



## Boston City Council

LIZ BREADON

Councilor – District 9

TRANSMITTED ELECTRONICALLY

August 30, 2022

Joseph Blankenship  
Senior Transportation Planner  
Boston Planning and Development Agency  
One City Hall Plaza  
Boston, MA 02201

*RE: Western Avenue Corridor Study and Rezoning*

Dear Mr. Blankenship:

This is a letter of comment on the Western Avenue Corridor Study and Rezoning Draft Plan Report (the “WACRZ Draft Plan”) released by the Boston Planning & Development Agency (the “BPDA”) on July 28, 2022. This letter also includes comments on the associated proposed zoning amendments to Article 51 of the Boston Zoning Code.

I want to thank the BPDA and the Western Ave Corridor Study and Rezoning project team for their ongoing work on this proposed Study. I recognize that this Draft Plan is the culmination of a lengthy planning process, and appreciate the Study team’s dedicated efforts throughout this process.

The following comments on the WACRZ Draft Plan and proposed zoning amendments are contingent on the expectation that the BPDA will conduct a comprehensive Allston-Brighton master planning process in the near future, at which time the effectiveness of the WACRZ may be evaluated.

I ask the BPDA to respond the following comments and questions in regard to the Western Avenue Corridor Study and Rezoning:

- I support the proposed approach to land use for the WACRZ study area detailed on page 27 of the Draft Plan. I appreciate the BPDA’s prioritization of residential development throughout this corridor and the proposed land use mix that will result in an approximately 75% residential to 25% commercial use ratio within the study area.
- Section 51-45 of the proposed draft amendments to Article 51 of the Boston Zoning Code makes reference to Table 1 of the Western Avenue Corridor Study and Rezoning Report; this section, however, does not include the table itself. Will this table be inserted into Article 51?
- Reference to required minimum setbacks is not included in the proposed draft amendments to Article 51 of the Boston Zoning Code. Please clarify how the minimum setbacks listed on page 28 of the Draft Plan will be required of developers within the study area.
- As illustrated in the diagram featured on page 28 of the Draft Plan, a minimum setback of 10 feet will be required along Soldiers Field Road from the western end of the study area to Telford Street. If feasible, I ask the BPDA to consider increasing this required setback to 15 feet.



## Boston City Council

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- In order to allow for the future implementation of the proposed transitway, I ask the BPDA to ensure that sufficient setbacks are required along the entirety of Western Avenue.
- The proposed draft amendments to Article 51 of the Boston Zoning Code do not include the proposed on-site affordability requirements, as outlined on page 31 of the Draft Plan. How will these affordability requirements be appropriately codified?
- I ask the BPDA for the opportunity to further discuss the following topics:
  - The maximum FAR proposed for Zones 1c and 1b within the Everett/Telford area of the study, particularly those areas between the western end of the study and Telford Street.
  - The maximum building heights and residential affordability incentive proposed for Zone 2c of the study area.
  - Page 30 of the Draft Plan notes that “All inclusionary development recommendations are subject to update with the forthcoming Mayor’s Office of Housing Inclusionary Development Study.” Further discussion of how this Plan will incorporate the expected update to the IDP is needed, particularly in regard to the Plan’s included residential affordability incentive.
- I appreciate the Draft Plan’s long term vision for Barry’s Corner and its proposal to advance the creation of a vibrant square, complete with public open space, in this location.
- I wish to emphasize the importance of improving the connection between North Brighton, Lower Allston, and the Charles River to the north. As planning and development in this area advances, I ask the BPDA to explore the feasibility of creating a linear park along Telford Street that can serve to connect the neighborhood to the river.
- I support the short-term transit improvements proposed on page 54 of the Draft Plan. Proposed transit improvements include protected bicycle lanes and bus queue jumps on Western Avenue.
  - Please clarify where bus queue jumps might be implemented on Western Avenue. Would these queue jumps be implemented at the same time as the proposed protected bicycle lanes?
- I strongly support further study and the future implementation of a proposed transitway along Western Avenue. I recognize that robust public transit service is needed to support development expected along this corridor, and appreciate the BPDA and BTD’s ongoing work on this matter.
  - Does the BPDA have an expected timeframe for implementation of the transitway study?
  - Does the BPDA anticipate coordinating the transitway project with the City of Cambridge’s River Street Reconstruction project?
- On page 62 of the Draft Plan, a traffic calming plan for the four blocks immediately surrounding the Charlesview Residences is proposed. Though I support implementation of traffic calming in this area, I ask the BPDA to note that the streets within the Charlesview development are privately owned by Charlesview; as such, all traffic calming measures must be coordinated with Charlesview leadership.



