



egleston sq.
MAIN STREET

**Comments on 3200 Washington Street
Egleston Square Main Street
Board of Directors
March 10, 2015**

The proposed redevelopment of 3200 Washington Street would mark a new era in the growth of Egleston Square and the surrounding neighborhoods. Many residents have raised concerns about the scale of the development and its impacts on parking, traffic, affordability, and neighborhood character; and everyone involved in the process laments the fact that there is no comprehensive modern land use plan for Washington Street to guide the development. Nevertheless, the proposal exists and must be evaluated on its merits. In doing so, we face a variety of tradeoffs involving height, density, design, parking, and affordability.

Over the past 8 months, Egleston Square Main Street (ESMS)¹, through its Economic Development Committee has carefully considered the proposal, the positive impacts it may bring to the neighborhood and business district, the potential negative impacts of concern to many neighborhood residents, and what potential changes would result in a better balance of benefits and impacts.

Overall, we feel that the project will revitalize an underused property at a key location, will help to meet the city's housing needs, will substantially exceed the city's requirements for affordable housing, will deliver high-quality large-format retail spaces currently unavailable in the district, discourages auto dependency, and takes a thoughtful, sophisticated approach to urban design.

Given the lack of formal city-sponsored planning along Washington Street that could serve as a reference for this project review, the scale of this development, and its transformative impact on the neighborhood, it should be held to the highest standards, so as to set a precedent for future growth. Our principal concern relates to housing, an issue of utmost importance to the community. We support the Jamaica Plain Neighborhood Council's policy that calls for 19 units from a project of this size, at an average affordability of 65%. We expect 3200 Washington Street to meet that standard, and, in combination with the renovated units proposed at 52 Montebello, the project is almost there. We request that the proponents add another two deed-restricted units on site.

Since the issues of height and visual impact remain a major concern to many residents, especially those closest to the development, we also request that proponents make efforts to revisit the design of the upper stories of the development to determine if feasible reconfiguration or redesign of those upper floors and mezzanine can help to reduce their impact on views and neighborhood character.

¹ ESMS is a non-profit organization whose mission is to build the Egleston community, strengthen the business district, and revitalize public spaces through partnership with local merchants, residents and community groups. We represent a business district comprising 117 establishments, with a primary trade district of 12,000 residents.

This document presents additional facts, observations, and comments about various aspects of the project, including questions, suggestions, and expectations. It does not constitute a definitive assessment nor an endorsement of the project, which is contingent on satisfactory resolution of the issues raised here, as well as others that may be raised in the coming weeks of discussion with the broader Egleston community. We look forward to the proponents' response to these comments and to a successful conclusion to this process.

Process and Planning

Findings

- The site has been identified by ESMS as an important redevelopment opportunity since before the Economy Plumbing business moved to its new location. ESMS and its partners have conducted surveys, organized neighborhood visioning workshops, and commissioned reports from student researchers and pro-bono design professionals, all intended to help define community priorities and design principles relevant to the Washington Street context and this property in particular. This prior analysis informs all the comments and observations in this document.
- The proponents have participated in at least a dozen meetings with community organizations (section 2.7), including a well-attended ESNA meeting in July (as reported in the [Jamaica Plain Gazette](#)), three joint ESNA/ESMS committee meetings, and a Spanish-language meeting at Coco's in October. Reports on those committee meetings were made at the November and January ESNA meetings.
- ESMS and ESNA had planned a large community meeting on February 10, which was cancelled due to snow and subsequently combined with the IAG meeting on February 25.
- Information about the proposal and process is online at <http://eglestonsquare.org/possible-development-in-egleston-square/>

Comments

- The proponents have been actively seek and considering community feedback on the proposal since last July. Substantive changes have been made as a result of that feedback, in the design, programming, and affordability elements of the proposal.
- Unfortunately, many community members have remained unaware of the proposal until recently, and the meeting on February 25th was the first for which flyers were distributed door-to-door. It is essential that the scheduled meeting on March 19th be well advertised and facilitated so that the perspectives of a wide variety of community members can be heard.
- At this time we do not think it is necessary to extend the Article 80 comment period beyond the current April 3 deadline. However, we reserve the right to request such an extension based on community feedback and the results of the March 19 public meeting.
- It bears repeating how unfortunate it is that this project must be evaluated by the local community in the absence of any planning framework for one of the most active development corridors outside of Downtown Boston and the Seaport. Hundreds of housing units are in the pipeline along Washington Street, without any common benchmarks with regard to height, transportation, or affordability. As a result, many projects fail to meet their full potential and they exhibit little relation to one another in their form or objective. Once again we request that the BRA initiate a planning effort to develop a coordinated approach to land use and transportation in the corridor from Forest Hills to Egleston Square.

