

**From:** Betsy B

**Sent:** Monday, October 2, 2023 8:25 AM

**To:** Claire Ricker; Jim Feeney; Rachel Zsembery; Eugene Benson; Kin Lau; Stephen Revilak; Ashley Maher; MBTA Communities; Eric Helmuth; Stephen DeCoursey; Len Diggins; John Hurd; Diane Mahon

**Cc:** Andrew Pockrose

**Subject:** tonight's meeting about extreme housing density proposal!!!

As residents of Plymouth Street, we urge and ask you to please, please slow this process down, and hear what most Arlington residents want! This process, from a resident's standpoint, has been shrouded in mystery, unclear, confusing and overwhelming. This is not how Arlington should work. This is not how we do things here. Please slow down and address these many, many important and critical concerns before moving forward. This (confusing, unpublicized) plan does not have our support or the support of anyone we know! Please address all of these critical points before moving forward.

Many thanks,

Betsy Block and Andrew Pockrose, Plymouth Street

1. Groups that should be included in the planning process for this largest change in our zoning in our lifetimes - !!!!! -- include: affordable housing, open and green spaces, historic districts and preservation, business and retail stores, Arlington public schools, Arlington finance committee, to name just a few.
2. **The process in Arlington should include several scenarios, at least including a map and scenario of meeting, but not exceeding the Act's requirements of 2,046 units and with some of the density placed, as the Act intends, within easy walking of Alewife.**
3. **Arlington should better notify and better get the input** of residents and businesses. Other communities better involved the residents and businesses, such as sending letters or cards to homes and businesses in the density overlay areas, allowing for more public input and comment (Arlington has only had one public forum on July 25 - and comments were two thirds expressing concern). The WG proposals are justified poorly by a 213 respondent survey and an earlier very general survey of 1,000 - which didn't ask about density overlay details.
4. **The response should have better data about each map/scenario.** Arlington's response has lacked serious studies of the potential negative or unintended effects on services (school overcrowding or need for new schools and infrastructure spending), town finances, effect on existing affordability, effect on real estate taxes.
5. **Most people just don't know the Arlington 'overcompliance' proposal is happening - and when they do hear about it, they are very concerned.**
6. **The MBTAWG working group process has continually lacked adequate data, research, scenario details and quantifiable answers so as to make it nearly impossible for the public to evaluate any map/scenario properly.** The proposals of the Working Group have changed frequently and without full site specifics, dimensional requirements, explanations of calculations of numbers. They have maintained a moving target without explicit information so it's impossible for people to know what's actually going on or what they are for or against. One

example: Floor and building maximum heights have been redefined away from standard sizes, not explicitly detailed, changed, or obscured from public awareness.

- ***Affordability/lack of affordability***

1. **The act is not an affordability law - it will make housing higher priced than existing comparable units**, raising the cost of renting or owning a home here. It was promoted by the governor as a way to make market rate housing - housing that will be higher than comparable units that we already have. We've seen this in the development that has been built near Stop & Shop recently. Those 1 bedroom units, renting for \$3,000 are well above the rate older existing units cost in Arlington. The Act supercharges those buildings to be much higher, potentially have a lower number of affordable units going at a higher rent than our EXISTING town bylaws provide for. It actually hurts our affordability laws, unless we apply for, and receive, approval from the state.

2. **The state is promoting "capacity" in the future, while we need affordable housing now.** The state **discourages** affordability as an impediment to capacity. Towns **can** keep their existing affordable housing requirement of up to 10%. Towns like Arlington, whose affordable housing requirement is 15% (more precisely, at least of every 6 in structures with 6 or more units) **may** gain the state's permission to keep that requirement by submitting to the state (at its own time and expense) an "economic feasibility analysis" proving that such a requirement will **not** be an impediment to creating "capacity". Towns **cannot** include an affordable housing requirement of 20% or more.

- ***Overcomplying vs complying***

1. **It doesn't make sense to 'over-comply' with the unit totals in the law, since the units produced are more expensive units with less parking and open space!!!!!!!!** and will have various negatives to future residents in the density overlay buildings and to our town, broadly!!! Just complying with the Act at the 100% level will introduce hardships, such as increased load on services like schools and crowding and un-researched effects on our property taxes, rents and Town finances. Since there are concerns and risks of 100% compliance, to do more than what is required is reckless!!

2. **It's much harder to remove bad density than to introduce new density, so we should meet the law, but move cautiously.** A 2001 law signed by the past governor made it easier to pass laws in Town and City Meetings to increase density to 3 family and apartment buildings. The voting threshold was lowered to 50% from 2/3rds. Yet, votes reducing density and zoning overlays are still 66% votes. Because we don't know about the negative and unintended consequences, and because it's much harder now to remove density overlay decisions, it's important to move carefully, for Arlington's sake - for the existing businesses and residents. We should comply with the state law, because we have to - at zoning for 2,046 units, but we can always return to make additional density overlay zoning, if we determine, as a community, that we want to do this.

3. **Arlington is already built out; new market rate housing will be higher priced.** To comply with the law, Arlington must rezone to create "capacity" of 2,046 units (10% of Arlington's current housing stock) that can be built at a density of 15 units per acre. Since Arlington is built

out, developers will have to pay a premium to buy existing housing, demolish it, and then rebuild high-density housing. Developers have every incentive to make such housing as expensive as possible.