## Boston City Council

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Councilor – District 9

- As the Draft Plan states on page 66, “future traffic volumes in the Western Avenue study area could be approximately 14,000 vehicles during the heaviest travel time (the p.m. peak hour).” Though the transportation demand management (TDM) strategies outlined in the Draft Plan can significantly reduce these traffic volumes, I have serious concerns about potential future traffic congestion in the North Brighton/Lower Allston area and its negative impacts on neighborhood residents. To reduce future vehicular traffic in this area, I ask the BPDA to:
  - Reduce the maximum parking ratios proposed for the study area, particularly those ratios associated with office, research and development, and laboratory uses.
  - Apply the maximum parking ratios required by WACRZ to those projects within the study area that are currently undergoing Article 80 review by the BPDA. Several projects within the study area that are under review by the BPDA have been exempted from these parking requirements.
  - Reference to required maximum parking ratios is not included in the proposed draft amendments to Article 51 of the Boston Zoning Code. Please clarify how the proposed maximum parking rates will be enforced by the BPDA.
  - Will the BPDA commit to a periodic reevaluation of these maximum parking ratios?
- As discussed previously with the BPDA, there is a pressing need for improved construction mitigation efforts throughout Allston and Brighton. More specifically for North Brighton and Lower Allston, the development enabled by the WACRZ Study and Rezoning will have significant, long term impacts on neighborhood residents. In an effort to improve coordination of construction mitigation across neighborhood projects, I would like to propose the creation of a neighborhood-wide ‘construction mitigation forum.’ If feasible, this BPDA-facilitated forum would meet regularly to 1) enable developers to present anticipated construction mitigation measures for proposed developments prior to the construction phase; 2) allow representatives from developments in the construction phase to provide updates on active construction mitigation measures; and 3) enable community members to provide feedback on mitigation throughout the construction phase so that any issues might be addressed immediately. I ask the BPDA and the Study team to continue to work on this in conjunction with my office.

Sincerely,

Liz Breadon  
Boston City Councilor  
District 9, Allston-Brighton

September 6, 2022, via email

Joseph Blankenship and Kathleen Onufer  
Boston Planning and Development Agency  
1 City Hall Ave.  
Boston, MA 02108

Re: Comments regarding the Western Ave Corridor Study

The Steering Committee of the Coalition for a Just Allston-Brighton, a coalition of over 40 civic organizations from Allston-Brighton, other Boston-based groups, and community members with an interest in the future of Allston and Brighton, submits the following comments regarding the Western Ave. Corridor Study Draft Plan.

We know and appreciate the diligence and hard work of the BPDA planning team over the last three plus years on the development of this plan and understand the challenges the team faced completing the draft during the pandemic.

CJAB fully endorses the thoughtful and detailed comment letter submitted by the Harvard Allston Task Force and will focus our comments on the social, economic, and environmental justice issues specifically regarding construction, housing, small businesses, transportation and accessibility of the plan to those residents who will be most impacted and least likely to have their voices shared and heard.

The current plan demonstrates no sensitivity to the impact of construction on the contiguous and long-established residential neighborhood abutting Western Ave. The lack of a coordinated construction timeline and construction mitigation, as is currently practiced, has seriously impacted the health and safety of our Allston neighbors. The Allston Lab Works construction's disregard for the community is evident in the lack of rodent control and mitigation, the removal of the sidewalk on the south side of Western Ave., the lack of communication to residents regarding drilling and demolition impacts, and the construction vehicles speeding down Western Ave. at all times of the day. Given the number of projects before the BPDA, it is essential that this plan address the scheduling of construction and the responsibilities of the developers to mitigate the impacts on the neighborhood with oversight and consequences when responsibilities are not met.

CJAB applauds the plan's understanding of the need for housing with 75% of the land earmarked for housing. However, there is no detail regarding how many units should be built (given the housing need required for the proposed lab/science space), what percentage would be rental or homeownership, bedroom count, or affordability. CJAB will continue to advocate that 33% of housing developed be affordable to Allston/Brighton residents with a mix of affordability to ensure a diversity of, and equitable mix of incomes and household sizes in the community.

CJAB also appreciates the proposed zoning restrictions to develop housing with ground-floor retail and cultural space. Again, there is no detailed recommendation regarding affordability, locally owned, minority and small business opportunities to lease the space. As our commitment to economic justice, CJAB will continue to advocate that 33% of the developed retail space be reserved at below market rents for these businesses.

CJAB strongly supports accessible, equitable and affordable public transportation that safely incorporates all modes of transportation. It is very important to have the neighborhood understand the vision of the Transitway, how DCR, the City of Boston, Mass DOT, and the MBTA will address their competing concerns as well as the competing needs of those that drive, bike, walk, and/or take public transportation through the corridor. This ambitious plan will require a high functioning, safe and reliable MBTA with significantly increased service.

While BPDA planning staff has worked hard to offer the community opportunities to review, question and understand the draft plan, the majority of the community is not aware of the plan nor the impact the zoning and mobility changes will make in their lives. The community meetings have primarily offered high level and detailed explanations behind the plan using planning and urban design language and acronyms that are not familiar and don't speak plainly to the general public about what these changes will mean to their day to day lives. It is essential that the BPDA create easily understandable information to disseminate to the community that, for example, shows what building heights will look like, where parking would be permitted, how the transitway will change driving directions on Western Ave. etc. CJAB is advocating that this information be made available as soon as possible in multiple languages to be distributed throughout the neighborhood.

As the Harvard Allston Task Force states there is much to like about the draft plan and there is much to be done to ensure that the Western Ave. Corridor Study achieves CJAB's goals of a healthy, welcoming, and diverse neighborhood where people of our city can put down roots. We envision a neighborhood full of small businesses and entrepreneurial opportunities for a range of services. A neighborhood that supports Allston's arts, music and craft creators. A neighborhood with excellent public transit, bike and connections to the rest of Allston, Brighton, Boston, Cambridge, Watertown and points west. A community where greenspace and extensive tree canopy cools summer temperatures, absorbs stormwater and improves the mental and physical health of residents, workers and visitors.

