

To: Arlington Redevelopment Board
Subj: Docket 3625 - Floor Area Calculations

The original plans submitted for 882-892 Mass Ave claimed a Gross Floor Area of 18,009 square feet.

Property Location 882-892 Massachusetts Ave Zoning District B2
Owner: 882-892 Massachusetts Ave, LLC Address: 452 Massachusetts Ave, Arlington, MA
Present Use/Occupancy: No. of Dwelling Units: Uses and their gross square feet:
Retail, Service, Restaurant 1-Story 5,016 SF
Proposed Use/Occupancy: No. of Dwelling Units: Uses and their gross square feet:
Mixed-Use, 22 Apartment Units & 700 SF Retail 4-Story Mixed-Use 18,009 GSF

	Present Conditions	Proposed Conditions	Min. or Max. Required by Zoning for Proposed Use
Lot Size	14,381 SF	14,381 SF	min. ----
Frontage	208 FT	208 FT	min. ----
Floor Area Ratio	0.35	1.25	max. 1.5

The revised plans, submitted in early July, showed the expansion of the 4th floor by elimination of the stepbacks, and a small decrease in the building location and footprint. The net change resulted in a claimed GFA of 17,720 sf.

Property Location 882-892 Massachusetts Ave Zoning District B2
Owner: 882-892 Massachusetts Ave, LLC Address: 452 Massachusetts Ave, Arlington, MA
Present Use/Occupancy: No. of Dwelling Units: Uses and their gross square feet:
Retail, Service, Restaurant 1-Story 5,016 SF
Proposed Use/Occupancy: No. of Dwelling Units: Uses and their gross square feet:
Mixed-Use, 22 Apartment Units & 1,300 SF Retail 4-Story Mixed-Use 17,720 GSF

	Present Conditions	Proposed Conditions	Min. or Max. Required by Zoning for Proposed Use
Lot Size	14,381 SF	14,381 SF	min. ----
Frontage	208 FT	208 FT	min. ----
Floor Area Ratio	0.35	1.23	max. 1.5

The most recent plans submitted for the July 20 hearing do not specify a GFA, but it appears that the only change to floor area is reclassifying 450 sf in the basement from residential use to commercial use.

Both of these claims of GFA, whether 18,009 or 17,729 sf are restricted to the ground and upper floors. They fail to include any footage of the lower level. Some of this area can be excluded, with the exact amount depending upon whether the space is classified as Basement or Cellar. A reasonable approximation is that at least 3500 sf of this lower level should be included in the GFA calculation.

The calculations for the required Open Space, both Landscaped (10%) and Usable (20%), show a similar lack of understanding of Arlington's bylaws. Both the May and early July plans calculated the required areas as percentages of the lot size, 14,381 sf instead of the GFA used for residential. This resulted in a significant understatement of the requirements.

ZBL 5.3.21. Supplemental Requirements in the Business and Industrial Districts

- D. For mixed uses and any permitted residential use not specifically identified in the tables in Section 5.5.2, the minimum open space requirements (computed from the residential floor area only) shall be 10% landscaped and 20% usable in the B1, B2, B2A, B3, and B4 districts, and 15 percent usable in the B5 district.

More perplexing is how the latest plan submission calculated these areas. The basis of GFA is only 11,161 sf. I am at a loss to puzzle out how this number was derived. Even allowing for the error of excluding all lower level floor area, the basis should be 16,640 sf (17,720-1,300) based upon the applicants claim of total GFA minus the 1300 sf assigned to commercial space. This equates to 1,664 sf of landscaped open space and 3,284 sf of usable open space.

Open Space (% of G.F.A.)

Landscaped (square feet)

Usable (square feet)

-----	-----	min. -----
760 SF	1,226 SF (10.6%) (s.f.)	1,161 SF (10%)
0 SF	2,325 SF (20%) (s.f.)	2,323 SF (20%)

As I noted in a previous letter, the latest plans display an ignorance of our basic bylaw definition.

ZBL Section 2: Open space shall be deemed usable only if ... no horizontal dimension is less than 25 feet.

In one version of the newly submitted plans there is a small area behind the dumpster which may meet the dimensional requirement of 25 feet. In a second alternative, possibly a few hundred more square feet on the other side of the dumpster can be claimed as usable open space. The narrow strips of landscaping around the perimeter of the lot and the bicycle racks in front in no way meet the bylaw definition.

The claimed areas also fail to meet the basic standards set out in the bylaw for the Board's environmental review, **ZBL 3.4.4.C:**

- **Open Space. All open space (landscaped and usable) shall be so designed as to add to the visual amenities of the vicinity by maximizing its visibility for persons passing the site or overlooking it from nearby properties. The location and configuration of usable open space shall be so designed as to encourage social interaction, maximize its utility, and facilitate maintenance.**

It hardly needs to be said that the space hidden behind a dumpster does not meet this standard.

As I previously suggested, there are two steps that can resolve these fundamental problems with the parking and lack of open space. One row of parking should be eliminated, reducing the number of spaces by half. The reclaimed land can then be used to satisfy the Bylaw's dimensional requirements for open space.

I do not believe that the Redevelopment Board has the authority to exempt the developer from the basic dimensional parking requirements of Section 6 of the Bylaw, but you do have the authority to reduce the number of parking spaces.

It is worth noting that if the developer had wished to build a straightforward apartment building on his 14,000 sf B2 lot, he would be allowed only a nine unit building. That is consistent with what a lot this size can support. Relabelling it as a mixed use development relaxes certain zoning requirements but does not magically create the needed space. A 14,000 sf lot is simply not adequate for a twenty-one unit apartment building. It is suitable for a two or three story building with the ground floor all commercial and one or two residential floors above, with six to twelve apartments. That is the vision that was presented to Town Meeting in 2016 when they voted for Mixed Use.

•

It is the purpose of this Bylaw to discourage the perpetuity of nonconforming uses and structures whenever possible.

Don Seltzer

19 July, 2020