Urban Design & Architecture:

Findings

- The design includes four distinct functional elements along Washington Street: the narrow retail space at the corner of Iffley, the garage entrance, the residential entrance, and the marquee retail/restaurant space on the corner of Montebello.
- The project site area of 32,412 square feet and the total square footage of approximately 100,000 square feet translates into a Floor Area Ratio of 3.09.
- In numerical terms, the density of the project is comparable to other residential and mixed use buildings in close proximity on Washington Street include the mixed-use and residential buildings that reflect Egleston Square's "first wave" of transit-oriented development in the late 19th century, and one ten-year old mixed-use building, though most of these are only three to four stories and do not provide any on-site open space as proposed in this development.
- Buildings of comparable or higher density include:
 - 3122 Washington Street (5.5 FAR)
 - 3115 Washington Street (3.1 FAR)
 - 3222 Washington Street (3.18 FAR)
 - 3175 Washington Street (Franklin Brewery/Extra Space Storage, FAR 9.8),
 - 3039 Washington Street (Egleston Crossing, 3.2 FAR.)
- The new shadows cast by the building will principally fall on Washington Street and on nearby light industrial parcels. Few existing residential properties will see a substantial increase in shadows. Views from surrounding residences, and view corridors from the front yards of Iffley and Montebello will be affected.

Comments

- The height and bold design of the project have raised many concerns among the neighborhood. The proposed development is certainly more prominent than any building on this stretch of Washington Street, with the exception of the Franklin Brewery. It is certainly more dense than the two and three family neighborhoods nearby. Nevertheless, we feel that the proposal is both consistent with a sustainable future vision for Washington Street and sensitive to the abutting residents. It is clear that significant housing density will be necessary to meet future housing demand; and redevelopment of underutilized land in mixed use corridors in areas of existing density is an accepted and fundamental strategy for sustainable growth. However, mitigation and reduction of the impacts of the project density on existing abutters and neighborhood must also be considered.
- The mezzanine level, which is (9' compared to a typical 10'-6" floor) adds only 4 small bedrooms and elevator overrides. Eliminating or reducing this mezzanine would reduce the height along Iffley Road without significantly reducing the usable area of the project and should be considered. Other opportunities for reducing the mass and height at the street wall should be considered as well, such as increased setbacks for the mezzanine or different façade treatments.
- The decision to route auto egress to Montebello reduces car/pedestrian interactions in front of the building. However, the proposed 18' wide garage entrance creates a wide gap in the façade. The proponents and city officials should explore options to reduce or mitigate this width. It is needed to allow simultaneous truck exit/auto entry, but perhaps such conflicts could be managed with lit signage (no entry light when truck is exiting). Alternatively, the width of the opening could be reduced at most times through a partial door that opens only when needed for truck access & egress, with a car-width (12' or less) opening at most other times.

- The external entry to Bike Room 2 is via the garage entrance, creating potential driveway conflicts between vehicles and bike users. The entrance to this room should be designed to minimize or eliminate such conflicts. One option would be to move it to the front of the building adjacent to the garage entrance, behind the proposed landscaping. Alternatively, the installation of a moveable gate or barricade as described above could also be used to help protect access to this doorway.
- The proponent should clarify how retail space users will access the loading bay & trash area. Figure 3.7 (1st floor plan) does not depict any door or logical route from the large retail space at the corner of Montebello to the loading bay or the trash area, without going through the residential lobby.
- The raised retail plaza at the corner of Montebello will be a landmark location, but for occupants of the plaza it will also be one exposed to the intense activity of Washington Street. The renderings show a borderless edge of the plaza above the steps, but we encourage the proponents to consider approaches (permanent or temporary) that will provide a demarcation of the space.
- The location of the mechanicals atop Building B places them on a prominent edge of the tallest building element, where they may be highly visible from many vantage points. However, they do not appear to be depicted in Figures 3.19 or 3.20. These renderings should be updated to include the mechanicals. They should be placed in a location where they are less visible, to the extent feasible.
- Figure 3.8 (2nd Floor plan) shows a Transformer Pad in what appears to be the back yard of the townhouse units on Iffley Road, in a location that appears to substantially diminish the usable open space. The proponent should explain what this installation is and why an alternative location is not available.

