

Letter Regarding the Brighton Allston Community Coalition's View on the Proposed 1515 Commonwealth Ave Development

September 24, 2019

Mr. Michael Sinatra, Boston Planning and Development Agency

Dear Mr. Sinatra,

This letter reflects the views of the Brighton Allston Community Coalition (the BACC) regarding the proposed development at 1515 Commonwealth Avenue in Brighton. The BACC unites renters and homeowners who seek to ensure that new residential housing corresponds to the needs of the Allston-Brighton community. In particular, the BACC seeks to create more affordable housing and more owner-occupied housing in Allston-Brighton.

Before addressing limitations in the project, we recognize that the 1515 Commonwealth Ave site is an appropriate location for residential housing development and a good use of space in what is now an unused location.

The proposed 1515 Commonwealth Ave development is proposed to have a total of 330 residential units, including 155 condominiums (47% of total) and 175 rental units (53% of total) and 9/10ths of an acre (40,000 square feet) of ground level outdoor space.

The BACC seeks the following changes in the proposal so that it better meets the needs of Allston-Brighton residents:

Affordability

In keeping with its mission statement, BACC urges that at least 20 percent of the rental units be designated affordable. The development of affordable housing is a pressing need in Allston-Brighton. Furthermore, the BACC is advocating for 20 percent of the condos developed to be affordable to moderate and middle-income residents (80-120 percent of Area Median Income, or AMI), creating new ownership opportunities in the neighborhood. Furthermore, we believe at least 70% of these affordable condo units should be deed-restricted to owner-occupants.

A majority of the residential units -- 60 percent -- should be condominium units, with, once again, 70 percent of these units designated as deed-restricted to owner-occupants. This objective is based on the pressing need for more owner-occupied housing in Allston-Brighton.

The need for more affordable housing is an acute problem for our community because Brighton's median family income is \$56,729 and Allston's is \$42,722. For rents or mortgage payments to be considered affordable, they must be less than or equal to 30

percent of household income. Clearly, the majority of housing on the current market is unaffordable for these income levels.

Enhancing Affordability

Current definitions of affordability exclude many Allston-Brighton and Boston residents from renting or purchasing new affordable units in our neighborhood, given that these Area Median Income (AMI) definitions are based on income levels in greater Boston, including the city's more affluent suburbs.

We seek to have the developer commit to create a substantial number of both affordable rental and condominium units. Residents of mixed-income developments typically have longer tenancy and more financial mobility, especially in high-cost cities like Boston. This project should include low, moderate, and middle-income apartments in addition to market rate. We encourage the developer to build housing at a cost that is more consistent with the incomes of most Allston-Brighton and Boston residents. In order to create housing at a range of types and income tiers, we propose that the developer work with a local nonprofit affordable housing developer to better define the affordability mix that will be financially feasible and also meet the neighborhood's housing needs.

Characteristics of the Proposed Housing Units

The BACC also recommends that the project include a significant percentage of two and three bedroom units. This recommendation reflects a significant need for more family-oriented development in Allston-Brighton and would produce more residential stability.

Transportation Issues

The developer and the Boston Planning and Development Agency (BPDA) need to devote considerably more time and care to proper urban planning related to transportation issues, particularly public transportation. The Green Line is already at capacity, and there are several additional projects happening nearby. The Green Line Transformation Project will improve service at some point in the future, however the new developments will likely put new pressures on this service. In addition, this neighborhood has the highest percentage of bicyclists per total vehicles of any neighborhood in the city according to the Allston Brighton Health Collaborative (ABHC). The project as proposed will simply add to the congestion and over-capacity of the roads and transit, without providing any benefit to existing or new residents or visitors.

The BACC supports the ABHC's call for the developer to work with the MBTA and the Boston Transportation Department to improve the area transit network prior to funding an

independent shuttle service. We also agree with the ABHC that the developer must adopt the city of Boston's complete street guidelines for this development to maintain and improve transit, pedestrian, and bicycle accessibility and safety.

