

February 4, 2019

Brian P. Golden, Director
Boston Planning & Development Agency
One City Hall
Boston, MA 02201

Re: **45 Townsend Street, Roxbury**
Article 80 Impact Advisory Group response

Dear Director Golden:

We write you as members of the Impact Advisory Group (“IAG”) that has been reviewing the 45 Townsend Street proposal by Kensington Investment Company (“Kensington” / “developer”) in conjunction with the BPDA. We were nominated by State Senator Chang-Diaz, City Councilors Jackson and Pressley, State Representatives Tyler and Malia, the Garrison Trotter Neighborhood Association (GTNA) and the City of Boston (BPDA, ONS/Mayor’s Office). Twelve members were initially appointed and ten have been consistently active at both the public hearings and IAG working group sessions.

The views within this document represent the consensus of the ten active members of the IAG. Many of us have been involved with community planning meetings and activism regarding the site for more than four years - since December 2014 when the City considered placing displaced programs from Long Island at the former Radius Hospital on the 45 Townsend site. We reside in the Garrison Trotter Neighborhood and take a vested interest in what happens in our community. Some direct abutters on the IAG have had experience with the site for far longer.

We represent both homeowners and renters from the surrounding neighborhood; many of us residents for decades, yet others more recent arrivals. We have been inclusive in our outreach efforts to include everyone in our community. For example, the interests of homeowners on one side of the site have not always been the same as the residents of a subsidized community like New Academy Estates - located on another side - yet we have brought both groups into the process. We also have as IAG members both the leadership and members of the neighborhood association (GTNA) within which the site sits, and IAG members regularly report back to the GTNA membership. In short, we are confident that collectively we speak on behalf of the entire neighborhood.

Differing visions for the site

We believe that the community and the developer hold fundamentally different views of the site and its role within the neighborhood. From our point of view, the site has been an institutional anomaly in what is otherwise a residential neighborhood with rich architecture and history. The hospital grew in several spurts to encompass the site; yet the Sanborn maps from a century ago clearly show the assumption that the neighborhood would be stitched together as buildings were built on the subdivisions and streets were completed.

For example, Dennison Street, which climbs the hill from Walnut Avenue in the southeast and currently terminates in a dead end at the 45 Townsend property line, is shown in those old maps as being planned to continue down the hill and connect with Townsend Street, with Harrishof Street (also currently a dead end) connecting along the way. Across from where that connection would have been is - no surprise -

BPDA-owned land where the street would have continued and connected with the what is now the terminus of Brinton Street.



We look at the the closure of the hospital as a unique opportunity to attempt to undo some of what the hospital's institutional appearance, mass, height and abundance of asphalt did to the neighborhood. It is also - if you exclude the Lower Roxbury and Southwest Corridor parcels - one of the largest sites in Roxbury available for complete redevelopment, and its position on the hill makes it one of the most visible. It's incumbent upon the City, developer and us to get it right.

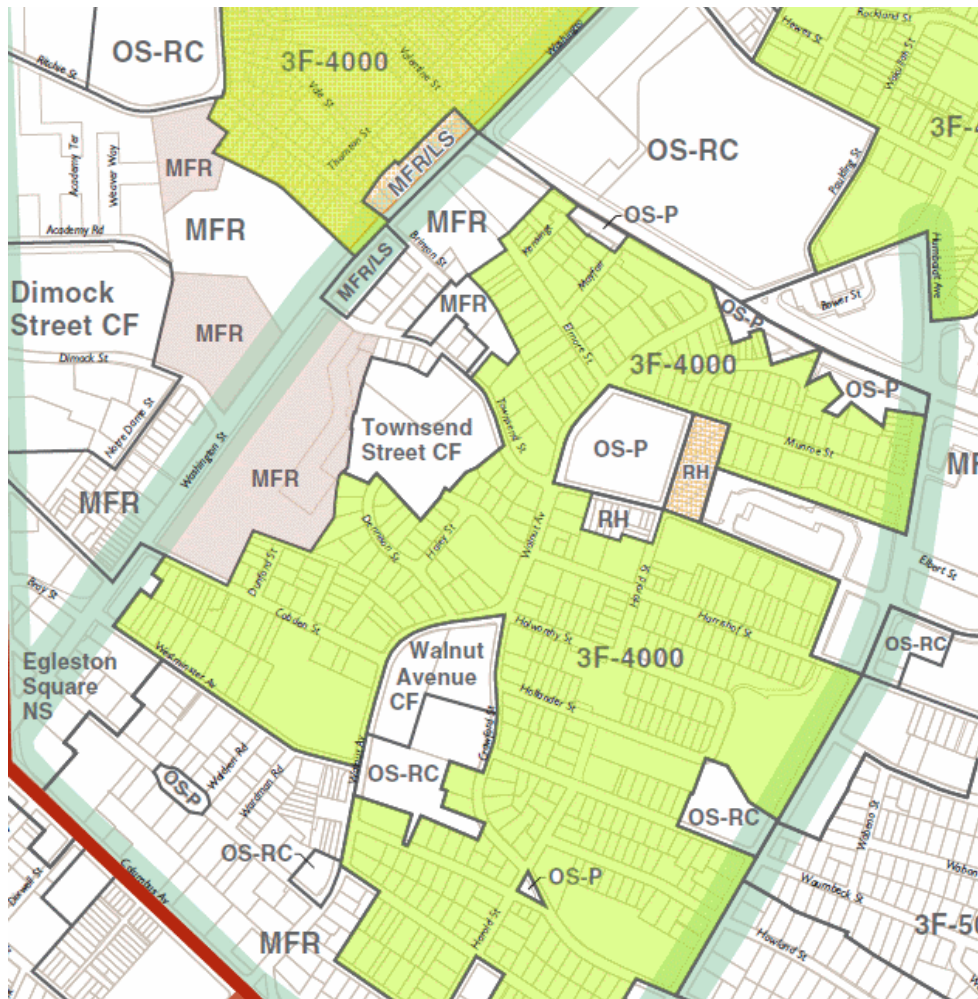
Meanwhile, based on assertions made at numerous public meetings, Kensington views the site as a blighted institutional site onto which pretty much anything residential would be an improvement. We