The CJAB Steering Committee

Jo-Ann Barbour  
Anthony D'Isidoro  
Cindy Marchando  
Ellen Krause-Grossman  
Barbara Parmenter  
Maria Rodrigues

Submittor	Date Received	Comment
Joseph Guidry	7/31/2022	All new green spaces, especially those developed by private housing developers, must be accessible to the public. Second, new housing developments from these zoning updates must be affordable. This means guaranteeing that 50% of all new units are affordable by the poorest residents, NOT THE MEDIAN INCOME LEVEL -- which excludes a significant fraction of our community. Gentrification is a significant threat to my neighborhood. It is displacing established residents. It is raising our rent. It is uprooting rat nests and contributing to the rat/sanitation crisis in my neighborhood. All new developments MUST considering the ecological impact of their construction and mitigate the pest crisis their construction will prompt.
Bob Breslin	7/31/2022	I have many comments as a lifelong Allston resident, homeowner, and 50-year Harvard employee. My 2-story house abuts the parking lot of 25 Travis St. where I attended kindergarten 60+ years ago. I now notice that property has been added to the rezoning with 80% lot coverage? This is not what a peaceful neighborhood would ever want. Including that with the proposed Samuels development at 180 Western is exactly what most current Allston residents are opposed to. An average house takes up about 50% of its lot leaving the rest for gardens and green space. We pay our taxes for that green space. These giant 7-9 story apartments do nothing but add hundreds of people into what is becoming a dense urban landscape. What about utility use? The current drought is becoming severe in many parts of the world and is predicted to get worse. We are told to water our gardens once a week now. Adding another 2,000+ people will be crazy. What will the outlook be? Water once a month? I am not a fan of artificially adjusted rents. They have been abused and will continue to be. Rent control in Cambridge was a joke with layers living in \$400 a month apartments, etc. In the old Charlesview I knew of children of low-income mothers living there rent free while earning more than I made. The point is a millionaire and a pauper take up the same space, use the same water, power, parking, etc. The abused rent control is secondary - my and my neighbors concern is with unnecessary density. The 2 properties I mention happen to be on Harvard land, but I see less scrutinized abuse with the Nexus project, Garabedian's project, the skating club plans, and the ridiculous WBZ 4 tower plan. And this doesn't touch on the whole Mass Pike new neighborhood creation. How any of this can or will be addressed is a mystery as the zoning heights and lot size seems to be rolling along to a forgone conclusion. I see the word vibrant tossed around a lot. When I come home, I am not looking for vibrant, I want a peaceful place to sit and watch the birds, talk to a few neighbors, go for a walk... This whole exercise is designed as the opposite of that. Bob Breslin
John Wilton	22-Aug-22	Thank you for the opportunity to comment on the draft Western Avenue Rezoning Report. I reviewed the draft report carefully. My greatest concern is that the recommendations go nowhere near far enough. For example, the report recommends the highest/densest zone as 150' (185' with bonus)/ 4.0 FAR (4.25 with bonus). That is far short of what this area needs. We should be seeing 300ft+ / 8.0 FAR along Western Ave and Soldiers Field Road, as of right. The BPDA needs to realize that this City needs to grow and urbanize. If this City is going to be a place for everyone, where everyone who wants to live here can, with greater economic activity, we can no longer be held back by overly restrictive and in effect exclusionary zoning. I hope that the BPDA will double the recommended heights and FAR restrictions in all zones in its final report.
Deborah	June 22, 2021	Trees are essential for planning . Take a drive down Guest St. Most trees are dead except for New Balance and PBS. Poor planning to offset heat, pollution, traffic, noise. Drive around Brighton to see how the turnpike , railroad , big apt buildings has failed its people.
David Benman	March 13, 2022	Hi, I have recently come across the proposals for a transit-way along Western Avenue and would like to express my support. I primarily use Western Avenue on a bike to access Trader Joe's, Home Depot, Mahoney's, and other businesses along the corridor. I normally return home via N Harvard St.-Franklin St.-Franklin/Lincoln St. Bridge-Harvard Ave. Occasionally I will use the Everett St. bridge instead. Sometimes I also ride the 86 and 66 buses and walk. This stretch of Western Ave reminds me of the Healthline from when I was a student in Cleveland, Ohio. The bus lanes, stations, and bike lanes there are great, and like Western Avenue through traffic is well-served by alternate, parallel routes (Soldier's Field Rd., Memorial Drive, and the Pike in this case). This should give the BPDA the confidence to be bold and prioritize transit, cycling, and walking over parking and car lanes. Plans for this area should include improved shelters for bus riders and sheltered bike parking. I've transferred buses many times at the intersection of Harvard and Western Ave. Bus transfers are much easier on Market St. in San Francisco, one of the examples that planners have pointed to for this project. On Commonwealth Ave. near BU there are protected bike lanes that go around the bus stops, which keep buses and bikes from getting in each others' way. A successful transit-way should take all of these factors into account. Lastly, while I understand that some neighbors may have concerns about shadows or impeded views due to upzoning, there are several locations along the corridor where that impact is negligible. In those areas, we should be as aggressive as possible with putting the most affordable housing on those lots. There are many ways to preserve sunlight with buildings that are 6, 10, 20 stories tall. Reducing the amount of parking reduces construction costs. Our lack of affordable housing impacts renters the most, and Allston is a neighborhood with a large majority of renters. The BPDA should work for renters to relieve the housing crisis. Sincerely, David
Emily Jacobsen	March 30, 2022	I work in an office at 1380 Western Ave. I am so glad you are going to redo the road with better bike and bus access. The road is a death trap at the moment and the nearby car repair businesses use Western Ave. as a free parking lot where they store cars they aren't currently working on. Even the people who drive their cars in have trouble parking because all the free spaces are taken by these decomposing cars. Many of my younger colleagues take the bus because they can't afford cars. Some of us bike. We will be glad to have a safer faster way to get to work. If you can improve travel times to the red line more of my colleagues might take public transit.
Alex Twist	July 21, 2022	I want to express support for sidewalk level bike lanes. My second preference would be curb protected bike lanes akin to what is along Commonwealth Avenue along the western half of BU campus. I would strongly discourage paint-only or plastic bollard protected bike lanes - it has been my experience that these features don't encourage more riders because of the likelihood of car collisions and that BTD does not actively maintain the plastic bollards year round.
Sean McDonnell	August 9, 2022	Hi BPDA Team- I am part of the redevelopment team at the Speedway. The issue on my mind frankly is your plan to build dedicated bus and bike lanes removes parking and will adversely impact important destination parking serving legacy businesses in our neighborhood. Speedway is a new project but is also an inefficient historic building and could not afford to build sufficient structured parking to serve our customers (same for Big Daddy's, Article 24 and Pavement, the local retail on our end of Western) we are a destination that many people drive to - we have some parking, but on a busy Friday we need on-street parking to survive. By removing it from Western, our customers will park in the neighborhood, or choose to go elsewhere. Looking at Radius, our neighbor, they have ground floor retail space that has never been occupied- our market is too thin. I am making the observation that you need to be very careful not to adversely impact these businesses, ours included. Parking is very important. reduce it, but don't get rid of it.
Six Rudolph	Sept 7, 2022	I am looking for more direct attention to green spaces, as opposed to open spaces. Open spaces include impervious surfaces (plazas, sidewalks, anything paved), which contribute to Allston's heat problem, air quality issues, and flood dangers. I am looking specifically for a focus on park space, trees, and grassy areas as we enter a period of climate crisis. Allston was a rough place to be during this summer's heat waves, especially for kids and people with medical issues, and it's going to get worse before it gets better. Additionally, I'd like to hear about access to those green spaces. I live off Western, so I don't even have to cross the Pike to get to the green space by the river, and it's still difficult because of Soldiers Field Rd - I don't want to see those same issues with Western Ave! I bike around a fair bit, and even so it's difficult to cross Western Ave safely sometimes. It could be productive to coordinate with current development of the I-90 project in terms of access to the Charles as well.

