridor, T Stations and Washington St to Franklin Park.
 - Page 130 of the draft plan states that connections should be enhanced between the Southwest Corridor and Franklin Park. Maps and diagrams of proposed improvements should be updated to reflect this in the final plan.
 - Page 152 of the draft plan cites proposed improvements for Egleston Square, including “new bike lanes, crosswalks, and connections to the Southwest Corridor.” Ideally these bike facilities should be two-way and protected from vehicle traffic. As with connections between the SW Corridor and Franklin Park, such proposed improvements should be consistently mentioned throughout all maps presented in the final plan.
- Install parking meters with 12-or-more hour maximum time on all streets within 1000’ of a train station to better manage commuter parking.

Thank you again for presenting to our group in July and for this opportunity to comment on the draft plan. We appreciate your consideration of our recommendations.

Sincerely,

Boston Cyclists Union
LivableStreets Alliance
WalkBoston



LivableStreets

Rethinking urban transportation



August 26, 2016

Marie Mercurio, Senior Planner
Boston Redevelopment Authority
1 City Hall Sq, 9th Floor
Boston, MA 02210

Re: Draft PLAN: JP/ROX

Dear Marie:

LivableStreets Alliance, Boston Cyclists Union and WalkBoston would like to make an amendment to the comment letter regarding the Draft JP/ROX Plan that we submitted on August 19, 2016. On the second page of the letter, under the Bicycle Safety and Infrastructure heading, the bullet point about page 133 of the draft plan contains an error. Please see the corrected recommendation that we would like to submit here:

- On page 133 of the draft plan, fig. 89 and fig. 90 depict two different conceptual drawings of bike infrastructure. We recommend the fig. 89 conceptual drawing of a separated bike lane.

Thank you for the opportunity to submit this amendment.

Sincerely,

Boston Cyclists Union
LivableStreets Alliance
WalkBoston



LivableStreets

Rethinking urban transportation



FEEDBACK TO THE JP/ROX DRAFT PLAN: SMALL BUSINESSES

Monday August 22nd 2016

Marie Mercurio
Senior Planner II
Boston Redevelopment Authority
Marie.Mercurio@boston.gov
(617) 918 - 4352

Dear Ms. Mercurio,

Thank you for investing resources on a new plan for JP/Rox. We understand that this task is challenging; bringing together many constituents and many voices is difficult yet essential. We appreciate your consideration of our feedback as we have decades of experience to bring to bear on building a plan for our community.

Essentially, the JP/Rox plan as it stands now does not sufficiently support small businesses and their owners in this neighborhood. From Egleston to Forest Hills, the central artery of our neighborhood hums because of small businesses. Further development under this plan could have several outcomes for small business owners; they could stay, be forced to relocate within the neighborhood, be forced to relocate outside the neighborhood, or close. We insist that this plan and its authors have an important role to play in ensuring that small business owners are empowered to make the choice that is right for their business. Below please find our specific recommendations to improve the work you have begun on this plan.

We have four immediate suggestions and one long-range suggestion. To address impact on small businesses in the neighborhood, the JP/Rox plan should:

1. **Be translated into different languages**, even at the draft stage. We suggest working with local organizations or even purchasing professional translation services for the plan so that residents and small business owners who speak languages other than English have access to the plan. In comparison to the \$670,000 BRA rebranding project, translating the plan would cost significantly less money and would greatly improve transparency.
2. **Commit to mediate disputes between landlords/developers and small business owners** for a mutually beneficial result. Business owners need to have a place at the table, which the City, BRA, and Office of Economic Development can ensure.
3. **Include funding mechanisms for small business technical assistance**, from legal services during displacement disputes to funding the costs of relocation, including marketing, architectural design of a new space, and accounting assistance. We suggest

FEEDBACK TO THE JP/ROX DRAFT PLAN: SMALL BUSINESSES

that this funding mechanism include a fee levied on landlords/developers for displacing a small business.

4. **Outline a clear role for organizations** to support neighborhood small businesses. Instead of duplicating efforts or reinventing the small-business-support-wheel, we recommend explicitly tapping into, and strengthen, the current support of organizations already doing the work of supporting small businesses. We recommend including language such as, “We will work with a coalition of organizations to support small business owners.”
5. **Create an Office of Small Business Stability** in the near future. This office should be in the model of the Office of Housing Stability that was created earlier this year. Just as residents need help avoiding evictions and lowering costs, so do small business owners. As it stands there are no protections for small business owners, an incredibly valuable asset for our community. With the creation of this office outlined in the plan, a process that mimics that of housing protections, which Boston has built over years to include robust protections, could be mimicked for commercial real estate. Comparable rules and regulations could be developed by the Office of Small Business Stability over several years.

Ultimately, we see these suggestions as one step in an ongoing conversation. The next step we’d like to take is to **meet with you, small business owners, landlords, and developers**. These constituents all have a stake in this plan yet there is an imbalance of power between landlords/developers, and small business owners. By facilitating a meeting, we could together take the next step in improving this plan. Thank you for taking the time to consider our recommendations. We will follow up about arranging a meeting and look forward to a more robust plan as a result of our feedback.

We have enclosed in this letter an Eviction Process Chart to support our conclusions.

Sincerely,

Carlos Espinoza-Toro Small Business Program Director
Jamaica Plain Neighborhood Development Corporation (JPNDC)

Lisa Owens Pinto Executive Director
City Life/Vida Urbana

FEEDBACK TO THE JP/ROX DRAFT PLAN: SMALL BUSINESSES

Luis Edgardo Cotto Executive Director
Egleston Square Main Street

Adam Gibbons Membership and Community Outreach
JP Local First

Maria Christina Blanco Community Organizer
City Life/Vida Urbana

Helen Mathews Communications Manager
City Life/Vida Urbana

Leslie Bos Director of Real Estate
JPNDC

Juan Gonzalez Director of Community Organizing
JPNDC



Marie Mercurio <marie.mercurio@boston.gov>

Feedback to the JP/Rox Draft Plan from: JPNDC, City Life, ESMS, JP Local First, Urban Edge

Carlos Espinoza <cespinoza@jpndc.org>

Mon, Aug 22, 2016 at 1:50 PM

To: Marie Mercurio <Marie.Mercurio@boston.gov>

Cc: Anna Waldron <awaldron@jpndc.org>, Richard Thal <rthal@jpndc.org>

Dear Marie,

Attached are two documents containing feedback to the JP/Rox Draft Plan. These documents are:

- A 3-page **Letter laying out 4 short-term suggestions and 1 long-term suggestion**. This letter has been produced in partnership among JPNDC, City Life, Egleston Square Main Street, JP Local First and Urban Edge.
- An **Eviction Process Chart** tracking current outcomes of displacement of small businesses in the Study Area.

We see these suggestions as one step in an ongoing conversation. The next step we'd like to take is to meet with you, small business owners, landlords, and developers.

We will follow up about arranging a meeting and look forward to a more robust plan as a result of our feedback.

Sincerely,

Carlos Espinoza-Toro Small Business Program Director
Jamaica Plain Neighborhood Development Corporation (JPNDC)

Lisa Owens Pinto Executive Director
City Life/Vida Urbana

Luis Edgardo Cotto Executive Director
Egleston Square Main Street

Adam Gibbons Membership and Community Outreach
JP Local First

Bob Credle Director – Community Programs
Urban Edge

Maria Christina Blanco Community Organizer
City Life/Vida Urbana

Helen Mathews Communications Manager
City Life/Vida Urbana

Leslie Bos Director of Real Estate
JPNDC

Juan Gonzalez Director of Community Organizing
JPNDC

PS: We will also send this feedback using the comments link. We will do the best to fit its format.

Carlos Espinoza-Toro
Small Business Program Director
Jamaica Plain Neighborhood Development Corporation ([JPNDC](#))
cespinoza@jpndc.org
Office: (617) 522-2424 x226

(Current) EVICTION PROCESS by OUTCOME

Jamaica Plain and adjacent neighborhoods

Created by JPNDC Small Business Program
Created on: Monday August 22nd, 2016

OUTCOMES	STAKEHOLDERS AND ROLES						EXAMPLES ²
Business owner (BO)	Municipal Government ¹	Local Organizations	TA Provider	Funding Sources	Legal Services	Landlord/Developer (L/D)	Business owner (BO)
BO(s) STAY in the same location.	Broker between BOs and new L/D. Facilitates negotiation process.	Are approached by BOs facing eviction. Convene a meeting to address eviction. Invite TA Provider.	In partnership with local organizations, advocates on behalf of the BO(s).	N/A	N/A	L/D lawyers negotiate with BOs. Negotiation items include: new lease, staying vs. relocation, covering relocation costs, etc.	Restaurant Pin Bochinche
BO(s) RELOCATE to another location IN the Study Area.	N/A	Are approached by BO facing eviction. Refer BO to TA Provider	Meets with BO, assesses legal needs. Secures funding sources to cover cost of legal services. Brokers meeting between BO and lawyer.	Award funds to pay for professional services, such as legal services.	Are contracted to represent the BO in front of the L/D. Start negotiation process with L/D lawyers.	L/D lawyers negotiate with BO lawyer. Negotiation items include: new lease, staying vs. relocation, covering relocation costs, etc.	Restaurant El Embajador
BO(s) RELOCATE to another location OUTSIDE of the Study Area	<i>Information currently being tracked and documented.</i>	<i>Information currently being tracked and documented.</i>	<i>Information currently being tracked and documented.</i>	<i>Information currently being tracked and documented.</i>	<i>Information currently being tracked and documented.</i>	<i>Information currently being tracked and documented.</i>	<i>Information currently being tracked and documented.</i>
BO(s) CLOSES business.	N/A	N/A	Meets with BO, assesses legal needs. (After BO failed to negotiate w/o a lawyer) Secures funding sources to cover cost of legal services. Brokers meeting between BO and lawyer.	Award funds to pay for professional services, such as legal services.	Are contracted to represent the BO in front of the L/D. Start negotiation process with L/D lawyers.	L/D lawyers negotiate with BO lawyer. Negotiation items include: new lease, staying vs. relocation, covering relocation costs, etc.	Quisqueya Bakery

1. As it stands the role of the Municipal Government is very limited. In the meeting we have requested we would like to discuss a broader role for the Municipal Government beyond the first row.
2. This list has been kept to one example per outcome to enhance the clarity of the chart. The extended list of more than a dozen examples will be available upon request.

TO: Marie Mercurio, Senior Planner, Boston Redevelopment Authority
FROM: Jamaica Plain Good Jobs Committee – Weezy Waldstein, Richard Monks, Susan Pranger, George Lee, Elizabeth Skidmore, Carolyn Royce
DATE: August 22, 2016
RE: Good Jobs & Plan JP/Rox

The Good Jobs Committee has been working on promoting good job standards in Jamaica Plain. We would like to offer the following comments on Plan JP/Rox.

We appreciate that Plan JP/Rox notes that good jobs are a factor when planning for growth, that job quality is important, that access to good jobs is essential, and that the community as a whole benefits from preference policies in hiring and procurement for local residents and contractors. The Plan includes a recommendation to support workforce development: "Explore expanded City of Boston workforce goals, job standards, and career pathways spanning construction and permanent jobs for area residents."

To make that recommendation real, the Plan needs to insist on:

Access to and good job standards in local construction jobs

Access to and good job standards in permanent jobs other than construction

Access to good jobs outside the footprint (downtown/Financial District/Longwood/Back Bay/Seaport) along with stepping stone access for younger people

What Plan JP/Rox Needs to Include

Access to and good job standards in local construction jobs

Job quality

- For all projects over 50,000 sq. ft. or over 10 units, whichever is smaller, all workers shall be paid prevailing/union rate whether the contractor is union or non-union.
- All projects below the smaller of 50,000 sq. ft. or 10 units, all workers shall be paid a "community rate" based on a review of responsible community contracting. This rate shall be proposed through a community review process led by Boston Jobs Coalition with our participation.
- In order to increase affordable housing above required standards, there will be consideration that projects may pay workers a "community rate" in return for a higher number of affordable units.

Access

- Access for construction jobs shall be 51% Boston residents, 51% people of color, 20% women.
- We encourage the development of programmatic approaches that connect JP/Rox residents to construction jobs, such as 1st source programs or programmatic preferences for site-based hiring.

Enforceability

- These job quality and access provisions shall be incorporated into any city contracts or agreements on variances.
- These job quality, access, and enforcement provisions shall be incorporated into any new zoning requirements.
- All developers shall be required to include these provisions in their contracts with their general contractor, who must then include them in contracts with subcontractors to receive City approval.
- All developers shall agree to participate in a local monitoring process with local residents and officials that includes enforcement of the BRJP and these commitments, including providing wage data.
- Individual workers shall have rights to enforce the wage levels set by this standard through private court action.

Access to and good job standards in Permanent jobs (other than construction)

Job quality

- For all jobs in establishments with over 10 employees or in businesses with over 10 employees in multiple locations, whichever is smaller, all jobs must:
 - Pay a family-sustaining rate of \$15 an hour, rising to \$16 an hour on January 1, 2017, \$17 an hour on January 1, 2018, \$18 an hour on January 1, 2019, and thereafter indexed to the CPI-Urban at each site.
 - The City shall adjust this wage rate to use a new rate set by Jamaica Plain Neighborhood Council (JPNC) every 3 years, initially by January 1, 2019, to revise the rate and establish an improved rate better able to support JP/Rox residents stability in the neighborhood, for new projects. JPNC will continue to review the rate every three years thereafter.
 - Provide 75% full time jobs with “Minimally Credible Coverage” health benefits.
 - Provide stable shifts defined as no on-call scheduling, minimum 3-hour shifts, and 4-week notice on shift changes.

Access

- Access for permanent jobs in the neighborhood shall be 51% Boston residents, 51% people of color, 51% women.
- We will promote the development of a local “1st Source” hiring program, based at transit stations, to develop access to good quality downtown jobs for local residents (Downtown Crossing, Financial District, Longwood Medical Area, Seaport, Back Bay, Government Center, etc.).
- We encourage the development of programmatic approaches that connect JP/Rox residents to local permanent jobs, such as 1st source programs or programmatic preferences for local hiring.

Enforceability (same as above)

Access to good jobs outside the footprint (downtown/Financial District/Longwood/Back Bay/Seaport) along with stepping stone access for younger people

First source job access program at JP/Rox hub locations targeted to accessing anchor Boston employers.

Our Reasoning

Good jobs are an anti-displacement strategy.

A primary goal stated by residents is retaining current residents as well as the diverse character of the neighborhood. We recognize there have already been substantial changes to the character of the community, making it even more important to retain the diversity that now exists.

Increasing income for the families in the footprint and the surrounding area so that they can stay should be one of the goals of the proposal. This means recognizing that access to good jobs for residents at risk of displacement can be a solution to a housing problem.

Key employment opportunities can be identified by looking at how the JP/Rox footprint relates to the city as a whole.

All problems cannot be solved inside the local JP/Rox footprint. There are very few jobs inside the footprint or even in JP as a whole. Though employment density is also growing on the margins of downtown, most jobs are still downtown and in the Financial District, Longwood, Back Bay or the Seaport. Residents who are at risk of displacement often have no connections or relationships to the major downtown employers.

JP/Rox is an area defined by its transit opportunities. The city takes a position that there should be greater housing density where there is access to public transit. However, increasing that density with new housing that is primarily market rate will also lead to higher rents in other existing units. We must use the same transit line that is the source of the problem (increased housing costs) to be part of the solution (increasing income by providing access to good downtown jobs for targeted local residents). This programmatic intervention must be used to complement zoning or other approaches.

Good jobs, business development, and workforce development are all different, with limited overlaps.

The report needs to unbundle good jobs, business development, and workforce development and refocus on the separate problems: (1) making sure all targeted residents have access to a good job, (2) providing the right mix of businesses in the JP/Rox footprint to meet the needs of residents, and (3) supporting local businesses.

Where possible, creation of good local jobs for local residents should be encouraged. Once we recognize, as the report does, that there are few jobs in the footprint and even fewer people who both live and work in the footprint, we can see that there are limited opportunities for providing enough good jobs in the footprint to have an impact on the demand for jobs from local residents.

Similarly workforce development is typically about “fixing people”, but most low income, under-employed people, who are disproportionately people of color, are already educated, skilled, with job experience. It is the quality of the available jobs and a historic system that tracks residents and people of color into lower wage (but high skill) occupations and industries that is the problem. The city’s own recent reports have provided highly useful documentation of this.

In some parts of the city, increasing the income that local residents bring back into their neighborhood each pay day can lead to wealth development that turns into greater small business development. In JP/Rox, wealth development is important to housing security, but may be less of a priority strategy for business development since there is already wealth in the area that is not being spent here. Small business development in JP/Rox is better supported by encouraging development of services and retail that better meet the needs of existing and future residents.

We may also find that by unpacking this, we can find some key opportunities. As an example, local anchor employers could provide first jobs for younger people that provide them with skills needed to later access to downtown jobs, even if they could never absorb everyone as a permanent employee. This stepping stone strategy mirrors real life for more privileged young people with who have relationships to employment already in place.

We must respond to the structural racism that is now embedded in the local labor market with strong and effective interventions.

We are at a particular moment when the issues of historic racism and how that racism was embedded into our systems with laws and standards are being recognized more widely. We are therefore particularly required to elevate as well as address these issues as we think about public planning so that everyone can expect to have a robust economic future.

Expectations matter. Positive expectations allow people to align their private efforts with the direction we want for the future—young people stay in school, mid-career people invest in learning a new skill, and so on.

It is not a surprise that it was young people of color who stopped the Plan JP/Rox process to demand “What about me? Will there be a place here for me?” Above all else, we need an answer from this report that says “Yes”. We need an answer that does not blame people by saying that if they were only smarter, better, more credentialed, whatever, then they would have a better job. The City of Boston’s own report now documents that our low income not our fault: Boston residents at all education levels are paid significantly less than suburbanites coming into the city for our jobs.

We believe we can do this. We believe there is no better place in the city to commit to this than in the highly resourced area of the PLAN:JP/Rox footprint.

Focus on solving problems, with intersectional interventions.

Just as issues are siloed in the traditional planning framework, the interventions to respond to problems are siloed. The city has zoning, use of public land, publicly funded programming, public-private programmatic interventions, incentives, minimum standards, and more, at its disposal. We need to see how a set of interventions can address each problem.

These interventions also move on different time frames with different players controlling them, making it hard to think of them together. We need an immediate targeted intervention for people rapidly being displaced from the area. How can long term re-zoning support a program that provides residents with the job access connections and access that allows them to see a future for themselves and make use of the education and credentials they have already achieved? We need the synergies that come from making these strategies work together.

We must have a dynamic analysis to see the planned impacts as well as the unintended consequences of planned changes.

We know that any change will have both intended and unintended impacts on the existing systems and on the success of the next change down the road. The current draft is still static—naming a change as needed without consideration of the further impacts from implementing those changes. For example, how will the addition of significant new market rate housing impact existing rents? What are the impacts just outside the footprint?

IMPLEMENTATION

TOPICS	TIME FRAME	RESPONSIBILITY	STRATEGY
Strengthen access to good jobs for residents at risk of displacement			
<p>Provide access to good jobs outside the Plan JP/Rox footprint (downtown/Financial Dist/Longwood/Back Bay/Seaport, etc.) along with local stepping stone job access for younger people:</p> <ul style="list-style-type: none"> ▪ Establish job access, 1st source-type program in JP/Rox hub locations targeted to accessing anchor Boston employers ▪ ID permanent funding via NJT and others ▪ Establish board of local leaders comparable to Main Streets board ▪ Consider city-wide policy for resident/diverse/youth job access for all major new development to provide job access 	Very short term: immediate	OED, BRA, city councilors	Policy, Guideline, Development-Specific, Program (added implementation process)
<p>Provide access to local construction jobs:</p> <ul style="list-style-type: none"> ▪ Set policy requiring local hiring in addition to Good Jobs Standards hiring for all projects over 10 units or 50k sq ft ▪ Convene JP and JP/Rox bi-weekly monitoring review meeting as is done in Dudley (with community residents and political leadership) ▪ Coordinate construction recruitment through BRJP Job Bank together with new local job access program 	Very short term: immediate	OED, BRA, city councilors	Policy, Guideline, Development-Specific
Ensure new jobs created in JP/Rox lead to resident retention and family-sustaining employment			
<p>Establish Good Jobs Standards for new development and all larger employers.</p> <ul style="list-style-type: none"> ▪ Set criteria for approving new development in JP/Rox to include the Good Jobs Standards for both job 	immediate	OED, BRA, JPNC, community leaders, city councilors	Policy, Guideline, Development-Specific

<p>quality and local access, possibly based on size of project</p> <ul style="list-style-type: none"> ▪ Negotiate with developers with projects already designated or underway for improved job quality and access goals 			
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TRANSITMATTERS

22 August 2016

Ms. Marie Mercurio
Senior Planner
Boston Redevelopment Authority
1 City Hall Square, 9th Floor
Boston, MA 02210

Re: PLAN: JP/Rox Draft Plan

Dear Ms. Mercurio:

TransitMatters appreciates the effort that the Boston Redevelopment Authority (BRA) has put forward to engage the communities and stakeholders that this proposed revision of planning documents will affect. Included among these stakeholders are the co-founders of our organization are myself and Mr. Jeremy Mendelson.

We especially appreciate the broad range of issues around development that the BRA has sought feedback on, is attempting to reconcile, and is envisioning solutions for. While our principal focus is on transit issues, we believe that planning for transit and other components of our transport network have been siloed across modes and governing bodies. This draft document does a great job of acknowledging the mobility concerns that residents raised at meetings and bridges those to larger concepts and policies that require comprehensive planning.

That said, we would like to make specific comment on aspects that we believe BRA should strengthen in light of resident concern over transit mobility, congestion, environmental impact, and the limited capacity BRA has to affect change on MBTA service due to jurisdictional boundaries.

Transport Demand Mitigation Packages

We would like to suggest BRA explicitly lay the foundation for citywide transit proximate districts regarding formulaic transport demand mitigation (TDM) packages for developments. This should build on the much lauded 'density bonus' this document proposes for developments near transit whereby developers can achieve a greater housing density in exchange for more inclusionary housing.

Regarding mitigation packages, developers within a district and/or prescribed distance from rapid transit or surface transit within certain service delivery guidelines (hours of operation, frequency) should be given explicit options for funding bike share facilities (e.g. Hubway), bicycle parking, car sharing vouchers/discounts, and transit pass vouchers/discounts. This should be assembled based on successful TDM packages that have been deployed across the city under BRA approval, national examples of city-wide policies, and with comprehensive study with an appropriately experienced engineering firm to build upon upcoming GoBoston 2030 recommendations.

We laud the BRA's promise that development teams will be required to financially support the Hubway program's continued growth and operations and we look forward to the final draft or some future policy that prescribes this in a way that is formulaic and predictable to developers and stakeholders.

We also acknowledge and laud the City's plan to study appropriate funding from development for complete streets accommodation. We further urge the City to initiate plans for a transit/complete streets infrastructure bank. It's easily understood how developers can mitigate via traffic and parking issues, but as yet stakeholders don't have a great way to ask for mitigation through transit, biking, and walking facilities. These types of mitigations need to be implemented both at the proposed Mobility Hubs and along identified corridors across the city. Especially for small developers, rather than paying for transit corridor improvements, they could pay into the fund so that every unit constructed contributes. The amount required of developers would be much less than cost of structured parking or have less impact on the economics of the development with a smaller building envelope and it would achieve significant impact toward mode shift goals envisioned in this document.

As you may know from recent research and ongoing conversations with developers, parking is a significant factor in economic feasibility for developments and has a major impact on the number of units that can be built within an approved building envelope, the type of units that get built, and then has knock-on effects on the modes those residents choose to get around.

Elimination of Parking Minimums in Transit Districts

We laud BRA for its recommendation that parking should be shared between developments. We would like to see this executed across the city to mitigate pressure on developments to build expensive parking facilities.

We challenge BRA to develop more forward-thinking policy regarding zoning requirements for parking above the Boston Transportation Department's (BTD) current policy. In some cases, as exhibited in Figure 70 of the document, BRA zoned minimums and maximums exceed BTD policy maximums. We strongly encourage BRA to entirely eliminate parking minimums from zoning requirements within transit districts and instead apply parking maximums of .5 for all uses within these districts.

Continuing to require developers to build parking or enabling stakeholders to demand its inclusion in development is contrary to the study area vision and recommendations, whereby BRA is intending to accommodate the aspiration of prioritizing walking, biking, and transit over driving. We hear stakeholder concerns about perceived on-street parking pressure, but we believe this should be resolved by BTD through on-street resident parking policy reform and improved accommodations and service across the bike and transit network, not through expensive off-street parking accommodations.

Improving Surface Transit Service

Before pursuing the restoration of a discontinued MBTA bus circulation loop between Jackson Square and Forest Hills, we strongly recommend the City work with MBTA on advancing a system-wide service plan, which they have not updated for a number of years and which the Fiscal, Management, and Control Board would like to pursue.

We would also like to continue our conversation with the city on a number of initiatives that would prioritise street-running transit and ultimately unlock additional bus capacity or realise better transit frequency.

With regard to development, we encourage BRA to more deeply engage MBTA and BTM on transit-related street furniture and features, such as bus stop bulb outs, as it has done with ensuring developers assist with parts of BTM's planned infrastructure upgrades.

Sincerely,



Marc Ebuña

President & Co-Founder

URBAN EDGE FEEDBACK ON JP/ROX PLAN

September 2, 2016

Urban Edge appreciates the opportunity to be a part of the City of Boston's JP/Rox process. We understand that the JP/Rox plan lays the groundwork to guide the preservation, enhancement, and growth of our neighborhoods for generations to come. It is Urban Edge's expectation that the JP/Rox process will result in a plan which has very clear and consistent commitments for housing production and policies in Roxbury and Jamaica Plain. We also anticipate that affordable housing development and its various requirements will be more streamlined and predictable once this plan is finalized and that the elimination of contentious one-off negotiations between residents, developers and the City is a primary goal of this process.

Urban Edge Board and Staff have reviewed the JP/Rox plan and provide the following feedback. As you will note, Urban Edge still has a number of questions about the plan and/or is requiring additional information.

HOUSING POLICIES

Affordability Goal

- The JP/Rox plan assumes an initial 30% affordable housing goal. The scenarios shown to date do not evoke confidence that this goal will be reached. We would ask that the aspirations identified as a means of getting to 30% become commitments prior to the completion of the plan. For example:
 - **ADDITIONAL SOURCES OF SUBSIDIZED AFFORDABLE HOUSING UNITS**--The JP/Rox plan assumes 472 affordable units to be built at the MBTA Arborway Yard. The MBTA for decades has stated the need to use a large portion of the yard for its multi-purpose bus facility, has well documented financial challenges and has, to this point, sought to maximize revenue in its land disposition processes (i.e. Mattapan Bus Yard disposition). Without clear commitments from the State/MBTA and the City around the plan for this property and timing of implementation, it is impossible to count on such a large percentage of the affordable units included in the 30% goal to be developed on that site. Urban Edge requests a clear implementation plan and commitments from the City and State that will lead to that level of new affordable units on that site, including the timing of implementation.
 - While the **RCC underutilized parking parcels** south of the college were not identified in the plan as they are just outside the plan boundaries, they are an opportunity for the significant development of affordable housing. Given the very limited amount of publicly owned land in the JP/Rox Area, Urban Edge asks that the City to take a leadership role in creating and implementing a plan with the Roxbury Community College lots as well.
 - **AFFORDABLE HOUSING SET ASIDES IN PRIVATE DEVELOPMENT**--The JP/Rox plan assumes 297 units with IDP @ 70% and bonus density at 50% AMI. This seems to require that developers will build to the maximum allowed by the new zoning, which seems unlikely. Please provide a site by site analysis or further details on the source of this estimate.