respectfully disagree. There is no clamor in the neighborhood for “something to be done” with the site. Nor is there pent-up demand for housing for young professionals - except perhaps those being priced-out of other housing, something that Kensington’s proposed rents will not solve.

As you know, in situations where there is a large or long standing blighted parcel, there is often openness to allowing greater density, height or other variances in order to “make the project work.” That is not the case here.

Kensington has accordingly not demonstrated neighborhood support for their proposal. Of their letters of support and their known supporters, the only direct abutters were a homeowner and his tenant - a property that Kensington purchased not long after. The only supporters in close proximity were a few residents of the Council of Elders Tower across the street, who did not submit actual letters and would not be impacted by the proposed development. The majority of the developer’s other supporters of record are literally people who have a financial interest in the project as consultants - and their associates - and none of those people live in the immediate neighborhood.

Thus, not surprisingly there is a mismatch in expectations for density and the number of units on the site. **We strongly prefer density that matches the 3F-4000 zoning of the majority of the surrounding neighborhood.** The developer proposes the kind of high density / small unit / young-professional-focused / minimal-parking development better suited for a subway station or transit spine.



To paraphrase what a member of the Mayor’s housing cabinet said at one of our neighborhood association (GTNA) meetings, “the City of Boston does not support high density in the middle of neighborhoods,” yet the developer presented density comps to the community that compared their proposal to developments at Forest Hills and on South Huntington Avenue.

Meanwhile, in terms of unit count their proposal is more than 2.7 times as dense as what the surrounding 3F-4000 zoning would dictate; and 157% to 338% more dense than any of the large complexes actually in the surrounding area:

distance (miles)		# units relative to 45 Townsend	site square feet	site size compared to 45 Townsend	units per 2,000 sf	45 Townsend relative density
	45 Townsend - developer's (KIC) current proposal	300	221,463		2.7	
0.6	Bartlett Place	323	373,980	169%	1.7	157%
	what if 45 Townsend were:	166	221,463		1.5	
0.1	Council of Elders tower	144	211,613	96%	1.4	199%
0.2	Marksdale Gardens	178	296,818	134%	1.2	226%
	Roxbury zoning code: 3F-4000				1.0	271%
0.0	New Academy Estates	236	506,779	229%	0.9	291%
0.3	St. Joseph's Community	137	341,894	154%	0.8	338%

We believe that the excessive number of units drives nearly every other concern raised by neighbors: parking; height; massing; traffic; construction impact (blasting, etc); and radical changes to the demographics of the voting precinct.

