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Subject: Flawed Buildout Affordability Analysis

To the Arlington Redevelopment Board

I apologize for sending this correspondence at such a late date. I am aware of the flood of letters that you have been receiving in the last few days and I did not intend to add to the list with another statement of For or Against sentiments. I write this because I have only just come across some data that has been provided to the Board that is seriously and demonstrably flawed.

It was only today that I took a closer look at the ARB Hearing Presentation document that was first presented two weeks ago. Within it is a table on page 18 labeled 'Build Out Analysis - Residential'. As far as I know, it is the only study that has been done to estimate the number of affordable housing units that may result from the adoption of the proposed warrant articles. A quick reading of the last row of the table suggests an increase of 444 affordable units, going from 1048 to 1492 projected.

There are several fundamental flaws in the reasoning behind this table which I will demonstrate by looking at the numbers for just the residential zones, R4-R7, aggregating the numbers.

	Total Allowed Units	Total Allowed Affordable Units	Total Projected Units	Total Projected Affordable Units
R4	233	35	252	38
R5	1274	191	1911	287
R6	1225	184	1911	287

R7	486	73	729	109
R4-R7	3218	483	4803	721

Both the currently allowable affordable units and the projected numbers under the zoning changes make the simplistic and erroneous assumption that affordable units will be 15% of all units built. After several weeks of public hearings you are undoubtedly aware of (and probably tired of repeatedly hearing) that this will almost certainly not be the case, that developers will use the loopholes of subdivision and exemption of five units or less to avoid the inclusionary requirement. You also won't see ten unit developments (8 market rate and 2 affordable) but instead nine unit buildings (8 market rate and 1 affordable). This is not just speculation. This is exactly what has happened with the very first mixed-use developments built under the 2016 zoning change. 887 Mass Ave and 483 Summer combined will have 12 market rate and 1 affordable, hardly the 15% assumption built into the projections.

At the beginning of my letter I claimed that this data is demonstrably false. As proof, I cite the claim that only 483 affordable units in the R4-R7 districts are allowable under our current bylaws, but 721 affordable units would be possible under the proposed changes. In fact, **there are currently 948 affordable units today** in those districts (from the SHI list; I would be glad to provide a detailed list with addresses). This is nearly twice what the MAPC 'study' claims is possible under our current zoning laws. It is even 31% more than what they claim is achievable under their proposed density changes.

The affordability data they have provided you is useless because MAPC has a single-minded view of how affordable housing is created, and they have crafted these proposals based upon this flawed view.

In all of their research they have failed to discover a simple truth about Arlington. Most of our affordable housing has come the Town's Housing Authority or non-profits such as the HCA. They efficiently use our Town's limited resources to create buildings that are 100% affordable, not some token amount.

Please consider this as another serious shortcoming in the work product from MAPC.

Sincerely,

Don Seltzer