August 31, 2022, via email

To: Joseph Blankenship and Kathleen Onufer

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## **Harvard Allston Task Force Comments regarding the Western Ave Corridor Rezoning Study**

We, the undersigned members of the Harvard Allston Task Force (HATF) submit the following comments regarding the Western Ave Corridor Rezoning Study (WACRZ) Draft Plan.

First, we appreciate the hard work of the BPDA planning team over the past three years, and the fact that they have had to balance many competing and complex needs and desires. We also appreciate that the rezoning draft plan would ensure that approximately 75% of use at full-buildout would be for housing.

In general, we support the planned land uses which puts a major focus on housing and limits lab spaces to two nodes of higher density, but we have concerns about how build-out of these uses will be handled, in terms of transportation and mobility, community benefits, and construction management and mitigation. We also want to ensure that there is adequate greenspace and central place of some sort for people to gather - an arts district, a public square, etc. And we would like to see more attention given to architecture and design, to ensure a high quality public realm. Our concern is that as development plays out over time, the opportunity for big picture thinking will be lost in a series of protracted development processes. The community's experience with Guest Street to date provides a cautionary tale when it comes to how the community's hard work on a corridor vision plays out in reality when the various proposals come up for Article 80 review.

We understand that this is a zoning overlay process and we look forward to the Community Needs Assessment and the Allston Brighton Master Plan to carefully identify further community needs and benefits in this area as well as current gaps in services, facilities, and amenities. We need an actionable plan and investment process by which the City can meet these needs and fill the current gaps.

### **Proposed overlay zoning**

We'll first address the land use aspects. Our understanding is that what is being proposed will be written as zoning overlays as a basis for Planned Development Area proposals which would then undergo Article 80 review. The proposed density and height is much higher than current use on Western Ave, but it represents a balance between community and developer desires, especially when paired with lot coverage limits. As stated above, we like that over much of the area, proposed zoning restricts development to housing with ground-floor retail and cultural

spaces. We appreciate the limitations on lot coverage. We very much support the BPDA planning team's "breathe and adapt" approach to ensure there is new greenspace and public realm, multiple points of access to the Charles River parks, and plenty of space for trees, green infrastructure for stormwater mitigation, and places for residents and workers to keep cool in an area that already suffers from rising urban heat.

We feel that the area designated as 2c around Barry's Corner is too dense given the importance of that intersection, the current and very likely future stopping and delay of vehicles at the stop lights there, the pollution generated due to that. This is zoned for residential use, so both new residents will need more greenspace there to accommodate the development. We would like to see 2b thus have similar lot and height requirements to 2a (60% lot coverage, 65 foot height limit, FAR 3.5).

We would also like to see the two tables (Table 1 and Table 2) from the WACRZ Plan document that are referenced in the proposed Article 51 zoning code amendments be actually added as tables to Article 51. The need to reference a separate document is unwieldy, and requires that the Plan be always accessible.

It would be useful to see an estimate of how many housing units this plan could support if developed at full build-out, and the projected distribution between rental and home-ownership units. We believe that lab spaces that have been and will be proposed will require thousands of units of housing, otherwise our community will be facing a Seaport-like transportation bottleneck. So far, Harvard is proposing only 1000 units of housing for the ERC area, which we believe also needs to increase substantially.

We have a major concern that the new zoning overlays will be subject to requests for variances during the Article 80 review process for individual proposals. Again, the Guest Street Corridor which underwent a long planning process, only to have variances extensively granted, is something we don't want to see on Western Ave. The BPDA Western Ave project team stated at the August 24th public meeting that they would fight variances "tooth and nail" but since the Mayor and senior BPDA officials are the final arbiters, it is important to know whether they have the same commitment to this plan and to maintaining its requirements.