Now, to our specific response to the proposed project, including the recent DPIR filing:

Unit count

Our position is that **166 units** is appropriate for the site. This has long been the position of the neighborhood.¹ We came to this number on this basis: for 3F-4000 zoning, Article 50 (Roxbury zoning) requires a minimum lot area of 4,000 s.f. for the first two units *plus* 2,000 for additional unit. Therefore, if we apply the 3F-4000 zoning to the site, and subdivide the site into 4,000 sf parcels:

$$221,463 \text{ sf} / 4,000 = 55.4 \text{ parcels}$$

$$=$$

$$111 \text{ units "as of right" under 3F-4000 (55.4 x 2) or}$$

$$166 \text{ units on the basis of variances granted allowing 3 units per 4,000 sf lot (55.4 x 3)}$$

¹ as measured by:

- A. A survey conducted over the summer of 2017 to which approximately 175 local residents were invited and 45 respond - 32 voted that 166 was their maximum and 9 voted that 166 was too many, for a total of 41 (91%), and;
- B. A community meeting held in February 2017 at which 166 was the unit count supported unanimously by the attendees

Note that in the calculations above we have already made two concessions in the developer's favor².

Affordable units

When surveyed and asked to vote (same survey and meeting referenced above), residents prioritized affordable ownership over whether the affordable units are on-site. Accordingly, the IAG has also long held a similar position. Many of us were indeed disturbed by the extent to which the developer's PNF attempted to create a de-facto gated community of wealthy young professionals within the broader neighborhood. Nevertheless, if forced to choose, we prioritize ownership over whether the units are on-site. We do appreciate that the DPIR places some affordable rentals on site, which would help to bring diversity to the site. We also strongly support the DPIR's pledge that the affordable ownership units will be in close proximity - i.e., within the bounds of the Garrison Trotter neighborhood.

Parking

We request the following adjustments and accommodations to be made:

1. Minimum of 1.0 parking spaces per unit;
2. 45 Townsend residents be prevented from obtaining BTM resident parking stickers for any future residential parking district covering the abutting streets;
3. Developer creates and maintains a minimum of ten parking spaces reserved for residents of both sides of Townsend Street (the block the site sits on). These spaces could be created on-site, or in conjunction with the City of Boston where the City owns the land and the development provides the up-keep.
4. Developer discloses to the community that parking on-site is not part of the included amenities - i.e. that residents of 45 Townsend will have to pay extra for parking;
5. Drop-off space(s) in front of the Townsend Street lobby door to ensure that ride share and other vehicles move out of the traffic lane.

Architectural issues

- 1) Article 50 specifies maximum building height of 45 feet for the Townsend Street Community Facility Subdistrict that the site sits in; a 35 foot maximum for 3F-4,000, 5,000, 6,000 & 7,000 subdistricts; and 35 to 45 foot limits for MFR subdistricts depending on structure type. As the site sits upon a hill, the developer's current plans quickly exceed the 45 foot limit.
- 2) We support the changes incorporated in the DPIR for the Harrishof Street and Dennison street elevations.
- 3) We support the reduction in height behind New Academy Estates; however, we await a rendering from the developer showing that view/elevation before giving our final approval to the changes on that side.
- 4) We still have major concerns about the Townsend Street side of the development. Therefore, we request, **regarding the Townsend Street elements:**

²

- A. Dividing the site by 4,000 sf would produce 55.4 parcels, which in reality would not be the case, given the need for new streets, infrastructure, setbacks, parking, et al if the site truly rejoined the neighborhood; and;
- B. The assumption that variances would be granted in every case, leading to 3 units per 4,000 s.f. lot.

- a) Height: for the portion of the buildings closest to Townsend Street, those heights shall be in line with the existing height of the abutters to the right (17-35 Townsend Street);
- b) The height of the portions of the buildings set back from Townsend Street be no higher than the existing hospital;



- c) Setbacks to follow those of the abutters to the right (17-35 Townsend);
- d) Architectural features consistent with the abutting homes (17-35 Townsend; 67-71 Townsend) and the historic homes across the street from the site;
- e) Use of brick wherever possible, consistent with the red brick buildings in the neighborhood;
- f) No metal cladding larger than details - i.e. no panelized systems that are apparent from the street to be panels (brick and other appearances achieved through panelized systems are ok).

Site issues

1. Non-residents shall be able to pass through the site on foot at all times, i.e. from the Harrishof Street auxiliary entrance, down the main drive to Townsend Street and vice versa;



2. Conversely, the developer and Dennison Street residents agreed that there shall be no access between Dennison Street and the site and we support their agreement;
3. Developer needs to declare their plans for the 2-family house they purchased at 33-35 Townsend. The renderings and site plans in the DPIR imply the house will remain but we would like clarity.

Construction mitigation

1. Developer to pay for an independent study to show the impact of construction on abutting properties, which includes an independent assessment of the condition of neighbors' foundations and properties prior to construction;
2. Everything shall be contained within the site, including construction trailers, contractor parking, etc;
3. Developer shall present a long-term rodent control plan.

