

Casey Hines
Boston City Hall
1 City Hall Ste 242
Boston, MA 02201

October 31, 2017

Dear Ms. Hines,

The 40 Rugg Road Impact Advisory Group (IAG) views this as a significant project that will shape future residential development within this former industrial area of Allston. As such, the BPDA and other city agencies, for example the BTDA, need to devote considerable care in evaluating the merits of this proposal. This project will set an important precedent for future development in this area and should conform to the guidelines of the Guest Street Area Planning Study. A properly designed building that meets the needs of the Allston-Brighton community, therefore, has the potential to lead to a well planned residential district in this part of Allston.

Given significant concerns that are developed in our subsequent discussion, **the IAG does not support the project as it is currently proposed.** We hope our comments help to inform a planning process that produces a project that better reflects the needs and interests of the Allston-Brighton community. We remain committed to working with the developer and the BPDA to produce this outcome.

Below we have listed a number of concerns and suggestions related to the building itself, the impact on the immediate community, and the impact on the broader Allston-Brighton neighborhood.

Building Structure and Occupancy

1) Density:

This project has a Floor Area Ratio of 3.6, which is above the Brighton Guest Street Area Planning Study recommendations of 1.25 to 3.5 (and well above the current zoning of maximum FAR of 1.0). **We recommend the FAR be no more than 3.0**, which would allow density without placing as much of a burden on the lot and limit the population increase on the surrounding neighborhood and existing streetscape and traffic. We believe the current design will create an imposing presence on this corner, and while understanding the motives of the developer to maximize their development for efficiency and profit, we also view this corner as a crucial component of how Braintree Street will function. When compared with the current proposal, a FAR of no more than 3.0 will lessen strain on a neighborhood that was never designed for such density.

To achieve a more balanced FAR that is closer to the ideals of the neighborhood, **we would like to see this project decreased in height by one story across the whole project, and to have setbacks in the final story to lessen the perception of an overbuilt lot.** The current design of six stories is out of step with the surrounding neighborhood of three-story townhouses along Hano Street. The current design is also one-story higher than the adjacent condo building at 20 Penniman, and two-and-one-half stories higher than the adjacent project at 30 Penniman. A shorter building would cast shorter shadows on the neighboring city park and homes in the Hano Street neighborhood.

Furthermore, the proposed building's edges comes up against the sidewalks on Penniman Rd, Rugg Rd, and Braintree St to create a narrow sidewalk, specified by the developer as a 5' pedestrian zone and 1'6" furnishing zone. This is the *minimum* pedestrian zone as defined in the City of Boston's

Complete Streets Guidelines for a Neighborhood Connector road. Instead, **the IAG would like to see the preferred guidelines for pedestrian zone be met, with significant setbacks from the sidewalk to create a 15'6" preferred sidewalk zone**, which includes a 8' pedestrian zone, a 2' frontage zone, and a 5' greenscape/furnishing zone. Since the developer plans to rebuild the sidewalks along these streets to make them ADA compliant, we see no reason for the developer not to build to the preferred standard.

To accomplish a greater setback from the sidewalk, we also recommend **increasing the accessible green space on the surrounding landscaping, which may require redesigning the public green space to be facing the streets** rather than being hidden within the development. This whole lot, and indeed this former-industrial corner of Allston as a whole, deserves to be "greened" through the **addition of substantial street trees** while still allowing for 5' of passable sidewalk. The developer should also improve the condition of the sidewalk by **incorporating street lighting** into the streetscape redesign.

2) Affordability

The median income of Allston/Brighton is \$52,362. Given the current market rate for housing and the proposed rent for this development, most neighbors in Allston/Brighton would be spending more than 50% of their annual income on this housing. As we experience one of the region's most expensive housing markets, **we recommend that the developers increase the percentage of their affordable units to 20% of the development**. This inclusion rate has worked successfully in Cambridge without discouraging development.

3) Artist Space

Arts and culture has been an integral part of this community for several decades and is one of the main reasons our neighborhood is such a dynamic and attractive place to live. Unfortunately, given the desirability of our neighborhood, artists in our community continue to be displaced by climbing real estate prices, rent, and demolition of artist space for residential development. Although we appreciate and applaud the developers inclusion of public art in the proposal and their collaboration with Artists for Humanity, there needs to be a better effort in providing actual physical artist space in the development to replace the space they are removing. **We recommend that 25% of the affordable units be live-work spaces for City of Boston certified artists and that they be permanently dedicated to artists.**

4) Unit composition

The development as proposed includes 94 studio, 105 one-bedroom, and 62 two-bedroom apartments. With the majority of units being 1-bedroom units or fewer, **we recommend a significant increase in the number of 2-bed apartments as well as the addition of 3-bed apartments**. Apartment size, number of bedrooms, and apartment layout should be conducive for family living. There should be an option for families and those interested in creating roots and stability in this neighborhood.

5) Homeownership

We recommend that the project's housing units be divided into 50 percent condominium units designed for owner-occupants and 50 percent rental units. The fact that the current proposal calls for two separate buildings at the site makes it easier to include condominium units.