Inclusionary Development Policy (IDP)

- Urban Edge requests that off-site commitments and cash out plans need to be presented, reviewed, and finalized before the on-site development begins. Off-site commitments and cash out payments need to be concurrent with development benchmarks for the “on-site” projects (for example, off-site projects funded at closing of the “on-site” project). Urban Edge is concerned that future commitments and plans remain vague, subject to future market changes and could become a compliance burden for the city.
- The City stated early on in JP/Rox process that the first 13% of IDP will be built into the zoning code. The City then stated that such a requirement will require State legislation. Is this correct and, if so, what progress has been made on moving such legislation in the past year?

Increase in Floor Area Ratio (FAR)

- The JP/Rox plan increases FAR to 2.0—which will provide tremendous benefit to existing property owners—with no increase in IDP requirement (the IDP required remains at 13% even with an increase in FAR). Urban Edge suggests the IDP should be greater than 13% in such a scenario to help the community mitigate the impact of this immediate increase in land values in an already super-heated market.
- The proposed RDA zoning assumes density bonuses at 2.0 FAR. Urban Edge would like to see bonuses being awarded at a lower FAR level.

Land Banking

- The City’s identification of support for non-profit land banking activity is welcomed. Urban Edge would like to see more from the City directly on these initiatives including:
 - Direct City funds to accelerate acquisition and absorb risk over an extended holding period.
 - Better City program to acquire “naturally occurring” rental and homeownership housing (more than \$100K/unit as opposed to the proposed \$75K/unit). This program has the potential to mitigate displacement and add to the stock of restricted units but the funding levels need to be feasible for the JP Roxbury markets to be effective.

Government Funding

- Urban Edge suggests priority scoring and recommendations for City and State funding for JP/Rox projects. The market pressures that led the City to prioritize this neighborhood for this planning processes likewise warrant prioritization of resources to mitigate displacement.

Section 8 Public Based Rental Assistance

- Section 8 PBA is perhaps the most effective tool available to provide homes to families at lower than 50% AMI. Urban Edge requests the City offer Section 8 PBA contracts to developers for properties of 5 units or more.

INDUSTRIAL DEVELOPMENT

- Urban Edge requests information from the City on how the JP/Rox plan is going to strike a balance between housing production and ensuring that light industrial opportunities (and jobs) remain in the neighborhood. The presence of jobs that are available to people with a range of skills and experiences is key element in retaining an economically diverse neighborhood. City zoning and other policies need to mitigate the development pressures that displace industrial uses from traditionally mixed neighborhoods like those found in the JP/Rox area.

PARKING

- Urban Edge requests the City to provide clear guidelines on parking ratios for housing development. The Plan should include a table identifying the parking ratios that will be included in the new zoning. Two uses, residential and commercial (retail/office), are not enough. Please add light industrial, affordable units, and residential units within ½ mile of transit station. Also the new zoning should allow clearly defined shared parking opportunities as a way to reduce land devoted to parking. Bicycle parking requirements should be identified and codified in the new zoning.
- Urban Edge would like to better understand the City's plans for parking opportunities for commercial spaces in the neighborhood.

RETAIL

- Urban Edge wants more information on the City's strategies for ensuring that commercial space remains affordable for current and incoming local merchants and that their customers have access to parking.



September 7, 2016

Martin Walsh, Mayor
Brian Golden, Director, Boston Redevelopment Authority
Timothy J. Burke, Chairman, BRA/EDIC Board
Carol Downs, BRA/EDIC Board
Michael P. Monahan, BRA/EDIC Board
Dr. Theodore C. Landsmark, BRA/EDIC Board
Priscilla Rojas, BRA/EDIC Board

Dear Mayor Walsh, Director Golden, and Members of the BRA/EDIC Board,

The Jamaica Plain Neighborhood Council has closely followed Plan JP/Rox, the planning initiative for the area in Jamaica Plain between Forest Hills, Egleston Square, and Jackson Square.

There has been a long-standing request from the community to plan for growth in this area. Half of this corridor used to lie under the shadow of the tracks of the old elevated Orange Line; other sections of the area were in the path of the proposed route for the I-95 highway. There are many lots zoned for industrial use, which are no longer used for that purpose. There is substantial room for new housing and businesses, a desire for improved streetscapes, and a hope to reinvigorate vacant and underused spaces.

The goal of Plan JP/Rox is to provide a blueprint for sustainable, inclusive, smart growth. The current Draft Plan is a good start, but is not yet complete. There are some essential elements that are necessary to the Plan's success, and we ask that these issues be addressed before the Plan is brought before the BRA/EDIC Board for approval:

Affordability

Economic diversity, a key goal for Jamaica Plain, will not be met under the current Plan.

In the Jamaica Plain/Roxbury study area, 70% make less than \$75,000 a year. Yet the current Plan calls for 70% high-end market-rate housing, where a family needs to make \$100,000 a year to afford a \$2500/month apartment. About 50% of households make less than \$35,000 a year, but less than 2% of new housing will be affordable to households making that amount.

Even with the density bonus, the Plan's affordability requirement for private development is 17-18%, below the JPNC's requirement of 25%, and below what many believe is necessary.

The Plan commits to 30% affordability in new construction for the area, relying on a combination of IDP requirements and nonprofit housing development. However, 50% of the planned affordable nonprofit housing is located on the Arborway Yard, a problematic site. This site is owned by the MBTA, which has no plan to turn that land over to the community despite a Memorandum of Understanding signed over 15 years ago to do so.

A number of neighborhood associations and community members working on affordability have recommended solutions, including increasing the 30% affordability goal, shifting the income levels of affordable housing downward from an average 60% AMI, and strengthening private developer requirements. Groups have also recommended that the City make concrete commitments and goals around land banking, setting aside units for voucher holders, and increasing City funding beyond the plan's current \$35 million (about \$2.3 million a year).

Design Guidelines

Design guidelines - set backs, step backs, and open space requirements - need to be strengthened in the Plan and respected in new developments. The industrial lots vary greatly in size and topography, but all are next to existing 2- and 3- story homes and buildings. The guidelines help bigger, higher, denser buildings fit in with their neighbors. This has been a significant concern with all neighborhood associations in the Plan JP/Rox corridor.

An important purpose in having a Plan is to have more zoning by rules and less zoning by variance. The neighborhood associations have dedicated considerable thought and discussion to the specific design guidelines, leading to new zoning, that will respect the scale and character of the neighborhoods while allowing higher and denser new construction. A strong example of this comes from Stonybrook Neighborhood Association, which has been actively involved in several large new developments in their area. In their Vision for Washington Street Corridor Development, Section VI, Design Guidelines, SNA lays out detailed and reasonable recommendations for step backs, set backs, open space, and design.

The neighborhood associations are unclear on the BRA's current commitment to the design guidelines coming out of Plan JP/Rox since the BRA has not required these guidelines to be followed in recent Article 80 projects in the area.

Transportation Improvements

The Plan is full of good recommendations for transportation improvements, but there's no plan from the City's Transportation or Public Works Departments to deliver any. A unique element of Plan JP/Rox has been that many City departments were involved in general meetings with the public, as well as with regular interdepartmental meetings with Plan JP/Rox staff. We need a coordinated and funded plan from City departments for transportation and related infrastructure improvements: we are doubling the population while moving towards a more sustainable, less car-dependent future.

As a side note, all Article 80 projects over the past year or so in this area have offered a .5 parking ratio. It would be good to see the substantial savings created by lower parking requirements be reflected in increased affordability and/or contributions to transportation improvements.

Good Jobs Opportunity

Good jobs, jobs that pay a family-sustaining wage and carry benefits, can be a strong anti-displacement strategy. Plan JP/Rox is a great opportunity to bring in good jobs as a tool for neighborhood growth and stabilization. Developers could be required to apply Boston Resident Jobs Policy standards to all construction over 50,000 sq. ft. Developers could be required to apply good jobs standards on all construction jobs regardless of size. The BRA could ask that a jobs plan be included in a developer's plans when submitting a project notification form.

Martin Walsh, Mayor
September 7, 2016
Page 3

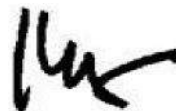
There is also an opportunity here in Plan JP/Rox to explore linking transit oriented housing to transit oriented jobs through First Source Access Rights and a program that would help residents connect with good jobs downtown. First Access sites could be located in or near Orange Line T stations and help residents connect to where most good jobs are - downtown, Financial District, Longwood, Back Bay, and Seaport.

We appreciate the 3-month extension given in June for the community to review the Plan. It has been useful. The BRA Plan JP/Rox team has been willing and available, and met with many groups for thoughtful and respectful discussions over the summer.

It is our hope now that the extensive community feedback will be incorporated into Plan JP/Rox, and that the issues outlined here will be addressed so that Plan JP/Rox will be the best possible Plan for current and future residents.

Attached please find comments submitted to Plan JP/Rox from neighborhood associations in the Plan JP/Rox area, from affordability advocates, from Livable Streets Alliance/Boston Cyclists Union/Walk Boston, and from the JP Good Jobs Committee.

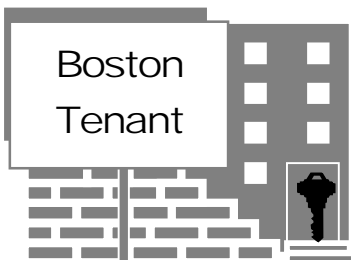
Very truly yours,



Kevin F. Moloney, Chair
Jamaica Plain Neighborhood Council

Attached:

Stonybrook Neighborhood Vision for Washington Street Corridor Development
Union Ave. Neighborhood Association's response to the first (7/15) draft of the Plan JP/Rox Proposal
Concerns from the Brookside/Brewery Neighborhoods of Jamaica Plain
Letter from Egleston Square Neighborhood Association (includes participation of Chilcott Place-Granada Park Neighborhood Association)
Informational handout packet from AffordableEgleston
Letter from Sarah Horseley, Advisory Group Member Plan JP/Rox and neighborhood resident
Memo from Jamaica Plain Good Jobs Committee
Letter from Livable Streets/Boston Cyclists Union/WalkBoston



Boston
Tenant

14 Beacon Street, Suite 421, Boston, MA 02108

Phone (617) 423-8609

Kathy@bostontenant.org | Maga@bostontenant.org | Kadineyse@bostontenant.org

October 13, 2016

Mayor Martin Walsh

Sheila Dillon, Director of the Department of Neighborhood Development

Brian Bolden, Director of the Boston Planning and Development Agency

City of Boston

Dear Mayor Walsh, Ms. Dillon and Mr. Bolden:

On behalf of the [Boston Tenant Coalition](http://bostontenant.org), we write to submit comments on Plan JP Rox. While we appreciate the City of Boston's efforts to conduct comprehensive planning for the Washington Street and Columbus Avenue corridor, we have significant concerns about the JP Rox Plan. We also want to ask you to delay the vote of the BPDA on approving the plan and work further with the community to address significant issues many neighborhood and community groups have raised.

As an organization devoted to fighting for the rights and needs of tenants and low-income Boston residents, we urge the City of Boston to make the following improvements to the Plan:

- 1) **Raise the overall affordability goal well beyond 30%, not only to prevent displacement, but also preserve economic & racial/ethnic diversity.** A higher percentage of units could be achieved through some combination of: raising base IDP to at least 25% of units, strengthening the density bonus, or helping CDCs to build or acquire more units.
 - Higher IDP - In the BTC campaign to strengthen the City-wide IDP private units, we pushed for the percentage of private units to be raised from 13% to 25%. The JP Neighborhood Council also requires developers to build 25% of private units affordable. The City has added additional tools in its plan since June, but the affordability commitment remains at 30% with only a stated hope to do more. With these additional tools, the City should make a firm commitment well beyond 30%.
 - Lower income residents and residents of color are already being forced out of the study area by rising rents, and without a strong commitment on the City's part, it is only going to get worse. We are concerned that the housing that is being built is not meeting the needs of the present Boston residents that need them most and those residents that are at high risk of displacement from the city to areas outside of Greater Boston.
- 2) **Deepen overall level of affordability and ensure sufficient new units for families at 30% AMI, 40% AMI, and 50% AMI.** The average income levels of the affordable units have not seemed to change in the new plan. Ways to enhance depth of affordability, include:
 - Strongly encouraging private developers to set aside a significant percentage of IDP units for Section 8 or MRVP voucher holders.
 - Expanding the Acquisition Program (and making this program more flexible to increase funding to help non-profits purchase occupied buildings and land).

3) **Push the MBTA and State to act on developing the Arborway Yard for affordable housing:**

To prevent displacement, we must build as many CDC (non IDP) affordable units *before permitting most IDP/private developments*. We laud the City for the rental acquisition program and willingness to help CDCs to acquire publicly owned land for affordable housing. In order to prevent displacement of *current* residents, we have to build the majority of affordable units *before* (or at the same time) as private developers are building the market units. In addition, we need to remove as much housing and land as possible from the speculative market. Otherwise, rising rents will force current families out.

We recognize that the BRA has taken the Arborway Yard out of the latest version of the Plan. However, whether or not the City chooses to include Arborway Yard in Plan JP Rox, the Yard offers the possibility of significant new affordable housing in the plan area.

Therefore, we urge the Walsh Administration and the City Council to push the State/MBTA to agree to an immediate and definite commitment and timeframe to hand the land over. In addition, the City should regularly report progress to the JPNC Housing and Development Committee, which is now overseeing the Arborway Yard process.

4) **Provide a thorough analysis of the racial impacts of development and develop policies to mitigate these impacts.**

We appreciate that the most recent Draft Plan JP Rox begins to discuss the disproportionate racial impact of this scale of market-rate development. We urge the City to deepen its commitment to analyze and address the racial (in)justice aspects of this plan, especially in light of HUD's new Affirmatively Furthering Fair Housing policy and Mayor Walsh's signing onto the Government Alliance for Racial Equity (coming out of the Racial Equity Summit in May). The plan projects that the neighborhood will remain at least 50% people of color, but the neighborhood is currently 2/3 people of color. This is a drastic drop and also means that the vast majority of new residents will be white.

The Government Alliance on Race and Equity (GARE) has a race equity tool (and toolkit) that cities can use to operationalize race equity in city planning and program development and assessment. A number of cities including Seattle, Madison, League of Cities in Minnesota, and towns and cities in Northern and Southern California and others are using such tools. The race equity tool can be found at

<http://racialequityalliance.org/newsite/wp-content/uploads/2015/10/GARE-RacialEquityToolkit.pdf>.

Information about the work of these cities and towns can be found at

<http://racialequityalliance.org/category/community-capacity-building/>

5) **Provide analysis and proposed solutions to address land speculation.** Both affordable housing advocates and private developers have warned the City that land speculation is allowing landowners and investors to demand inflated prices. Developers' ability to deliver affordable units is then constrained, because they seek to make a return on the inflated price they paid for the land.

The City needs to factor speculation into its analysis and put into place policies that regulate the amount that landowners/investors can demand for land. In addition to affordability requirements, these policies can put downward pressure on land prices and enable developers to deliver more affordability. **One possible solution is tax-increment financing**, by which the increase in property taxes is used to float bonds which are spent on solutions for affordable housing (e.g. affordable commercial space) rather than going into the City's general fund. **The City could also establish an anti-speculation tax.** This would require a home rule petition, but other localities have enacted such policies.

6) Be innovative and courageous in identifying additional resources and regulatory tools that can help prevent displacement and create more affordable units at a deeper level of affordability in JP Rox and across the City. We greatly appreciate the establishment of the Office of Housing Stability to address displacement. Other innovative and courageous ideas include:

- Capturing excessive profit made from land speculation, through tools such as:
 - tax-increment financing (see description under ¶5 above)
 - anti-speculation tax
- Removing more housing from the speculative market, through community land trusts, co-ops, and land banking.
- Aggressively urging developers to obtain agreements to rent a certain number of units to voucher holders (as mentioned in ¶2 above)
- Expanding the Acquisition Program and making it more flexible (as mentioned in ¶2 above)
- When appropriate, working with private developers to acquire and rehab occupied (or vacant) units and turn those over to nonprofits as part of their IDP obligations (vs. doing on site units).
- Passing the Just Cause Eviction Ordinance and using the new Office of Housing Stability and other tools to prevent displacement.

7) Good job standards – The City must put in place enforceable standards to make sure local residents in need of opportunity benefit from the jobs that development brings. We support the recommendation of the JP Good Jobs Committee and ESNA that Plan JP Rox include the following specific requirements:

- Require developers to deliver good job access and wages on construction jobs - hire 51% residents, 51% people of color, 20% women, paid at union or strong residential construction rate
- Require developers to promote access to good permanent jobs for businesses located on their site - 51% residents, 51% people of color, 50% women, paid at livable wage
- Create a link between downtown jobs and the neighborhood by City providing one-stop, transit-oriented job centers at MBTA locations

If the City of Boston is truly committed to the needs of all of its residents, it must be bold and innovative to prevent displacement and preserve affordability. Further, it is crucial that the City takes care to put in place effective affordability and anti-displacement policies for Plan JP Rox, as it will serve as model for planning across the City. Thank you.

Sincerely,

Kathy Brown
Coordinator
Boston Tenant Coalition

Sarah Horsley
Board Member, Boston Tenant Coalition
Advisory Group Member, Plan JP Rox

Cc: Devin Quirk, DND
Marie Mercurio, BPDA

Lydia Edwards, DND
John Dalzell, BPDA

These comments are divided into two parts: **CLARIFICATIONS** which affect the meaning of content, and **ISSUES** which request changes to the content. They include additional description of issues in the 10/13/16 Alliance letter, as well as other issues, such as parking, that have not had time for discussion.

CLARIFICATIONS

On several important points, the intent of the 9/20/16 Draft is unclear at best, and misleading at worst, **and should be clarified to avoid unintended future consequences and/or confusion.**

1. **Differentiate and clarify each of the three approval processes** (Pages 124 & 125)
 - a. The process to allow RDA zones and establish the related zoning and design guidelines;
 - b. the process to approve a specific RDA project within the RDA zone;
 - c. the Article 80 process
2. **RDA Calculations** (page 125)
 - The explanation of RDA density bonus calculations is incomplete and unclear.
 - Clarify that the “base bonus” (currently at 13%) is triggered by an RDA request for change in use, regardless of existing or proposed FAR.
 - Clarify how the FAR is clarified (excludes parking, includes retail?)
 - Clarify how the bonus is calculated when the building includes retail space. If the FAR changes from 1.0 to 3.0, is the bonus applied to 1/3 of the housing? Is retail considered part of the base, or is it subtracted from the bonus? (It adds to height, and should not be deducted from the bonus.)
3. **REVISE the identical colored maps “Development Focus Area Map by Height” maps to more accurately show the existing (amended) conditions and the proposed changes to both allowable height and allowable uses** (Pages 127, 135, with blow ups of each neighborhood on pages 143, 147, 150, 155, 159)
 - a. **Compare Existing (amended) Base Zoning to the Proposed RDA.** The 9/20 colored maps mix apples and oranges – existing use with proposed height. Rather than try to illustrate all of the above information on a single map, it would be much clearer to split the information into two maps; one map would show the amended base zoning height and use, and the other would show proposed RDA allowable height and use.
 - b. **Amended Base Zoning Map:**
 - i. **Zoning Subdistricts Key:** The 9/20 key identifies the black lines/text as indicating “Existing zoning Subdistrict boundary” when it actually includes the amended base zoning subdistricts proposed on page 121. **REVISE KEY to “Amended base zoning subdistricts. See page 121.”**
 - ii. **Existing Height:** The existing allowable height (in feet and stories) is not shown. This information is only attained by comparing the existing zones on page 121 to the key on page 123. **REVISE KEY and/or add footnote that refers to existing allowable height.**
 - c. **Proposed RDA Map:**
 - i. **Proposed Height Key:** The 9/20 key identifies the colors as “Proposed Height (in feet)” when in fact the proposed height in each color zone is up to 5’ higher per the chart on page 134 and in the Neighborhood Design Guidelines (pages 143, 147, 150, 155, 159). In a 9/30 meeting¹, the BRA indicated that the increased height might only be allowed where the first floor is commercial.) **REVISE KEY and/or add footnote that refers to exceptions that allow greater height. ADD a footnote to a definition of Maximum height.**

¹ On 9/30/16, the BRA presented several potential changes and clarifications to a group of representatives from several JP Neighborhood Groups. The changes were still in flux.

- ii. **Proposed Stories:** The proposed maximum allowable height in stories is not shown on the 9/20 key. This information is only shown in the text under Neighborhood Design Guidelines (pages 142, 146, 150, 154, 158. **REVISE KEY and/or add footnote that refers to allowable stories.**
 - iii. **Proposed RDA uses:** The 9/20 maps indicate the *existing* allowable uses but do not indicate the *proposed* uses. Although the overall plan proposes housing in all RDA zones (pages 124 and 125) and proposes complementary retail or institutional uses in the Neighborhood guideline narrative (140, 144, 148, 152, 156) NOWHERE does the plan specify which uses (Housing, Mixed Housing/Retail, Mixed Housing/Institutional) are allowed in which subdistricts.
4. **CLARIFY chart “RDA SUB-ZONES AND ALLOWABLE HEIGHTS”** (Page 134 and related text on 146, 150, 154 and 158)
- a. The text for each neighborhood (146, 150, 154 and 158) is different than column in page 134 for “adjacent building height”, showing that the proposed RDA heights are actually adjacent to much lower buildings than indicated by page 134.
 - b. **DEFINE “RDA Building Height (page 134 “Building Height, Scale and Massing” narrative and chart)**
 - i. ADD a column for the number of stories allowed in each RDA subzone
 - ii. **Indicate how maximum height is measured (Average of the perimeter height, height at the street, height at each elevation?** Zoning typically refers to an average of the perimeter height. Given the topography, the distinction between average height, and maximum height will have a significant impact on both abutting residences and neighbors. This distinction should be studied, and coordinated with the requirements for stepbacks (for example, the maximum height might be an average of the building perimeter, while the setbacks might be determined for each elevation condition). It may be appropriate to work this out in the zoning, with neighborhood input. **Acknowledge that determining how height will be measured will be studied during the zoning phase with stakeholder input.**
 - iii. **Clarify the intent of the column called “adjacent building height”.** The information on page 134 conflicts with that shown for each neighborhood (page 142, 146, 150, 154, 158) and conflicts with what is shown on the map on 135. Regardless of the goals shown on these charts, 5 and 6 story heights are regularly proposed adjacent to 1-3 family residential zones.
 - iv. **Revise charts on 146**
5. **CLARIFY description of Step Backs** (Page 136) - Clarify meaning of “level 4/5”. It is not clear that it means between the 4th and 5th floor, as indicated at the 9/30 meeting².
6. **CLARIFY Setback diagrams** (page 136)
- Distinguish between residential building and residential street
 - Does “RESIDENTIAL” diagram apply to residential building on Main streets?
 - Does “LOCAL RETAIL/RESIDENTIAL” mean the setback is not required where ever there is some retail, or only on a main commercial street? Is this retail on first floor/residential above? Retail on a residential street?
 - Why is rear setback different for mixed use than it is for residential only?
 - How do the images relate to the diagrams? All images show main commercial streets.

² On 9/30/16, the BRA met with a group of representatives from several JP Neighborhood Groups and indicated that 4/5 meant “between the 4th and 5th story”.

7. CLARIFY “RECOMMENDATIONS TABLE” narrative, definitions and content (PAGES 160-164)

- a. Page 160 - “RECOMMENDATIONS OVERVIEW” – ADD process for community to review Plan progress and revisions, and to participate in the ongoing process of implementing the plan.
- b. Page 164 – In “Strategy” column, does “Z” refer to Zoning? ADD a definition of “Z” to the list of definitions on page 161.
- c. Page 164 – Under “Housing” item “Revisit zoning bonus policy every 2 years...”, Clarify process and public input into proposed “revisiting” of the bonus policy. (Would a change require a zoning revision with public input?)

ISSUES - REQUESTED CHANGES TO CONTENT:**8. PARKING RATIO (page 88- 92)**

- The BPDA proposal for parking ratio is unclear and misleading.
 - The Expo on 9/20 included a board showing the existing BTM maximums and minimums, but it was not labeled, which gave many the impression that this was the proposal. No proposed ratios were included on the board. When asked, the BRA staff indicated that it was the existing policy, and that the proposed policy would be a maximum without a minimum. A reduction in the maximum was not mentioned.
 - Page 88 of the Transportation Framework states “All new projects that are “large projects (>50,000 s.f.) will have their parking supply determined through Article 80 design review process, and with consideration of the Boston Transportation Department policy parking ratio maximums. Below are current parking ratios for residential and commercial areas.” The existing ratios are on page 89.
 - Page 92 presents reduced parking maximums of 0.75 for large projects.
 - Page 94 proposes policies to reduce pressure on on street parking, including on street parking pricing.
- Page 94 proposes strategies to reduce pressure on on street parking. However resident parking will not discourage residents of new project who will be JP residents and who may choose to park on the street in lieu of paying for al-la carte parking. Requiring payment for on street parking shifts the cost and responsibility for parking from developers onto existing low income residents.
- **Parking maximums should at least allow for 1 space per unit, unless clear guidelines are in place to disincentive residents who have cars from parking on the street. Zoning should include clauses that residents of developments without sufficient parking will not be eligible for resident parking.** It has been argued that no resident is guaranteed a parking space on the street. However these developments are asking for relief from existing zoning while disproportionately burdening the existing residents.
- **The proposed strategy should be clarified, and there should be an opportunity for community input.**

9. ALLOWABLE RDA HEIGHT (Pages 127, 135, with blow ups of each neighborhood pages 143, 147, 150, 155, 159)

- Refer to the 10/13/16 letter from the Alliance of Neighborhood Associations for specific request for changes to RDA height.
- Confirm that the Design Guidelines will be integrated into the applicable zoning revisions. (Page 130 indicates that “additional dimension” may be allowed.) Be clear that maximum heights will be enforced and

excess height will require a variance, which guidelines will be required by zoning, which are at the discretion of subsequent BRA design review, and how the community will participate in that review

10. SETBACKS AND OPEN SPACE (Page 134-136)

- Setbacks are defined as being from the property line. The minimum sidewalk width and minimum setbacks should be coordinated with each other, and with existing building setbacks.
- On page 134, Sidewalk requirements refer only to the minimum sidewalk width, which is defined on page 90 as 7' wide. A 7 foot sidewalk is not appropriate for a 5 to 6 story building on a residential street, and is certainly not reasonable for a commercial street. Page 90 also refers to "preferred widths of 11' 6" at Residential Streets and 16' 6" at Commercial Main Streets".
 - **Provide appropriate minimum sidewalk width for each street condition.**
- The side and rear setbacks should reflect the character of the abutting residential zones, including MFR, not the character of the front street.
 - **All rear yard setbacks that abut existing residential zones should be minimum 20 feet.**
 - **All side yard setbacks that abut existing residential zones should be minimum 10 feet.**
- Open space requirements (page 138) are easily met by rear yard setbacks, and do nothing to contribute to public open space.
 - **Add requirement to large projects for public open space on or off site.**

11. REAR AND SIDE FAÇADE STEP-BACKS (page 136, 137):

- Rear and side step-backs should protect the adjacent residential zones by providing transitional height that reflects the sloping topography, and maximum 35 feet allowable height in abutting residential zones. Depth of step back should be sufficient to reduce the impact of height and preserve access to views and sun.
- With grade changes on the south side of Washington, the proposed BPDA step back at the 4/5 level would result in a façade that is as much as 25 feet higher than an existing 3 story residence (10 foot grade change + 10' extra story + 5 feet additional proposed height for all zones).
- The BPDA proposals have REDUCED the depth and length of setbacks even as most neighborhoods requested an increase to 10 feet to 20 feet.
 - The 7/15/16 draft required that setbacks be 8 feet deep across 100% of the rear and side facade.
 - The 9/20 final draft (page 136, 138) required an average of 8 feet across 80% of the façade
 - The 9/30 meeting proposed reducing the step-back to 5'.
- **The neighborhood consensus is that new buildings that abut existing 1-3 story residential zones should be stepped back at the 3/4 level along 100% of the length of the façade, with at least a 10' depth.**

12. FRONT FAÇADE STEPBACKS (p 136 – 139)

- The goal of the front step back is to relieve flat, unbroken facades, open up the views to the sky along the street, reduce shadows, reduce the canyon effect and reflect the existing character of the street. Therefore, requirements for front yard setbacks should **not** be the same throughout the Plan JP/Rox area and should vary to reflect the differences in different neighborhoods. Requirements should reflect the width and character of the street. The BPDA proposals have a single set of criteria for setbacks at all streets.
- The BPDA have REDUCED the depth and length of setbacks and INCREASED the height even as most neighborhoods requested an increase to 10 feet to 20 feet and a lowering of the height.