### **Proposed Affordability and IDP Requirements**

We support expressing affordability requirements in terms of square footage of total residential development rather than units. This will allow for greater flexibility for larger units, rather than trying to hit the target with small studio apartments. Those larger units should be designated for the deeper subsidies (e.g., 50% or below) in order to provide homes for families.

Our understanding is that the current draft affordability requirements will be updated once the City's new IDP requirements are updated. We would like to see the on-site affordability requirements set at 33% of residential square footage across the board.



We feel it is also important to set the Area Median Income ranges to average 50% AMI which would more closely match the household median income for Allston area families with children (\$64,606) and non-family households (\$57,589) (See American Community Survey, 2020 5-year estimates, Table S1903 for ZCTA 02134; also see [BPDA Income, Asset, and Price Limits](#)).

## **Major concerns about the draft plan**

### Clearer plan for transportation and mobility

We have very serious misgivings about how safe mobility and car/service vehicle traffic is being addressed in the WACRZ draft plan. In general we strongly support multimodal transportation that safely accommodates buses, pedestrians, bicyclists and cars, and appreciate the proposed setbacks for new development along existing and proposed streets. Also, the planners have given thought to long-term parking needs, e.g., provision for on-street parking on new streets, and requirements that any new garage space in private developments include public parking. We appreciate that there will be a study of the Transitway vision, its feasibility, and how it will materialize over time. There has been no timeline given for this study or its conclusions.

In the meantime, however, the proposed zoning is set to go up for approval in the next few weeks. As Task Force members, we are still unclear regarding the impacts of new developments on near-term parking and traffic, how the removal of street parking from Western Ave will be managed in the short-term so as not to spill over onto already crowded neighborhood streets. As the study points out, there is existing off-street parking for many businesses, and unused parking spaces, but these are private and not shared. A parking management system that encourages shared parking (e.g., the Star Market parking lot) could go a long way to help address concerns.

We are likewise concerned that there may be competing plans between the City, Mass Department of Conservation and Recreation (DCR), and MassDOT in this area, as well as conflicts between priorities like preserving the Charles River and its parklands and diverting traffic onto Soldiers Field Road. We would very much like to see a frank discussion of conflicts and competing priorities to understand these and their potential to upend planning for Western Ave.

A pedestrian / bike bridge over the Mass Pike at Everett Street has been discussed in the community for many years, as has a bike path along Lincoln Street together with a sound barrier.. We'd like to see consideration of these requests in the Transitway Vision Study.

As part of a coordinated community benefits plan (see below), there needs to be a way that different developments contribute meaningfully to MBTA planning and to provision of more bus service which will be critical to the success of this corridor.

It will also be important to have traffic signalization to help ensure a smooth, safe speed flow of traffic.

Coordinated community benefits (link coordinated approach to Community needs assessment)

With so much actual and potential construction happening at once, we ask that the City develop a way to coordinate benefits across projects. The current project by project approach leads to inconsistent and disconnected benefits. As part of its community benefits for Phase A of the ERC, Harvard has agreed to fund a community wide needs assessment. If run in a thorough and inclusive way, this could serve as the basis for a standardized community benefits framework for the WACRZ zone in which every development project would participate.

Thus it is critical that the promised community needs assessment be carried out first prior to future community benefits being decided on a project by project basis.

We anticipate that as part of the coordinated benefits planning, developments would have to make meaningful contributions to community park space and transit improvements above and beyond typical mitigation requirements.

Coordinated construction mitigation

At present, this area of Allston Brighton is facing uncoordinated construction mitigation. Once a project is approved, the City and the BPDA appear to be done, and it is the developer's responsibility to oversee construction mitigation. Some developers do this well, and some do it very poorly. In the end, residents and businesses become responsible for attempting to monitor construction and report to different developers about problems. This current approach is untenable for the amount of construction this corridor will be experiencing.

The City and the BPDA need to establish a standard construction mitigation approach and set expectations and requirements. The City also needs to take responsibility for monitoring the overall situation, and compel developers to monitor their own projects, not wait for a resident to call in a problem. There also needs to be City or BPDA officials responsible for addressing situations where developers violate or otherwise mishandle construction rules.

Public realm, adequate open space and green space

We greatly appreciate the thought given to public realm, streetspace, connectivity, and the overall vision the BPDA planners have provided for how this might work. Specifically we agree in principle with the open space goals in the WACRZ draft proposal (pages 43-49). However, these are entirely framed as "shoulds". And there is a big escape clause on page 44:

*Projects that do not comply with lot coverage guidelines and open space requirements must provide additional public benefits. The qualification of individual projects and specific benefits will be determined through the Article 80 development review process.*

As stated above, the current Article 80 community benefits process is very problematic, and left to individual projects, we strongly feel that the envisioned open space planning will come to naught in the WACRZ zone. We would like to see much stronger language and an open space needs assessment and plan for the area, as requested by the Boston Parks and Recreation

Commission in its March 2021 and October 2021 comment letter regarding Harvard's Enterprise Research Campus.

Likewise, we see no requirements regarding actual greenspace as part of the open space recommendations. Our experience in the past points to greenspace being an afterthought, and developers prefer paved plazas and planters to actual greenspace. We would like to see actual green park space dedicated in the WACRZ zone.

We strongly support the vision in WACRZ of a Telford Street green promenade from Holton Street to the Charles River as shown in the illustration on page 18 of the Draft WACRZ Plan and discussed in several places.

