



egleston sq.
MAIN STREET

**3200 Washington Street – Supplementary Comments
Egleston Square Main Street
BOARD APPROVED -- April 15, 2015**

Egleston Square Main Street supports the proposed redevelopment of the Economy Plumbing building and adjacent parcels to create a mixed use development project at 3200 Washington Street. Over the past eight months, ESMS has met with the proponents on numerous occasions, coordinated multiple community meetings about the project, and provided provided comments to the BRA through a comment letter dated [March 10, 2015.] This document provides our updated comments and concerns regarding the project, and specifies questions that remain outstanding, and issues that must be resolved before the project is approved.

- Changes to the design of the building in the past month have substantially improved its appearance and reduced neighborhood impacts. The increased setbacks for the 6th floor and mezzanine of Building B effectively reduce the visual impacts of the building and help to create the appearance of a five-story street wall. Of course, this change was not without its corresponding impacts on the project's housing program and financials; Mezzanine setbacks resulted in the elimination of two bedrooms from the overall program. **We are satisfied that the proponent has been sufficiently responsive to neighborhood concerns about visual impact, and we support the current height and massing proposal.** We are opposed to any further reductions in building height, bedroom count, or unit count which would negatively affect the affordability program.
- We commend the proponents for exceeding the inclusionary housing requirements on-site and acknowledge the provision of three 3-bedroom homeownership units for households earning 65% of AMI, a rare opportunity in the neighborhood. While commendable, we feel that the affordability program still falls short of established neighborhood goals. If the units at 52 Montebello are counted (as we feel is appropriate), then the project currently provides 18 income restricted units, 24% of the new units proposed. **We request that the developers provide at least one additional income restricted unit to bring the total to 19, or 25% of the total new units.**
- We feel that the proposed acquisition, rehabilitation, and transfer of 52 Montebello to a local nonprofit for use as long-term low income rental housing is a significant community benefit that will help to mitigate the project's potential impacts on housing affordability in the neighborhood. Absent the proponent's investment in this property, it will likely require \$1 million or more of city or state financing to rehab those units, which may take years to acquire. The delivery of those six units with zero public subsidy will provide immediate neighborhood benefits that should not be discounted simply because they are "off site." However, given the remaining uncertainty regarding 52 Montebello (DND will not award the property until May), **we request that the developers commit to a binding community benefits agreement that specifies their commitments with regard to the property's acquisition, rehab, and transfer; and specifies an acceptable alternative community benefit if best efforts to acquire the property are unsuccessful.** Our expectation is that the proponents will renovate the

property to the specifications of DND and the receiving CDC, and will deliver it at a nominal cost to the receiving entity for debt-free operation. In the event that the proponents' best efforts to acquire and rehab 52 Montebello are unsuccessful, either of the following two options may serve as acceptable alternative community benefits: a) the developers provide an additional four deed restricted units on site, at no more than 70% AMI; or b) the developers make a cash payment to the city's Inclusionary Development Fund, in the amount of 110% of the anticipated rehab cost (including contingency) for 52 Montebello, or \$1.2 million, whichever is greater.

- **Questions raised in our prior comment regarding the ownership structure of Building C (triple decker) have not been addressed by the proponents.** Will the property be subdivided and conveyed to a new condominium association, or will the land remained owned and maintained by the development team? The proponent should demonstrate that strong supports are in place to ensure effective condominium management, should that be the chosen form of ownership.
- While we support the project's low parking ratio and transit orientation, there is additional work to do to ensure that the program is successful. **Many of our transportation-related comments and recommendations made in the March 10 letter remain unaddressed.** Specifically, the proponent should agree to provide at least two dedicated indoor spaces to Zipcar or another car sharing service, free of charge, should there be interest in locating cars there. We also request that the one-time transit pass benefit be replaced with an annual alternative mode subsidy of \$50 to \$100 per unit that can be spent on an MBTA pass, Hubway, or car sharing membership. The proponent should specify the mechanism for allocating the parking spaces; as described in our earlier comments, we strongly recommend "unbundling" the parking spaces from residential leases so that car-free households are not forced to lease a space they do not need. We also request that spaces unclaimed by tenants be made available (for lease) to neighborhood residents.
- The reconfiguration of the garage entrance to Iffley Road allowed for the creation of additional garage parking spaces, but it also resulted in relocation of the second bike room to the rear of the garage, where users do not have the direct lobby access available from the street-front bike room. **We request that the second bike room be relocated to provide direct lobby access, even if this would require the loss of parking spaces.** We feel that the parking program as initially proposed in the PNF [(36 spaces total)] was appropriate given the location and transit orientation of the development.
- The reconfiguration of the parking entrance to Iffley Road significantly improves the building's street wall and pedestrian environment, and we support this change. However, this change requires loading and trash pickup to occur on the street, rather than within the building. The specific configuration of loading zones and on-street parking restrictions is the responsibility of Boston Transportation Department. **We request that the proponents and BTM provide ESMS with the opportunity to review and comment on the final loading zone plan before it is finalized,** so that we may evaluate its impacts on retail parking, through traffic, and neighborhood parking.
- The location of the transformer pad in the backyard of the townhouse units on Iffley Road appears to substantially diminish the usable open space for those units. The proponent should explain what this installation is and why an alternative location is not available.