- The 7/15/16 draft required that setbacks be 8 feet deep across 80% of the front façade at level 4/5.
 - The 9/20 final draft required an *average* of 8 feet across 40% of the façade area (Using an average of the area allows greater height before stepping back, and minimal setbacks in one area, in exchange for deeper but less effective setbacks. Because the setback is measured from the property line, not the façade of the building, the entire building could theoretically be stepped back a few feet with no other relief.)
 - The 9/30 meeting proposed reducing the step-back to an average of 5' across 80% minimum (It is not clear if this refers to 80% of the lineal length of the building, or 80% of the area of the façade, and whether there is a height criteria.)
- **The Front step backs should be at least 8' deep across 80% of the façade length. Height should vary with the character and width of the street.**
 - On narrow streets, such as Green Street, step back above the 3rd story (3/4 floor line).
 - On predominately residential streets, step back above the 3rd floor story (3/4 floor line) to respect both the narrow street width and the residential height and character.
 - On Washington Street, the step back above the 4th story (4/5 floor line) is appropriate.
 - On Columbus Ave, where the street is much wider and existing buildings are larger, higher step backs and more variation might be appropriate.
 - **The average setback should be measured from the building face closest to the property line NOT FROM THE PROPERTY LINE.**

13. Parking and Loading (page 139)

- **Add language to screen parking, loading and access points for abutting residences.**

STONYBROOK NEIGHBORHOOD ASSOCIATION RESPONSE TO PLAN: JP/ROX FINAL DRAFT 9.20.16

The Stonybrook Neighborhood Association (SNA) has a number of major concerns with the PLAN JP/Rox final draft. We request that the BPDA postpone the hearing and vote scheduled for October 20 in order to allow full consideration of our concerns, time for the BPDA to prepare a comprehensive and transparent response to community feedback, and to accommodate continued engagement of community residents.

General Comments:

- Many of our comments on the previous draft (submitted on August 22) were not addressed, and it is not clear to us whether decisions were made to reject our suggestions or they were not considered.
- Where guidelines within the draft plan are relatively vague (e.g., 4 stories = 45-50'; setbacks for non-RDA zones are not specified), we request greater precision.
- The BPDA has signaled that additional changes in allowed heights, setbacks, and stepbacks may be made; the public should be allowed to review such significant changes.
- In addition to our concerns, the SNA supports the specific comments submitted by the Alliance of Washington Street Neighborhood Associations.

Summary of Major Concerns:

- The massing allowed by the plan is inappropriate. Allowed building heights, setbacks, stepbacks, sidewalk widths, and street widths all contribute to massing. We are especially concerned about areas where new development meets existing residences.
 - Proposed stepback requirements (average 8' deep over 40% of front façade for buildings over 4 stories and over 80% of front façade for buildings over 6 stories) are grossly insufficient.
 - Side setbacks should be a minimum of 10' and rear setbacks minimum 20' where new buildings abut residences. The final plan allows 0' side and 10' rear setbacks for commercial buildings.
 - The SNA continues to request that the height on the west side of Stedman Street, between Brookley and Rossmore Roads, behind the 65' and 55' zones on Washington Street and Stonley Road, be limited to 35' to respect the adjacent residential property on Stedman, Brookley, and Rossmore and due to the narrow width of Stedman Street.
 - Allowed heights, setbacks, stepbacks, sidewalk widths, and other design elements should complement the characteristics of the local area, including existing land uses and street width.
- The SNA remains opposed to the 15-story height allowance proposed for the MBTA bus yard, without substantial evidence of concrete commitments to infrastructure improvements that would adequately address the density impacts. The BPDA plan proposes the creation of >1250 new housing units between Williams Street and the Forest Hills T station. This would add to the nearly 1,000 units already planned, under review, or under construction within a half mile of the SNA neighborhood. Current infrastructure (e.g., transportation, retail, commercial, and other services) cannot sustain such increased density and the plan does not address the commitments needed from other agencies to expand infrastructure.
- The SNA requests stronger affordability requirements in base zoning and RDA incentive programs beyond the 13%/70% AMI and 20-25%/50% AMI bonus. The base affordability in RDA developments should be 25% with higher percentages for the bonus density.
- The additional 5' in height, added to all RDA zones in the 9/20/16 draft, should be reduced to 3' and only allowed in ground floor commercial uses.
- The SNA requests a mandate that developers who purchase more than one abutting or adjacent lot be required to draft plans/proposals for all properties purchased or in play by that developer or related combination of developers, disallowing variances for any project(s) to be reviewed or considered as individual lots/projects.



BIKES NOT BOMBS

284 Amory Street • Jamaica Plain, MA 02130
phone: 617-522-0222 • fax: 617-522-0922
www.bikesnotbombs.org • mail@bikesnotbombs.org

October 13, 2016

Boston Planning & Development Agency

To Whom It May Concern:

Bikes Not Bombs (BNB) is a 32-year-old community organization in Jamaica Plain that uses the bicycle as a vehicle for social change. We reclaim thousands of bicycles each year. We create local and global programs that provide skill development, jobs, and sustainable transportation. Our programs mobilize youth and adults to be leaders in community transformation.

Since 1990, Bikes Not Bombs has provided youth leadership and cycling programs for more than 3,500 youth at our Hub in Jamaica Plain. For the last five years, through our program Bicyclists Organizing for Community Action, many of these young people have participated in efforts to improve their communities through youth organizing and empowerment. You may have seen these youth at the many meetings and hearings about Plan JP/Rox. We are pleased to submit these comments and issues, raised by the undersigned youth and adult leaders at Bikes Not Bombs about the Plan and its impact on us and our community.

We as a community and as individuals are opposed to the final Plan JP/Rox as it stands, and are united in our demand for real negotiations between the BPDA, the City, and the community around the issues of affordable housing, preventing displacement of low-income people and people of color, the process of approving the plan, and the infrastructure of the neighborhood. We believe the current JP/Rox Plan is not ready for an approval vote and request that it be removed from the upcoming BPDA Board meeting on October 20th due to the following concerns.

1. The plan must better reflect the neighborhood's needs around affordability. There is not adequate housing to provide for the large number of households in the study area making \$25,000 - \$35,000 a year. These households represent an important part of the fabric of our community, and as currently proposed this plan explicitly assumes economic displacement of these low-income households - many of which are made up of people of color. Additionally, the currently proposed plan's definitions of affordable housing fall far short of addressing the need. Most proposed units would be eligible for households that are at 50-70% of the area median income, which is not reflective of the income levels of current residents.
2. Meanwhile, displacement is already happening. Many of our friends, family members, and community leaders have already been forced out of the neighborhood, and some out of the city and away from their communities and support networks because they cannot afford to stay. Our political leaders and the BPDA must stand up for a vision that actually addresses the state of crisis that our communities are in! The current Plan JP/Rox doesn't even come close to the 70% of new construction affordable to those making less than \$50,000 a year that we need to stem the current economic displacement.
3. The loss to the neighborhood is not just our community members and family members, but also a loss of the rich cultural diversity that this community is home too. While many of the current and long-term residents of the area are Black and Latino, the new arrivals that the BPDA's plan is built for is most likely going to be overwhelmingly White. We also know that many of the households facing the threat of displacement are people of color, so this represents a forced racial shift in the demographics of the neighborhoods.
4. We are concerned that the proposed plan does not in any way prepare for the influx of thousands of new residents and the demand that will place on existing transportation infrastructure. Introducing new housing into the area will bring unforeseen and unplanned challenges for our roadways, bicycle infrastructure, pedestrian paths and parkways, and public transit system.
5. There have been numerous and significant challenges procedurally with the JP/Rox Plan development and community process.
 - a. Almost all of the public meetings (except for one, on a Saturday at Bromley Heath) have taken place at English High School, during the same evening time period on weeknights. This categorically excludes anyone who cannot make it to that location during that time frame.
 - b. No attempt was made to provide childcare, and the result was that only 1-2 families with small children were ever present at any of the meetings. This makes it difficult, or even impossible for families with children to participate in the community process and excludes a large segment of the population.
 - c. The community meetings, plan drafts, and materials created by the BRA (BPDA) were done in highly-professionalized 'plannerspeak' that made it very difficult for us and other

community members to participate fully. Often BPDA staff used this language in a way that stifled conversation and made community members feel that their input was not being valued.

- d. BRA staff had a handful of talking points that they tended to repeat over and over again when faced with challenging questions from community members. Repeating the same thing over again is not engaging in dialogue with the community, and it does not address the realities of that community members are facing in the plan area.
- e. When we would bring other proposals or recommendations for ways that the BPDA could increase the levels of affordable housing accessible to low-income people (other ways to fund projects, looking into more land-banking), we would hear in public meetings that we should send along those solutions to be considered. Then at the next meeting no changes would be made, and BPDA staff would have the same responses to our proposals despite having sent over or otherwise provided information to BPDA staff.
- f. In dialogues with youth and other community members, BPDA staff would sometimes try to co-opt or downplay personal stories or realities expressed in an effort to build rapport. This is inappropriate and was most often being done instead of actually addressing the concerns that the youth or community member was bringing up.
- g. For a study area that has a large population of non-English-speaking community members, the BPDA's lack of preparation was inexcusable. Public meetings had large charts, handouts, other materials and presentations that were only available in English. In the earliest community meetings, we were doing interpretation for our own members, because the BPDA did not have anyone to do it.
- h. Despite almost all of the meetings being held during the dinner hour, the BPDA almost never had food - making it difficult for families with children to participate. As a result our community groups bought and provided food for the public to make it more accessible to families.
- i. After a year of struggling to be heard, putting together recommendations, participating actively in the planning process, and making thoughtful and important critiques in support of our communities, the BPDA's plan has remained essentially unchanged in terms of the overall levels of affordable and middle-class housing in the neighborhood. This unwillingness to change or reconsider Plan JP/Rox despite widespread and sustained community opposition is disturbing.

As a result of all of the above issues with the existing plan, we demand that the BPDA open real negotiations on key areas of the plan, and do not vote on the plan's approval on October 20th.

On behalf of the Bicyclists Organizing for Community Action, a program of Bikes Not Bombs:

Hericles Cardoso

Andry Celado

Bernie Cruzeta

Lezhan Dossantos

Franklin Dume

Marc Garcia

Miguel Angel Guerrero

Jeremy Hanson-Gutiérrez

Serah Holley

Carlos Ortiz

Ivan Richiez

Modesto Sanchez



To: Brian Golden, Marie Mercurio, John Dalzell, Cecilia Nardi
Boston Planning and Development Agency
From: Lisa Owens, María Christina Blanco
City Life/Vida Urbana
Re: Comments on 9.20.16 Final Draft of PLAN: JP/ROX

October 13, 2016

Dear BDPA staff,

This letter is a response to the solicitation of public comment regarding the 9.20.16 Final Draft of PLAN: JP/ROX.

City Life/Vida Urbana has long organized and advocated for preservation and creation of affordable housing, especially in the Jamaica Plain/Roxbury border where we have been located for 4 decades. We are deeply concerned about the growing and well-publicized displacement effects of the real estate speculation that goes along with the development process, in our city and particularly in the Washington St. Corridor area. Since the PLAN: JP/ROX process started, we have worked with nearly 100 longtime residents of the area (including tenants and homeowners) and small businesses at risk of displacement, across dozens of buildings. These displacement cases – which we have found to have a disproportionate racial impact - are often triggered by sales of occupied buildings to developers. In this comment, we ask the BDPA to consider and address standards of accountability for developers regarding displacement, which is an important fair housing issue.

Our organization has signed on to comments by larger groups such as the Boston Tenant Coalition and the JP/Rox small business coalition, addressing some aspects of our displacement concerns. However, we have outstanding deep concerns about standards of accountability for developers regarding displacement, which have always been inadequate in our experience. Developers' impact on neighborhood displacement has only been addressed in a piecemeal, ad hoc way, through the zoning variance petition process. Neighborhood zoning committees, groups, and residents can go to the Zoning Board of Appeals hearings and ask for deferral of zoning variance decisions until displacement concerns have been resolved; however, the ZBA is not mandated to take these concerns into account as a factor in their decision. Rezoning of the PLAN JP/ROX area would take away even this small piece of leverage from residents and neighborhood groups.

Therefore, we believe that PLAN: JP/ROX, and any other rezoning process in our city, should include the adoption by BDPA of anti-displacement standards for developers, that will hold them accountable for resolving displacement cases of tenants, homeowners, and small businesses before BDPA approves new developments. We see precedent for such standards in the "Invest In Boston" policy adopted in 2013, which uses a point system to vet City vendors in the decision of which financial institutions will receive our municipal deposits; and in the enforceable jobs standards dating back to 1985 that developers are held to for large construction projects. For another point of reference, see the attached "Developer Standards Regarding Predatory Acquisition Practices" that our organization proposed to the JP Neighborhood Council and which was adopted July 2016.

Sincerely,



Lisa Owens, Executive Director



María Christina Blanco, Community Organizer/ Washington Street Corridor

**JP NEIGHBORHOOD COUNCIL POLICY:
DEVELOPER STANDARDS REGARDING PREDATORY ACQUISITION PRACTICES
Adopted July 2016**

**JP NEIGHBORHOOD COUNCIL POLICY ON DEVELOPER STANDARDS WITH REGARD TO
PREDATORY ACQUISITION PRACTICES:**

If a developer is pursuing a lawsuit against an owner-occupant to force them to proceed to purchase and sale after signing an offer letter, where the homeowner affirms that they only intended to sell if they found appropriate alternative housing but were not properly assisted to put in a strong enough contingency clause into the offer letter, this should be taken into account by the JPNC when weighing in on this developer's development proposals. In particular, the Housing & Development and Zoning subcommittees should respond to requests for project approvals or zoning variances by developers who engage in these kind of lawsuits against vulnerable homeowners, by requesting that the developer first show evidence that the lawsuit has been resolved in a way that avoids forced displacement of the owner-occupant family. Developers should be urged to engage in good-faith mediation to resolve these cases.

JPNC also urges our Boston city government to respond to this emerging pattern with a public awareness campaign and homeowner advocacy resources such as legal and mediation services similar to the anti-predatory-lending "[Don't Borrow Trouble](#)" campaign.

Background provided by City Life/Vida Urbana

PREDATORY ACQUISITION PRACTICES DEFINED:

Jamaica Plain has become a very attractive area for development, and City Life/Vida Urbana has found that some developers are using strongarm tactics against the same demographics of residents targeted with predatory subprime loans, but now with acquisition practices that threaten forced displacement. City Life/Vida Urbana has 3 members with cases wherein a longtime homeowner either approached or was solicited by a realtor about selling their home, but was only willing to sell if they found appropriate alternative housing - and ended up being sued by a developer to force them to proceed to purchase and sale after signing an offer letter (although they had indicated that they only intended to sell if they had a place to go). It appears that these longtime homeowners were not properly advised or assisted by the realty companies' lawyers about how to put in a clear contingency clause indicating that the offer was accepted subject to the homeowner acquiring a new place to live. This left them open to being sued to force the sale of their home to the developer, regardless of whether they had secured appropriate alternative housing. A longtime homeowner in this situation who discovers after signing an offer letter that they are unable to obtain financing to pay off their mortgage and also buy a new house accessible to their neighborhood/ job/ healthcare/ children's schools, could be vulnerable to a lawsuit where the developer seeks to force the sale and even pursue damages for lost profits.

COMMUNITY IMPACT OF PREDATORY ACQUISITION PRACTICES BY DEVELOPERS:

These lawsuits are brought not because the developer needs the home to live in, but rather because they want to acquire the property as an investment or a redevelopment opportunity. On the other hand, in the cases City Life/Vida Urbana is aware of, there are school-age children and disabled and elderly people within the families put at risk of displacement. The longtime homeowners in these cases are African-American and Latino – the very demographic groups most severely targeted by predatory lending and most affected by economic inequality.

DEVELOPER ACCOUNTABILITY FOR PREDATORY ACQUISITION PRACTICES:

The developer in this scenario has the choice whether to pursue a lawsuit against the homeowner, or to let the offer expire and get their deposit back. Once a lawsuit has been filed, they have the choice to pursue the case to trial, or to settle it in such a way that if the homeowner finds appropriate alternative housing in the future, they will be obligated to sell to the developer under the original terms – but if they never find appropriate alternative housing, they never have to sell. Developers must be held accountable for these choices when they come to the community seeking approval for their construction projects.

October 13, 2016

Marie Mercutio, Senior Planner
Boston Planning and Development Agency
1 City Hall Sq, 9th Floor
Boston, MA 02210

RE: final draft of PLAN: JP/ROX and Walkability

Dear Marie:

WalkBoston welcomes this opportunity to comment on the final draft of the Boston Planning and Development Agency's (BPDA) PLAN: JP/ROX study, specifically with respect to issues of walkability and active transportation. On September 14, we hosted a walk assessment in Egleston Square in partnership with Urban Edge to examine local pedestrian infrastructure conditions and recommend potential walking improvements. We were grateful for the participation of current and former BPDA staff along with other diverse City and community stakeholders in this exercise. We have included the final walk assessment report as an attachment to this letter. We stand ready to work with the BPDA and partner agencies to implement the following priority improvements, which reflect a broad consensus amongst walk assessment participants and are consistent with PLAN: JP/ROX's overall transportation goals:

- Add a crosswalk across Washington Street at Bray Street/Westminster Avenue
- Enhance pedestrian infrastructure at the intersection of Washington Street and Columbus Avenue
- Add a crosswalk across Washington Street at Beethoven Street

These priorities, as well as additional areas of improvement (including crosswalk conditions along Columbus Avenue), are further detailed in the walk assessment report.

We are pleased that the final draft of PLAN: JP/ROX acknowledges the current walking challenges along Washington Street and Columbus Avenue and in Egleston Square (pg. 84) and calls for "fast and flexible" improvements that advance Complete Streets and Vision Zero goals (pg. 90). We also appreciate that the final draft puts a broad array of infrastructure options on the table for calming traffic and accommodating all travel modes, including a potential road diet on Columbus Avenue (pg. 94), which is one of our walk assessment report suggestions as well. We hope you will consider the specific recommendations in the attached report as you move towards implementation strategies to advance these goals.

The final draft notes in several places that further analysis, design and study is needed to determine how to best accommodate all travel modes on Columbus Avenue and Washington Street and in Egleston Square (pgs. 95-96). While this may certainly be the case with respect to more capital-intensive or disruptive infrastructure redesigns or improvements, this should not slow the implementation of quick near-term improvements, consistent with the "fast and flexible" approach mentioned above. Again, the attached report offers several specific recommendations as to how you might proceed in this regard.

Thank you again for this opportunity to comment on PLAN: JP/ROX. We look forward to working with you to implement on-the-ground built environment changes in Egleston Square that enable active and sustainable transportation for all.

Sincerely,

Wendy Landman

Executive Director, WalkBoston

October 2016

Improving Walking Conditions in Egleston Square

Background

In the summer of 2016, Urban Edge and WalkBoston initiated a conversation about scheduling a walk assessment for the Egleston Square area to examine pedestrian infrastructure conditions in this highly trafficked Main Streets corridor. Concurrently, the Boston Planning and Development Agency (BPDA – formerly the Boston Redevelopment Authority) was pursuing (and continues to pursue) its PLAN: JP/Rox planning and development study for the Washington Street corridor. This area includes Egleston Square as well as Stonybrook, which has been designated a “Neighborhood Slow Streets” pilot as part of the City’s Vision Zero efforts to eliminate traffic fatalities and serious injuries. Urban Edge’s push for a walk assessment and BPDA staff’s interest in applying innovations from the Slow Streets pilot more broadly both highlight a strong desire for transportation infrastructure that accommodates all road users, whether they are walking, bicycling, driving or taking transit.



Egleston Square walk assessment participants, including neighborhood residents, City of Boston staff and representatives from WalkBoston and local community organizations, examine local pedestrian infrastructure conditions on September 14, 2016.

MAKING MASSACHUSETTS MORE WALKABLE

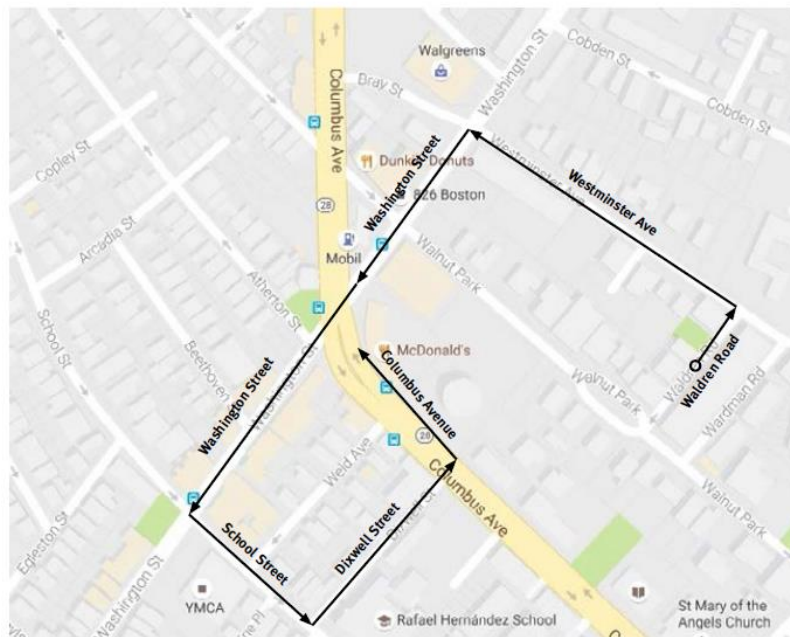
Old City Hall | 45 School Street | Boston MA 02108 | T: 617.367.9255 | F: 617.367.9285 | info@walkboston.org | www.walkboston.org

Given the opportunity to comment on the PLAN: JP/Rox study, WalkBoston and partner organizations Boston Cyclists Union and LivableStreets submitted a joint letter to the BPDA on August 26 (see Appendix A) outlining numerous recommendations for enhancing pedestrian and bicycling infrastructure in the study area. The Egleston Square walk assessment subsequently took place on September 14, providing diverse city and community stakeholders (listed in Appendix B) the chance to further examine the issues raised in the comment letter and to discuss more specific local walking and biking improvements. WalkBoston subsequently presented several of these recommendations (which are further described in the report sections that follow) to the Egleston Square Neighborhood Association (ESNA) on September 26. These recommended improvements, as follows, reflect a broad consensus between walk assessment participants and ESNA meeting attendees:

- Add a crosswalk across Washington Street at Bray Street/Westminster Avenue
- Enhance pedestrian infrastructure at the intersection of Washington Street and Columbus Avenue
- Add a crosswalk across Washington Street at Beethoven Street

Additional walking issues that merit further consideration are highlighted in this report as well. While this document is primarily focused on pedestrian improvements, the need to enhance bicycle infrastructure (as discussed in the aforementioned comment letter to the BPDA) remains critical too. It is WalkBoston's hope that this report helps lead to on-the-ground built environment changes in Egleston Square that enable active and sustainable transportation for all.

Egleston Square walk assessment route (September 14, 2016)



A map of the walking route for the September 14 Egleston Square walk assessment.

Egleston Square walk assessment participants (see Appendix B) met at 9 Waldren Road, one of Urban Edge's residential properties. They then walked along Westminster Avenue to Washington Street, then south on Washington Street to School Street. The group then walked east on School Street, then north on Dixwell Street to Columbus Avenue. Finally, the group returned to Waldren Road via Washington Street and Walnut Park for further discussion.

Summary of Priority Improvements

Walk assessment participants and ESNA meeting attendees broadly agreed upon three specific areas of improvement, as follows:

- Add a crosswalk across Washington Street at Bray Street/Westminster Avenue
- Enhance pedestrian infrastructure at the intersection of Washington Street and Columbus Avenue
- Add a crosswalk across Washington Street at Beethoven Street

Existing conditions and proposed improvements at the aforementioned locations, as well as additional walking issues that merit attention, are further detailed below.

Priority Improvement: Add a crosswalk across Washington Street at Bray Street/Westminster Avenue

The stretch of Washington Street north of Columbus Avenue has no crosswalks across it until Dimock Street – a distance of nearly a quarter-mile. As a result, pedestrians are forced to jaywalk across Washington Street, highlighting a clear need for additional pedestrian crossings along this major thoroughfare.

Walk assessment participants and ESNA meeting attendees broadly agreed that a crosswalk should be installed across Washington Street at Bray Street/Westminster Avenue, given the location of a bus stop at this corner and the high volume of pedestrians walking to the nearby Walgreen's. Walk assessment participants also noted that the adjacent crosswalk across Bray Street traverses a right-turning slip lane, which could be reclaimed for pedestrian use. This would not only calm traffic and shorten a lengthy crossing distance for pedestrians; it would also present opportunities to create a small plaza and/or enhance the public realm using the reclaimed street space. Given that Bray Street is a very short one-way street, removing the slip lane here should not adversely affect traffic flow in Egleston Square more broadly.