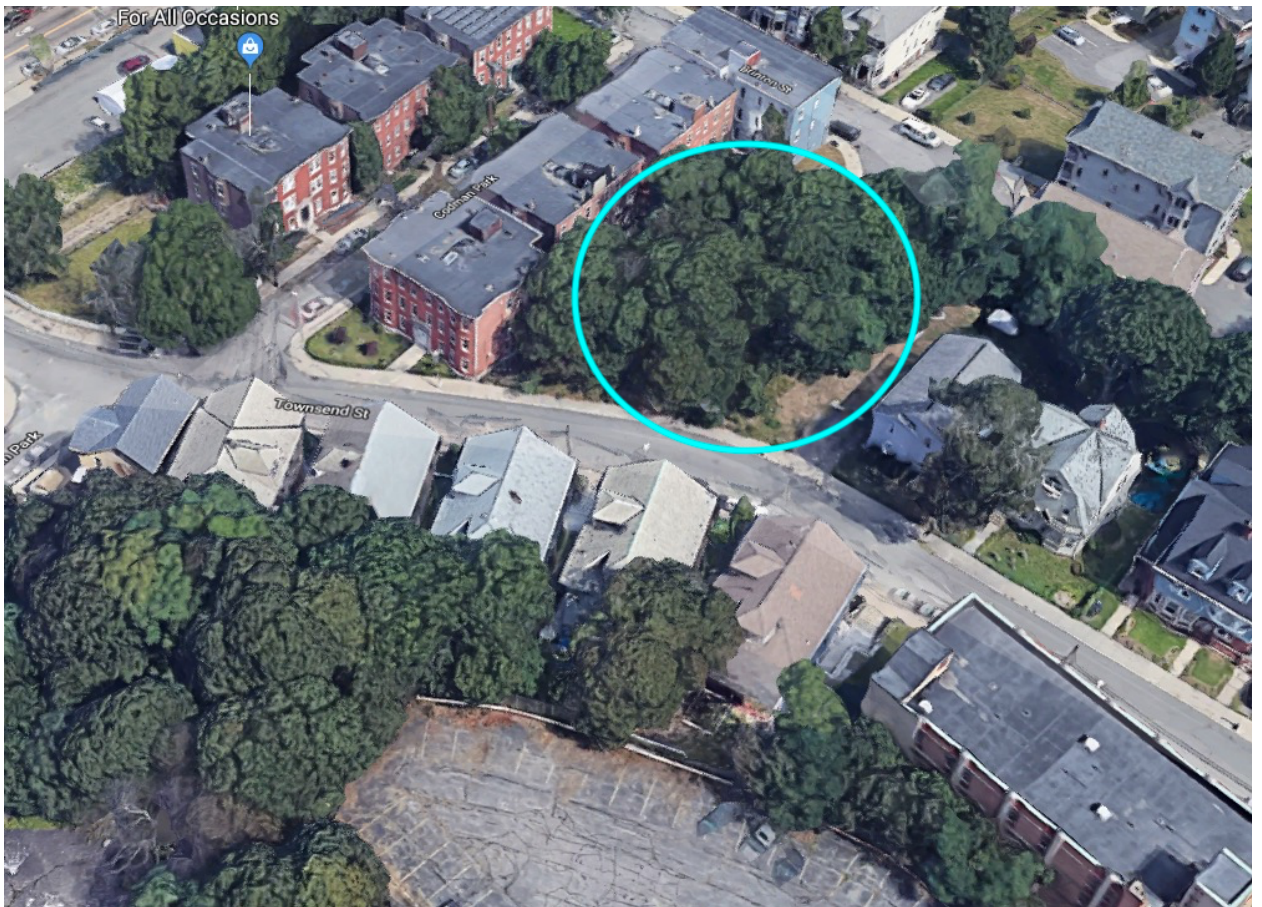
Traffic

While we are in general agreement with the developer's proposed traffic mitigation measures, we have contended all along that much of the potential traffic impact is driven by the excessive number of units on the site. We strongly prefer to address traffic after the final scope of the project has been determined.

Community benefits

We have not finalized our position on benefits but expect to require both:

1. Ongoing benefits;
2. Physical benefit(s) - something that is visible and concrete: for example developing the BPDA-owned Townsend Street open space (on the left, before the hospital) into a passive park / skyline observation area;



We thank you, Dana Whiteside, the Mayor and our other local elected officials for the opportunity to serve on the IAG and help shape the future of our neighborhood. We thank our neighbors for their support and the trust they have placed in us.

Sincerely,

Amira Abdal-Khallaq

Louis Elisa

Connie Forbes

Jed Hresko

Dorothea Jones

Nefertiti Lawrence

Jean Maguire

Lauren Miller

Yaritza Pena

Norm Stenbridge