

Board of Directors

September 14, 2015

Co-President

Logan Keck Christ the King Church IP/Roxbury

Christine Araujo

City of Boston Zoning Board of Appeals

City Hall, Boston, MA

Co-President Solomon Lemma

Egleston Liquors

Dear Ms. Araujo,

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Robert Torres Urban Edge

Egleston Square Main Street (ESMS) appreciates the opportunity to comment on the proposed redevelopment of the Economy Plumbing building and adjacent parcels to create a mixed-use development project at 3200 Washington Street. We encourage the Zoning Board of Appeals to grant the variances necessary for this project to proceed.

Egleston Square Main Street is a community-based nonprofit organization working to promote, preserve, and revitalize the Egleston Square business district and surrounding neighborhood. Over the past fourteen months, ESMS has met with the proponents on numerous occasions, coordinated multiple community meetings about the project, and provided comments to the Boston Redevelopment Authority (through the Article 80 process) and the Department of Neighborhood Development (pursuant to the disposition of 52 Montebello Road.) We are aware of the diverse perspectives on this proposal and remain frustrated that the planning framework to guide such developments is only just beginning to be created. Nevertheless, we have reviewed the project on its merits and conclude that it will provide substantial net benefits to the community and should proceed as currently proposed.

While much has been made of the size of the building, it is our position that the proposal is appropriate for the site and surrounding neighborhood. The scale, height and density of the proposed buildings are consistent with adjacent properties. There is a building 25 feet taller immediately across the street, and at least six other properties within a quarter mile of the building with a similar density (above 3.0 FAR), including the adjacent residential property on Washington Street and a mixed-use building near Columbus Avenue built in 2003.

The requested variances are legally justified due to particular circumstances relating to the soil conditions, shape, and topography of the site. The steep slopes of side streets and shallow bedrock affect this site in a manner that is unique for the area. If the site were flat and regularly shaped, the same amount of development could be accommodated in a building of just four stories, but the steep slopes create both the necessity to add height as well as the opportunity to add the extra height with minimal impact to immediate abutters.

The current proposal would add 64 much-needed rental units to the housing stock in the area, and would produce another 18 income-restricted units (with an average affordability 66% AMI) with zero public subsidy. This is nearly double what would be required under the city's Inclusionary Development Policy (10 units) and provides deeper levels of affordability than required. 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. It would require more than \$4 million of public resources to provide the same number of affordable units through conventional channels. It should be noted, we continue to request that the proponents add an additional affordable unit, consistent with our prior comments on the project.

The proponents have made numerous substantive changes to the proposal in response to community concerns, including a reprogramming of the first floor to create more retail spaces; a reconfiguration of the parking garage entrance to dramatically enhance the street wall; addition of a setback to the top floors to reduce their visual impact; and, most recently, elimination of the top floor/mezzanine to assuage community concerns. Further reductions to the density of the building would undoubtedly affect the total unit count and the number of affordable units, thereby undermining the project's housing benefits. To ensure that the new retail spaces provide opportunities for local entrepreneurs, we ask the developers to stand firm in their commitments to work with Egleston Square Main Street as they finalize the configuration of the retail spaces and solicit tenants.

Finally, while we lament the fact that there is not yet a Washington Street Corridor Plan that can be used to evaluate the proposal, we can still consider it in the context of other citywide planning efforts. The proposed housing production is consistent with Mayor Walsh's plan *Housing a Changing City*, which calls for 53,000 new housing units by 2030, including 16,000 middle-income units (such as would be provided by this development.) The streetscape of the building is consistent with the City's Complete Streets Policy, and the low parking ratio and proposed transportation demand management plan are consistent with the themes emerging from the GoBoston 2030 planning process underway, as well as regional and state initiatives to promote reduced car ownership and usage. The energy efficiency aspects of the project will help the city meet its energy performance objectives and will reduce utility costs for residents. In short, if one were seeking to design a project that exemplified the city's goals and planning best practices, it would look much like 3200 Washington.

Thank you for the opportunity to comment on this proposal. We encourage you to grant the requested variances so that this ambitious proposal can move forward.

Sincerely,

Logan Keck Juan Gonzalez Co-Presidents Egleston Square Main Street