In addition to installing a crosswalk across Washington Street at Bray Street/Westminster Avenue adding additional crosswalks across Washington Street north of Egleston Square (whether at mid-block locations or side street corners) should be considered as well.



The crosswalk across Bray Street at Washington Street presents opportunities to reclaim a right-turning slip lane for pedestrian use.

Priority Improvement: Enhance pedestrian infrastructure at the intersection of Washington Street and Columbus Avenue

The wide and heavily trafficked intersection of Washington Street and Columbus Avenue at the heart of Egleston Square presents numerous challenges for people walking and biking. High traffic speeds, long crossing distances, inconsistent and confusing WALK signals, and conflicts between turning vehicles and pedestrians in the crosswalks all present serious potential hazards. Potential solutions to address these safety issues include the following:

- Use curb extensions to reduce crossing distances and calm traffic
- Reconfigure signal timings to create more predictable WALK signal cycle
 - Consider making WALK cycle automatic, thus eliminating the need for pedestrians to push a button
- Consider eliminating right-turn lanes (potentially in conjunction with curb extensions) and/or banning left turns
 - Consider gathering traffic counts to determine the implications of such changes and how traffic might be diverted to other streets
- Consider moving the crosswalk across Washington Street at Atherton Street from the south side of the intersection to the north side, thus enhancing visibility between

pedestrians in the crosswalk and drivers turning right onto Washington Street from Columbus Avenue

- Implement a road diet on Columbus Avenue (reduce from two travel lanes to one)



The intersection of Washington Street and Columbus Avenue presents numerous challenges for people walking and biking to and through Egleston Square.

In the long term, the intersection of Washington Street and Columbus Avenue may require a more comprehensive redesign, which may include scaling back the existing medians along Columbus Avenue (which would open up additional space for pedestrian and bicycling improvements). However, this should not preclude efforts to start implementing the solutions outlined above. Curb extensions can be done quickly and cheaply using paint, flex posts and/or planters, for example. Similarly, WALK signal timings can be re-evaluated based upon reduced crossing distances. Overall, short-term improvements should be tested here to lay the groundwork for longer-term solutions.

Priority Improvement: Add a crosswalk across Washington Street at Beethoven Street

The stretch of Washington Street between Columbus Avenue and School Street is Egleston Square's main commercial corridor, with numerous small businesses lining both sides of the street and generating a high volume of foot traffic. There are no crosswalks across Washington Street between these two ends of the corridor, and as a result people frequently jaywalk across

Washington Street. Parked cars, delivery vehicles and double-parking all contribute to the congestion here as well, blocking visibility between crossing pedestrians and people driving.

Walk assessment participants agreed that a crosswalk should be added across Washington Street at Beethoven Street (the midpoint of the commercial corridor) to enhance pedestrian safety. Since this crosswalk would likely be unsignalized, it should also incorporate high-visibility signage, including an in-street pedestrian crossing sign. Daylighting this crosswalk to improve visibility will be critical as well; this may include adding bumpouts/curb extensions, removing parking spaces, and/or better enforcement against double-parking.



Adding a crosswalk across Washington Street at Beethoven Street would enhance pedestrian safety in the heart of Egleston Square's main commercial corridor.

Additional Areas of Improvement

While the Egleston Square walk assessment on September 14 did not focus on Columbus Avenue as a corridor, follow-up observations by WalkBoston and discussions with local residents suggest a critical need to address high traffic speeds and pedestrian safety along this major thoroughfare.

The walk assessment did examine the crosswalk across Columbus Avenue between Weld Avenue and Dixwell Street (outside Walnut Park Apartments), which currently has a very long wait for the WALK signal, as well as heavy traffic congestion with an adjacent MBTA bus stop, parked vehicles, and double-parked delivery trucks. To address these issues, the WALK signal at this location

should be reconfigured to provide a shorter waiting time between WALK signal cycles and the crosswalk should be daylighted to improve visibility by adding bumpouts/curb extensions, removing parking spaces, and/or better enforcing double-parking restrictions.



Wide stretches of roadway and inconsistent crosswalks create an unpleasant and dangerous environment for pedestrians along Columbus Avenue.

As mentioned earlier in this report, a road diet on Columbus Avenue (reducing the number of travel lanes) can help calm traffic along this corridor – especially along the roadway stretch south of Washington Street up to Walnut Avenue, where traffic currently tends to move at much higher speeds compared to the roadway stretch north of Washington Street. While in the long term this may mean shorter pedestrian crossing distances and reconfiguring traffic medians accordingly, in the near term crosswalks can be added and enhanced at multiple locations along the Columbus Avenue corridor. At unsignalized locations, these crosswalks should provide ample pedestrian refuge islands in the medians that allow safe and unobstructed passage for seniors and people with disabilities. Further crosswalk improvements along Columbus Avenue could include the following:

- Enhance the mid-block crossing outside Egleston Branch Library by adding more visible pedestrian signage in the median and/or a flashing beacon
- Add a mid-block crossing with visible pedestrian signage and/or a flashing beacon across Columbus Avenue at the Rafael Hernandez School
- Add crosswalks across Columbus Avenue at Walnut Park
- Add a crosswalk across Columbus Avenue on the south side of Bray Street

- Add WALK signals to all sides of the crosswalks across Columbus Avenue at Bragdon Street and remove obstructions in the medians to facilitate access for seniors and people with disabilities

Finally, the walk assessment and discussions with residents surfaced several other issues around local pedestrian infrastructure and traffic congestion, as follows:

- Consider adding “Don’t Block the Box” at the intersection of Washington Street and School Street, as well as other heavily congested locations
- Consider changing traffic circulation patterns around Egleston Square (e.g. converting two-way segment on School Street between Washington Street and Weld Avenue to one-way, banning/blocking left turns from Columbus Avenue onto Weld Avenue)
 - Consider gathering traffic counts to determine the implications of such changes and how traffic might be diverted to other streets
- Address collision hazards at Westminster Avenue and Wardman Road, where Westminster Avenue bottlenecks due to parked cars
- Address curb drainage issues at Waldren Road and Westminster Avenue

Appendix A: Boston Cyclists Union, LivableStreets and WalkBoston joint comment letter on PLAN: JP/Rox

August 26, 2016

Marie Mercurio, Senior Planner
Boston Redevelopment Authority
1 City Hall Sq, 9th Floor
Boston, MA 02210

Re: Draft PLAN: JP/ROX

Dear Marie:

LivableStreets Alliance, Boston Cyclists Union and WalkBoston appreciate the work the BRA has done thus far to ensure that neighborhood development in Jamaica Plain and Roxbury aligns with residents' wishes and is done in a sustainable way that preserves neighborhood character. However, our organizations believe that the policies and recommendations outlined in the BRA's draft plan can be improved. Washington Street is a high-density, transit-accessible corridor, with low rates of automobile usage and a high share of residents traveling via transit, bicycle and walking. The policies and recommendations outlined in the BRA's report should further advance these aspects of the neighborhood. Please find comments from the LivableStreets Advocacy Committee, WalkBoston, Boston Cyclists Union, and local residents below. Many of these recommendations align with work WalkBoston is pursuing in partnership with the Elderly Commission's Age-Friendly Boston initiative and other city agencies to improve safety and comfort for seniors and other vulnerable populations.

First, we would like to recommend general improvements for the area in the following categories: Policy Initiatives, Pedestrian Safety and Infrastructure, Bicycle Infrastructure, Transit Improvements, Placemaking and the Public Realm, and Parking. In addition, we recommend a number of specific infrastructure improvements throughout the PLAN: JP/ROX study area, which are detailed later in this letter.

Policy Initiatives

- Commit to Complete Streets, Vision Zero, and other policies and standards that the City of Boston has adopted – don't just aspire. Roadway design should prioritize pedestrians, bicycles, transit, and personal motor vehicles, in that order. Vehicular capacity/level of service should not trump other needs.
 - Page 120 of the draft plan mentions that traffic calming, improved sidewalk and pedestrian crossings, and bike facilities should be created "where possible." This statement does not go far enough and the words "where possible" should be eliminated from the final plan. Boston has committed to implementing Vision Zero, which requires that streets be engineered in ways that prevent vulnerable road users from being killed by motor vehicles when motor vehicle operators make errors. The term "where possible" implies that nothing will change on a

street unless no parking spaces are lost and motor vehicle traffic speeds are not impacted.

- Implement fast and flexible programs for infrastructure that advance Complete Streets and Vision Zero goals. Use flex posts, paint and other inexpensive and temporary materials to demonstrate innovative roadway treatments such as physically separated bike lanes, curb extensions, and pedestrian plazas.

Pedestrian Safety and Infrastructure

- Improve pedestrian safety through appropriately configured WALK signals.
 - All WALK signals should be on automatic recall, unless there are streets with very low pedestrian volumes.
 - All WALK signals should be concurrent with traffic, unless there are high volumes of turning traffic or special circumstances (e.g. locations near schools or senior centers) that should be further reviewed.
 - All concurrent WALK signals should provide a leading pedestrian interval (LPI) of 6 seconds.
 - All WALK signals should provide countdowns that give sufficient time for pedestrians to cross the street. At major intersections the timing should be set to accommodate the MUTCD standard of a pedestrian walking 3.0 ft/sec. (MUTCD Section 4E.06, Paragraph 14)
- Establish an aggressive minimum standard for distance between crosswalks (signalized or not) and corresponding installation of new crosswalks at minor intersections and mid-block locations.
- Create landscaped pedestrian refuge areas where possible at unsignalized crosswalks.
- Install sidewalk bump-outs at all pedestrian crossings where appropriate for pedestrian safety.

Bicycle Safety and Infrastructure

- Determine feasibility of implementing separated bike lanes along all collector and arterial streets.
 - On page 133 of the draft plan, fig. 89 and fig. 90 depict two different conceptual drawings of bike infrastructure. We recommend the fig. 89 conceptual drawing of a separated bike lane.
- Create bike lanes/separated bike lanes, not sharrows, on major streets, and build as much as possible using paint on existing streets.

- Expand Hubway service and stations according to station density requirements and locations within a quarter mile radius of MBTA stations, including at transit hub Forest Hills MBTA Station.
- Bicycle and pedestrian access to the Southwest Corridor should remain as safe as it is today or be made safer.

Transit Improvements

- Study additional options for improving buses and expanding BRT. Options may include extending the Silver Line from Dudley through Forest Hills as an alternative to the BRT corridor planned for Columbus Ave.
- Use transit priority signals and far-side bus stops to provide better bus service, instead of queue jump lanes as currently recommended in the draft plan. Far-side stops are better for bus operations and also help to daylight crosswalks to oncoming traffic.
- Ensure that buses are accommodated if future development takes place at the Arborway Yard and either redesign or relocate bus operations. The memorandum of agreement between the City and the MBTA calls for building a permanent \$250 million facility to house 118 buses.

Placemaking and the Public Realm

- Install attractive, high-visibility, main-street-style, pedestrian-scale lighting to not only provide better illumination but to help visually narrow the street and signal to motorists that they are not on a high-speed arterial but in a village/neighborhood commercial center.
- Install attractive and coordinated benches/street furniture, parklets, public art and other placemaking features
- Minimize curb cuts through use of shared driveways and ensure that they have the tightest possible curb radii and level sidewalks.
- Create more robust incentives to encourage store owners to remove metal security covers for storefronts or to replace them with less visually obtrusive interior-mounted alternatives.
- Where appropriate, require setbacks for larger buildings to accommodate wider sidewalks and sidewalk cafes. Any residential or non-storefront, non-active ground-floor uses permitted to front on Washington St should require deeper, well landscaped setbacks, such as those along Marlborough St. in the Back Bay.

Parking

- Conduct a comprehensive neighborhood parking study to assess the proper regulations needed neighborhood wide.

- Regulate on-street parking in business districts for 15% vacancy using a combination of time limits and metering to encourage turnover.
- Assess residential streets, especially near transit stations, for viability of resident parking zones. Permits could be required during the day if people from outside the neighborhood are parking there during the day. Make residential permits required during the day and/or during the night if overnight parking by non-residents seems to be an issue.
- Institute recommended parking ratios ranging from 0 to .7, consistent with research suggesting parking ratios of .5 to .7 spaces per unit in neighborhoods with similar mode share and vehicle ownership rates as this section of Boston. “Decoupling” usage of private parking spaces from specific residential units and encouraging commercial shared parking can further extend the usefulness of existing and proposed spaces.
- Provide enough loading/drop-off/pick-up zones to reduce/eliminate double parking.
- Explore maximums for off-street parking.
- Reducing parking would save residents more than \$8,500/year, which will aid the BRA’s goal of affordable housing. (This is based on the estimate that car ownership costs an average of \$8,500/year.)

In addition to these general recommendations, the plan should also address and mention specific infrastructure improvements to existing deficiencies, including the following:

- Create a road diet for Columbus Ave between Egleston Sq. and Jackson Sq.
- Add bump outs/curb extensions to narrow crossing distances and increase turning radii for vehicles turning right onto Washington St from Columbus Ave.
- Add visual cues such as rapid flashing beacons and other high visibility signage to slow northbound traffic on Columbus Ave coming downhill through Egleston Square at Washington St.
- Add and improve crosswalks throughout the study area.
 - Add raised crosswalks on all side streets along Washington and Columbus.
 - Add a crosswalk, preferably raised, with an in-street pedestrian crossing sign across Washington St at Beethoven St and across Washington St at Kenton Rd.
 - Add crosswalks with in-street pedestrian crossing signs across Columbus Ave between Washington St and Seaver St, and across Washington St between Columbus Ave and Dimock St, to enhance pedestrian connections to and surrounding Egleston Square. (Currently there are very few crosswalks across the major arterials of Columbus Ave and Washington St along the

aforementioned roadway segments. New crosswalks may be located at side streets or midblock, depending on the circumstances.)

- Fix the WALK signal across Columbus Ave outside Walnut Park Apartments (between Weld Ave and Dixwell St) to shorten wait time and provide regular pedestrian phase. Currently the wait for a WALK cycle is very long even when the button is pushed.
- Widen the sidewalks on Amory Street from the Brewery Complex to School Street to a minimum of 8’.
- Establish wayfinding and pedestrian/bicycle links connecting and directing people from the Southwest Corridor, T Stations and Washington St to Franklin Park.
 - Page 130 of the draft plan states that connections should be enhanced between the Southwest Corridor and Franklin Park. Maps and diagrams of proposed improvements should be updated to reflect this in the final plan.
 - Page 152 of the draft plan cites proposed improvements for Egleston Square, including “new bike lanes, crosswalks, and connections to the Southwest Corridor.” Ideally these bike facilities should be two-way and protected from vehicle traffic. As with connections between the SW Corridor and Franklin Park, such proposed improvements should be consistently mentioned throughout all maps presented in the final plan.
- Install parking meters with 12-or-more hour maximum time on all streets within 1000’ of a train station to better manage commuter parking.

Thank you again for presenting to our group in July and for this opportunity to comment on the draft plan. We appreciate your consideration of our recommendations.

Sincerely,

Boston Cyclists Union
LivableStreets Alliance
WalkBoston



LivableStreets

Rethinking urban transportation



Appendix B: Egleston Square walk assessment attendees

Al Andres, Boston Police Department (E-13)
Bill Jones, Boston Police Department (E-13)
Jim Fitzgerald, Boston Planning and Development Agency
Josh Weiland, Boston Transportation Department
Luis Cotto, Egleston Square Main Streets
Tim Reardon, Egleston Square Main Streets
Carolyn Royce, Egleston Square Neighborhood Association
Andrew Farnitano, LivableStreets Advocacy Committee
Arthur Natelle, Office of Representative Liz Malia
Bill Egan, Public Works Department
Sahar Lawrence, Urban Edge
Judith Lamb, Wardman/Walnut-Washington Community Working Group
Taylor Cain, local resident
Lori DeSantis, local resident
Ron Hafer, local resident
Ralph Walton, local resident
Dorothea Hass, WalkBoston
Adi Nochur, WalkBoston

Jamaica Plain Neighborhood Council Good Jobs Standards 10.5.16

The following is a proposal to the Jamaica Plain Neighborhood Council for principles for job quality and access for new developments, licenses, re-zoning, and any other matters on which the council provides opinions.

We are at a moment of both extensive new development and investment in Jamaica Plain, but also displacement of long-term residents. Our goal is improve opportunity and build wealth in the JP neighborhood for current residents with a range of strategies for new and existing businesses and better access to both construction and permanent (post-construction) jobs. Our goals are part of a city-wide effort to demand good jobs in our neighborhoods and access to good jobs downtown, and other high employment areas, for our residents.

We recognize:

- Housing costs in JP are outstripping what people can afford.
- Taxpayers subsidize companies that pay low wages: the majority of low wage workers get some type of public assistance - food stamps, health insurance, earned income tax credit, emergency assistance.
- Higher education levels have not escaped declining wages.
- Good Job Standards are needed in all fields, not just construction.
- Access to good jobs outside the JP footprint, is essential, as most jobs in Boston are in other high employment areas, such as Downtown Crossing, the Financial District, Longwood Area, Seaport, etc.. If JP is to be developed based on our transit access, residents should use the transit to access to good jobs.

These principles have been developed in coordination with the Boston Jobs Coalition to serve as guidelines for decisions made by the Jamaica Plain Neighborhood Council and its working committees and to inform questions asked of businesses coming before us. In addition we have urged the City and BRA to incorporate these guidelines into the JP/Rox re-zoning and any other zoning changes in our neighborhood.

What makes a good job:

- Pays a living wage
- Full time with a reliable schedule
- Safe
- Health, insurance, and sick time benefits provided
- Opportunity to improve skill level & grow
- Is equally accessible to people of color

Good Jobs Standards—Principles

All proposals must include job quality and job access standards.

Construction

Job quality

- For all projects over 50,000 sq ft or over 10 units, whichever is smaller, all workers shall be paid prevailing/union rate (wages and benefits) whether the contractor is union or non-union.

- All projects below the smaller of 50,000 sq ft or 10 units, all workers shall be paid a “community rate” based on a review of responsible community contracting. This rate shall be proposed through a community review process led by Boston Jobs Coalition with our participation.
- In order to increase affordable housing above the city-required standards, there will be consideration that projects may pay workers a "community rate" in return for a higher number of affordable units.

Access

- Access for construction jobs shall be 51% Boston residents, 51% people of color, 20% women.
- We encourage the development of programmatic approaches that connect JP/Rox residents to construction jobs, such as 1st source programs or preferences for site-based hiring.

Enforceability

- These job quality and access provisions shall be incorporated into any city contracts or agreements on variances.
- These job quality, access, and enforcement provisions shall be incorporated into any new zoning requirements.
- All developers shall be required to include these provisions in their contracts with their general contractor, who must then include them in contracts with subcontractors to receive JPNC approval.
- All developers shall agree to participate in a local monitoring process with local residents and officials that includes enforcement of the BRJP and these commitments, including providing wage data.
- Individual workers shall have rights to enforce the wage levels set by this standard through private court action.
- Sanctions for being out of compliance on these standards shall be the same as set in the Boston Residents Job Policy.

Permanent jobs (all post-construction jobs)

Job Quality

- For all jobs in establishments with over 10 employees or in businesses with over 10 employees in multiple locations, whichever is smaller, all jobs must:
 - o Pay a family-sustaining rate of \$15 an hour, rising to \$16 an hour on January 1, 2017, \$17 an hour on January 1, 2018, \$18 an hour on January 1, 2019, and thereafter indexed to the CPI-Urban at each site.
 - o JPNC will review the wage rate every 3 years, initially by January 1, 2019. The City shall adjust the wage rate as set by this JPNC 3 year review.
 - o Provide 75% full time jobs with “Minimally Credible Coverage” health benefits.
 - o Provide stable shifts defined as no on-call scheduling, minimum 3-hour shifts, and 4-week notice on shift changes.

Access

- Access for permanent jobs in the neighborhood shall be 51% Boston residents, 51% people of color, 51% women.
- We will promote the development of a local “1st Source” hiring program, based at transit stations, to develop access to good quality downtown jobs for local residents. (Downtown Crossing, Financial District, Longwood Medical Area, Seaport, etc.).
- We encourage the development of programmatic approaches that connect JP/Rox residents to local permanent jobs, such as 1st source programs or programmatic preferences for local hiring.

Enforceability

- These job quality and access provisions shall be incorporated into any city contracts or agreements on variances.
- These job quality, access, and enforcement provisions shall be incorporated into any new zoning requirements.
- All developers shall be required to include these provisions in their contracts with their tenants and business operators, who must then include them in contracts with subcontractors to receive JPNC approval, as well as apply them to all direct hires.
- All developers shall agree to participate in a local monitoring process with local residents and officials that includes enforcement of the BRJP and these commitments, including providing wage data.
- Individual workers shall have rights enforce the wage levels set by this standard through private court action.
- Sanctions for being out of compliance with these standards shall be the same as set in the Boston Residents Job Policy.

Keep It 100 for Real Affordable Housing and Racial Justice

Comments on September 20, 2016 Draft of Plan JP/Rox

Introductory Comments

This response include:

- A request to include our past comments in the official record, and to make additional feedback/analysis transparent
- A request to remove Plan JP/Rox from the BRA/BPDA October 20 board agenda and begin real negotiations
- An overview of the main changes and items we believe should be negotiated about affordability in the plan. This includes calling on the BRA/BPDA to also work with the community on design guidelines, height, transportation and utilities, affordability goals, neighborhood stabilization, and jobs, and it includes calling on the BRA/BPDA to support community control and real affordable housing in additional special planning areas.
- More detailed notes about solutions to strengthen affordability
- Concerns about the planning process
- A list of additional analyses that should be completed
- A reflection on the ways our group and community members have engaged with the City, and our hope to move forward productively

Include Our Comments in Official Record, and Make Additional Feedback/Analysis Transparent

The comments submitted by our group in July, and the City's response to them, were not included online in the public comments. In addition, the Jamaica Plain Neighborhood Council submitted comments in August that included a handout from our group about affordable housing, and this was also omitted from the public comments online. We are re-attaching our comments and the City's response here. Please include them in the official record.

The meeting with developers was the only stakeholder meeting during the summer that was not announced publicly. The notes do not describe who attended. It seems that one developer submitted followup comments. If developers' feedback is influencing the plan, the details of their feedback should be documented more clearly and they should submit comments in the same, transparent manner as community members.

In particular, we request that you please make public the following information before October 20, 2016:

- * The disaggregated responses of developers around project finances to surveys and questions that the BRA/BPDA asked them. This include but is not limited to operating costs, vacancy rates, reserves, brokerage and marketing costs, land costs, construction costs, parking costs, and ratio/percentage of soft costs to hard costs,
- * Data that the BRA/BPDA has collected on land sales and cost per square foot.
- * Excel spreadsheets that calculate the feasibility of a 20% at 50% AMI site using 4% LIHTC credits.
- * Excel spreadsheets that show financial models of specific parcels in the area.

* Data about the occupancy of IDP units across the city, and neighborhood by neighborhood, by voucher holders, income levels, race/ethnicity, household size, and additional demographic data available

It is critical that these documents and this information are shared in complete form in a timely manner. Since December 2015, together with area non-profits we have asked for a financial analysis of affordability requirements in the neighborhood. Advisory group members also asked for this analysis throughout the year. Many documents released since then were short, incomplete, and snapshots of spreadsheets instead of original spreadsheets, and no data about condos. Only on September 26, 2016, nine months after our initial request, and five days after the expo at English High, did the BRA/BPDA publish the Excel spreadsheets with financial models. We think it is a positive step to release these documents, and in particular we thank Tim Davis for his work on the models. But now the BRA/BPDA needs to publish additional data, models, and spreadsheets. It is not possible for the community to give complete feedback on the plan or hold constructive conversations with the City without transparent data and models.

Remove Plan JP/Rox from the BRA/BPDA October 20 Board Agenda and Begin Real Negotiations

We are a member of the Alliance of Neighborhood Associations which is submitting a letter calling for the removal of Plan JP/Rox from the October 20 board agenda. This will give time for the BRA/BPDA to incorporate additional feedback into the plan. In addition, the BRA/BPDA needs to work with community members to set up a structure of meetings and negotiations to find agreement on outstanding areas: design guidelines, height, transportation and utilities, affordability goals, neighborhood stabilization, and jobs. As we describe toward the end of this document, the planning process has been flawed and has not allowed for real community input and decision-making. As community members narrow our list of outstanding issues, we need a process to offer proposals back and forth with the BRA/BPDA and negotiate a final plan we can agree on.

We are also attaching a petition which has gathered more than 300 signatures in less than one week, also calling for the removal of Plan JP/Rox from the October 20 board agenda and real negotiations. We plan to continue collecting signatures after this comment period is over.

We are willing to negotiate to create a strong plan for real affordable housing, economic and racial diversity, and racial justice. We ask that the City change its core commitments of 30% affordable housing at an average of about 60% AMI. As the City offers new proposals, we are prepared to negotiate alternative proposals from our initial ask of 70% affordable housing at an average of 40% AMI.

Overview of Main Changes and Areas of Negotiation

The plan has started to incorporate more tools, but there is no true change in the key affordability commitments. After months of advocacy, community members succeeded in getting the plan to begin incorporating land banking (the plan names a limited description of a citywide land banking program and a number of non-profit units locally) and City funding (the plan names \$42 million, or \$2.8 million a year). But the point is to use these tools, plus strong private

requirements and vouchers, to strengthen the **key commitments: increase 30%, decrease the “affordable” income levels from 50-70% AMI**. Those commitments **have not changed**.

Although the City has published documents explaining how they are responsive to community feedback, any changes must be tied toward strengthening the central commitments: the bottom-line commitment of percentage of affordable housing, and shifting the income levels of affordable housing downward. Although this document describes many specific changes that should happen, we ask that the City make these changes in order to strengthen its central commitments. An attachment shows visually what this would look like.

Overview of Main Changes and Areas of Negotiation (Continued)

The following text is taken from our petition:

We demand a plan for the Jamaica Plain/Roxbury/Egleston area that protects existing residents and businesses, and builds new housing that is truly affordable to the City's growing population. We want a plan that reflects the true community need:

- 70% of new housing should be affordable
- Include real affordable housing at a range of income levels, with an average of \$35,000 a year or "40% area median income" (40% at \$25,000/yr, 10% at \$35,000/yr, 10% at \$50,000/yr, and 10% at \$70,000/yr)

Mayor Walsh, the BRA/BPDA, and DND should immediately stop the October vote on Plan JP/Rox and postpone approval until real negotiations change the plan's affordability commitments to acceptable levels. We need negotiations with City officials with the power to offer new affordability goals and income levels. Negotiate with us on the following items:

- Land banking and advocacy to support non-profits to acquire land for 50% the new housing in the plan, with 100% affordability on most non-profit land
- Requirements that for-profit developers make 40-50% of housing affordable
- Set aside many affordable units for voucher holders/contracts
- Increase City funding for affordable housing in the neighborhood to \$15 million a year, along with increasing funding citywide and leveraging State/Federal funding
- Strong, specific goals for converting market-rate housing into affordable housing

We also call on the City to negotiate with community members so that the plan includes appropriate height, density, and design guidelines, a transportation and infrastructure plan, good job standards, and protections for small businesses. We support the Roxbury community's organizing for community control and a stop to Plan Dudley Square, and South Boston community members' advocacy for real affordable housing in Plan Dorchester Ave.