- ***Resident Parking Space/Property private space/Open Space/trees Issues:***

1. Arlington's proposal **should be realistic about transport options** - either locate density close to Alewife where cars are less needed, or provide adequate parking in the density overlays!!!! The WG plans 'car free' developments, where residents from Cambridge to Lexington might not have a parking spot - 0 spaces are required, with a maximum allowed of 1 space per unit proposed. 0.5 (half a car!) is not realistic for many parts of town not in walking distance of Alewife - and is cruel to future residents of multi-bedroom units and to neighborhoods near the density overlays, where the overflow of vehicles will fall. Increased density risks adding to pollution and congestion, so the Act intends the density where cars are least needed - by Alewife. Yet, ironically, Arlington's proposal doesn't place the density overlay near Alewife!!!

2. Arlington should **require adequate setbacks** (location of building on lots) from abutting buildings and the street border so that shade trees are able to grow. This is generally 20 feet frontage, yet the WG has repeatedly proposed 15 or fewer feet.

- ***Meeting the spirit of the MBTA density overlay law- density where driving isn't necessary:***

Arlington should locate **at least some of the density close to Alewife**, to the law's goal of minimum pollution and congestion creation. The law requires that communities with subway and commuter rail hubs WITHIN their borders must zone the new density within half a mile of the hub. Although MA Guidelines have stated that Arlington isn't required to locate our density overlays within the half-mile of Alewife, this is the spirit and goal of the law!

- ***Arlington doing its share (2nd densest town, vs Lexington and less dense towns):***

Arlington and other already dense communities are being treated unfairly - and the amount of density required is higher than for less dense communities. We are already the 2nd most dense town, and 12th most dense city or town in Massachusetts. Arlington naturally built our density within the half mile of Alewife to the level the Act requires, but the Act disqualifies our density on a technicality, that seems to only aid developers: the act only counts unit density in zoning for 3 family or apartment buildings. Our 1 and 2 family zoning by Alewife is not allowed in the count!

- ***Building size, envelope so it doesn't shade/dominate abutters and neighborhoods:***

The density overlay **building heights and sizes planned must be abutter/neighbor friendly**. Arlington's current plans allow 6 floor buildings with minimal setbacks on Mass Ave, 5 floors on Broadway and 4 floors on side streets, going back about 350' or a full block. Additionally, the WG redefined the height of a floor from the standard to 13', which will produce buildings that actually are the height of at least 1 floor higher structures. The sizes will cause street canyons and heavily shaded, darkened winter streets, shading of abutter properties and solar panels. Other communities like Lexington and Newton (both using the same Utile project consultant) have limited building height/sizes to help the density overlays fit better with abutting and neighboring buildings. In those communities 3 and 2.5 floor limits were set. Arlington must do a better job of limiting density overlay building size to not dominate abutters.

### ***Crowding, Pollution, Services (schools, sewer, roads etc)***

- ***Lack of studies and data on negative and unintended effects:***

Arlington is already one of the most dense communities of any type in our state. 20,000 units of housing hold a current 46,000 people. Since we are already fully built out, increasing the unit count by more than the Act's requirements will stretch our schools, infrastructure and livability. **The WG has at times proposed maps and scenarios with dramatic overcompliance, yet without any studies of the effect on the livability, pollution, congestion, schools, finances, rents/unit cost of living or real estate taxes.** Arlingtonians spent much effort and money to choose to live in this town and deserve better research and answers before any proposal is implemented!!!!

- ***Luxury condos/gentrification/housing at any cost with promise of trickle-down to existing, lower and middle income residents***

Adding apartments or condominiums to a community that will cost more than the existing housing stock, with fewer space and parking amenities than existing residents have or expect, implies that the housing is for people who can pay more, don't live in our town already and can replace current renters, owners and businesses. This effect is known as gentrification. Small new, high priced units are also known as 'luxury condos'. The process of pushing these changes through is called 'upzoning', changing zoning to allow developers to make luxury condo gentrification. Arlington shouldn't give in to this change, since it hurts us and our affordability - and many other aspects. Arlingtonians - business and residential tax payers are the most important stakeholders in any Town of Arlington decision and our needs and opinions must be respected, particularly as the potential for higher priced living helps no one, except people who don't live here yet, and developers.

- ***About the threat to businesses, historic places and houses of worship***

1. The Town should **make sure that existing businesses are excluded** from the density overlay. If not, structures housing existing businesses will be sold for 4, 5 or 6 floor development, with the businesses likely snuffed out.

- 2. It's **not adequate to offer mixed use in new residential structures** - we've seen what happens in all mixed use construction in Arlington...the businesses are removed and don't come back. In all mixed use developments in Arlington, existing businesses were evicted and most didn't return. The sort of commercial spaces that go into mixed use residential buildings have increased our loss of engaging street level services, by the Stop and Shop and elsewhere in town.

3. **Historic structures, places of worship and cultural history are all threatened unless the overlay excludes them.** Historic districts and structures may provide an additional year of protection compared to a non-historic structure, but cannot be relied upon for lasting support. Our museums (Old Schwamb Mill, oldest mill in America) and historic structures and historic buildings are at risk. Where the density overlay includes churches and houses of worship, only a sale to a developer stops the permanent loss of these cultural and civic areas.