To enhance the public realm, we would like to see the status of the Department of Public Works parcel discussed in the Master Plan process, as it could be the site of important other community needs (housing, arts, etc.)

Finally, we would like to see some kind of central, focal district in the corridor, whether that be a core arts district or some other kind of public realm. In the long-term vision, the BPDA planners seem to see the Gas Station triangular parcel (Spurr St - Western Ave - N. Harvard Street) as a potential area for this, but we believe this needs to be more definitively planned, possibly through a coordinated community benefits process.

#### Status of pedestrian crossings across Soldier's Field Road?

Pedestrian crossings of Soldiers Field Road have been planned and budgeted for in previous community benefits for the Harvard Institutional Master Plan. To date, we have seen no progress on this and do not know where the money has gone. These crossings will be critical to the success of Western Ave redevelopment, with thousands of new people living and working in the area.

#### **Conclusion**

There is much to like in the Western Ave Corridor rezoning draft plan, especially its vision for a future that balances new housing, retail, and commercial spaces, its approach to open space and connectivity, and its long-term vision for safer mobility through this area. At the same time, there are many questions, and the path ahead is very unclear for us as Task Force members and we presume for many other community members. We understand the pressure to approve the zoning, but we have deep misgivings about actual implementation. As discussed in this letter, the following commitments from the BPDA and the Mayor's office would help alleviate these concerns:

- A commitment from the Mayor and BPDA senior leadership to this plan and maintaining its requirements during the Article 80 process
- A strong commitment that the Community Needs Assessment and the Allston Brighton Master Plan will be used in future planning, and that this rezoning step is the beginning rather than the end of a planning process

- A coordinated approach to community benefits, informed by the needs assessment
- A stronger plan to manage short-term mobility and parking needs as the long term Transitway vision is studied
- Discussions with the DCR and the MBTA and the community to better understand potential conflicts and competing priorities, including resolution concerning already funded pedestrian crossings on Soldier's Field Road
- A plan for coordinated construction mitigation, enforced by the City
- A more definitive plan for green parkspace and a central public realm coordinated across developments

We look forward to working with you to accomplish these goals, and we thank you for this opportunity to comment.

Signed,

Members of the Harvard Allston Task Force

Troy Brogan

John Cusack

Dan Daly

Tony D'Isidoro

Rita DiGesse

Michael Hanlon

Millie Hollum-McLaughlin

Bruce Houghton

Edward Kotomori

Cindy Marchando

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Barbara Parmenter

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September 7, 2022

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RE: Western Avenue Corridor Study & Rezoning Draft Report Comments

Dear Joe:

Harvard appreciates the City's efforts in advancing the planning discussion for anticipated growth of the Western Avenue Corridor in Allston-Brighton, and we thank the members of the Allston-Brighton community who have given so much time reviewing and commenting on the study. We are grateful for the City's focus on this study and recognize the challenges in undertaking this activity during a global pandemic. We support the objective of ensuring that the area along Western Avenue continues to evolve into a vibrant, mixed-use neighborhood and are committed to continued engagement with the BPDA and community to achieve that objective. Western Avenue is a vital corridor in the community, and it is why Harvard continues to invest in so many of its important elements: local businesses such as Pavement Coffee, Aeronaut Brewery, and Mahoney's Garden Center; mobility solutions such as shuttles, Blue Bikes, pedestrian and bicycle connectivity (greenway and Western Avenue cycletrack); and transportation hubs and other infrastructure.

We want to confirm at the outset that we share the vision advanced by the BPDA for a vibrant, mixed-use neighborhood anchored by Western Avenue including:

- Increased multimodal transportation on Western Avenue;
- Significant housing production with increased affordability for both renters and owners;
- A network of open spaces through the neighborhood connecting to existing parks and the Charles River;
- Encouragement of a variety of uses within the study area to support the unique urban fabric that makes the neighborhood special today;
- Attractive and flexible spaces for emerging industries and companies that will power Boston's economy in the future;
- Pedestrian-friendly development including larger sidewalks, better road crossings, and improved urban conditions; and
- Places for art-marking and artists.

We believe that the Western Avenue Corridor Study and Rezoning Draft Report (dated July 2022) advances this vision in many ways; however, Harvard believes that the Corridor Study should represent itself as guidance and vision whereas it can currently be read as prescribing solutions. While there are elements within the Corridor Study that we believe require adjustment and clarification, we hope that these are addressed in the final Corridor Study Report and we will be excited to see the planning process wrapped up this Fall.

## The Plan as Illustrative versus Prescriptive

Harvard recognizes the vision and aspirational framework that the BPDA provides within the WACRZ Draft Report. While it is important to articulate the vision and framework for future conditions within the Corridor Study area, it is also important for this planning document to be less prescriptive. This is particularly true as it concerns design concepts that show an impact on existing businesses. As an example, there are a number of small businesses – many of them tenants of Harvard University, that are vital parts of the community -- located precisely where proposed new “internal roadways” would bisect.

Further complicating its intent, the current Corridor Study draft report shows the replacement of a critical neighborhood grocery store (currently operating under a long-term lease) with a park with no discussion of how, when, or where this service might be replaced. Notably, this grocery store as a use would not be allowed to be rebuilt on the current parcel under the proposed rezoning, which seems contradictory to the desire for a mixed-use and vibrant neighborhood with significant new residential growth. As proposed, the Corridor Study unnecessarily raises neighborhood questions about when the park will be built/what will happen to the grocery store and tenant concerns about being displaced – questions that Harvard as the landowner is unable to respond to.