Why:

Our community and city are strong because of our racial and economic diversity. In the Jamaica Plain/Roxbury/Egleston area, 2/3 of residents are people of color and small local businesses anchor the community. About 50% of the area makes less than \$35,000 a year, and 70% of the area makes less than \$70,000 a year. Across the city, most workers make less than \$35,000 a year and most households make less than \$54,000 a year.

In contrast, 70% of the new housing in Plan JP/Rox will be for households making about \$100,000-\$125,000 a year, and only 2% will be affordable for households making less than \$35,000 a year. Only an estimated 1/3 of residents in new housing will be people of color. Citywide, only 15% of housing will be affordable to households making less than \$50,000 a year, leaving 50,000 households at those income levels without affordable housing.

City and State officials: Prove that you care about racial and economic justice. Work with us to

create a city that supports low-income residents, seniors, and families, and people of color. Rather than push people out, create a city that respects our right to housing and recognizes our value to the city.

Detailed Comments on Areas That Would Strengthen Main Affordability Commitments (increasing the 30% goal and shifting income levels downward)

Area 1: Land Banking and Non-Profit Housing

The land banking program described in the plan (Page 49) is a citywide program and it is only a pilot program. It is a good step that the City is launching this program, because the solution is critical to ensuring a just range of affordability in new construction.

However, the scale is far too small to support the land banking needed in the JP/Rox area. The program “will enable the purchase of between 60,000 and 175,000 square feet,” up to about six sites of 30,000 square feet each – across the entire city. In contrast, the plan proposes finding sites for 402 units of additional affordable housing constructed by non-profit in this area. The goals and financial commitments for land banking need to be stronger in this area.

Before the plan is passed, it must include a more detailed plan for land banking. Although many City officials now say the phrase, “We are not hanging our hat on Arborway Yard,” the new plan now hangs its hat on 402 units of affordable housing on “locations to be identified.” It is not acceptable to pass a plan with concrete, codified zoning changes that will usher in market-rate development, without having as strong and concrete a plan for constructing non-profit affordable housing.

This more detailed plan should include a commitment of City staffing and a structure to work with local non-profits to identify and purchase land, goals for how much land will be purchased and a timeline for the purchases, and an analysis of the parcels of the area that backs this plan up. It should be made clear that the funding is available to purchase land that is not vacant, such as industrial lots. In addition, the City should clearly commit that the land banking fund can be used to support non-profits to pay costs beyond the appraised value of parcels, as well as pay pre-development costs that accrue between the date of purchase and construction.

In addition, the number of units constructed by non-profits should be increased in the plan in several ways:

We believe that the City should look for additional sites for 1500 units of non-profit built housing, not including the current pipeline or Arborway Yard – this would be about two sites a year for fifteen years, with 50 units on each site.

If units are built on Arborway Yard, they should not replace the commitment of 402-1500 units, but add to it.

The City should provide additional direct funding for the rehabilitation of 125 Amory Street and for the construction of affordable housing on 125 Amory Street and Jackson Square Phase III, where the percentage of affordable housing is only about 30-50% on the sites despite being on

public land. The City can also find ways to leverage additional funding sources for these sites.

The City should commit to increasing the 50% commitment of affordable housing on Arborway Yard. For example, there could be a goal of 100% affordable housing on public land, 75% similar to Tent City, or 2/3; this should be discussed with the community. Our group and community members can help advocate to the State to turn over Arborway Yard in the future; in the mean time, we need the City to commit to more affordability there and throughout the rest of the neighborhood.

The City should remove the 13-15 story RDA's planned near Forest Hills. Its own financial analysis shows that the cost of steel construction make buildings these high unfeasible. Even if they become feasible in the future, the costs will reduce the possible percentage of affordable housing in the buildings. Removing the 13-15 story heights will also prevent adding to the already bad traffic gridlock in the area and will protect the quality of life for residents in the area. (Likewise, we would like to reach out to more community members to determine if the the City should remove the high-rise RDA's near Jackson Square.)

In order to make land banking for non-profits, there must be strong affordability requirements for private developers as well. Even if the City's financial models assume a 6% NOI/cost ratio with conventional bank financing, the reality is that rezoning without high affordability requirements will dramatically increase the valuation of the highest and best use of land. Land owners will charge much higher prices for land, even if they need to wait for an investor who can provide their own equity without relying on banks. The neighborhood has already seen sharp increases in land costs because of speculation; new policies should not codify these increases, but instead reverse them by including strong affordability requirements. Otherwise, non-profits will not be able to compete with for-profit speculators and investors to purchase land in the future. More details about the dynamics of land costs are discussed later in this document.

Area 2: Affordability Requirements for For-Profit Developers

In the BRA/BPDA's September analysis of feasibility, and in an October 7, 2016 meeting with Tim Davis, Sara Myerson, and Devin Quirk, the City offered some important principles which differ from past comments about the housing market. (Note: We explicitly said in the October 7, 2016 meeting that we did not consider that meeting to be a negotiation. We used the meeting to express our desire for negotiations and to present some alternative analysis, but we do not want it to take place of true negotiations where the City offers new proposals and goes back and forth with community members.)

These principles include:

- “Creating a proforma ... for a development ... is an art, not a science” (page 2 of the September 19, 2016 Financial Analysis). There is a range of assumptions that can be used in modeling development finances and determining appropriate affordability requirements. We have alternative models that allow for substantially higher affordability, which we believe show that the City should negotiate on better proposals.
- The City's recommendation “is largely a policy decision,” not a mechanical calculation based on any specific threshold like 6.0% net operating income to construction cost ratio

(page 23). The City acknowledge that it can set policies to strengthen affordability even if its models suggest some financial challenges depending on the specifics of a parcel. The City acknowledges that for sites that are difficult to develop immediately, “[I]ndividual developers may face more feasible conditions, and these sites may become feasible in the future. Indeed, it is anticipated that future land/property sales will factor in the IDP and Density Bonus in the land purchase, making additional projects feasible in the future” (pages 13-14).

- Similarly, Chris DeSisto shared a comment: "Developers are speculating on sites and many are overpaying. ... If the % of inclusionary apartments increases, the price of the land decreases, bc all other costs are somewhat fixed. Once established, a developer will have no trouble adjusting."
- In other words, land costs may decrease to adjust for new, predictable rules around affordable housing.
- For the above reasons, Tim Davis indicated that he was comfortable with NOI/cost ratios of 5.8% in his modeling.
- Tim Davis indicated that the NOI/cost ratio would ideally be close to 1.5% over cap rates. At current cap rates of 4%, 4.25%, or 4.5%, this could be 5.5-6% and not just 6%.
- Unlike in Cambridge, where there is a strong market for research and development labs, there are not strong existing markets for alternative uses to housing in the area where high affordability requirements would spur many developers to develop alternative projects. Even if developers did develop some alternative projects to housing, this could help decrease the increase in population and strain on infrastructure, which many residents have expressed concern about. It could also relieve pressure on existing businesses and non-profits to have land sold, or allow for the construction of additional non-profit office space. Tim Davis acknowledged that alternative uses to housing could support community needs, and that stronger affordability requirements could make it easier for non-profits to purchase land.

Alternative Modeling

Although the City has been more transparent with their model and changed some assumptions to increase affordability, they have changed different assumptions the other direction and have similar affordability recommendations as a result. We think that the model can support stronger affordability.

By adjusting the assumptions in the City's financial model, the affordability can be increased to as much as 28% base affordability at 70% AMI (or 21% at 50% AMI), and a bonus of 46% affordability at 50% AMI (or 40% at 40% AMI, or 36% at 30% AMI). The City does not have to agree with all of our assumptions, but this shows that there is a range of possible policies. We want to negotiate with the City to choose a policy in the middle.

The following assumptions could lie along a range of values:

- Market vacancy rate could be between 5% (the City's original value) and 7% (the City's new value)
- Reserves could be between \$250/unit (the City's original value) and \$325 (the City's new value).

- Land costs could be between \$70/sf (the City's original value) and \$90/sf (the City's new value).
- Residential construction could be between \$225/sf (the number obtained from MetroMark's public filings, and reported by one developer to the City) and \$250/sf.
- Soft costs could be between 16% (the average obtained by the City) and 20%.
- Cap rates could be between 4% (to better reflect current values) and 5%.

In the future we will submit additional documentation demonstrating how various assumptions can lead to stronger affordability requirements.

Using Affordability Requirements to Encourage Partnership With Non-Profits and Accessing State Funding

The plan mentions that developers can use 4% LIHTC funding and says the City will look for ways to encourage this, but this encouragement is short of a policy that actively plans for increased use of City, State, and Federal funding. Especially with DND's changed policy to allow for funding private developments, and with potential plans at the Federal and State level to expand LIHTC funding and ease some of the recent increase in competitiveness (although this competitiveness is still not as prohibitive as the City sometimes portrays it), it is important to build in policies now.

One example is to require that buildings over a certain FAR or height are 50% affordable – a second layer of the density bonus. This way, private developers can still choose to build at smaller or medium densities. But if they choose to build at higher densities and heights, the policy will encourage them to partner with a non-profit or apply for funding. This policy would also help reduce upward pressure on land costs and make it easier for non-profits to purchase land.

Return on Equity and Land Valuation Analysis

It is important that the City conduct an analysis based on return on equity. Chris DeSisto's comments suggest this as well and give a sample calculation.

What the 6.0% metric does not capture is the value added to the best and highest use of parcels, the return on equity that a developer will obtain, and the additional amount of money that investors will obtain.

For example, the City's own financial model of a model parcel yields a return on equity of 23.8% (assuming a four-year holding period and 20% equity), far beyond the 8% used in Cambridge's affordable housing study, and higher than an 11% minimum suggested by Brian Golden. Using a 4% cap rate, this goes up to 61% as the value of the final project goes up to \$16 million – far higher than an industrial use of the land would allow.

Under our alternative model, the return on equity remains high and in fact even higher than 23.8%.

This is important because it helps defend the City against legal arguments that affordability

requirements decrease landowner or developer profits; in fact, rezoning will without a doubt increase both. This is also important because the City needs to develop methods of capturing the additional value of final projects, and using it for affordability and community benefits. A speculation tax is one example of such a policy, but more should be identified.

In addition, there are investors in the area who now bring their own equity to projects and do not require traditional bank financing. We believe, for example, that this is true of the Goddard House and of the new investors in 3200 Washington Street. In these cases, the 6.0% metric does not apply, and investors can afford to either pay more for land or affordability.

This also shows why it is important to have high affordability requirements to discourage speculation and high prices of land, so that non-profits can still compete to buy land in the area – as explained earlier.

Cambridge and New York both have analyzed the return on equity of affordable housing requirements. The City of Boston must do the same. The City should also analyze how much value is being added to potential construction under rezoning, and how to capture this value beyond using the 6.0% NOI/cost metric.

Analyzing Lower AMI's

The City's plan does include allowing developers to choose multiple AMI's for bonus units, so that 30% or 40% AMI units could be built in addition to 50% AMI units. However, this comes at the expense of increasing the rents of 50% AMI units to 60% or 70% AMI. The City's plan for using average AMI levels is a positive step in acknowledging the need for more units lower than 50% AMI, but it needs to be accompanied by a shift downward in income levels, not simply rearranging rents around a 50% AMI level.

The feasibility analysis concludes that adding density bonus units at an average of 30% or 40% AMI is not feasible. Although less units could be added than at a 50% AMI level, it is still possible to design a bonus policy with a somewhat smaller percentage of units but also a lower AMI. For example, under all alternative model, the bonus could be 46% affordability at 50% AMI, 40% at 40% AMI, or 36% at 30% AMI.

In addition, we believe that the plan incorrectly labels the 402 non-profit units as 50% AMI units when most will be 60% AMI.

The plan refers to DND's policy of requiring 10% of units set aside in DND-funded developments to be at 30% AMI, and says this could be encouraged to be higher. However, there is no concrete commitment or suggestion for how this will happen. The 10% should be increased dramatically.

Area 3: Set Aside Units for Voucher Holders

Cambridge estimates that 50% of inclusionary housing is used by voucher holders. Boston Tenant Coalition has long advocated for a more aggressive attempt to connect voucher holders to inclusionary affordable units. Mass Alliance of HUD Tenants and the Boston Homeless

Solidarity Committee are advocating for City-funded low-income housing vouchers that can be used as project-based vouchers. Urban Edge has recommended making project-based voucher available for developments of five units or more.

Setting aside units for voucher holders will result in developers and management companies making the same profit, while reducing segregation in new developments and making units more accessible to households and families who are people of color and have lower incomes.

In an August response, the City wrote, "This policy deserves additional analysis and could be implemented as a pilot program in JP/ROX." The September Plan gives neither additional analysis nor a commitment to begin this program. Instead, it refers to an already-existing plan by the Boston Housing Authority to convert 100 vouchers into project-based vouchers a year; but even this element is not linked to a goal for project-based vouchers for the neighborhood.

Tim Davis has indicated that a preliminary analysis shows that 30% of inclusionary units citywide are used by voucher-holders. This data, along with data on the race/ethnicity, income levels, household size, and additional demographic data of vouchers and tenants of IDP units, should be released before October 20.

If 2/3 of affordable units were occupied by voucher holders – through a combination of using project-based vouchers, set-asides, and additional occupancy without set-asides – the new affordable units would become more truly affordable and closer to our 40% AMI goal.

Area 4: Increased City Funding and Leverage State/Federal Funding

We call on the City to increase its funding for affordable housing both in the JP/Rox area and across the City. There are multiple potential sources, including but not limited to:

- Giving a more equitable share to JP/Rox of current City funding. If there is a goal to have about \$40-50 million in City funding for affordable housing, allocating more than 10% to the area would help match the proportion of housing being built in the area.
- Direct funding from new property taxes in new construction in the area to affordable housing in the area (around \$10 million a year), including possibly using tax increment financing
- Direct PILOT payments from institutions in the area to affordable housing here (about \$700,000 a year).
- Community Preservation Act, including using funds for low-income housing vouchers
- New property taxes from the 53,000 new units (about \$200 million) and PILOT payments (about \$40 million) citywide
- Increasing the commitment from the City's operating budget, mirroring commitments used to fund the construction of senior housing
- Passing a speculation tax
- Using funding from major land transfers and construction such as Winthrop Square (\$150 million) and property taxes on Millennium Towers

Increasing funding is possible – it requires political will and leadership, but it is appropriate given the urgency of the affordable housing, low-income housing, and displacement crises.

Area 5: Set a Goal for Acquisition/Conversion of Market-Rate Housing Into Deed-Restricted Housing

The City references a plan to provide \$125,000 a year through an Acquisition Opportunity Program to convert market-rate housing into deed-restricted housing. It needs to be clear that this funding can be used to make purchases beyond appraised value, and there needs to be a clear commitment and goal for how many housing units will be converted over 15 years.

Additional Analysis

Throughout this document there have been requests for additional data and analysis. Three additional elements that we believe are important for the plan:

- A stronger projection of the racial demographics of new residents. The plan's current analysis uses the racial demographics of current residents as a baseline, ignoring the changes that will occur if residents are displaced, and ignoring that the Greater Boston Area where residents may come from has a smaller proportion of people of color.
- Studies of the environmental, traffic, and health impacts of the plan.
- The plan and supporting documents need to be translated into Spanish to allow for community review.

Past Dynamics and Moving Forward

Criticisms of Process

The BRA, now BPDA, is looking to do more community planning, and it has held up Plan JP/Rox as a good model. The plan praises the community engagement process.

However, many community members have criticized the process as not being truly supportive of community input and decision-making or engaging more marginalized groups in the community. We share these not to take away from some of the positive elements of the process, but to highlight important elements that must be improved now and in additional planning processes.

With the exceptions of meetings where our group and partners mobilized many people, the racial demographics of meetings' attendees was overwhelmingly white. In one meeting, we estimated more than 90% of attendees were white.

Large posters were often not translated into Spanish. The drafts of the plan were not translated into Spanish. Interpretation was sometimes not available or left to BRA staff members who are not professional translators.

Only one large BRA-sponsored meeting was held outside of English High School, at Bromley Heath. No large meetings were held in Egleston.

Initial meetings did not provide food, and later meetings only provided some food and snacks. Our group brought food to a number of meetings.

Meetings did not have childcare available. Our group brought someone to provide childcare at one meeting.

Many residents, especially people of color and also white people, stopped attending meetings because they were not conducive to people's participation and because the BRA was not providing adequate information and analysis, taking feedback on the right issues, or showing changes in their plans that responded to people's feedback.

Meetings and Protests

The City has at times criticized our group for protesting, and at times thanked us for our advocacy. The protest at the May 11 meeting helped lead to an initial three-month extension, a “blessing in disguise” according to Marie Mercurio. Contrary to some portrayals, our goal has never been to personally attack individuals. Our goal has been to point out problems and needed changes in policies. People's frustration comes from our experience and our desire to protect the neighborhood from negative changes, and the realities of displacement and gentrification that new developments and City policies are bringing. It is important for City officials to recognize that even when they feel uncomfortable, that the City has the ultimate decision-making power around its policies, and that community members have less power and will not only experience short-term discomfort, but negative effects of policies will affect community members for decades to come. In addition, when community members hold the City accountable around policies, it is inevitable that there will be conflict; our group works to focus on policies and not addressing people in personal ways, and it is important that City officials also recognize that tensions they feel stem from disagreements around policy and not personal dislike.

In addition, members and supporters of our group have engaged in many meetings to offer input. When our group has protested, it has often been at critical moments where the City has said that it does not plan to make changes to the plan or has repeatedly presented the same plan, or when it has said they plan to pass the plan (in July or October), or when it has said it will not negotiate.

Moving Forward

We request that the plan be removed from the October 20, 2016 agenda in order to give breathing room for good-faith negotiations on the plan around affordability and neighborhood stabilization, as well as design guidelines, height, transportation and utilities, and jobs. We do not seek to protest for the sake of protesting, and hope that negotiations can lead to an agreed-upon plan that meets the goals of real affordability and racial justice, as well as constructing additional housing to meet the City's needs. We look forward to creating a mutually agreed upon structure with real negotiations, where the right people from the City are at the table who can make decisions and offer new plans and proposals, and where we can go back and forth to create agreements.

Attachment 1: Petition

This petition was signed by 348 people within one week. We continue to collect petition signatures.

Petition: Real Affordable Housing and Real Negotiations in Plan JP/Rox

To:

- Mayor Marty Walsh
- Brian Golden, Director of the Boston Redevelopment Authority/Boston Planning and Development Agency
- Sheila Dillon, Director of Department of Neighborhood Development
- State Senator Sonia Chang-Díaz
- State Representatives Jeffrey Sánchez and Liz Malia
- City Councilors Ayanna Pressley, Annissa Essaibi-George, Michael Flaherty, Matt O'Malley, Tito Jackson, and Michelle Wu

We demand a plan for the Jamaica Plain/Roxbury/Egleston area that protects existing residents and businesses, and builds new housing that is truly affordable to the City's growing population. We want a plan that reflects the true community need:

- 70% of new housing should be affordable
- Include real affordable housing at a range of income levels, with an average of \$35,000 a year or "40% area median income" (40% at \$25,000/yr, 10% at \$35,000/yr, 10% at \$50,000/yr, and 10% at \$70,000/yr)

Mayor Walsh, the BRA/BPDA, and DND should immediately stop the October vote on Plan JP/Rox and postpone approval until real negotiations change the plan's affordability commitments to acceptable levels. We need negotiations with City officials with the power to offer new affordability goals and income levels. Negotiate with us on the following items:

- Land banking and advocacy to support non-profits to acquire land for 50% the new housing in the plan, with 100% affordability on most non-profit land
- Requirements that for-profit developers make 40-50% of housing affordable
- Set aside many affordable units for voucher holders/contracts
- Increase City funding for affordable housing in the neighborhood to \$15 million a year, along with increasing funding citywide and leveraging State/Federal funding
- Strong, specific goals for converting market-rate housing into affordable housing

We also call on the City to negotiate with community members so that the plan includes appropriate height, density, and design guidelines, a transportation and infrastructure plan, good job standards, and protections for small businesses. We support the Roxbury community's organizing for community control and a stop to Plan Dudley Square, and South Boston community members' advocacy for real affordable housing in Plan Dorchester Ave.

Why:

Our community and city are strong because of our racial and economic diversity. In the Jamaica Plain/Roxbury/Egleston area, 2/3 of residents are people of color and small local businesses anchor the community. About 50% of the area makes less than \$35,000 a year, and 70% of the area makes less than \$70,000 a year. Across the city, most workers make less than \$35,000 a year and most households make less than \$54,000 a year.

In contrast, 70% of the new housing in Plan JP/Rox will be for households making about \$100,000-\$125,000 a year, and only 2% will be affordable for households making less than \$35,000 a year. Only an estimated 1/3 of residents in new housing will be people of color. Citywide, only 15% of housing will be affordable to households making less than \$50,000 a year, leaving 50,000 households at those income levels without affordable housing.

City and State officials: Prove that you care about racial and economic justice. Work with us to create a city that supports low-income residents, seniors, and families, and people of color. Rather than push people out, create a city that respects our right to housing and recognizes our value to the city.

[See attached document for signatures.]

Sheet1

A. Gonzalez Milliken				
Adam Blaustein Rejto	425 gallivan Blvd		Dorchester center	12414
Adam Wehrkamp	143 Massachusetts Ave		Boston MA	02115
Adele Levine	158 Boylston St	#3		
Adeline Ansell	1677 Commonwealth Ave		Brighton MA	02135
Alex Ahmed				
Alex Webster	13141 clifton Rd		silver spring MD	20904
Alexander Loughran Lamothe				02130
Alexandra Castillo	15 waldren Rd	apt 4		
Alison Brill				
Alison gottlieb	19 Rodman St		Boston MA	02130
Alison Rice				02144
Allison Tweedell	178 Boylston St		Shrewsbury MA	01545
alvin shiggs				
Amanda Reyes				
Amanda Wilson	6 Ashley St Apt6 Jamaica Pln		MA	02130
Amy Jiravisitcul			MA	02119
Amy Pett	65 Cornwall St		Jamaica Plain MA	02130
Ana Hurka-Robles	19 Garden St		Cambridge	02138
Andria Palange				
Angela Borges				02130
Angela Kelly				02125
Ann Gilmore				
Ann Philbin	91 Selwyn St		Roslindale MA	02131
Anna Gaebler				02130
Anna Mudd	53 Boynton St			
Anna Rae			Cambridge MA	
Anne Erde	39 Boylston St		jp MA	02130
Annie Atwater				02135
Annie Gonzalez Milliken	68 Woodlawn St		Middleborough MA	02346
Arifa Awadallah	64 Day St		NJ	07003
Armani White				
Ashley Wells	14 Hyde Park Ave Apt 4B Jamaica Pln		MA	02130
Barbara Watkins			MA	02130
Ben Trolio	97 Ocean St		Dorchester MA	02124

Sheet1

bernardo cruceta	47 Columbus Ave	New York	NY	10023
Betty Lo				
Brian Curran	1078 South St	Roslindale	MA	02131
Brian Stilwell	42 Woodlawn St	Boston	MA	02130
Bridget Stevens		New England		
Brittany Mitchell				
Bryn Spielvogel	50 Park Vale Ave	Allston	MA	
Caitlin Andrews	4b Lords Ct	Somersworth	NH	
Caitlin Cannon				02131
Caitlin Gianniny	54 Willow Ave	Somerville	MA	02144
Cansu Alkan			MA	
Casie Horgan				
Cassie Hurd	2 Guilford St	Allston	MA	02134
Catherine Oldshue				
Catherine Rizos				
Charles McIntyre	13 Park St	Mattapoisetts	MA	02739
Charlotte Fagan	44 Hutchings St	Boston	MA	02121
Charlotte Goddu				
Charlotte Lakes	137 Ferncroft Rd	Milton	MA	02186
Chelsea Fredrikson	24 Spencer St			
Chris Messinger				02130
Christina Illarmo				
Christine Olsen				
Christopher Fung	14 Trescott St	#3	MA	02125
Christy Pardew				02130
Chuck Ciampa				
Chuck McIntyre				
Claire Berman				02130
Claire Lindquist				02140
Clare Fitzgerald				
Clayton Brown	17 George St	Central Falls	RI	02863
Cole Parke				02130
Colleen Cornell	42 Forbes St	Annapolis	MD	21401
Courtney Lawrence		Ithaca	NY	
Danielle Sommer	2 Atherton Pl	Boston	MA	02119

Sheet1

Danny Mekonnen	5 Chilcott Pl	#2	Boston	MA	02130
Danya Sherman	68 Wendell St	#2	Cambridge	MA	02138
Darnell Johnson	4 Kearsarge Ave	#2		ME	04677
David Blitzer	150 Buckminster Dr	Apt 103	Norwood	MA	
David Branigan	106 Emerson Pl	Apt 2	Brooklyn	NY	11205
David Kay					
David Mapes-Frances					
Debbie Lubarr	55 Atherton St				
Debra Wallbridge	18 Boynton St				
Diana Doty	47 Northbourne Rd		Boston	MA	02130
Doris Reisig	15 Atherton St		Roxbury	MA	02119
Dorothy Hanna			Boston	MA	02124
Douglas Goodman					02474
Drew Curtis					
Eliza Sparkes					02130
Elizabeth Behrendt					02131
Elizabeth Cultrara					02155
Ella Willard-Schmoe	17 Bellis Cir	#1	Cambridge		02140
Ellen Tibby	65 Cornwall St	#2			
Elsa Bondlow	13 Sciarappa St		Cambridge	MA	02141
Emily Kirkland					02143
Emily Myers	220 Hanover St	#10	Boston	MA	02113
Emily Payrits	75 Glen Rd		Saint Cloud	WI	53079
Emily Pirates					
Emily shuster					
Eric Averion					02120
Erica Brien				MA	02130
Erica Brule	76 Elm St	Unit 111	Jamaica Plain	MA	02130
Erika Nauda	174 Melrose St				
Erika Rodriguez	18 cedrus Ave				
Erna ChagnonSmith	65 Sanford St				
Eve Ewing				IL	
Felicity Lingle			Boston	NY	14025
Food Not Bombs Bostn			Boston	MA	
Francesca Ely-Spence	290 Commonwealth Ave				