Finally, we have concerns for the impact of the development on the existing carriage lane and these impacts, especially in terms of increased traffic and congestion, have not been adequately addressed.

Green Space

The developer should guarantee that the public space in front of the development and the access through the development to Overlook Park is open to the public. The BACC advocates that this green space be publicly owned, with the developer agreeing to construct, maintain and financially support programming for the park.

Sustainability and Energy Efficiency

The developer's sustainability and energy efficiency plans are vague and non-committal. The developer proposes to create a LEED "certifiable" project with a "target" of LEED Silver. Given the city's greenhouse gas reduction targets and its climate action plan, the BACC recommends that the developers meet LEED Platinum standards and follow the other recommendations of Boston's Interagency Green Building Committee as stated in their letter of July 8, 2019, to your office.

Conclusion

We believe that the 1515 Commonwealth Ave development, with the significant refinements that we have recommended, could be a welcome improvement to this site. We appreciate your attention to the many complex issues raised in this letter. We hope the developer works cooperatively with the community and the City to produce a better project.

Cordially,

Kevin M. Carragee

Chair, Brighton Allston Community Coalition.

Cc. Mayor Marty Walsh; Representative Kevin Honan; Representative Michael Moran; Boston Councilor Mark Ciommo; State Senator Will Brownsberger; Brian Golden, Director, Boston Planning and Development Agency (BPDA); Sheila Dillon, Director of Neighborhood Development; Lauren Shurtleff, Interim Director of Planning, BPDA;

Jonathan Greeley, Director of Development Review, BPDA; Michael Christopher, Deputy Director of Development Review, BPDA; Tim Davis, Housing Policy Manager; John Read, Senior Deputy Director of Transportation and Infrastructure Planning, BPDA; Conor Newman, City of Boston, Office of Neighborhood Services

To: Michael Sinatra
From: BPDA Transportation, Boston Transportation Department, and Boston Public Works
Subject: Comments on 1515 Commonwealth Avenue Project Notification Form (PNF)

The Transportation & Infrastructure Planning Department of the Boston Planning and Development Agency (BPDA) has reviewed the 1515 Commonwealth Avenue project proposal. The BPDA is excited to work with the Proponent on this project. It represents a significant enhancement of the public realm and provides an opportunity to improve mobility and access to mobility in Brighton.

Context

Go Boston 2030, the City of Boston's long-term transportation action plan, envisions a city where all residents have better and more equitable travel choices, where efficient transportation networks foster economic opportunity, and where the City has taken steps to prepare for climate change. Whether traveling by transit, on foot, on a bike, or by car, Bostonians will be able to access all parts of the city safely and reliably. This vision was created with the help of thousands of Bostonians through a significant public engagement process.

This vision establishes foundational priorities for all transportation projects in the City, including development proposals as they impact transportation networks and the public realm. Go Boston 2030's primary goals- expanding access, improving safety, and ensuring reliability- help us hold all projects accountable to this vision. Its aspirational targets clearly establish metrics for measuring success.

In short, when reviewing proposals we must ask ourselves, does the project bring the City closer to achieving its transportation vision, goals and targets?

1. Expanding Access:
 - Goal: Make Boston's neighborhoods interconnected for all modes of travel.
 - Aspirational Target: Every home in Boston will be within a 10-minute walk of a rail station or key bus route stop, and Bluebikes station, and carshare.
2. Improving Safety:

- Goal: Substantially reduce collisions on every street through education, enforcement, and designs that reallocate street space to prioritize moving people safely rather than faster.
 - Aspirational Target: Eliminate traffic fatalities and severe injuries in Boston.
3. Ensuring Reliability:
- Goal: Prioritize making travel predictable on Boston's transit and roadway networks.
 - Aspirational Target: Bostonians' average commute to work time will decrease by 10%.

Site Design

Demonstrate how pick-up/drop-off operations will occur at the front door of the building.