As planners, we understand that time and further study can bring new and exciting solutions to today’s issues. Harvard recognizes the value of additional circulation opportunities and open space within the study area and believes that a strong planning document provides the vision and framework for these elements without being prescriptive of solutions, particularly when they aren’t fully vetted. The graphics and narrative of the Corridor Study suggest specific routing of internal roadways and the location and size of a new park, all of which have not been technically vetted or reasonably discussed with landowners or abutters. As such, the City’s report should specifically note whether an element of the Corridor Study is illustrative, particularly if it appears to impact existing uses.

## Clarity in the Affordable Housing Calculation

Harvard recognizes, appreciates, and supports the Mayor’s efforts to increase housing, particularly affordable housing, within Allston-Brighton and throughout the City. Given our experience and understanding of the housing and development environment, it is most helpful when affordable housing criteria and calculations are as specific as possible and without room for interpretation. This level of specificity and clarity level-sets expectations for all parties. The way that the affordable housing calculation is currently presented leaves room for interpretation and confusion. If the affordable housing provision is part of the zoning regulations, an additional degree of clarity and unambiguity is needed (e.g., do IDP requirements measured in square feet apply only to the residential portion of a mixed-use development’s gross square footage?). We look forward to receiving more information on the Mayor and BPDA’s approach to solving the housing crisis and additional guidance on the affordable housing calculations.

## Furthering the Transportation Analysis

We look forward to the continuation of the transportation study and a comprehensive and collaborative approach to developing a transportation solution that embraces more sustainable modes while supporting the organic and energetic neighborhood that already exists. Ultimately, we would like to see a transportation plan that is aspirational but also grounded in reasonable methods and evaluated against community-defined purpose and needs. Given Harvard’s land stewardship along the corridor and the critical local and regional access that Western Avenue provides our

institution, we request a seat on the transportation study working group to assist in scoping and executing this vital study. As a start, we hope to see the following elements in the upcoming study:

- Clear definition of the transportation issues the plan is attempting to solve and to the extent possible, quantification of these issues using available data.
- Definition of key performance metrics to demonstrate how well the proposed interventions address the issues relative to a baseline or compared to other alternatives.
- An exploration of all viable options identified by the community.
- A broader analysis of the transportation systems, including a study area that extends to Lincoln Street to the south and Soldiers Field Road to the north and the key neighborhood streets in between, that provides a district wide assessment of how best to improve the pedestrian, bicycle, and transit networks and appropriately accommodate truck and vehicular demands.
- A discussion of phasing and how an element such as the proposed Transitway could be implemented in segments over time.
- Complete district wide diversion analysis based on Origin-Destination data and its resultant impact on the transportation system, particularly other public and private transit routes servicing the area.
  - Understand and separate those travelling through the corridor versus those originating or destined to the district.
- Full engagement with DCR to understand the proposed plans for Soldier's Field Road as part of the DCR Parkways Master Plan.
- Full engagement with the MBTA to understand:
  - The feasibility to commit resources to more transit service through the corridor
  - How current routes, potential future routes, adjacent uses, and bus network can support current and forecasted travel patterns and the level of ridership needed to truly drive down the auto mode share within the district.

Harvard looks forward to continuing its collaboration with the BPDA to ensure that the WACRZ plan delivers on its transformational promise for the City and the community. We appreciate the steps already taken by the BPDA to this end. We remain committed to working with the BPDA, the Task Force, and other stakeholders to ensure that the Western Avenue Corridor lives up to its potential.

Sincerely,



Marika Reuling  
Managing Director, Urban District Initiatives, Harvard University Planning and Design

Mr. Joseph Blankenship  
Boston Planning and Development Agency

Dear Mr. Blankenship:

This letter advances my views on the BPDA's Western Avenue Corridor Study. Taken as a whole, my evaluation is a mixed one, focusing on the strengths and potential limitations of the study. I hope my comments and the views of other Allston-Brighton residents assist the BPDA in refining the plan so that it better serves our community and Boston as a whole.

I begin by commending the BPDA for taking a more comprehensive approach to planning by evaluating development in a particular area rather than by engaging in a piecemeal project-by-project approach, an approach that has, unfortunately, dominated the agency's planning in the past. I also commend the BPDA for improving the study over time, an improvement that owes much to the approach to urban planning of the Wu administration. The plan's emphasis on a mix of uses along Western Avenue -- housing, office and lab, and retail -- is sound. The clear priority given to residential housing construction is sound as well, given the severity of Boston's housing crisis and the extent of proposed and approved lab construction, including on Harvard University's Enterprise Research Campus (ERC), in Allston-Brighton.

Before moving on to more specific comments, I should recognize the time that the BPDA staff has devoted to this planning effort. The evolution of the study over time reveals their willingness to address the concerns of Allston-Brighton residents. While I still have reservations about the study, it remains important to provide this context.

I also should address another contextual point, *prior* to the Wu administration, the BPDA made a significant mistake in approving the Nexus development project on Western Avenue, unfortunately excluding this project from the broader Western Avenue Corridor Study. This produced a massive lab project, with too much parking and far too little housing (35 units). The Nexus project, in fact, violates many of the planning assumptions and principles of the current version of the Western Avenue Corridor Study. The approval of the Nexus project should be a case study of what *not to do* in future urban planning in Boston.

After advancing these broad points, I now discuss specific comments, including some reservations about the current nature of the Western Avenue Corridor Study. I divide my comments into the following sections: Transportation, Housing, and Open Space.