Housing & Affordability:

Findings

- The city's Inclusionary Development Policy would require the creation of 10 units of on-site affordable housing for a development of this size (76 units), mostly affordable to households earning 70% of Area Median Income. Meanwhile, the Jamaica Plain Neighborhood Council's policy (25%) would call for the creation of 19 units at an average affordability of 65% of Area Median Income (\$61,200 for a family of four, somewhat less than the median income for a family of that size in Boston, which was \$68,800 from 2009-2013)
- The proponent's affordability proposal distributed on January 14 calls for the creation of 17 units of affordable housing.
- 11 units would be created on-site as follows:
 - Three (3) 3-Bedroom triple decker units (for-sale, 65% AMI)
 - Two (2) 2-Bedroom units (rental, 70% AMI, \$1,361 max rent)
 - Two (2) 1-Bedroom units (rental, 70% AMI, \$1,190 max rent)
 - Four (4) Studio units (rental, 70% AMI, \$1020 max rent)
- An additional 6 units have been proposed through the acquisition and renovation of 52 Montebello, a vacant city-owned property being disposed of for affordable housing in the coming months. The proponent has held multiple meetings with the two local CDCs (JPNDC and Urban Edge) regarding financing or long-term management. Conceivably, the proponent could acquire the property through the DND disposition process, renovate it, and deliver it "turnkey" to one of the local CDCs for low-income or very-low-income households. Alternatively, they could make a donation sufficient to finance CDC renovation. A draft MOU is currently under development.

- All on-site affordable units will be made available via a lottery. The developer has asked local CDCs to support the marketing of affordable units to local households.
- Assuming the units at 52 Montebello will be rented at or below 50% of AMI, the 17 units would have an average affordability of 62% of AMI.
- The development would include four handicap-accessible housing units, one of each size (studio, 1-, 2-, and 3-bedroom.)
- It would require \$4.5 million dollars of tax credits and city funding to produce 19 affordable rental housing units through traditional affordable housing channels, according to Mayor Walsh’s [Housing Plan](#) (page 28.)

Comments

- This project helps to achieve the goals of Mayor Walsh’s housing plan, which has identified housing production as a fundamental citywide strategy for addressing affordability and meeting the needs of a growing population. That plan calls for 53,000 units of new housing over the next two decades, most of it rental housing. Reasonable people can disagree on whether meeting that target would make the affordability crisis any better, but the data are clear that *not* meeting it will only make the problem worse.
- We appreciate the proponent’s progressive affordability program, and willingness to engage in a serious discussion about affordability. The inclusion of three homeownership units at 65% of AMI is particularly notable, since for-sale units at that income level are very difficult to finance using public subsidies such as tax credits. The renovation of 52 Montebello will make that property available as rental housing for low income households without public subsidies or the long (multi-year) wait that is often entailed with public financing.
- Nevertheless, we feel strongly that the development should deliver 19 units of affordable housing, as required by the JPNDC affordability guidelines and as requested by ESMS and ESNA in September 2014. Given the potential transformative nature of this development and its height substantially in excess of the current zoning envelope, we expect an affordability program that will set a precedent for future growth. The additional two units necessary to achieve this target should both be two-bedroom units or larger.
- Initial conversations with the local CDCs have been positive, but many details remain to be addressed. If the “turnkey” option is chosen, our expectation is that the proponents will renovate the property to DND and receiving CDC specifications, and will deliver it at a nominal cost to the receiving entity for debt-free operation. If payment-in-lieu of renovation is chosen, we expect that the payment will be sufficient to achieve substantial completion, including contingency, according to independent cost estimates conducted consistent with DND and CDC specifications.
- The proponent should specify how many additional affordable units will be provided on-site if a successful program for 52 Montebello cannot be implemented for whatever reason.
- Given the projected growth in Boston’s senior population over the coming decades (22,000 additional households², many of whom may have mobility impairments), we strongly encourage the proponents to consider additional accessible units. Studio and one-bedroom apartments suitable for smaller senior households are appropriate candidates for accessibility.
- The proponent should describe the proposed ownership and management arrangement for the three homeownership units on Iffley Road. Will the property be subdivided and

² “[Housing a Changing City: Boston 2030](#),” 2010, Executive Summary, page 4

conveyed to a new condominium association? Or will the land remain owned and maintained by the permanent owners of the larger development? If the latter, a limited equity cooperative association for the homeownership units may be a viable option.

Retail Space:

Findings

- The proponents have purchased a new location on Columbus Avenue for the business currently operating the site, E & J Auto.
- ESMS business development priorities for this “node” of the district, based on market analysis and community surveys, include the following: full-service restaurant, green grocer, children’s clothing, and hardware store.