This recommendation responds directly to Allston-Brighton's declining owner-occupancy rate. Allston has a very low 10 percent owner-occupancy rate, while Brighton's owner-occupancy rate has declined

from 26.8 percent in 2010 to 22 percent in 2017. These owner-occupancy rates compare unfavorably to the city-wide average of 34 percent.

To ensure the goal of increasing owner-occupancy housing in Allston-Brighton, **we also recommend that the condominium units be deed restricted.** This would produce owner-occupied units rather than condominiums units purchased as an investment. The provision for deed restricted condo units also will make the building more attractive to individuals/families who want to live in Allston-Brighton for an extended period of time.

The proposal by the developer to commit \$1.5 million to fund owner-occupied housing at another site, while well intentioned, is an **inadequate response to the lack owner-occupied housing in Allston-Brighton.** As the developer noted, this commitment would produce 5 owner-occupied units. An acceptance of this proposal by the City would produce the following negative result: the creation of 261 rental units and the creation of 5 owner-occupied units at some point in the future. As a consequence, this current proposal, if accepted, would actually reduce Allston's troubling 10 percent owner-occupancy rate.

6) Environmental Standards. **We encourage the developer to attain LEED gold status** which further demonstrates commitment to building residents and A-B environment.

Immediate Neighborhood

1) *Parking*

Though the parking ratio of 0.64 is in-keeping with the current demographic of car ownership amongst renters in Allston, this project seems to have no disincentive for its car-owning residents to obtain a free on-street permit from the City of Boston and park on city streets. Adding on-street parkers will create an undue burden along Penniman Rd and Hano St, a neighborhood already strained for current residents who have no access to a private parking garage. If this is deemed to be the case, the developer should offer certain parking amenities, such as space in their private parking garage, to the surrounding neighbors of the Hano St neighborhood at a subsidized rate. **After the building attains full occupancy, we recommend that the developer track and share usage and occupancy rates for the onsite garage and work with the BPDA and BTM to offer available garage parking to the neighborhood residents.**

The main vehicle access points to the development should be designed in a way that minimizes trips taken down Penniman Rd and through the Hano St neighborhood. To this end, **the entrance/exit to the parking garage should be relocated away from Penniman Rd, and we recommend that all vehicle trips to the development occur either directly from Braintree St or from Rugg Rd/ Denby Rd.** The current proposal has the parking garage access immediately adjacent to the city park, which will bring excessive car traffic to an (neighborhood) area where children play.

2) *Penniman Park*

The IAG appreciates the developer has offered to dedicate \$60,000 for improvements of Penniman Park and we agree that updating this park would benefit the residents of this community. After some research, needed improvements to a city park could cost \$200K to \$400K including ongoing maintenance. An initial fund of \$85,000 with an additional \$20,000 a year for a maintenance and improvements fund for Penniman Park is more realistic.

Two examples of much-needed safety-related improvements in the park include a) the addition of a police call box and b) lighting improvements in and around the park would be highly appreciated. These improvements would significantly decrease drug dealing and increase the quality of life for this community.

These improvements will help demonstrate the developer's commitment to the A-B community and to the residents of the area. Please keep in mind new and old residents would greatly appreciate and benefit from all these improvements.

3) Rodent Mitigation

The IAG assumes the developer will perform the normal rodent abatement procedures during construction. Additionally, the **IAG encourages the developer to perform ongoing rodent mitigations** in the neighborhood (defined by Braintree-Cambridge-Hano-Everett Strs) such as professional abatements and purchasing appropriately constructed trash and recycle bins for all non-commercial residents.

Allston Brighton

1) Transportation

We recommend the developer become a member of the Allston-Brighton Transportation Management Association (ABTMA), which is an organization that provides transportation alternatives and facilitates non-single-occupancy-vehicle trips for its members. By becoming a member, the developer will bolster transportation improvements throughout Allston and Brighton, and will also gain access to the amenities provided by the ABTMA, such as shuttle buses, investment in public transit, bicycle education and repair services, and other mode-sharing opportunities.

However, the IAG also acknowledges that the ABTMA is a private, third-party organization which can only fill some of the gaps we face in our public transit, and the developer should not rely solely on any private organization to provide transportation solutions to our congested streets without also making significant investments in the MBTA. **The developer should also financially support specifically the 57, 86, and 64 MBTA bus routes, the Green Line B-Branch, and the Framingham/Worcester Commuter Rail Line.** We realize the failings of the MBTA are a greater problem that cannot be solved by one development, however, we hope to inspire the City of Boston to follow the lead of nearby examples such as Kendall Square by creating a standard where all developments must financially support local public transit in order to improve service throughout the neighborhood, thereby, increasing capacity and quality of service.

The developer should also have public ZipCars (or other public car-sharing) available on-site. The current proposal does accommodate car-sharing, but only for its residents which does little to benefit the greater Allston neighborhood.

2) Jobs for A/B residents.

The IAG reminds the developer and the BPDA of the importance of creating construction jobs that provide a working-wage for Allston-Brighton residents. **We also recommend that 2 of the 4 permanent jobs created by the development go to Allston-Brighton residents.**

Thank you for the consideration of this letter. We look forward to working with the developer, the BPDA and other city groups to create a project of which we can all be proud.

Signing Members of the 40 Rugg Road Impact Advisory Group

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