### **Transportation**

- One of my chief concerns is that not enough attention has been devoted to the necessary public transportation that needs to be provided given the scale of the proposed development along and near Western Avenue over time. The bus transitway remains a sketch of a dedicated bus lane and there is no assurance at this time that this sketch will be first translated into a comprehensive plan and then into a reality, both of which can only be achieved through considerable funding. Nor is there an assurance that the MBTA will significantly increase the frequency of bus service along Western Avenue and



without this increased frequency and capacity the transitway will fail to reduce traffic congestion.

The transitway can't be achieved without eliminating street parking along Western Avenue. I realize some residents have opposed this, but this step is a necessity to ensure that a dedicated bus lane can be established. In addition, some residents have underestimated the amount of surface parking that now exists along Western Avenue, including ample Harvard-related parking at the Business School and the Allston Science and Engineering Center, the sizeable surface parking lot at the Star Market shopping center, and other surface lots at additional locations (for example, at the Charles River Community Health Center, the German International School, and Swiss Bakers).

Moreover, the transitway, on its own, does not represent an adequate solution to public transportation needs in this area (please see my next point). Without the transitway and without other improvements in public transportation, we will face sizeable increases in congestion produced by car traffic, along with associated health and environmental consequences. This outcome needs to be avoided.

- Other improvements in public transportation need to be achieved to reduce the likelihood of massive traffic congestion along Western Avenue and in surrounding areas. The current infrequent commuter rail service at Boston Landing needs to be replaced by subway-like frequency service, a view endorsed by many community groups in the recent review of Harvard's ERC. The City's Go Boston 2030 plan also endorsed this proposal. This significant improvement needs to be augmented by the construction of West Station in Allston, combining rail and bus service.
- Other steps should be taken to reduce traffic congestion and support other forms of transportation. As part of the community benefits process, developers should be required to subsidize MBTA passes for either their residents or their employers. The BPDA should take steps to reduce parking provided at residential and office/lab spaces to incentivize the use of public transportation. Providing ample parking at residential and commercial buildings does not resolve traffic congestion; it contributes to it by encouraging people to drive cars. Finally, I support the study's focus on the need to provide protected bike lanes along Western Avenue.
- These improvements in transportation take on added significance given the DCR's plans to transform Soldiers Field Road into a boulevard, an approach that calls for a narrower road and additional traffic calming steps. I support this plan, given its ability to significantly improve pedestrian and bike access to the Charles Rivers parks.

## **Housing**

- Given the severity of Boston's housing crisis and the unprecedented wave of development occurring in Allston-Brighton, the BPDA should ensure that 20 percent of residential housing built in the area covered by the Western Avenue Corridor Study

should be income restricted. Cambridge and Somerville have had this mandate in place for several years and it has not slowed development.

- Consistent with the preceding point, density bonuses for specific residential developments should mandate that *more than 20 percent* (the newly required IDP minimum in this area) should be income restricted.
- The BPDA should ensure a mix of residential housing be built, including units designed for families, in the area covered by the Western Avenue Corridor Study.
- The BPDA also should ensure that the housing developed in the area include opportunities for home ownership to address Allston-Brighton's chronically low owner-occupancy rate. We need to avoid building residential housing stock that is *overwhelmingly rental* in character. This issue takes on added importance because the recently approved Phase A of Harvard's ERC project will produce, unfortunately, *only* rental housing.
- I fully support the extension of the housing guidelines in the Western Avenue Corridor Study to any new proposed housing in the Boston Landing area.

## Open Space

- The BPDA should study and reflect on the failure to ensure adequate open space, particularly green space, near the Boston Landing commuter rail stop. We should avoid a similar outcome along and near Western Avenue.
- I commend the BPDA for its proposed guidelines that new buildings in the Western Avenue Corridor study area will occupy 60 to 80 percent of their site depending on their location, leaving other areas of the site as open space. My understanding and concern, however, is that this guideline may not be currently enforceable given the current zoning code. This problem needs to be addressed to transform these guidelines into actual practice.
- The BPDA should ensure that much of the open space on and near Western Avenue be green space not hardscape. This should be done both for aesthetic purposes and for environmental purposes. This issue takes on added import given that the majority of the open space in Harvard's recently approved ERC will be hardscape, not green space. This unfortunate outcome should not be reproduced along Western Avenue and surrounding streets.
- I share the concern, expressed at a recent community meeting, that the current study may produce a series of small open spaces or pocket parks in individual residential or lab projects built along or near Western Avenue. This would be a problematic outcome. Therefore, the BPDA should ensure that development in this area produces some larger open, green spaces for public use.

- Larger green spaces produced by development in the Western Avenue Corridor study area should be publicly owned to ensure that they will not be developed in perpetuity. Owing to community pressure, this was accomplished in the Stop and Shop development or Allston Yards. Facing community opposition to privately owned public space, the developer agreed to finance the creation and maintenance of a 1-acre public park managed by the Boston Park and Recreation Department. This template can be applied to the creation of green space in the Western Corridor Study area.
- Working with the DCR, the BPDA should work to improve public access to the ample green space and recreational opportunities along the Charles River. Current access to the river parks is clearly inadequate and raises pedestrian and bicycle safety concerns.

### Conclusion

I hope the BPDA views this letter as a constructive effort to enhance the Western Avenue Corridor Study. While the current version of the study has merit, a good deal more needs to be done to refine the plan so that we collectively produce a dynamic and diverse new neighborhood in Allston-Brighton.

Cordially,

Kevin M. Carragee

Cc

City Councilor Liz Breadon  
State Representative Michael Moran  
State Representative Kevin Honan  
State Senator Will Brownsberger