Sheet1

Franklin Dume	115 brookway Rd	apt 561		MA	02131
Gabriel Arkles				MA	
Gabrielle McFrane					
Gerry Scoppettuolo	48 Tremont St		Malden	MA	02148
Gianna Teague	36 Atherton St		Roxbury	MA	02119
Gloria McGillen	38 Englewood Ave		Englewood	NJ	07631
Gloribel Rivas					
Gwyn Cattell			Whiting	VT	05778
Haley Jordahl	68 Wendell St		Cambridge	MA	
Hannah Cummins					
Hannah Freedman	24 Whitman St		Somerville	MA	
Hannah Jacobs	1211 Chestnut St	Apt 1			
Hannah Klein	33 Peter Parley Rd		Boston	MA	02130
Hannah McMeekin	34 Moraine St		Marshfield	MA	02050
Hannah Poor			Arlington	MA	
Hannah Schoenwald	3 Glen Rd	#1	Jamaica Plain	MA	02130
Harris Hoke	9 Fulkerson St		Cambridge	MA	02141
Heather MacKenzie	140 summer St				
Helen Matthews					
Helen Schroeder	6 greenwich St	#2		NY	10013
Hersch Rothmel	24 colborne Rd				
Hilary Allen					02130
Hope			Boston	MA	
Hope Landry	100 Brainerd Rd		Allston	MA	02134
Ian Isaac	358 Princeton St	#3			
Ian Trefethen	463 Arborway #7		Jamaica Plain	MA	
Isaac Hunnewell					
Isaac Simon Hodes	28 Flint St	Apt 3	Lynn	MA	01905
Jade Franco					02119
James Cook	17 Michael Way		Cambridge	MA	02141
James Recht	3313 Washington St	Suite 1	Jp	MA	02130
James Shearer				MA	02138
Jamie Erdheim	19 Banks St		Somerville	MA	02144
Jamie Garuti					02143
Jane Leo	395 Broadway		Cambridge	MA	02139

Sheet1

Janet Penn					02472
Jasmine Gothelf	210 Chestnut Hill Ave		Boston	MA	02135
Jazmin Idakaar	183 Belgrade Ave		Boston	MA	02131
Jeff Bravo	32 Leamington Rd	Apt 2	Boston		02135
Jeffrey Thomas					02138
Jen Douglas	32 Mozart St	#3	Jamaica Plain	MA	02130
Jenna Cohn					
Jennifer Lewis	16 Francis St	#2	Boston	MA	02115
Jennifer Stiles	274 Boston Ave		Medford	MA	02155
Jennifer Teixeira					
Jeremy Hanson-Gutiérrez	284 Amory St				
Jeremy Phillips	8 Jess St		Boston	MA	02130
Jerrone Elliott	9 Vallar Rd	Apt 113		MA	02128
Jess Swazey				MA	02145
Jesse Leavitt					02138
Jessica Gill-Grant	41 Sheridan St		Jamaica Plain	MA	02130
Jessica Hall	23 Bellvista Rd		Brighton	MA	02135
Jessica Samuels	54 pilgrim Rd		Boston	MA	02115
Jessica Toglia				MA	
Jill Cowie					
jim strickland	7 virgil Rd				
Joanie Parker	40 Hall St	#3	Jp		02130
Joanna Gattuso					02130
Joanna Olivetti	16 Saint Rose St	Apt 3			
Joe Tache					
Joel Chavarria	191 Green St	Apt 146			
John Pusateri			Boston	MA	02134
John Walkey				MA	02128
John Wang				MA	02127
Jonathan Barry	60 Hobart St		Brighton	MA	02135
Jonathan Liu					02143
Joshua Decosta	866 Huntington Ave		Boston	MA	02115
Joyce Roberge					02108
Jt Thayer	4 Alfred st #1 Jamaica Pln			MA	02130
Judith Ellman	3 Leslie Park				

Sheet1

Julia Kantnrt	16 Hopedale St		Allston	MA	02134
Julia Lipuma					
Julia Priest					02135
Julia Vance	62 Mozart St	#1			
Juliana Jones	5 Atherton Pl		Roxbury	MA	
Julie Barnes	11 Grandview St		Roslindale	MA	02131
Julie Boss	69 McBride St				
Juliette Terry					02139
Justine Portmann	34 Brookside Ave #3 Jamaica Pln		Jamaica Plain	MA	02130
Kalyn Horst					
Karen Narefsky	43 Perry St		New York	NY	10014
Karey Kenst	4 Alfred St		Boston	MA	02130
Karsten Frey	23 Dartmouth St				
Kasia Ciesla					
Kate Horner					02143
Kate Oldshue					
Kathleen O'Brien	42 Wyllis Ave		Everett	MA	02149
Kathleen Santora					
Katie James					
Katie Kidwell	578 Huntington Ave		Boston	MA	02115
Katrina Ciraldo			Boston	MA	
Kayla Seeger					02478
Kc Mackey	96 Wenham St		Danvers	MA	01923
Keecha Guerrier	808 Memorial Dr		Cambridge	MA	02139
Kelly Wingo					
Kevin Green					
Kevin O'Kelly					
Kim Lampereur	184 Bennington St	#3	Boston	MA	02128
Kobina Adeniji					02126
Kristen Aldrich	94 Sawyer Ave	#1	Dorchester	MA	02125
Kristopher Toma-Lee				MA	02474
Krystle Brown	63 Robeson St Apt 2 Jamaica Pln			MA	02130
Kyra Norsigian					
Laura Foner	24 Kingsboro Park		Jamaica Plain	MA	02130
Lauren Awad	15 Woodward Ave		Norwalk	CT	06854

Sheet1

Lauren Miller	113 Townsend St	Apt 2	Boston	MA	02121
Laurie Goldman					02143
Layne Keating					02143
Leah Shapiro	48 Weld Hill St		Boston	MA	02130
Leigh Chandler	2 Torpie St				
Leslie Belay					02130
Liam Sullivan	6 Craft Pl	#3	Jamaica Plain	MA	
Lili Allen					
Lillian Medville	116 Garfield St				
Linda Kirshenbaum					
Lindsay Allen					01921
Lisa Marie Garver	20 Lawn St		Brockton	MA	02302
Lisa Owens	27 Jeffries St	#1		MA	02128
lisa thompson	10 Forest Hills St		Jamaica Plain	MA	02130
Liz Raskopf					
Liza Brecher	420 Huntington Ave		Boston	MA	02115
Lor Holmes			PO Box		220231
Lori Hurlebaus	36 Robinson St		Dorchester	MA	02122
Lori Lobenstine	226 Wachusett St		Jamaica Plain	MA	
Louise Profumo	2 Atherton Pl				
Lucas Orwig	3 Leslie Park		Roxbury	MA	02119
Lyn Freundluch				MA	02130
Maarit Ostrow					
Madeline Gale	63 Elm St		Montclair	NJ	07042
Maggie Cannon				MA	02130
Maggie Capwell	8 Kittredge St	Apt 13			
Malcolm Torrejón Chu	42 Kittredge St		Boston	MA	
Marge Maloney					
Maria Christina Blanco	65 Cornwall St	#110			
Maria Konizeski	38 Boynton St #3R Jamaica Pln			MA	02130
Maria Sedjo	12 Rossmore Rd		Boston	MA	02130
Mariel Cohn	15 Bemis St		Newton	MA	02460
Mark Earley	28 Greenleaf St		Malden	MA	02148
Mark Seifried	42 8th St	#1314			
Marquise Jones					

Sheet1

Martha Karchere	8 Park Ln		Jp		02130
Mary Cate Curley					
Mary Hansen	34 Robeson St		New Bedford	MA	02740
Mary-Frances Brangman	7 Marlowe St		Dorchester	MA	
Mathew Hollander	23 Gayhead St				
Mathieu Coe					
Matt Karlin	82 North St		Medford	MA	02155
Matt Parker	194 highland St				
Matt Shuman	23 Wenham St		Boston	MA	02130
Matthew Goldfield	47 Prince St	#2	Jamaica Plain	MA	02130
Maya Milic-Strkalj				MA	02130
Maya Ochoa-Blanco					
Megan Pietruszka	26 Hardwick St		Cambridge	MA	02141
Meghan Hynes					02119
Meghan Metivier	43 Dalrymple St	#2	Jamaica Plain	MA	02130
Melanie Jessel					02141
Mellissa Honeywood					02132
Michelle Weiser			Jamaica Plain	MA	
Mimi Micner					02130
minor Sinclair-Thompson	13 Edgehill St		Princeton	NJ	08540
Modesto sanchez	664 Morton St		Boston	MA	02126
Molly Hannon	85 High Hill Rd		Wallingford	CT	06492
Myrlaine Henry	22 Osceola St				
Nadia Davila	174 Pleasant St		Brunswick	ME	04011
Nalaya Shand-Campbell					
Nancy Griffin			Brighton	MA	
Nancy Sanchez	408 border St		Boston	MA	02128
Naomi Porper			Boston	MA	02131
Natalie Brady	3140 Washington St	#3	Jp	MA	02130
Nathan Mortenson	187 strathmore rd brighton				
Nicholas Martin					
Nicole Brooks					02139
Nicole Leland	109 Child St		Jamaica Plain	MA	02130
Nicole Weber			Arlington	MA	
Nina Colombaro					

Sheet1

Nk Acevedo			MA	02122
Noni ChagnonSmith				
Olivia Kefauver				02143
Omer Hecht				02130
Patricia Morrow		Boston	MA	
Patrick Keaney				02135
Paul Johnson	39 Boylston St			
Philip Johnston	36 Highland Ave	Cambridge	MA	
Rachel Banderob				02155
Rachel Meharry	131 Dartmouth St	Boston	MA	02116
Rachel Murray	47 Sedgwick St	Boston	MA	02130
Rachel Stevens	23 Brookford St	Cambridge	MA	02140
Rachel Willen	15 Bardwell St	Jamaica PLain	MA	02130
Rafael Horowitz Friedman	74 Pearson Ave	Somerville	MA	02144
Ramel Bodden	18 Crispus Attucks Pl	Boston	MA	02119
Renessa Ciampa				
Rhyland Gillespie			MA	02155
Richard Horsley	19 Park Ln	Jamaica Plain		02130
richie eldridge	12 silver Rd	everett	MA	02149
Riva Pearson	54 Rossmore Rd	#3		
Rob Flax	63 Robeson St	Jamaica Plain	MA	02130
Robbie Samuels		Boston	MA	
Robert Folan		Boston	MA	02115-4624
Rose Sandberg	63 robeson St	apt 2 boston	MA	02130
Rosemary Kean	83 Codman Hill Ave	Dorchester	MA	02124
Rubin Hohlbein	216 South St	Wrentham	MA	02093
Ruthy Rickenbacker	176 Hyde park Ave	Boston	MA	02130
Ryan Manganelli				02446
Samara Grossman	28 Forbes St			
Samuel Schwartz				02144
Samuel Stolper	42 Windermere Rd	Newton	MA	02466
Sara Driscoll				02130
Sara Riegler	43 Dalrymple St Apt #2	Jamaica Pln	MA	02130
Sara Sargent				
Sarah Langer		Somerville		

Sheet1

Sarah Netherton					
Sarah Sheehan	186 Lowell St		Somerville	MA	02144
Sarit Luban	1 Peabody Pl		Jamaica Plain	MA	02130
Savina Martin					
serah holley	22 Osceola St				
Seth Kirshenbaum					02130
seven klein	69 McBride St		Boston	MA	02130
Shaima Joseph	310 Copeland St		Quincy	MA	02169
Shalisa Lamb	2 Nazing Ct	Apt 6		MA	02121
Shannon Fuller					
Shari Mendler					
Shaya French	28 Moreland St		Roxbury	MA	
Shoshana Narva	47 Spring Park Ave		Jamaica Plain	MA	
Simona Lang					
Stacey Lantz	141 Williams St				
Stacey Melchin	47 Watts St		Malden	MA	02148
Stephanie Knight				MA	02135
stephanie mullaney					
Stephen Marsh	27 Pasadena Rd		Boston	MA	02121
Steven Spady	36 Grace St	Apt 1		NJ	07111
Stop Desahucios León					24003
Susan Bollinger	14 Woodlawn St	Apt 2			
swati joshi					
talia sternberg	18 dudley apt 2 cambridg		e	MA	02145
Tamara Bonn			Allston	MA	02134
Ted Chaloner	36 Milford St		Boston	MA	02118
Thea Rowan	22 MacArthur St	Apt 1		MA	02747
Tiffany Brown					02130
Tonya Tedesco					02132
Tracy Curtin					
Trevor Culhane	11 Houghton St		Somerville	MA	02143
Tyler Healey	16 b Alcott St		Boston	MA	02134
Valerie Enriquez	124 Cushing Ave	#1			
Veronique Rodriguez					
Weezy Waldstein	3 Lamartine Place Jamaica Pln				

Sheet1

William Antebi	66 Channing Rd		Newton	MA	02459
William Herbert					
Yohana Beyene	1231 Adams St	Apt 304	Dorchester	MA	02124
Yossef Mendelssohn					02139
Zoe Madonna			Boston	MA	

WHAT A STRONG PLAN LOOKS LIKE

Land Banking & Non-Profit Housing

Strong Requirements for Private Developers

The center area is the most important way to measure the City's main commitments. The four arrows are tools, and each needs to have strong plans/commitments. But ultimately a plan must tie the tools together into a strong overall commitment here in the center.

**Commitment to
High % of
Affordable Housing
Income Levels
Defined at Lower
Amounts**

Set Aside Units for Voucher Holders (Mobile & Unit-Based)

Increase City Funding and Leverage Funding

WHAT THE PLAN LOOKS LIKE NOW:

Incomplete/Weak Use of Tools, No Change In Central Commitments

LAND BANKING: 402 units on locations "to be identified." No clear local plan or funding; only a citywide pilot program. Also 402 can be increased.

The main commitments (in the center) have remain unchanged since first drafts in Mar-May. A real change in the plan would mean changes to these commitments.

VOUCHERS: In July the City wrote that they might pilot a preference for voucher holders, but the final draft does not include this.

**30% Affordable
Average Incomes
for Affordable
Units:
\$50K-\$60K**

PRIVATE REQUIREMENTS:

The plan keeps base affordability at 13% at 70% AMI. Developers can build "bonus" units for a total of about 16-17% affordable, some at 50% AMI and some at 70% AMI.

These requirements can be stronger and the City has not changed them.

CITY FUNDING: The City estimates it will spend \$42 million, about \$2.8 million a year, on affordable housing here.

This amount can be larger and the City has not held real conversations about this.

Fixes to Housing Report (July 1, 2016)

Analyze “land banking” to support non-profits to buy land.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Set a concrete goal for units on land acquired by non-profits with land banking.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Sets a high enough goal for land banking.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Analyze feasibility at lower income levels, including what % is possible.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Name clear dollar amount for City funding for future projects beyond existing projects.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Set a high enough commitment for City funding.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Analyze government funding and dollar amounts needed for different goals from 30-70% and deeper affordability.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Analyze possible sources of government funding, dollar amounts, and how they could increase affordability goal.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Set a strong enough affordability requirement for private developers.		
---	--	--

Reserve option to opt into private developments.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Analyze racial impact and effects of displacement.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Analyze racial impact and equity accessing new housing.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Include a goal for converting market-rate housing into affordable housing.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Includes a strong enough goal for converting market-rate housing into affordable housing.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

In table summarizing units, include additional market-rate and affordable housing in pipeline,	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

and separate out future projects.

Analyze setting aside units for voucher-holders.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Change how the report addresses displacement – discuss how existing residents may not get into new housing or may not have an income that matches it.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Change how the report addresses displacement – discuss how preserving the overall diversity of the neighborhood, not just # of units, is important.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Change how the report addresses displacement – address how new housing can drive up rents on a local basis.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Compare income levels in plan to neighborhood demographics.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Improve the count of households at risk of displacement.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Explain the buildout analysis better.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---------------------------------------	------------------------------	-----------------------------

Portray the community plan accurately and analyze the solutions.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
---	------------------------------	-----------------------------

Explain affordability guidelines for condos.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

Fixes to Density Bonus Report (July 1, 2016)

Provide Excel spreadsheets with formulas.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Make assumptions explicit.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Research actual pro formas and construction costs.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze feasibility for steel construction.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Use accurate calculations for operating expenses, and fix discrepancy from old model.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Compare feasibility and NOI/cost to current FAR/use, not 2.0 at 13%/70% AMI.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze what is possible beyond 13%/70% AMI for low FAR / base zoning.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze finances based on land costs of current zoning and value gained from change of use.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Use lower construction costs in analysis.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze feasibility at averages of 30%, 40%, and 50% AMI.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze finances if projects use 4% LIHTC.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze finances if projects get property tax breaks.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze finances if projects get additional subsidies at different amounts.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Analyze finances at smaller NOI/Cost.	<input type="checkbox"/> Yes	<input type="checkbox"/> No

What Needs to Be Fixed in the Financial and Density Bonus Analysis

Given the importance of Plan JP/Rox and the need for real transparency, input from the community, and accountability to the community, the City should release **spreadsheets with formulas** and not just the snapshots in the appendices. Given the major problems in the analysis, this is even more important.

The issues brought up in this document need to be addressed in a transparent way, to ensure that the City is using calculations to maximize affordability – and not to justify an existing policy agenda. The two drafts of financial analyses give the impression that the City is adjusting numbers to output a 6.0% return for the 13% at 70% AMI affordability level, rather than allowing a stronger requirement emerge from the numbers.

Clearer Presentation to Make Assumptions Explicit

- (1) Make explicit that the model assumes a rent of \$250/mo for parking.
- (2) Make explicit that the model assumes a 5% vacancy rate in market-rate units.
- (3) Make explicit the assumptions about operating expenses. In a previous document released explaining the IDP financial feasibility, analysis, these assumptions were:
 - A general \$5500/yr operating expense per unit in Zone B
 - Real estate taxes at 10% of potential gross income before deducting 5% for vacancy (with clarity on whether rent from parking is part of this income)
 - Management costs at 5% of residential effective gross income
 - Reserves at \$250/unit
- (5) Make explicit the assumptions for land construction costs. The model seems to assume:
 - \$70/square foot of land, which is held constant even when a development is more dense in order to capture value from density.
 - A \$258/GSF hard construction cost for residential, plus \$35,000 per parking space (which comes out to \$28 per residential GSF), for a total of \$286/GSF, if the model assumes above-ground parking.
 - A soft cost of 20% of residential construction costs.
- (6) The appendices use **six different** example lots of different sizes, an unnecessary complication that makes the feasibility and density bonus calculations more confusing to understand. This could be simplified to a single lot size.
- (7) Overall, the presentation of the appendices needs a thorough overall in order to be accessible.

Research Actual Pro Formas and Construction Costs

The BRA can get documents from developers and architects if it wants to. It should get a hold of the finances of recent projects in the area to better analyze actual construction costs. When the BRA planned the South End Neighborhood Housing Initiative, for example, it looked at actual pro formas.

New York City also looked at a number of actual projects to refine the numbers it used in its assumptions.

Major Substantive Errors and Inconsistencies Given the City's Assumptions

(8) Projects at 5.0 and 6.0 FAR, and possibly at 4.0 FAR, may require steel construction. **The model does not use steel construction costs.** The City has previously estimated this would cost \$425/GSF residential. Even assuming a substantially smaller rate for neighborhood or non-union construction, given the City's assumptions for rents and required return, **steel construction at 6.0 FAR is not feasible even with 0% affordability.** This error has a potential policy implication, that it may be bad policy to allow buildings at the much higher FAR's because they will be unfeasible or because strong affordability levels (high percentages at lower income levels) will not be feasible.

(9) The model's estimate of operating expenses is substantially higher than the estimates in the previous IDP financial model (which is explained in (3) above). Using a corrected estimate would substantially boost the amount of feasible affordable housing from 13% at 70% AMI to 19.3% at 70% AMI. For example, in the "Base Model < 2 FAR" example with 240 units, the model gives operating expenses that are \$230,000 greater than the previous model. This amount could be used toward subsidizing additional affordable housing. (See Appendix A.)

Major Flaw and Missing Analysis About Base Zoning and Change of Use

Note: This section uses the City's logic of requiring a 6% net operating income over development cost, in order to illustrate problems with the analysis. This is not to say that this assumption that developers must make at least 6% is correct; this document challenges this assumption elsewhere.

Developers' Choice About Adopting Density Bonus Versus Base Zoning

The analysis considers a base zoning at 2.0 FAR in order to compare the choice of staying at base zoning or adopting a density bonus. BRA staff have repeated a number of times that they are considering keeping base zoning similar to existing zoning. The reason this makes sense as a policy is that it maximizes capturing value from rezoning.

For example, consider the scenario of setting aside 35% of bonus units at 50% AMI. At 3.0 FAR, the developer still makes 6.00% net operating income over development cost, enough for the model to consider financially feasible. Yet the model says the developer will opt out because at 2.0 FAR, the developer could make 6.21%.

Even the analysis that a developer will opt to choose the higher percentage return may be incorrect, because the slightly smaller return may be more attractive because it could yield a larger pure dollar amount. (6% of \$20 million is more than 6.21% of \$13 million.)

But even putting that issue aside, the current zoning is **not** 2.0 FAR, and a developer would expect to make less than 6%. If the base zoning is kept similar to current zoning, then the 6% at 3.0 FAR would be more profitable after all. Alternatively, the affordability requirements at 2.0 FAR could be strengthened enough so that the 6% at 3.0 FAR is a better option. At 2.0 FAR, the City could require more than 13% affordable at 70% AMI and allow developers to make 6% or slightly less than this.

By setting a new base zoning with 13% affordable at 70% AMI, whether at 2.0 FAR or another FAR, the City is giving up a good amount of the development value achieved by changing use and FAR. Instead, the City could require a higher amount of affordability for both shorter/less dense buildings *and* higher/more dense buildings.

Capturing Land Value From Change of Use

The model assumes a land cost of \$70 per square foot. However, there is no analysis if this cost accurately reflects how much land is worth *as currently zoned*. The City should analyze how much different types of parcels (light industrial, etc.) are valued at based on current zoning, not based on speculation.

This month (June 2016), for example, Mordechai Levin acquired a 32,724 square foot parcel at 41 Amory Street for \$1.3 million, at a cost of \$40 per square foot. This suggests that land may cost less than \$70 per square foot.

By reducing land costs further in the models, affordability can be increased in a way that does not take away the actual zoned value of land, and instead captures increase in land values from rezoning.

Flaw in Assumption About Cost of Construction

The cost of construction in the model appears to be \$258/GSF, compared to \$280/GSF in a previous model. \$280/GSF represents a union rate for downtown construction, and \$258/GSF seems like it is still a high assumption for construction in the area. For example, the developers of 3200 Washington Street estimated a \$20 million construction cost for a 100,000 square foot project, at a cost of \$200/GSF.

Additional Analysis: Deeper Affordability and Lower AMIs

The community has been very vocal since April 2015 that many residents in the area and across the City make less than 30% AMI. It is critical that the City incorporate 30% and 40% AMI into its analysis.

Based on the City's analysis, the average rents at different affordability levels are as follows:

Market Rate	\$2884
70% AMI	\$1328
60% AMI	\$1139
50% AMI	\$949
40% AMI	\$759
30% AMI	\$569

Because the market rate rent is more than twice the 70% AMI rent, the effective subsidy to achieve 70% AMI is the same order of magnitude as the effective subsidy required to achieve lower AMI's. For example, \$2125 could be used to subsidize a market rate unit to a 40% AMI unit, or to subsidize 13.7 market rate units to a 70% AMI unit. As a more general example, a developer would find the following options equally affordable:

19.3%	at 70% AMI
17%	at 60% AMI
15.2%	at 50% AMI
13.7%	at 40% AMI
12.5%	at 30% AMI

This shows that it is possible to have units at 40% AMI (which is built into options in New York's mandatory inclusionary housing policy) and even 30% AMI. This does not mean that a policy would have to require only units at these levels – a policy could require a range of AMI's that average to 40% or 50% AMI.

For example, many community members are organizing for 70% affordability at an average of about 40% AMI:

10% for households making \$50,000-\$70,000 (about 70% AMI)
 10% for households making \$35,000-\$50,000 (about 50% AMI)
 10% for households making \$25,000-\$35,000 (about 40% AMI)
 40% for households making \$0-\$25,000 (about 30% AMI)
 Average of 70%, 50%, 40%, 30%, 30%, 30%, 30% is 40%

The City should present analysis on lower AMI's in this manner so that the community can decide what affordability policies are best.

Additional Analysis: 4% LIHTC, Tax Breaks, and Subsidies

New York analyzed the feasibility of building more affordable housing if a developer used 4% LIHTC credits and tax breaks.

The City of Boston should likewise analyze the financial feasibility of stronger affordable housing requirements if a developer used 4% LIHTC credits, got partial or whole tax breaks (or equivalently, subsidies equal to that amount), and/or got additional subsidies.

For example, in the scenario given by the City where a developer builds 240 units, a 100% break on property taxes would allow the developer to build at least 18% more housing at an average of 70% AMI, or at least 13% more housing at an average of 40% AMI (which could include housing at 30%, 40%, 50%, and 70%). An alternative to giving tax breaks is to give subsidies using funds obtained from property taxes.

The City should also analyze the impact of subsidies on feasible affordable housing. The City's analysis mentions a new policy where private developers can apply for City subsidies. Rather than looking at the policy as simply subsidizing additional units at \$250,000-\$300,000 a unit, the City could consider this policy as helping support the entire affordable housing program of a private development. Traditionally, the City can provide \$50,000-\$60,000 in gap funding to help developers supplement \$200,000-\$250,000 from the State, but this funding itself doesn't fully fund a unit; it funds about 1/5 or 1/6 of a unit. Likewise, an analysis could consider the impact of different amounts of City funding on a private developer's ability to add affordable housing. For example, in a 100-unit development, how much affordable housing is feasible with \$0 City subsidy per affordable housing unit (counting all the affordable units, not just additional units)? \$50,000? \$100,000? And so forth.

Additional Analysis: Analyzing NOI/Cost Less Than 6%

New York City's financial analysis also analyzes "Unleveraged IRR" and "Leveraged IRR." This gives a more complete sense of the profit a developer makes, because of the equity in the building that accrues to the developer (and which allows for a possible sale of the building) and because a developer can leverage loans. The City of Boston should conduct a similar analysis..

The NYU Furman Center uses a measure of 5.25-5.75% NOI instead of 6% for financial feasibility. The City should do analysis that looks at lower levels of NOI.

Overall, it is important to challenge the implicit assumption that developers' profits outweigh the needs of low-income people and renters, especially people of color. Although the City claims to prioritize ending displacement and protecting diversity, in reality its policies and models prioritize profits rather than more aggressively protecting people and neighborhoods.

Appendix A.

“Base Model < 2 FAR” using City's previous model for operating expenses

Percentage Affordable	13.0%	19.3%
Average AMI Affordable	70%	70%
SF Land	157010	157010
Residential SF	228360	228360
Gross SF Unit	950	950
Total Units	240	240
Operating Income		
Rental Income Market	7226150	6702877
Rental Income Affordable	497428	738489
Parking Income (250/space each month at 0.75 ratio)	540000	540000
5% Market Vacancy	(361,308)	(335,144)
<u>Subtotal Operating Income</u>	7902271	7646223
Operating Expenses		
Operating (5500 per unit)	1320000	1320000
RE Taxes (10% of PGI – Rental and Parking)	826358	798137
Management (2.5% of Res EGI)	197557	191156
Reserves (250 per unit)	60000	60000
<u>Subtotal Operating Expenses</u>	2403915	2369292
Net Operating Income	5498356	5276930
Development		
Land (70 per sf)	10990700	10990700
Residential (258 per sf)	58916880	58916880
Parking (35000 at 0.75 ratio)	6300000	6300000
Soft Costs (20% of Residential)	11783376	11783376
Cash-In-Lieu	0	0
<u>Total Development</u>	87990956	87990956
RETURN: NOI/Development Cost	6.25%	6.00%

What's Missing From the City's Analysis

Analyze “Land Banking” Solution for Non-Profits

The City is working with Urban Edge to acquire land near Jackson Square. One model of this is that a non-profit can get funding for land from traditional sources, and the City adds another \$10,000-\$20,000/unit, allowing the non-profit to outbid private speculators and allowing the non-profit to pay some maintenance costs before housing is developed.