- The pick-up/drop-off area shown in Figure 1-8 shows a 90-degree curbline for vehicles to navigate into and out of. It is not clear how cars can maneuver through here for a quick pick-up/drop-off, so more detail is required to appropriately evaluate.

Bike parking rooms and access should be more detailed to demonstrate compliance with BTDA requirements and BPDA design standards.

- The most recent site plan presented to staff shows the bike storage relocated to the southern end of the site, which seems far preferable to the center of the site. Access to this parking area from the street should be clearly depicted on the site plan. These bicycle parking room must have a ratio of 1 parking space per residential unit, with the racks illustrated dimensionally in the site plan. Bike room access should be logical and include an internal to the building access point (preferably by an elevator bank in the lobby) as well as an external access point connected by a well-lit and signed path. The bicycle parking area design should also conform with the new City/BPDA Bike parking guidelines.

Identify the location for and include a Bluebikes station in compliance with BTDA's requirement.

- This project size requires a Bluebikes station per BTDA's requirement. The Proponent should show on the site plan where this Bluebikes station is planned for. Preferably, it should be placed out of the public way so it can be maintained year-round.

Reduce to one curb cut along the Comm Ave Carriage Road or demonstrate infeasibility to do so.

- Every effort should be made to reduce the curb cut onto the Commonwealth Avenue carriage road to just one curb cut.

Parking/Loading

BPDA Transportation is pleased with the low parking ratio of 0.6 proposed with this project. This low parking ratio will hopefully reduce the amount of vehicle trips created.

Define how parking will be allocated to each residential use.

- The Proponent should define how parking will be allocated for rental units and condominium units. It is recommended that parking be unbundled so as to not encourage residents to continue to use a car if they do not need to or even buy one as a result of a complimentary parking space.

Consolidate garage entrances for loading and parking into one or demonstrate infeasibility to do so.

- As currently designed, the parking garage entrance and loading entrance are two separate access points. Because of the proximity to the Fidelis Way Park access, reducing to one garage door would improve the public realm and would limit the impact on the pedestrian experience.. The proponent should attempt to design an access point that consolidates to one garage door for both uses, while maintaining a 20' width. Appropriate demonstration of infeasibility could include autoturn analysis or some other proving of dimensional constraints.

Access to Transit

Develop wayfinding signage to/from Washington Street Green Line Station, nearby bus stops, and other key nearby locations.

- We would ask that the proponent provide wayfinding signage at the Washington Street Green Line Station to direct passengers to the nearby bus stops on Washington Street and other nearby locations such as parks or civic services.

Relocate bus stops adjacent to Washington Street/Commonwealth Ave intersection.

- We would like to request that the proponent move the east-bound bus stop currently located on the north side of the intersection of Washington Street and Commonwealth Avenue to the south side of that intersection to help expedite bus service. The result would be a far-side bus stop which improves bus operations.

Carriage Road Design

Preliminary design for one way Comm Ave Carriage Road in coordination with BT&D and PWD.

- We request that the developer provide a preliminary design for a one-way carriage road on the west side of Commonwealth Avenue between Warren Street and Washington Street and for the intersection with Warren Street, consistent with the City's Commonwealth Avenue redesign project, including modifications to the signal and geometry at this intersection as well as other pertinent improvements as contemplated by the Commonwealth Avenue redesign. Specific considerations at the Warren Street/Kelton Street intersection as part of the City's project include geometric changes to the median to include an eastbound left turn lane on the main line of Commonwealth Ave, clearer delineation of MBTA track space vs. roadway space where the tracks transition to the center median the roadway, addressing the desire and safety conflicts associated with westbound carriage road traffic merging onto the mainline, continuity with bicycle infrastructure, and increased sidewalk space and accessibility for pedestrians.

TDM

Consider joining a potential shuttle created by the development project at St. Gabriel's.

- Several other projects in Allston-Brighton have committed to paying for a shuttle that would provide service at minimum to Boston Landing commuter rail station. Committed projects have agreed to paying \$20 per unit per month for 5 years to operate this shuttle. We would ask this project to consider a similar commitment.

