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To: Rachel Zsembery; Eugene Benson; Stephen Revilak; Kin Lau; Ashley Maher; Claire Ricker; MBTA Communities

Subject: MBTA Communities Agenda Item 9/11/23

The Report of the MBTA Communities Working Group indicates deviation from the assigned task.

The creation of the Working Group occurred at the November 7, 2022 ARB meeting.

An excerpt from the Minutes:

"The Chair introduced agenda item 6, creation of an MBTA Communities Working Group for zoning recommendations to achieve compliance with Section 3A, MBTA Communities."

Unit Number

The assigned task was to "achieve compliance with Section 3A, MBTA Communities".

The Town's assigned housing unit capacity number is 2046 across 32 acres.

The Working Group has produced maps and numbers much higher, exceeding the authority given by the ARB.

The plans, maps, and recommendations should be revised to comply with the 2046 unit capacity number.

Further, a 2046 number can always be increased if the result is found to work well and not impose heavy costs on the town and residents.

Once done, it is very hard or impossible to back down to a lower number.

Family Housing

The 51 page report says in multiple places:

"Allow housing that is suitable for families with children "

and

"Seniors having trouble finding appropriate housing to downsize into"

The 3A law says

" multi-family housing shall be without age restrictions and shall be suitable for families with children."

"Allow" is not the same as "shall".

The report should be revised to strike "allow" and replace with "provide" or similar.

The MBTA C is not for senior housing.

The minimum unit size is 1000 square feet.

Even mentioning senior housing is contradictory to "without age restriction".

The reason for some of the language in MBTA C is that towns were using senior housing to comply with affordability requirements, while also excluding families. MBTA C is strictly intended for FAMILY housing, though, of course, others may buy or use it.

The report repeatedly mentions "*More housing in a variety of sizes*".

1,000 square feet is the minimum size allowed (assuming the State sticks to their requirements), so many units will be higher.

Looking at recent multi unit developments, 1,000 square feet and higher is luxury housing.

Affordability

The report uses rents for 2 bedroom units in the affordability discussion. The State does not consider 2 bedrooms "family housing".

Contrary to what has been stated, the State ALLOWS the town up to 10% affordable housing. It is not REQUIRED.

The report says that the town wants to require up to 25% affordable housing and is contracting a feasibility study, but does not state the percent of AMI. The State minimum, without waiver, is 80% AMI. The Town is at 60%.

What is the town requesting from the State?

FYI - The 1975 moratorium was for size and height of buildings, not necessarily because they were multi-family. There was discussion at the time to also apply the moratorium to commercial buildings but it did not pass.

Design and Material - Quality Control

There was concern expressed by community comments regarding possible unsightly design.

To assuage those concerns, the report says, on page 33:

"Well-developed design guidelines can be a valuable part of the site plan review process, ensuring that builders understand community expectations beforehand. Arlington has existing Residential Design Guidelines¹⁹ for single- and two-family housing. There are also Design Standards for Industrial and Commercial development²⁰."

However, there are no Multi-Family Design Guidelines.

Existing Guidelines are either not enforced or need to be tightened. Many examples abound.

On the northeast corner of Mass Av, across from the high school, a cheesy looking 3 story building, with inexpensive looking materials was built.

But the bottom of the barrel had not been reached.

Across the street from this is a recently built 4 story building even cheesier looking, with dime store materials.

In contrast, TD Bank and CVS are much nicer looking, quality design and materials.

The Town sets the bar. If low quality, unattractive, materials are allowed, the builders will use them.

A major factor in the good appearance of the buildings is the use of traditional colored and sized red brick, along with other natural materials like granite, limestone, stone and others (Robbins Library, Town Hall).

Traditional colored and sized red brick looks good from day 1 to 200 years in the future.
The AHS Old building still looks good, 110 years after being built.
The new high school has a majority brick facade (the pink color takes some getting used to), however the sides use similarly colored blocks rather than bricks. Likely a cost consideration, it does not look good.

Most of the new/rebuilt schools, using traditional red brick, look great, such as Pierce and Brackett. The Thompson School looks like it used trendy colors at the time, but looks dated.
The recently built Arlington Eats, the Police/Fire Station on Mystic, and others used bricks of non-traditional color.
They become dated looking quickly, or immediately.

All new multi-family, not just MBTA C, should be built with traditional color and size red brick facades and other natural materials.
Another design consideration with multi-family is maintenance.
Apartment maintenance is owner dependent. Condo maintenance is like herding cats. It can be hard to get agreement to spend money.
The faux wood siding and other materials do not last like brick and can quickly look unsightly without diligent maintenance.
I went with my parents to see Legacy in the center some years ago. It looked nice, but on closer look there was peeling paint and rotting wood, due to the materials used.
The old apartment building across from CVS was not maintained for many years, but it still looked ok because it is brick.
Watermill Place is a nice looking, predominantly red brick facade.

No favors are done when allowing cheap materials to be used on facades. There is an up front cost savings, but a permanent higher maintenance requirement and likelihood of becoming a blight.
The Town should require quality materials and majority percentage, traditional red color and sized brick facade for multi-family and commercial.

Finances and School

It is astonishing that a proposal to potentially double the number of housing units in Town did not do a deep dive into finances and school requirements. Even the required 10% increase could put a major drain on Town finances.
Residential property taxes do not pay for services required. In Arlington, that is one of the reasons for serial overrides.

There must be a financial analysis, using several different sets of assumptions regarding the number of units built, potential school aged children and how those affect revenue, expenditures, infrastructure, emergency services, and schools.

Blindly moving forward without knowing if the finances work is troubling.

Speed of Change

The report and discussions indicate a long time horizon for change.

Observation of current change contradicts that.

Arlington is like a construction zone with single and two family houses torn down and replaced by larger and more expensive housing.

Profit is the driving force.

Allowing multi-family housing will increase the profit potential and motivate developers to buy adjoining properties, increase price offers, and speed change.

Traffic and Infrastructure

Ten percent to 100% increase in the number of housing units in Town will increase traffic and put demands on infrastructure.

People will still want personal transportation, aka cars.

Public transportation has been declining in Arlington for 50 years, driven by decline in demand.

The overnight parking study is a prelude to allowing full overnight to the benefit of multi-family developers

These impacts need to be studied before any plan is approved.

Postponement

The deadline for approval is not until the end of next year.

The State recently approved changes, allowing commercial. The report basically dismisses that. The town proposal gives incentives for commercial, while the recent State change could allow commercial to be required. That is a large spread of difference.

There may be further beneficial changes coming down the line.

Using the Fossil Fuel program as a reason not to delay is extremely weak considering the consequences of the proposed changes.

The MBTA C response should be postponed to allow for reduction in the number of units to achieve compliance, greater effort to inform and involve the broader community, mandatory study of financial impacts across all departments, school impacts infrastructure impacts, step and straight line costs, and better compliance with the Master Plan and Housing Production Plan.

Stephen Blagden