Non-profits can build up to about 50 units a year (assuming the State approves one project a year, with additional project applications put back into queue). The City could help non-profits (like JPND, Urban Edge, or a community land trust) purchase two sites a year for 15 years, for 100 units a year or 1500 units total.

In addition, the City could commit to building 100% affordable housing at Arborway Yard. Because steel construction is very expensive and may prohibit building high amounts of affordable housing, the projected units for Arborway Yard may need to be decreased to 472, while keeping the projected number of affordable housing units the same at 472.

The more land obtained by non-profits, the more 100% affordable housing can be built by groups without a profit motive. The less land obtained by non-profits, the higher affordable housing requirements would have to be for private companies in order to achieve high affordability goals.

Non-profit land acquisition is the primary tool for making a 70% neighborhood affordability goal for new construction attainable.

Stronger Requirements for Private Developers

The City should not adopt a model of a base requirement of 13% affordable at 70% AMI, with a density bonus. Sticking to 13%/70% AMI already eliminates much of the value that can be obtained from rezoning, and a base requirement that is not strong enough will undermine higher requirements at higher FAR.

A separate document outlines many things that must be fixed in the financial and density bonus analysis, including: (1) capturing value from change of use, (2) not setting a 13%/70% AMI base requirement, (3) fixing construction cost estimates, (4) analyzing lower AMI levels, (5) analyzing how 4% tax credits and subsidies impact feasibility, and (6) analyzing smaller return rates.

Analysis should also incorporate local communities' feedback about the appropriate design and height for the neighborhood.

Analyzing Deeper Affordability and Lower Income Levels

The community has been very vocal since April 2015 that many residents in the area and across the City make less than 30% AMI. It is critical that the City incorporate 30% and 40% AMI into its analysis.

Based on the City's analysis, the average rents at different affordability levels are as follows:

Market Rate	\$2884
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50% AMI	\$949
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19.3%	at 70% AMI
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15.2%	at 50% AMI
13.7%	at 40% AMI
12.5%	at 30% AMI

This shows that it *is* possible to have units at 40% AMI (which is built into options in New York's mandatory inclusionary housing policy) and even 30% AMI. This does not mean that a policy would have to require only units at these levels – a policy could require a range of AMI's that average to 40% or 50% AMI.

For example, many community members are organizing for 70% affordability at an average of about 40% AMI:

- 10% for households making \$50,000-\$70,000 (about 70% AMI)
- 10% for households making \$35,000-\$50,000 (about 50% AMI)
- 10% for households making \$25,000-\$35,000 (about 40% AMI)
- 40% for households making \$0-\$25,000 (about 30% AMI)
- Average of 70%, 50%, 40%, 30%, 30%, 30%, 30% is 40%

The City should present analysis on lower AMI's in this manner so that the community can decide what affordability policies are best.

Government Funding

Rather than simply listing existing commitments of City funding and a vague description of possible future funding, the report should name a clear dollar commitment to additional City funding for future projects.

Rather than saying that there are limited funds and subsidies, the report should analyze different goals around affordability between 30% and 70%; how much government funding would be needed to achieve those goals; and analyze possible sources of that funding (e.g., 4% LIHTC, CPA, additional operating budget funds, etc.), including how City funds could be used to leverage additional funds.

The table describing City funding should be made clearer and more accurate:

- Some items appear to be in the wrong locations
- The table should have additional columns for additional sources of funding (Federal, State, etc.)
- The table should separate the rehabilitation project to make it clearer to see the new affordable housing that is being supported
- The table should separate subsidies in land from cash subsidies
- The table should indicate what projects are already in the pipeline and what projects are anticipated for the future

Higher Requirements Achievable With Subsidies and Reserving Option to Opt In

New York's zoning plan in East New York purposely sets affordability guidelines that are not attainable unless developers to apply for subsidies. The City can do the same thing here in Boston, to ensure that more developers apply for funds to bring to this neighborhood.

If the City's affordable housing requirements are not sufficiently high in new zoning, it should find a way to reserve the option to opt into private developments and attach vouchers or subsidies in the future.

Analysis of Racial Impact and Impact on Diversity

The plan should clearly analyze:

- Who will be moving into newly constructed housing, and what the expected racial and economic diversity will be
- The access that various racial groups, and groups at different income levels, will have to the new housing
- Quantify an estimate of how many people in the neighborhood will in fact secure housing in newly constructed housing, and analyze this according to race and income levels
- The impact displacement will have on people and families (e.g., health, education, employment, access to services), and analyze this according to race and income levels
- Quantify the possible impact of new market-rate housing on rents in the neighborhood and the risk of indirect displacement to people living here now

Conversion Goal

The plan should include a goal for how many of the market-rate units should be converted into deed-restricted affordable housing.

Current Pipeline

The report misleadingly includes affordable housing projects in the pipeline without identifying many additional projects, including:

- The Commons at Forest Hills: 280 units, 37 deed-restricted
- 3521-3529 Washington St: 132 units, 18 deed-restricted
- 3383-3389 Washington St: 21 units, 4 deed-restricted
- Bartlet Square II: 15 units, 2 deed-restricted
- 3353 Washington St: 44 units, 7 deed-restricted
- 3200 Washington St: 76 units, 12 deed-restricted
- 3193 Washington St: 46 units, 8 deed-restricted
- 75 Amory St: 55 units, 55 deed-restricted

The report should separate housing that is in the pipeline now (both market-rate and affordable) and housing that is not yet proposed.

Inaccurate Discussions About Displacement

The report conflates mitigating “displacement risk” with only the new number of affordable units. Current residents who are being displaced are not guaranteed a place in new units, and the income levels of the new deed-restricted units does not match the need of current residents.

Also, the number of new deed-restricted units does not reflect the low economic and racial diversity of overall new construction in the plan. A high percentage of new housing for households making \$0-25,000/yr, \$25,000-35,000/yr, and \$35,000-50,000/yr is important for preserving the diversity of the neighborhood, which helps slow gentrification and rising rents. It also creates housing for low-income people, renters, and people of color who have been displaced throughout Boston or who will be moving into Boston.

The report conflates mitigating “displacement risk” with producing new market-rate housing. The Lincoln Land Institute and UC Berkeley's Urban Displacement Project have found that producing market-rate housing can destabilize, rather than stabilize, housing prices on a local neighborhood level.

Comparing Income Levels in Plan to Neighborhood Demographics

The report should compare the income levels that new housing will be built for, and compare this distribution to the current demographics of the neighborhood. Rather than lumping everybody under \$50,000 together, the report should look at additional ranges: \$0-25,000, \$25,000-35,000, and \$35,000-50,000.

Vouchers

The report should analyze how developers could deepen affordability by setting aside deed-restricted units for households with housing vouchers.

Issues With Counting People At Risk of Displacement and Buildout Analysis

The report should more carefully analyze how many people are at risk of being displaced, including people in the immediate neighborhood who are not technically in the study area. It should also more carefully analyze how many people who make less than \$50,000 actually live in deed-restricted housing.

The buildout analysis is not presented clearly in a way that allows people to verify the number of units, and there should be an explanation why the unit count has dropped from previous meetings.

Inaccurate Portrayal of Community Plan

The report continues to give an incomplete portrayal of the community plan and does not mention any positive reasons for it. Instead of criticizing the plan, the report needs to more thoroughly analyze the solutions in the plan.

Condos

The report needs to explain how affordability guidelines will apply to condominiums.

Requests from 100% Egleston 7/1/16

Responses by BRA, DND, Mayor's Housing Innovation Lab 8/3/16

Housing Policy Document

SPECIFIC REQUESTS		YES	NO	RESPONSE
1. Land Banking				
a	Analyze "land banking" to support non-profits to buy land.	X		DND is working with LISC, CEDAC and others on a pilot program to help provide additional capital for the acquisition of vacant property to support both immediate and future affordable housing construction. While a launch date is not set, the program is targeted for this Fall. Working through existing financial mechanisms, DND will provide additional financial resources that will help to improve responsiveness of the funding sources, reduce cost to the borrower and help to advance the site toward development of affordable housing. This program will be administered through partner agencies and is a firm commitment already endorsed by Mayor Walsh in his Housing Plan.
b	Set a concrete goal for units on land acquired by non-profits with land banking.		X	<p>The goal will be established as the requirements of the program are finalized (the goal will be similar to the program DND announced in the Spring for acquiring market housing to convert to affordable housing - this program had a \$7.5 million budget and a \$75k per unit maximum so the goal was 100 units in the first round). This will be a pilot program and if successful the program will be expanded.</p> <p>The goal will not be geographic but will instead depend on partners to propose qualified projects from across the City. The City will work with nonprofits and other partners to identify vacant properties in the JP/Rox area that could be acquired for affordable housing development. DND will consider all projects brought to it through this program and work with them on all funding options. The success of the program is reliant on partners bringing forward qualified projects.</p> <p>One of the goals of the pilot will be to set deep affordability requirements for all developments that access the fund. Those goals should reflect both the deeper affordability (targeting lower incomes) desired by the community and the maximum number of affordable units to ensure the developments financial viability.</p>
c	Sets a high enough goal for land banking.		X	See above. We cannot estimate a goal for the JP/Rox area at this time, but are committed to pursuing this strategy.

2. Government Funding				
a	Analyze feasibility at lower income levels, including what % is possible.	X		<p>The analysis provided by Affordable Egleston in this area is both conceptually accurate and very helpful. There are two important trade offs mentioned here: 1) we could reach deeper levels of affordability if we are willing to create a smaller number of affordable units overall and/or 2) we could set an "average" level of affordability and ask developers to create units that are both below and above this average as long as the total mix of units generated the same total rent.</p> <p>There has been some conflicting feedback from the community on how to address these trade offs. Some groups clearly want more deeply affordable housing, other groups want a larger total number of affordable units which requires a higher income limit. We asked this question very explicitly of everyone who participated in the housing breakout sessions at community meetings and based on the community feedback we suggested prioritizing the creation of 50% AMI units through the density bonus policy.</p> <p>This is the planning team's best estimate at establishing compromise between competing demands. However, if the AG believes we have misinterpreted community desires on this issue we need this feedback.</p> <p>It is possible to rework the private development affordable unit set aside policy to either 1) create less units overall but reach lower income levels and/or 2) target an average level of affordability instead of maximizing 50% AMI units (this would mean additional 30-40% AMI units, less 50% AMI units, and more 70% AMI or higher AMI units to compensate for the more deeply affordable ones). There are many different permutations of how this analysis could be run, so we will be providing an analysis of the impact of shifting the density bonus to 30% and 40% AMI units for discussion.</p> <p>(Note: for publicly financed projects, State and Federal funding resources have set requirements which generally target 60% AMI units. In DND's last funding round we wrote in incentives so that projects that propose deeper levels of affordability score more highly in our funding award selections. This will be the standard going forward and allows DND to create 50% AMI units and perhaps 40% AMI units. DND also requires that any project we fund set aside 10% of the units for 30% AMI or lower income households. We are currently conducting analysis on what it would take to increase this 10% set aside. The details will be announced in all future funding rounds. We welcome input and participation on this.)</p>
b	Name clear dollar amount for City funding for future projects beyond existing projects.		X	<p>The funding provided by the City of Boston and the Commonwealth of Massachusetts is awarded through competitive funding rounds to qualified projects. The City cannot promise funding to projects that have not yet been proposed. In addition, the funding Boston receives must be spread across the whole City - and there are many neighborhoods with desperate needs for affordable housing.</p>

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			<p>However, we can estimate the likely public funding contribution to affordable housing in the JP/Rox corridor based on past performance, the community's commitment to affordability, and the strength of the neighborhood's community development partners.</p> <p>Currently in the JP/ROX corridor there are 184 new subsidized affordable units in identified pipeline projects. These projects will require approximately \$75 million in all public sources, including over \$7 million from the City of Boston.</p> <p>The Plan JP/ROX draft also calls for 497 affordable units outside of the existing pipeline to be identified to reach the 30% goal (and Arborway Yards is one potential mechanism for reaching this goal).</p> <p>Over the past five years, an average of \$105 million has been available annually to fund affordable housing creation projects within Boston from local, state and federal sources. Since 2014, the average affordable housing project in Boston required \$358,000 per unit in public financial assistance (from all sources). This includes an average of \$56,000 per unit from the City of Boston.</p> <p>At current affordable housing creation costs, the public subsidy required to reach 497 units of new affordable housing is \$178 million, which would require an estimated \$28 million from the City of Boston.</p> <p>The City is committed to reaching and, if possible, exceeding the affordable housing goals of Plan JP/ROX. This includes both the existing pipeline of 184 units, the additional 497 units, and as many additional units as possible. To do so the City will support this estimated \$253 million subsidy requirement as long as funding remains available. This includes upwards of \$35 million in subsidy from the City of Boston.</p> <p>Building this level of subsidized affordable housing is reliant upon partners proposing qualified affordable housing projects. Given the strength of the community partners in the area, it is possible that projects beyond these 681 subsidized affordable units will be proposed, and the City and the Department of Neighborhood Development will work diligently in the years to come to find mechanisms for funding these additional projects as well. The City has a lengthy track record of finding mechanisms to fund the vast majority of affordable project proposals and will continue to work with advocates and partners to build on this success.</p>
c	Set a high enough commitment for City funding.		X See above.
d	Analyze government funding and dollar amounts	X	The Affordable Egleston group has already done much of this analysis which has influenced the development of the draft Plan JP/ROX document.

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	needed for different goals from 30-70% and deeper affordability.			<p>It should be noted that the Plan JP/ROX 30% affordable housing goal is a minimum. Going above and beyond the 30% goal is an aspiration that many community members, the BRA and the City share.</p> <p>To summarize the question on the public tax dollar costs to increase the overall percentage of affordable housing - using the estimates described above and an estimated growth of 3,500 new units, each one percent increase in the goal would cost an estimated \$12.5 million in public subsidy. Therefore, increasing the new construction affordable housing goal from 30% to 40% would require over \$125 million in additional public subsidy. Each additional 10% would be roughly equivalent.</p>
e	Analyze possible sources of government funding, dollar amounts, and how they could increase affordability goal.	X		<p>See answer above on why we cannot commit funding beyond projects that are already proposed.</p> <p>That said, if CPA were passed or housing creation budgets continue to increase under Mayor Walsh's leadership, each additional \$358,000 is on average enough subsidy to create an additional unit. (The average City contribution to affordable housing is \$56k which leverages the additional State and Federal dollars, but \$358k on average from all sources must be identified to create a single new subsidized unit).</p>

3. Requirements for Private Developers

a	Set a strong enough affordability requirement for developers.	X		<p>The proposed Residential Development Area zoning and Density Bonus Program seek to maximize the required affordable housing set-asides from private development without requiring the expenditure of public funding. Part of the affordability maximizing strategy is also encouraging more market rate housing to be built - the more market rate units built, the larger the overall number of affordable set asides.</p> <p>The Density Bonus Program is aggressively weighted toward affordable housing creation, and therefore runs the risk that developers may decide not to build at higher densities. At a time when growing the housing supply is critical for alleviating the housing shortage and preventing further rent escalation, if a policy impedes development, even unintentionally, it will make it even harder to get rents under control. To that end, the Density Bonus Program will be run as a pilot but with the ability for the City and the community to adjust where financial necessity can be proven.</p>
b	Reserve option to opt into private developments.		X	<p>This is an interesting proposal that received much discussion and analysis through the planning process, but it is the City's recommendation that this policy not be pursued further. Ultimately, purchasing units within a private development is an inefficient use of City affordable housing dollars as these projects would not generally be eligible for state tax credit resources. It is a better use of City funding to reserve these dollars for qualified affordable housing projects where the City's dollars are used to leverage the investment of many more public dollars from State and Federal programs.</p> <p>Ultimately, more affordable housing units at more deeply affordable rents can be achieved through</p>

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				<p>preserving limited City resources to fund traditional affordable housing projects. For example, the City's affordable housing dollars can create more lower income units - including homeless set-aside units for individuals with no incomes.</p> <p>However, for-profit private developers are encouraged to compete for funding in the City's and the State's affordable housing financing rounds alongside traditional non-profit partners. The City will work with the community to encourage more for-profit developers to consider developing affordable housing and submit applications for funding through DND. If these for-profit projects better met the goals of the JP/ROX Plan, then the City will work with them to award funds.</p>
4. Racial Impact and Impact on Diversity				
a	Analyze racial impact and effects of displacement.	X		<p>This is critically important. Ensuring social and racial equity in the outcomes of the plan is a priority for Mayor Walsh, all members of the planning team, and nearly all community members we have heard from throughout the process. The plan identifies that there are 302 households at very high risk of displacement and estimates that the majority of these households are people of color. By creating over 1,000 new units of affordable housing in the area, the plan will effectively double the supply of deed restricted housing. It is the City's estimate that if this housing comes on line quickly enough, it should provide an opportunity to prevent the displacement of many of these 302 households. In addition, the new Office of Housing Stability offers an expanding suite of services to help these households remain in their homes.</p>
b	Analyze racial impact and equity accessing new housing.	X		<p>It is difficult to estimate exactly who would be moving into new housing once it is created, but the City recognizes the importance of this analysis. Given available data, only a rough approximation of the outcome may be possible, but the BRA/DND team will be contacting research partners to identify a possible approach to this question. More details will be forthcoming.</p> <p>To assist with this effort, the BRA, in cooperation with Fair Housing, is working to improve data collection on IDP housing units, so as to better understand who gets IDP units in terms of income, race and ethnicity, and neighborhood of origin.</p>
5. Conversion Goal				
a	Include a goal for converting market-rate housing into affordable housing.		X	<p>DND's recently announced \$7.5 million "Acquisition Opportunity Program" has a goal of creating 100 units of affordable housing through converting market-rate units. If successful, DND will seek funding to expand this program. However, this goal is citywide and requires qualified partners to step forward to acquire property. Therefore the successful expansion of this program in the JP/ROX area will require development partners to propose projects.</p>
b	Include a strong enough goal for converting market-		X	<p>see above</p>

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	rate housing into affordable housing.			
6. Current Pipeline				
a	In table summarizing units, include additional market-rate and affordable housing in pipeline, and separate out future projects	X		The BRA is in the process of updating the table to include the market rate development projects with deed-restricted set asides.
b	Explain the buildout analysis better.	X		The BRA is working to clarify and update the build out analysis with the understanding that this is one of many potential scenarios and that full build out will occur over a 10 to 20 year time frame if at all.
7. Vouchers				
a	Analyze setting aside units for voucher-holders	X		<p>This policy deserves additional analysis and could be implemented as a pilot program in JP/ROX. Some have suggested that prioritizing access to affordable housing for voucher holders may have the unintended consequence of limiting overall access to affordable housing resources (as a single household would be consuming two limited resources - both the voucher and the restricted unit). On the other hand, this strategy could be an effective way to help lower income households access units that have rents capped at 70% AMI.</p> <p>If launched, this preference program needs to be weighted against other preferences to establish priorities (e.g., should a voucher holder have a higher or lower priority than a household facing immediate displacement from the neighborhood?). The City is committed to continuing to analyze this idea and resolve any fair housing and resource concerns. If warranted, the BRA/DND could run a time limited pilot using the affordable housing lotteries for units created in this neighborhood for a year, then evaluate to see if the policy was effective.</p>
8. Discussions About Displacement				
a	Change how the report addresses displacement - discuss how existing residents may not get into new housing or may not have an income that matches it.		X	<p>Affordable Egleston is correct that there is no guarantee that all new affordable units will go to the 302 households in the area at greatest risk for displacement. This is one reason why the plan calls for creating over 1,000 units of new affordable housing. We believe that the plan makes sufficiently clear that creating new units is only one strategy for mitigating displacement risk, and that other strategies must be employed to effectively combat displacement.</p> <p>To be clear, we agree with Affordable Egleston's rationale and arguments, but suggest that they are already captured effectively in the text of the plan. We will be looking for the AG's feedback on this.</p>

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				Among the possible solutions identified to this problem, one policy listed in the plan - thanks to the advocacy of Affordable Egleston and others - is the creation of the new "Diversity Preservation Preference" in housing lotteries.
b	Change how the report addresses displacement - discuss how preserving the overall diversity of the neighborhood, not just # of units, is important.		X	Same answer as above, we agree with the goals of the group but believe that this is already discussed and supported in the plan. In addition, the plan clearly prioritizes preserving the tenancies of those facing displacement who already live in the neighborhood first.
c	Change how the report addresses displacement - address how new housing can drive up rents on a local basis.		X	<p>An aggressive regional housing growth strategy is necessary to address escalating housing costs due to the imbalance between housing supply and demand in greater Boston. Mayor Walsh has outlined his plan to add 53,000 new units by 2030 - and by no means is the JP/Rox corridor the only neighborhood engaging in a plan for equitable growth.</p> <p>In addition, there is evidence to suggest that preventing the construction of new housing accelerates rent increases and displacement. At a regional level, a shortage of housing is what drives up rents, not additional supply. Even supply at the upper end helps by giving more affluent people an option other than displacing existing residents. Impeding the growth of supply will have the unintended effect of increasing displacement.</p> <p>Additionally, within recent months in the City of Boston, initial data indicate that many neighborhoods that have completed more new housing construction have experienced less rent escalation than those where new projects have not yet come online. The JP/Rox corridor is in the later category - relatively few new units have finished construction (despite the pipeline of proposed projects) and rents are continuing to increase significantly.</p>
d	Compare income levels in plan to neighborhood demographics.	X		An analysis will be added comparing the income levels of units created under the estimated build-out scenario with the incomes of current residents.
e	Improve the count of households at risk of displacement.		X	DND and BRA researchers have spent significant time and effort to clearly quantify the number of households at risk for displacement and document how we have reached these conclusions. The data available does not allow for every possible question on this topic to be answered, but we believe we have provided the best possible analysis on this very important question.

9. Portrayal of Affordable Egleston Plan

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a	Portray the community plan accurately and analyze the solutions.	X		This chart in question has been removed from the draft planning document. In addition, the draft Plan JP/Rox already includes a large number of ideas and solutions that have been generated or influenced by the Affordable Egleston group. This response also provides more detail on how the solutions provided by Affordable Egleston are being incorporated.
10. Condos				
a	Explain affordability guidelines for condos.	X		This will be available for the next draft of the plan. However, we expect that the majority of new units will be rentals.

Density Bonus Financial Analysis

REQUEST		YES	NO	RESPONSE
1. Make Assumptions more explicit				
a	Provide excel spreadsheet with formulas	X		The basic model for both condos and rentals will be provided, with the next version of the analysis.
b	Make assumptions explicit	X		The assumptions highlighted as missing will be explained in the next version of the analysis.
2. Additional research and analysis				
a	Research actual pro formas and construction costs	X		The BRA and DND are seeking additional data on construction costs, including costs seen in the immediate area.
b	Analyze feasibility for steel construction	X		Further analysis has been completed and at this time we believe steel construction in this corridor is infeasible, but this may change if market rents, land costs or other major cost assumptions change in the future.
c	Analyze finances at smaller NOI/Cost	X		The BRA will provide a feasibility analysis that shows the resulting NOI/Cost using a variety of assumptions, whether the resulting project is feasible or infeasible.
d	Analyze finances based on land costs of current zoning and value gained from change of use		X	Land and commercial property in this area has not been purchased based on what can be built as-of-right, but based on speculation as to what could be approved through the Article 80 and ZBA processes. As such, land prices already factor in a higher density than what is currently allowed. The BRA is looking more closely at recent sales so as to check the land cost assumptions however. Even with this data, the model cannot easily incorporate the unknown costs related to specific sites including demolition and environmental remediation.
e	Analyze feasibility at averages of 30%, 40% and 50% AMI	X		Additional analysis is being completed.
3. Challenging assumptions				
a	Use accurate calculations for operating expenses and fix discrepancy from old model	X		The old model used \$5,500 per unit plus 10% of income to property taxes. The recent model used \$7,500 and 7% of income to taxes. In this respect, while the numbers are different, the total costs are not that different. These assumptions are being reviewed however, and either or both assumptions are likely to be updated in the new model.
b	Use lower construction costs in analysis		X	The BRA and DND are reviewing the construction cost assumption, which may result in either a higher or lower cost assumption..

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4. Developers choice about adopting density bonus versus base zoning

a	Compare feasibility of NOI/cost to current FAR/use, not 2.0 at 13%/70% AMI	X		The BRA is reviewing alternative and new models including the base zoning as the starting point for the bonus.
b	Analyze what is possible beyond 13%/70% AMI for low FAR/ base zoning		X	Inclusionary Development Policy (13% @ 70%) is the City's baseline policy for all development in all neighborhoods, and no community is exempt. That is the principle here. Where add-ons are desired, such as the Density Bonus program here, those add-ons apply only to the incremental units over base zoning. That way, developers opting out of the Density Bonus have the same IDP responsibilities as developers anywhere else in the City.

5. Incorporating subsidies into analysis

a	Analyze finances if projects use 4% LIHTC	X		Analysis in progress
b	Analyze finances if projects get property tax breaks	X		Analysis in progress In addition, the Mayor's Workforce Housing Tax Incentive Program -- is likely to be signed into law this summer. It was incorporated into the Governor's Municipal Modernization Bill. It is primarily designed to facilitate cash-flow in the construction and lease-up phases where the developers need it most. It won't affect the end financials of a development, however.
c	Analyze finances if projects get additional subsidies at different amounts	X		Analysis in progress

Overall Affordability Goal: Increase the Percentage

Increase the goal for new affordable housing from **30% to 70%.**

WHY?

- 70% of the neighborhood makes less than \$75,000 a year now.
- 38% of current units are deed-restricted, mostly at 60% AMI and below. **(Note: The BRA incorrectly stated 30% multiple times during its "road show" even though their revised housing documents gave a figure of 38%.)**
 - A goal of 30% deed-restricted, many at 70% AMI, does not match the current percentages – not even taking into account the market-rate units that low- and moderate-income families are living in now (see below).
- With a 30% goal, the economic diversity in the neighborhood could drop from 70% making less than \$75,000 a year, to 33-38%, and drop from 50% making less than \$35,000 a year, to 15%.
 - This is due to the combination of 70% new high-end market-rate housing and displacement of households from current housing. **Less than 2% of the new units are built for households making less than \$35,000/yr (and even many of these are studios).**
- With the current affordability goals, 67-84% of the new households will be white and 16-33% will be people of color, a drop from the 67% households of color who are in the neighborhood now.
 - 74% of the households in Boston who make more than \$100,000 and can afford the market-rate units are white; 87% of the households in the Boston area who make that amount are white.
- To maintain current economic diversity, about 80-90% of new units would need to be affordable to households making less than \$75,000 a year, and 60% to households making less than \$35,000 a year.
 - A 70% goal is reasonable because we would need *extra* affordable units above 70% to fully make up for the displacement occurring from market-rate units. If 70% of new construction is affordable, about 50% of the final total housing in the neighborhood will be affordable.