Design parking spaces in compliance with the City's electric vehicle charging policy.

- The City of Boston's electric vehicle charging policy requires projects to have 25% of parking spaces be EV parking spaces, with 100% of all parking space to be "EV ready".

Establish a vehicle sharing program on site, either Zipcar or a private car share service.

- Establishing a car share program discourages individual ownership of vehicles and should be considered in this TDM program. If Zipcar is not a feasible option, the Proponent should consider establishing a private, tenant-only car share service.

Mitigation

Designate funds for transportation recommendation(s) as a result of the Allston-Brighton Mobility Study.

- The Allston-Brighton Mobility Study is an ongoing BPDA study that will result in a list of actionable and implementable short-, medium-, and long-term transportation recommendations. Several other developments in Allston-Brighton have committed

funds to improvements resulting from the Allston-Brighton Mobility Study. Given the size of this project and the location along the development-heavy Washington St corridor, the Proponent should commit funds or implementation for some of these recommendations.



Martin J. Walsh
Mayor

Article 37 Interagency Green Building Committee

August 16, 2019

Mr. Stephen Davis
DIV 1515 Commonwealth, LLC
c/o Davis Companies
125 High Street, Suite 2111
Boston, MA 02110

Re: 1515 Commonwealth Avenue - Article 37 Green Building – Comment Letter

Dear Mr. Davis ,

The Boston Interagency Green Building Committee (IGBC) has reviewed the Project Notification Form (PNF) submitted in conjunction with this project for compliance with Boston Zoning Article 37 Green Buildings.

The PNF indicates that the project will use the LEED BD + C New Construction v4 rating system and commits the project to earning 52 points for a LEED Silver rating. The IGBC accepts the rating system selection.

The project team is encouraged to demonstrate leadership in sustainability by achieving a LEED Platinum rating. Additionally, the IGBC requests that project team contact utility and state DOE representatives as soon as possible and to maximize utility and state-funding for energy efficiency and clean/renewable energy support of the project.

Please review the Boston Transportation Department's Bicycle Parking Guidelines. Furthermore, LEED requires bicycle spaces for 30% of occupants and no less than one space per unit.

The Climate Resiliency Checklist was deemed incomplete. Please address the following issues:

- Please provide an annual building greenhouse gas emissions figure for section B.1.
- Please consider additional adaptation strategies on-site
- Provide energy modeling information

Greenhouse Gas Emissions

In support of the City of Boston's Resiliency and GHG emissions reduction goals including Carbon Neutral Boston 2050 the IGBC requests the project team prepare a project specific Zero Carbon Building Assessment by modeling a Low Carbon Building with an enhanced envelope

and optimized systems strategies, Maximized Solar Energy Systems, and determine any amount of renewable energy both on and off-site required for zero carbon performance including:

- Enhanced Building Envelope – reduced air infiltration (ACH below 0.6), increased opaque curtain wall insulation (below U-0.05), improved vision curtain wall performance (below U-0.20), improved window performance (below U-0.20), tuned glazing with Solar Heat Gain Coefficient (below SGHC 0.30), and increased insulation levels for roof (R-60 c.i.), wall (R-30+ with c.i.), and slab (R-7.5 c.i.) conditions.
- Optimized Building Systems – smaller, more efficient and alternative heating, cooling, dedicated fresh air with ERV (better 80% with MERV 8 filter), and hot water systems that fully consider the improved envelope performance.
- Including an all electrical building and campus solution(s).
- Maximized Solar Energy System – optimize roof design and install Solar PV systems.
- Renewable Energy Procurement – green energy, credits, and carbon offsets.

Please follow up within three weeks (of the date of this letter) with your BPDA Project Manager in responding to IGBC comments and the provision of the requested information and items.

Please let me know if you have any questions or if I can be of any assistance.

