

A Call to Action to Make Rozzie the Most Walkable Neighborhood in Boston

Nov 19, 2024

#### BY ELECTRONIC MAIL ONLY

Planner II Abdul-Razak Zachariah (abdul-razak.zachariah@boston.gov)
Boston Planning Department
One City Hall Plaza, 9th Floor
Boston, Massachusetts 02201
Attention: Abdul-Razak Zachariah, Maya Kattler-Gold and Kathleen Onufer

RE: Comments on the Planning Department's Squares + Streets Text Amendments

Dear Abdul-Razak Zachariah, Maya Kattler-Gold, and Kathleen Onufer,

Please accept the following joint comment letter on behalf of WalkUP Roslindale, Rozzidents for More Rozzidents, and Abundant Housing Massachusetts with respect to the Planning Department's Squares + Streets Text Amendments.

#### **Reference materials**

▶ Planning Department Text Updates to S+S Zoning.pdf

# Allowing more uses on upper floors would be an improvement

The current use requirements under Article 8 are quite restrictive. Greater flexibility in the mix of uses on a building's upper floors can lead to a more interesting and diverse mix of establishments.

However, our support for added flexibility ends at the point where it effectively creates lower density substitutes for the S2-S5 districts. We are concerned that this approach could be used to scale back an area's rezoning in order to limit building heights and densities for other reasons.

# The S2 amendment would hurt commercial area redevelopment and make fully residential buildings more expensive and less likely to happen

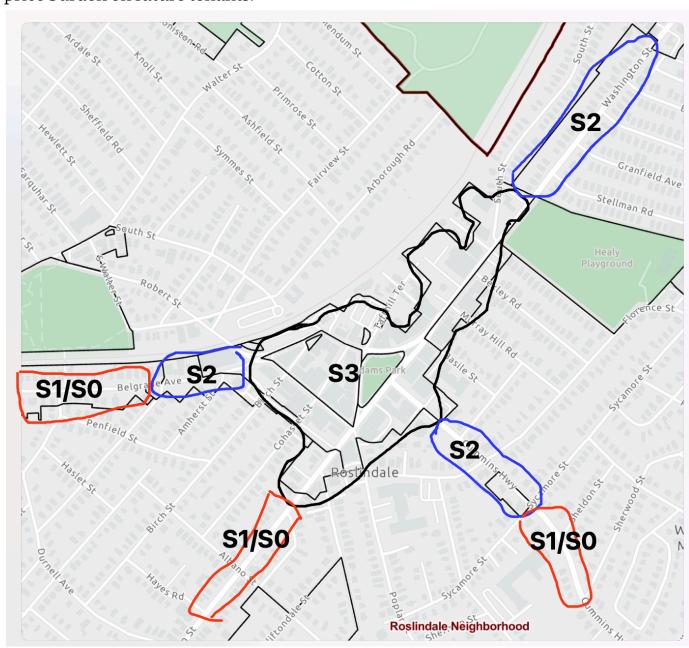
We oppose restricting ground floor residential use under S2 on two grounds:

- 1. It would limit redevelopment potential in commercial areas by inviting the mapping of S2 to areas where S3 or above would be more appropriate. In Roslindale Square, this raises the worrisome possibility that we won't see anything higher than S2 mapped here.
- 2. It would make fully residential development more expensive and less likely by adding yet another hoop to jump through, and dilutes the principle of allowing 5-story residential buildings by right on our main streets.

# Preserve the S3, S4, and S5 for commercial areas

It is important to maintain the S3 and above as the most appropriate districts for mapping to commercial areas, where we want to maintain a continuous stretch of active ground floors. In <u>Roslindale Square</u>, for instance, this includes those areas currently zoned for Community Commercial and Neighborhood Shopping (see below).

We believe S3 would be the best district for the job, because the trade-offs make sense to us. In exchange for requiring redevelopments to subsidize ground floor commercial, make 20% of the units affordable, and sustain the costs of enhanced anti-displacement measures under the City's forthcoming ordinance, developers are granted greater lot coverage, an additional two floors of height, and greater use flexibility. These increase the chances that redevelopment will make financial sense. Also, spreading the cost over a greater number of housing units relative to building under S2 can lessen the price burden on future tenants.



### Don't make residential projects even more expensive

This amendment would make fully residential developments under S2 more expensive by requiring a conditional use permit from the Zoning Board of Appeal, and all the added time, cost, and risk that their process entails. These costs will inevitably be passed on to future owners or tenants, and reduce housing.

This would not be worth the tradeoff when you consider that the S2 was designed for current or future mixed-use streets, where you'll see triple deckers and small apartments on one side, and a strip of ground floor retail on the other. This description fits the areas marked blue on the map above, as well as places <u>already mapped S2 in Mattapan</u>. In these locations, we think it would be a mistake to prioritize ground-floor commercial over residential, because adding more homes is the bigger benefit to the community.

There is value in the principle of allowing 5-story residential buildings by right on our main streets. It is a signal of the City's seriousness about addressing our dire housing shortage. Please don't dilute that.

#### A better way to address displacement concerns

The Planning Department noted the amendment was inspired by concerns over small store displacement and the loss of commercial activity. These are reasonable concerns and we share them, but we think there are better ways to address them without scaling back the redevelopment potential in our core commercial areas and weakening the S2's capacity for housing production:

- Enact an effective business displacement ordinance, which the City in the process of developing right now
- Boost overall commercial activity by allowing more uses on upper floors, which the Planning Department's other text amendment achieves
- Map the S3 district to core commercial areas, where it's crucial to protect against a net loss of ground floor commercial

We appreciate the Planning Department's effort to fine tune Squares + Streets zoning as it gets underway. But we also implore the department to remember the <u>130 residents who signed a pro-housing open</u> letter in September in

support of allowing "maximum zoning flexibility with S3, S2, and even S5 (where appropriate) districts on commercial corridors, main streets, gateways and community connections."

Sincerely,

WalkUP Roslindale Board of Directors Rozzidents for More Rozzidents Abundant Housing Massachusetts

#### About WalkUP Roslindale

WalkUP Roslindale, which takes its name from the international movement to foster "Walkable Urban Places," is a collaborative group of residents dedicated to making Roslindale the most walkable neighborhood in Boston. We advocate for a dynamic, livable streetscape and we support positive changes to our public and private built environment that strengthen walkability and other forms of active mobility as means toward better personal and public health, safety, social capital, economic development, and environmental sustainability. We are led by a steering group of about thirty residents and have nearly 1,000 additional supporters. More information about WalkUP Roslindale and our initiatives can be found at <a href="https://www.walkuproslindale.org">www.walkuproslindale.org</a>. We recognize that no single group of people can be said to speak for our entire neighborhood – instead, please take these comments as representing the collective support of our steering group members (indicated above) resulting from our mission and principles.

#### About Rozzidents for More Rozzidents

A group advocating for secure, abundant, and affordable housing in Roslindale, Boston, and beyond.

## About Abundant Housing Massachusetts

We stand up for abundant housing for all in communities across Massachusetts. We drive policy at the state and local level by identifying pro-housing changemakers, building the power of local organizers, and connecting a statewide network.

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