Overall Affordability Goal: Shift Income Levels Downward

Change the average income levels for affordable housing from **60% AMI** (\$60,000/yr, some less and some more) to **40% AMI** (\$40,000/yr, some less and some more). Prioritize households making **30% AMI**.

Our plan's specific breakdown is 40% affordable housing at 30% AMI, 10% at 40% AMI, 10% at 50% AMI, and 10% at 70% AMI, for an average of 40% AMI total.

WHY?

- About 40% of the neighborhood now makes less than 30% AMI, about \$25,000/yr. About 50% now makes less than 40% AMI, about \$35,000/yr. Most workers in Boston make less than \$35,000/yr.
- Less than 2% of the new housing in the plan is at 30% AMI. None is at 40% AMI.
 - In our plan, out of 10 new units, 7 are affordable: 4 at 30% AMI, 1 at 40%, 1 at 50%, and 1 at 70%. The average of these 7 amounts (30%, 30%, 30%, 30%, 40%, 50%, and 70%) is 40% AMI.

Misleading Points from the City:

1. The plan will double the affordable housing in the neighborhood.
 2. The City “stand(s) firmly with the community and pledge(s) to make housing affordability and preventing displacement the central goal of this planning process going forward.”
 3. The City is prioritizing “development without displacement.”
-

Responses

1. “Doubling” sounds positive but the plan falls extremely short of what the neighborhood needs. 98% of the new “affordable” housing is unaffordable to households making less than \$35,000 a year. The plan doubles the market-rate housing in the neighborhood, the new market-rate housing is high-end (\$2,500-\$3,500 a month), and people will be displaced from the current market-rate housing. Under the plan, the economic and racial diversity in the neighborhood will suffer greatly.

2. City officials constantly **say** they care about displacement, using phrases such as, “We share the same goals,” “We all feel the deep pain of displacement,” “We share an aspiration of building more than 30% affordable housing,” and “We don't want you to think that we don't care about displacement.” These statements are empty without real, more substantial commitments. The City has said they will not set a goal higher than 30%, will not set a goal for land banking, and will not increase the City funding commitment. Even if they begin doing these things, the goals must be high enough to meet the neighborhood need.

3. City officials focus on 302-433 households in the area and are using the phrase “development without displacement.” The plan does not have a goal for converting existing housing into affordable housing to protect these households, and there is no guarantee these households can move into the new housing. Also, “development without displacement” doesn't mean flooding a neighborhood with new residents as long as existing residents stay; it also means preserving the neighborhood's diversity, which the plan does not do.

Furthermore, there will be more than 50,000 households across the City making less than \$50,000 a year who will need affordable housing, not just a few hundred households in this neighborhood. New housing must reflect the economic and racial diversity of current city residents and new, low-income city residents. Building 70% high-end market-rate housing does not do this.

Solution 1. Land Banking

Provide City funds (about \$10,000-20,000 a unit) to non-profits like CDC's and land trusts to purchase land. Set a **concrete commitment and goal** for land acquisition and units build on this land.

The City's goal so far:

0 units

Potential goal:

Up to 1500 units (land for 100 units a year)

THE CITY'S RESPONSE SO FAR

The City will pilot citywide funding for land banking in the fall or in the future. However, they will not set a goal for this neighborhood.

But the plan **must** include an aggressive goal in order to include more affordable housing. Otherwise there is no real, measurable commitment behind the City's interest in land banking.

EXPLANATION

- With no new public land except for an uncertain possibility of Arborway Yard, we need to save land for development where affordability is prioritized over profits.
 - The City has virtually **zero** new non-profit affordable housing planned beyond the current pipeline, except for the uncertain possibility of Arborway Yard.
 - This pace of construction is similar to non-profits' current capacity. Each non-profit can build about 40-50 units a year as State funding becomes available, so 2-3 developers could build about 100 units a year.
-

Solution 2. Stronger Private Requirements

Require a higher percentage of affordable units in private developments, at lower income levels.

The City's requirements so far:

About 17-18% at 50% AMI and 70% AMI.

Potential requirements:

Groups have proposed a range of possibilities including 25%, 50%, and 70%. Especially by setting aside units for voucher holders (see below), the average AMI could go down to 40%.

EXPLANATION

- Rezoning, not just "density bonuses," creates land value that can be captured as affordable housing.

Because the neighborhood is being rezoned, there is a case to make for even stronger requirements than usual because of the value created by rezoning. An industrial lot's value will become much greater with rezoning, so the City can require that value to go back into affordable housing.

- The City's financial models can decrease costs and profits to get stronger requirements.
Construction costs and ongoing costs in reality are lower than what the City's models use. Also, the 6% profit the City uses translates into a 12% return on investment (a more traditional measure of profit). The City of Cambridge uses an 8% return on investment. The City can decrease profits to cool the pace of development without stopping it.
- The plan is proposing extraordinary changes; given the need for real affordable housing, this means bold, creative solutions and funding.
Requiring a small amount of affordability from private developers will not protect affordability and diversity in the neighborhood or the City. New York recognized this challenge and required additional affordability with the understanding that some subsidies would be required. Boston can set strong requirements with this understanding as well.

Solution 3. Set Aside Units for Voucher-Holders

The City's policy so far:

Interest but no clear details.

Potential requirements:

Set aside a high percentage of affordable units for voucher-holders.

THE CITY'S RESPONSE SO FAR

The City says they may start a pilot program to give preference in units to voucher holders.

It has not given details or provided an analysis of how this will affect the distribution of income levels. A "preference" may be too weak compared to a requirement.

EXPLANATION

- Setting aside units for voucher holders makes developments more deeply affordable without affecting developer profits.
- Half of the affordable units in Cambridge are used by voucher-holders.

Solution 4. Set a Strong Budget for Guaranteed, Annual City Funding

Set a strong budget for average annual City funding for building affordable housing in Plan JP/Rox.

The City's commitment so far:

\$35 million, about \$2.3 million a year.

Potential funding sources:

There is at least \$300 million a year the City could draw from.

THE CITY'S RESPONSE SO FAR

The City claims that they cannot guarantee funding for projects that are not already proposed. The City says the current commitment is strong enough.

But the plan **must** include a larger goal in order to include more affordable housing.

The City is already committing funding for a project that is not yet proposed, at Arborway Yard. This means it can commit funding for additional projects as well. That is the purpose of a plan, to set goals and commit the resources behind them. In addition, there are current projects at 125 Amory Street and Jackson Square that the City could commit additional funds to.

Also, \$2.3 million a year is small compared to the amount of housing being built in the neighborhood, it is small compared to the amount needed for affordable housing, and it is small compared to potential funding sources.

EXPLANATION

- There is no way to achieve high enough affordability goals with a real increase in City funding and a substantial commitment.
- Guaranteeing a budget every year for the neighborhood ensures more “sequencing,” making sure a flood of market-rate housing isn't built first without any affordable housing.

Almost 70% of the new publicly subsidized construction in the plan is from Arborway Yard, which is very uncertain. We need to make sure a high amount of affordable housing is being built every year.
- There is about \$300 million that annual funding could come from.

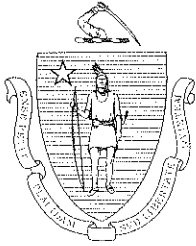
Property taxes and new developments: 53,000 new units of housing means about \$200 million in property taxes a year for the City. Up to \$13 million a year could come from the new housing in this neighborhood alone. There are multiple ways to use this funding; giving property tax breaks to developers to build affordable housing, using TIF (tax increment financing) to borrow funds at a low interest rate using the money from property taxes, or budgeting an equivalent amount of funds for affordable housing from the operating budget. Also, the sale Winthrop Square will generate \$151 million.

PILOT: The City receives \$44-50 million a year in PILOT (payment in lieu of taxes) funds from large non-profits every year, including about \$700,000 million from the Faulkner and Showa Institute in Jamaica Plain.

Existing Funds and Community Preservation Act: The City funds about \$40 million a year now, and CPA could provide up to \$20 million for affordable housing a year.
- \$2.3 million a year is low compared to the amount of new housing in the area, **and** overall City funding should increase beyond just this neighborhood.

Out of about 30,000 units remaining in the Mayor's Housing Plan, about 10% will be in this area. If City funding for affordable housing goes up to about \$60 million next year, 10% would be \$6 million a year for this neighborhood

More importantly, the pie of City funding should get **bigger**, so that all neighborhoods get the funding they need. This will only happen if all neighborhoods, including ours, advocate for more neighborhood funding *and* more overall funding.



COMMONWEALTH OF MASSACHUSETTS
THE GENERAL COURT
STATE HOUSE, BOSTON 02133-1053

October 13, 2016

Brian Golden, Director
Boston Planning and Development Agency
Boston City Hall, 9th Floor
Boston, MA 02201

Dear Director Golden,

Over the last 18 months the BRA/BPDA staff have put a great deal of time and energy into producing a revised zoning code for the Washington Street corridor from Forest Hills to Jackson Square. We applaud the significant efforts made by your staff to maintain a cooperative relationship with the community throughout this process, and appreciate both the patience required for such an effort, and the enormity of the task facing your agency.

It is our understanding that the final plan is scheduled to come before the BPDA board for a vote during the October 20, 2016 meeting; however, due to the variety and complexity of the unresolved issues remaining in the plan, we respectfully request that you remove this item from the BPDA board meeting agenda to allow comments and revisions to be thoughtfully incorporated and worked through with community stakeholders.

As it stands, all public comments are due on Thursday, October 13, the same night as the final Advisory Group Meeting. The final plan is expected to be released the following day, on Friday, October 14, and the BPDA Board is expected to vote less than one week later on Thursday, October 20. We have heard resoundingly from our constituents, and we agree, that this timeline does not allow for a healthy dialogue and exchange between the BPDA and the community about the final revisions to the plan.

Several community associations, including the JPNC, a large coalition of neighborhood stakeholders (represented by the newly formed Neighborhood Alliance) and individuals acting on their own, have identified a number of outstanding questions regarding design guidelines, and overall goals around height, density, affordability, neighborhood stabilization and job standards. Addressing these questions and creating an alternative communication framework where community members can see their feedback within the plan will go a long way toward making the plan more feasible and strengthening relationships between the BPDA and the community going forward.

We believe that an accord can be reached to finalize the plan, but that it will require additional revisions and some collaborative problem solving with the community before the board votes. We urge you to pull the vote from the October 20 agenda and resume communications with the community. Additionally, we, as a delegation, request a meeting with you to discuss how we can facilitate better communication with community groups in the interim.

Thank you for your consideration. We look forward to hearing from you before the end of Friday, October 14.

Sincerely,

Matt O'Malley
District City Councilor

Liz Malia
State Representative

Sonia Chang-Díaz
State Senator

October 13, 2016

Brian Golden, Director
Boston Planning and Development Agency
One City Hall Square
Boston, MA 02201

RE: Plan JP/Rox

Dear Mr. Golden,

On behalf of an Alliance of the Neighborhood Associations/Organizations along the Plan JP/Rox corridor, we respectfully request that you remove Plan JP/Rox from the Agenda of the October 20, 2016 BPDA Board meeting. The BPDA should not submit PLAN JP/ROX to their Board for approval until the following issues have been addressed, and the final version of the Plan is presented to the public for review.

Although significant progress was made during the 3-month extension, and many neighborhoods had an opportunity to provide input, the 9/20/16 plan includes substantive changes to the previous draft, and the BPDA is continuing to make critical changes to RDA policy and design guidelines, many contrary to neighborhood requests. The BPDA (BRA) will not finish receiving comments from the Advisory Group and Neighborhood stakeholders until October 13, and cannot possibly review, discuss and incorporate community feedback in the one week preceding the October 20 BPDA (BRA) Board Meeting. We will work with you or BPDA staff to develop a process to address our concerns as expeditiously as possible.

Our¹ concerns fall within two categories: (1) requests for revisions to metrics that will directly guide revisions to the Zoning requirements and (2) requests for specific commitments from the BPDA and related agencies to continue to work with the community to develop and implement non-zoning strategies and policies that are critical to the success of the overall plan. Attached is a summary of our primary concerns. Individual organizations may submit additional comments to BPDA Plan JP/Rox staff.

Sincerely,

Susan Pranger and Carolyn Royce, on behalf of the following Alliance members:

Asticou/Martinwood/South Street Neighborhood Association
Brewery District Neighborhood Crime Watch Group
Brookside Neighborhood Association
Chilcott Place Granada Park Neighborhood Association
Egleston Square Neighborhood Association
Green Street Renters Association
Parkside Neighborhood Association
Stonybrook Neighborhood Association
Union Avenue Neighborhood Association
Westminster/Wardman Tenant Association
Keep It 100 for Real Affordable Housing and Racial Justice

Cc: BPDA Board Members
Teresa Polhemus, Executive Director/Secretary, BPDA
Marie Mercurio; John Dalzell/BPDA
Representative Liz Malia
Senator Chang-Diaz
Councilor Matt O'Malley

1. DESIGN GUIDELINES SHOULD PROTECT AND BUFFER THE EXISTING RESIDENTIAL NEIGHBORHOODS**a. "Guidelines" must be mandatory requirements and enforceable by Zoning.****b. SETBACKS (at grade):**

- Maintain 20-foot rear/10-foot side setbacks on new development that abut residential zones. The draft guidelines are unclear, and appear to tie the setback requirements to the presence of first floor retail and to the character of the fronting street.

c. STEPBACKS (At 3rd or 4th floor):

- The stepback should be sufficiently deep to allow upper floors to visually recede, to allow views and sunlight, and avoid tunnel effects.
- Where new development abuts residential zones, step back the side and rear facade above the 3rd story (at the 3/4 line) to provide a transition to existing 1 to 3 story homes.
- Increase the depth of required stepbacks on all sides. Neighborhood groups have consistently requested 10 to 20 feet deep stepbacks. The 7/15 draft required an 8' deep stepback above the 4th story along most of the perimeter of the new building. The latest proposal (9/30ⁱⁱ) reduces the depth of the stepback to only 5 feet.
- Clarify the requirements for the front stepbacks.

d. SIDEWALKS:

- Specify minimum sidewalk widths of 8' to 12', depending on the building use and the street character. The 9/20 draft requires a 7' minimum in all locations, which is insufficient. Coordinate sidewalk requirements with Front yard setback requirementsⁱⁱⁱ.

2. OVERALL BUILDING HEIGHT SHOULD RESPECT THE SCALE OF ADJACENT PROPERTIES AND STREETS**a. Additional RDA height should be allowed ONLY where Design Guidelines are first met. ^{iv}****b. Height limitations should reflect site-specific changes in grade between the project and abutting properties.^v Stepbacks should relate to allowable heights on adjacent properties.****c. The additional 5' in allowable height (added to all RDA zones in the 9/20/16 draft) should be reduced to 3' and allowed only where ground floor commercial is allowed.****d. Green Street**

- i. Change the height limit of the entire LC subdistrict along Green St/Glen Rd to 4 stories/45', with 5 stories/55' at the Washington St intersection, to avoid creating an undesirable canyon effect on this narrow corridor and to respect the abutting 3-story residential neighborhoods.
- ii. In the LI subdistrict on the western side of Washington St, south of Green St, change the four parcels shown as 5 stories/55', to 4 stories/45' to respect the 3-story residences on Union Ave. and to be consistent with the change to 4 stories/45', already made, for the parcels on the remainder of this Washington block.
- iii. On the eastern side of Washington, the LI and LC subdistricts north of Rockvale Rd, the height should be changed from 65' to 55', consistent with the 55' designation south of Rockvale.

e. Stonybrook/Forest Hills

- i. The height on the west side of Stedman Street, between Brookley and Rossmore Roads should be limited to 35' to respect the adjacent residential property on Stedman and Brookley and due to the narrow width of Stedman Street. (While Stedman is a two-way street, cars cannot pass in opposite directions.)
- ii. We object to the development of 13-15 story buildings on the site of the bus yard as part of the BPDA's proposed creation of 1250 new units of housing between Williams Street and the Forest Hills T station. The proposal adds to the nearly 1,000 units already planned/under review/under construction within a half mile of the Forest Hill/Stonybrook neighborhoods. Washington Street is already in a perpetual state of traffic gridlock. The proposed density will overwhelm the neighborhood and significantly diminish the quality of life. Also, from an affordability perspective, a high-rise is not economically feasible in the JP Market, and actually makes it harder to get a high percentage of affordability.

3. COMMIT TO BETTER TRANSPORTATION AND UTILITIES^{vi} TO SUPPORT THE INCREASE IN DENSITY

- a. The implementation of Mobility & Connectivity Improvements is the responsibility of the BTD and PWD. BTD and PWD need to provide a schedule of budgeted short-term improvements that can be accomplished now, and a contact and process for continuing to work with the community on a steady plan for transportation improvements.

4. AFFORDABILITY GOALS AND STRATEGIES SHOULD REFLECT THE ACTUAL NEED

- a. Negotiate with the community to increase the 30% goal for overall affordability to better reflect the actual need of 70%; shift the plan's affordable housing income levels downward to meet the growing needs of low-income households and the working poor, while also providing for moderate-income households. Emphasize households making less than \$35,000 a year and include households making \$35,000-50,000 and \$50,000-70,000 a year.
- b. Use the tools in the Plan to make stronger commitments to increase and meet affordability goals. Include a detailed plan and commitments to land banking in the study area, set aside affordable units for voucher-holders, and increase commitments of City funding.
- c. Provide stronger affordability requirements in base zoning and RDA incentive programs (beyond the proposed 13%/70% AMI and 20-25%/50% AMI bonus). The base affordability in RDA developments should be 25% with higher percentages for the bonus density.

5. NEIGHBORHOOD STABILIZATION

- a. The plan must include commitments to immediate strategies to prevent displacement of existing residents and businesses:
 - Adopt a mission statement that commits the City to designing and maintaining a program solely devoted to the prevention of displacement and the growth of diversity.
 - Strengthen and better enforce ordinances and regulations to protect housing rights.
 - Include a concrete goal for converting market-rate properties into deed-restricted housing; work with neighborhood organizations to proactively identify properties suitable for acquisition.

- Include a commitment to immediately create an Office of Small Business Stability to assist small businesses, mediate disputes between small businesses and developers, and assist small businesses with funding.
- Promote the existence of the new Office of Housing Stability
- Include resident input as part of any displacement prevention endeavor.

6. JOBS:

- Incorporate Good Job Requirements, based on the recommendations of the JP Job Coalition^{vii}
 - Require developer proposals to include a jobs plan for their contractors and subcontractors reflecting good pay standards and job access guidelines proposed by Jobs Coalition.
 - Begin discussion with appropriate City department about establishing one-stop job centers to link neighborhood residents with downtown jobs, expanding transit-oriented housing development to include transit-oriented job development.
 - Prevent displacement of nonprofits that provide employment in the area.

ENDNOTES: (The fine print)

ⁱ This document was prepared by a subcommittee of the Neighborhood Alliance and approved by all organizations.

ⁱⁱ ON 9/30, BPDA (BRA) staff met with neighborhood representatives to review potential changes to design guidelines. It is our understanding that these criteria are still in flux.

ⁱⁱⁱ The 9/20 Draft p 90 indicates a “preference” for 11’ 6” at residential and 16’ 6 at commercial streets but specifies the minimum as 7’. On 9/30, BPDA staff proposed minimum sidewalk widths but criteria is still in flux.

^{iv} Where potential sites are not deep, as is the case in many neighborhoods, a proposed project might not be able to both reach the allowable RDA height and provide the required front and rear sidewalks, setbacks and stepbacks. It is critical that the Guidelines are specific that (1) allowable RDA heights are only allowed where the sidewalk, setback and stepback requirements are first satisfied (and not vice versa). In many areas along Washington Street, developers would need to acquire and consolidate multiple properties in order to meet the minimum site area of 10,000 sf, and/or to have sufficient depth to reach allowable heights while meeting the previously mentioned design guidelines. RDA criteria should specifically emphasize that RDA sites cannot be expanded by acquiring and including parcels in existing 1-3 family residential zones that are not within the proposed eligible RDA zones.

^v For example, 3193 Washington Street meets the proposed 5 story limit, but sloping topography means that the proposed building is 6 stories above the abutting residential zone, and 3 stories taller than abutting 3 story homes.

^{vi} Even though the 9/20 draft projects less growth than was shown in the 7/20 draft, there is still concern **that the proposed overall density** (the number of additional units under construction and review combined with the BRA scenarios) **in the Plan JP/Rox area - is too high to be supported by the existing infrastructure.** There is also concern regarding the height and density allowed in specific proposed RDA zones. These two issues are related; reducing the height and density of specific RDA sites will have the **added benefit** of reducing the overall density.

^{vii} Refer to draft Jamaica Plain Neighborhood Council Good Jobs Standards dated 10/5/16 - Projects over 50,000 sq ft or over 10 units, whichever is smaller, all workers shall be paid prevailing/union rate (wages and benefits) whether the contractor is union or non-union; smaller projects, all workers shall be paid a “community rate” based on a review of responsible community contracting; consideration of “community rate” in larger projects in return for higher number of affordable units; job access 51% Boston residents, 51% people of color; 20% women.



Marie Mercurio <marie.mercurio@boston.gov>

ESMS Comments on Plan JProx Final Draft

Luis Cotto <luis@eglestonsquare.org>
To: marie.mercurio@boston.gov

Mon, Oct 17, 2016 at 8:43 PM

Hello Marie,

Thank you for allowing me until today to get you these notes. I waited to try and have a quorum for what should have been the 2nd of 2 meetings on JProx but that was not able to happen. What you'll see are consensus points from our first (and only) meeting.

Firstly, I'd like to state our total support and participation in the creation of the Small Business Displacement position paper created by a small coalition of small business stakeholders including JPND, JP Local First and City Life / Vida Urbana. I want to express gratitude towards the more than warm reception given to our recommendations and look forward to working with appropriate City staff to move those recommendations forward.

I've categorized the comments from ESMS under the three appropriate categories we covered: Zoning, Transportation and Parking.

Zoning

The plan proposes heights of 55' for the noncommercial districts from Montebello Road to Columbus Avenue. While we feel that additional height (up to 65') along this corridor could be accommodated on certain parcels with careful design, we recognize the concerns of residential abutters and accept the proposed height as an appropriate compromise. However, there are other areas where additional height can be allowed with minimal impacts on abutting residents. Specifically, **we recommend that the section of the Egleston Square NS district along the east side of Washington Street between Columbus and Westminster Ave (including Egleston Center, Rent-a-Center, and Laundromax) should be added to the 65' subzone of the proposed RDA.** These properties have few immediate residential abutters and the area is large enough to permit substantial height.

We would make the same case for the light industrial areas located between Amory Street and the Orange Line, between Stony Brook T and Atherton Street. These properties have few residential abutters and could accommodate substantial height. **We recommend a 65' height limit for those properties as well.**

We note approvingly that the proposed RDA along Amory Street across from the Brewery excludes the small complex at 243-253 Amory Street, which includes a variety of small businesses. This property provides affordable and flexible space for innovative businesses, and should be protected from residential redevelopment. While the plan does exclude this area from the RDA, it makes no mention of updating the zoning to accommodate current or desired uses, which include retail, restaurant, personal services, studios, and "maker" spaces. **The plan should suggest an update to the base zoning in this subdistrict so that new innovative and desirable uses are not required to secure a variance.**

We also **suggest that the BRA consider excluding other light industrial areas from the RDA designation** so that they can continue to serve as flexible, low-rent spaces for small businesses and artists, without the threat of residential conversion. **Specifically, the properties at 116 to 128 Brookside currently contain a variety of studio and light industrial spaces** likely to be displaced if residential development is permitted. **We suggest that the RDA overlay be adjusted to exclude these properties.**

We would also add the building directly abutting the Egleston Square Peace Garden at 100 School Street (parcel #1101327000).

The inclusion of the Brewery Small Business complex as a proposed RDA is baffling, given the tremendous amount of economic activity going on at that location. It is also strange that the plan does not propose changing the base zoning for the JP Cohousing, Amory Street lofts, or Brookside artist studios from LI to residential or live/work to reflect current uses, as is proposed for other LI areas that are seeing residential or mixed-use development.

Note: Your most updated map has a number of lots with public spaces or public resources within the RDA. Further conversations with BPDA staff has confirmed that this might have been an oversight when creating the map. We will list these for your consideration for correction:

- Egleston Fire Station (1870 Columbus Avenue – Parcel #1100946001)
- “Stonehenge” (Columbus Avenue – Parcel #1101013000)
- Egleston Plaza (2 Atherton Street – Parcel #1101279000)
- Egleston Square Peace Garden (Washington Street – Parcel #1101328000)

Parking

The Plan JP/ROX study area has some of the best multimodal accessibility in the region and is a location where car-free living can be a reality for many different kinds of households. The plan should be structured to encourage development that will attract residents and shoppers who will utilize the area’s alternative transportation assets and will put less strain on the roadway network. **ESMS supports the establishment of maximum parking ratios** (page 92.) The implementation framework also recommends the unbundling of parking costs from rental/purchase costs, though it is not clear how this will be accomplished. **We recommend that new as-of-right or RDA zoning prohibit the “bundling” of parking spaces with the purchase price or monthly rent of a unit**, so that no household is required to pay for a parking space that it does not need. The zoning should also set out a framework for property owners to make unused spaces available to new development and for developers to satisfy parking requirements through acquisition of long-term leases on off-site spaces.

The plan suggests that changes to on-street parking regulations should be “explored” (page 171), but falls short of recommending an area-wide parking study essential to the effective design and implementation of such recommendations. Parking is a major concern of Egleston Square merchants; while we feel that meters may be an effective and equitable strategy for managing parking supply, they cannot be implemented without a careful assessment of district parking assets and needs. **The Plan should explicitly recommend a comprehensive parking study for Egleston Square that includes a feasibility analysis of a “parking benefit district”** (recently enabled by state legislation) that would institute parking policies and fees, with parking revenue reinvested in local transportation and urban realm improvements.

Transportation

We suggest adding the entire length of School Street as a candidate for Local Street Improvements on the “Recommended Transportation Improvements” map (page 91). While Atherton Street is identified, it is only one-way. School Street is more heavily used and has a wider ROW, making it a better candidate for dedicated bike/pedestrian facilities. School Street also serves three schools, is the most direct route from Stony Brook T station to the core of the Egleston business district, and links Washington Street to the Walnut Avenue entrance to Franklin Park.

Thank you in advance for your help with this process. Please call me with any questions.

Regards,

Luis

ps If the BRA board decides to postpone a vote, I would appreciate the opportunity to add more to this list.

—

Luis Edgardo Cotto
Executive Director

EGLESTON SQUARE MAIN STREET
3134 Washington Street
Roxbury, MA 02119
Tel. [203.215.9614](tel:203.215.9614)
www.eglestonsquare.org
www.facebook.com/EglestonSq
Follow us on twitter: [@eglestonsq](https://twitter.com/eglestonsq)
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