Sincerely,

Katie Pedersen LEED AP: BD+C
On behalf of the Interagency Green Building Committee

Cc: Michael Sinatra, BPDA



Michael Sinatra <michael.a.sinatra@boston.gov>

1515 Commonwealth Ave BCDC comments

Natalie Punzak <natalie.punzak@boston.gov>
To: Michael Sinatra <michael.a.sinatra@boston.gov>

Fri, Aug 30, 2019 at 4:05 PM

Mike,

Here are the minutes from the 1515 Commonwealth presentation at the August 6 BCDC meeting.

David Hacin: A model will be important, especially to help us understand the street conditions along Commonwealth Avenue that lead here. I tend to think of Commonwealth Avenue as a two-sided boulevard and I'm not sure what the condition is like here. I'm struggling with the idea of height at this location, particularly atop a hill. This is a big urban moment in an area that currently feels more visually open to the sky. This feels tall.

Deneen Crosby: I'm not sure I understand the relationship of this project to Commonwealth Avenue, so please clarify this in subcommittee.

Anne-Marie Lubeanu: You've described this site as bound by a smaller grain neighborhood. This scale feels much larger than the residential scale around it and I'm concerned with the contrast of scale and texture between what exists and what you propose. I'm interested in better understanding this project's footprint in addition to the height.

Linda Eastley: I'm trying to sort out the siting of the building. I think it's beautiful, but it seems the stairs and ramps could be eliminating by front the street for a consistent street wall along Commonwealth Avenue. I would like to understand the logic of the recessed building and its location on the site.

Eric Höweler: I think a site section would be helpful. This has an opportunity to become a new landmark in the neighborhood; that comes with its own responsibility.

Mikyoung Kim: Grading can offer an opportunity for interesting landscape. This feels like a wall of housing with a very urban gesture in the tower, and the landscape does not seem to facilitate a usable space for families who may live here.

Andrea Leers: I'd like to see other massing configurations of the same program. I'm not convinced this is the best disposition of volume.

The project will continue in Committee.



Natalie Punzak
Urban Designer I
617.918.4471

Boston Planning & Development Agency (BPDA)
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Michael Sinatra <michael.a.sinatra@boston.gov>

1515 Commonwealth Ave Comments

Carrie Marsh <carrie.marsh@boston.gov>

Fri, Aug 23, 2019 at 4:47 PM

To: Michael Sinatra <michael.a.sinatra@boston.gov>, Michael Christopher <michael.christopher@boston.gov>, Michael Cannizzo <michael.cannizzo@boston.gov>

Cc: Liza Meyer <liza.meyer@cityofboston.gov>, Christopher Cook <christopher.cook@boston.gov>, Ryan Woods <ryan.woods@boston.gov>

Hello -

The proposed project at [1515 Commonwealth Avenue](#) will require approval of the Boston Parks and Recreation Commission under Municipal Code Section 7-4.11, due to its adjacency to Commonwealth Avenue and Fidelis Way Park (a.k.a. Overlook Park). BPRD met with the proponent in July. The following topics were discussed:

- The proponent would like to make a connection to the park through its site. BPRD explained that such a connection would need to be open and accessible to public use.
- The accessible route should be as intuitive and visible as possible, but the redundancy of stairs is desirable for the most direct access.
- BPRD would like to see the improvements extend through the parking lot and connect with the park pathway to facilitate access.
- BPRD supports the idea of formalizing the parking area with improvements.
- The proponent understands that the parking lot is for park use only, and may not be used during construction. or for visitors or residents of the proposed project.

The proposed project at [1515 Commonwealth Avenue](#) will add impact to the park by creating new users who will rely on the park for their active recreational needs. As appropriate, impact mitigation commensurate with the scale of the development and consistent with mitigation by other projects in the vicinity of the park should be considered as part of the negotiations through the Article 80 process. Any such mitigation would be used for improvements to Fidelis Way park.

Finally, if pets are to be allowed, the project should provide a pet recreation space on site to reduce impacts to protected public open spaces.

Thank you.



CARRIE MARSH DIXON
Executive Secretary
Boston Parks and Recreation Commission
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[Boston, Massachusetts 02118](#)
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