Comments

- The proposed retail storefront spaces fill a missing niche in the Egleston Square business district, which is currently a mix of very small retail spaces and some industrial properties.
- We appreciate the proponents’ efforts to prevent displacement of an existing business by finding an alternative location in the neighborhood.
- We encourage the Jamaica Plain-based proponents to “Shop Local” when it comes to seeking tenants for the commercial spaces, and to engage local CDCs and organizations in outreach to local merchants who may be ready to graduate to a more substantial and prominent retail space.

Transportation and Parking:

Findings

- In the Egleston Square neighborhood, 45% of renter households don’t own a car, according to the American Community Survey (2007 – 2011.)
- The proposed development includes 36 on-site parking spaces (with one caveat—see comments below) and will restore at least seven on-street spaces currently unavailable due to large curb cuts.
- The Parking Mitigation and Transit-Oriented Development Plan includes the following elements:
 - \$35 Charlie Card
 - Car sharing promotion
 - Hubway informationand additional measures “may include” orientation packets, bicycle accommodation, electric vehicle charging, on-site zipcar, and a transportation coordinator

Comments

- Parking is a major concern for many nearby residents and merchants, who feel that a shortage of parking is an inconvenience and a deterrent to customers. Many feel it is inevitable that new residents will own vehicles and store them on the street if parking spaces are unavailable or prohibitively expensive. However, this past winter and the years before it make abundantly clear that parking challenges predate this proposal, and solving those challenges is far bigger than any one project. The neighborhood needs a comprehensive strategy for using parking resources, which could include resident permits & fees, metered parking, or other parking management measures. We encourage the BRA to include such an element in the requested comprehensive plan. In the long run, the only way for the neighborhood to grow sustainably (and equitably) without being choked by parking, is to enable more residents to live without a car, and to encourage more shoppers to come by foot.

- With more than 1,200 car-free renter households in Egleston Square already, we find it quite reasonable that the development might attract three dozen more such households attracted by the convenient location and transportation incentives.
- The proponents have not specified how the on-site parking spaces will be allocated. We encourage the proponents to lease parking spaces (including parking spaces at the homeownership units) separately from the apartments themselves, so that car-free occupants will not be compelled to rent a space. If some spaces are un-rented by building occupants, can they be made available to neighborhood residents?
- The proponent should actively market the garage as a potential car share parking location and should commit to providing at least two spaces, free of charge, to a car sharing service who chooses to deploy vehicles there.
- The transportation management proposal included in the PNF is notable, and we commend the proponent for preparing such a plan. Nevertheless, we feel that additional measures and commitments are needed to help enable residents to achieve the level of car-ownership envisioned by the plan.
 - The \$35 Charlie Card is a positive incentive, but would only pay for only a week and a half of commutes on the subway. Either the initial payment should be larger (\$100+), or occupants could be provided with an *annual* credit on their MBTA account (to be used for either Charlie Card or LinkPass) to help subsidize their transit usage on an ongoing basis.
 - Similarly, the Hubway incentive should include either an annual pass subsidy (e.g., 50% of the \$85 annual fee), or else a number of 24-hour passes to help introduce tenants to the system.
 - Combining the two ideas above, the proponents could consider an annual transportation subsidy for all tenants: \$50 to \$100 for each unit, which could be spent on MBTA pass, Hubway, Zipcar, or other transportation alternative, funded by a \$20 monthly surcharge on parking fees for the on-site spaces.
- Retail parking is a major issue of concern to merchants in Egleston Square, and in recognition of that we also ask the developers to coordinate with the Boston Transportation Department (BTD) to evaluate a two-hour parking limit on all new on-street parking spaces which the proposed project would open up on Washington Street and Iffley Road through the elimination of curb cuts. A comprehensive analysis of parking needs should also consider a two-hour parking designation from the proposed development site up both sides of Washington Street to the existing limited-parking area in Egleston Square.
- The PNF indicates that deliveries will occur via the indoor loading dock within the parking area. Will all deliveries happen within the garage? What is the proposed protocol if there are two deliveries at once, or if a delivery occurs via semi-trailer that cannot access the garage? Will a loading area be requested along Washington Street?
- The proponent should also propose a TDM program for employees of the retail spaces, designed to encourage employees to use alternative modes. Employee parking is a significant challenge for local merchants.
- The Executive Summary (Section 1.3.17) states that “The project will provide...3 spaces for the townhouse units,” yet General Information (Section 2.5., paragraph 1) states “the proposed townhouses would be three floors over one story of parking accommodating a total of eight parking spaces.” The proponent should clarify the number of parking spaces at the townhouse units.