

September 8, 2023

**Re: Comment on renter displacement, MBTA Multi-family Zoning proposal**

To the Redevelopment Board:

The current MBTA multi-family zoning proposal is likely to displace residents paying below low- and below-market rent, as I explain below, but the proposal still omits 5 acres worth of land throughout the Town that would give Arlington the most new growth in the tax base, be likely to include new inclusionary zoning affordable units, and be least likely to displace lower income Arlington renters, and still keep commercial uses. Since the state changed the MBTA zoning rules and now allows mixed use, why are we still ignoring these sites that our Planning Department has for years identified as ripe for redevelopment, and why are officials and proponents with whom I have discussed the MBTA zoning proposal indifferent to renter resident displacement?

Landlords of Renter-occupied buildings will be the first to get offers to sell because the developer will be negotiating with a *single* seller per building, the landlord, and single-owner non-condo buildings are less costly to acquire than condo buildings. If a developer buys from the one owner, the tenants' leases will not be renewed, the building will most likely be gutted, expanded, or demolished and replaced with a larger multi-unit building. Those new units, whether apartments or condos, will be priced out of reach for the tenants who were displaced. Condo buildings have multiple owners to negotiate with, and cost more to acquire since they are rehabbed before going condo. If you're a developer, you're taking the easier, less expensive path. It appears that the GIS step of sifting out condo buildings to evaluate the impact of the current proposed MBTA zoning map still has not been done. This planning step should be important to us, and we can have a district that creates opportunity for new units without displacing today's renter residents. It puzzles me that the working group and the ARB appear unwilling to ask Utile or the Town's GIS-trained staff to do this analysis of the current map, and consider adjusting the map accordingly.

I have talked with two members of the Board of Assessors and a member of the Assessing staff, and they agree that significant multi-family buildings yield more significant new growth in the tax base than a two family here or there going to three or four units. A larger site is also more likely to attract an experienced multi-family builder who can build high-quality and attractively-designed buildings for our town.

With the commercial parcels I've identified (below) that are ready for redevelopment, there are almost NO apartment renters to displace from their homes, and we can include a commercial use per the new state guidelines. Town Meeting only has so much bandwidth for complex zoning changes. Please let's not wait to include these sites for a hoped-for future elective zoning change. I urge the Board to re-consider whether standing firm on its position of excluding all commercial or industrially zoned land is really in Arlington's interest.

Thank you for your consideration.

Carol Kowalski, AICP, ICMA-CM  
182 Scituate Street

*Note about me: I am a certified planner with over 25 years of experience in four local towns, including Director of Planning and Community Development in Arlington, and I led the Town through its first/only Master Plan process in 2015. I have lived in Arlington since 1986. I am the Assistance Town Manager for Development in Lexington, where I have worked with commercial and residential developers since 2015. Lexington was the first town to adopt the MBTA Multifamily zoning.*

**5.23 acres of Smart Growth locations in Arlington that meet MBTA requirements; no resident displacement**

Arlington is an "MBTA adjacent" community. The state guidelines require the new zoning district to go in Smart Growth locations. The following all meet the state's Smart Growth site parameters.

**28 Mass Ave, .55 acres** Close to Alewife Greenway, close to amenities, bus stop, stores.

**30 Mystic Street 1.2 acres** This location is perfectly suited to multi-family development, large enough to actually be feasible to redevelop, unlike most of the proposed subdistricts. It's near other existing multifamily buildings, close to Mass Ave stores and restaurants, very close to the Minuteman Bikepath, close to bus service, and its lower site grade will help with landscaping and would keep it from appearing imposing. **No resident or commercial tenant displacement** (vacant July 2023).

**The Greater Boston Motor Sports block**, i.e. 1090, 1092, 1098, 1100 Mass Ave. .77 acre This block could generate genuine interest in redevelopment, and some of these addresses are already in common ownership. This block accommodates height and could yield meaningful units, including affordable units. It's walking distance to Ottoson Middle School, close to bus stops and to the amenities in Arlington Heights. The Greater Boston Motor Sports building is 51 years old, and mixed use redevelopment is now allowed by the MBTA zoning rules.

**Parcel 33-2-5B, a 1.35 acre parking lot behind 37 Broadway** Appears ready to accommodate several floors of residential above parking at grade behind the existing tenanted commercial building. There is a bus stop right out front on Broadway, and Stop and Shop and Boyles Market are each only a 4 minute walk, as is the Alewife Brook Greenway. Considering how many units this parcel could produce, including SHI units, and its optimal Smart Growth amenities-meets all requirements-**no resident or commercial business displacement**.

**RCN Parking lot 951-955 Mass Ave. approx. .62 acres** four parcels in use as parking for RCN. It's less than 500 feet from a grocery store and walking distance to Arlington High School. In front are bus stops for the Route 77 MBTA bus. **No resident or commercial business displacement**.

**956 and 960 Massachusetts Avenue, approx .72 acres**  
RCN Office, warehouse and adjacent parcel. See above amenities and bus stop. **No resident displacement**.