

Timestamp	Name	Neighborhood	Public Comments/Questions	Planning Department Response
10/25/2024 11:00:38	Dave Baron	Jamaica Plain	The concept of promoting "active uses" on the first floor, at least within certain new S+S districts, was a very good one, but it does seem to have been significantly watered-down in the actual implementation and use tables. A law office or real estate brokerage is not an "active use" -- it is an advertisement for a brand/company name and a mostly-empty office that deadens that part of the block. An insurance agent is not an "active use" for the same reasons. And most bank branches are not active uses, particularly "wealth management" services like the Chase office that now sits unoccupied and unused at the previously-active corner of Centre Street and Burroughs in JP. We don't really need business offices and flex space squatting on retail storefronts in the central squares of Boston, and this initiative is a chance to bring more process/scrutiny to those kinds of deadening/mostly-advertising uses of street-level space. But it seems that these latest changes make the "active use" concept, if anything, more all-encompassing and less substantive.	The proposed amendment does not change which uses are considered Active Uses, or change the Ground Floor Active Use Requirements for S3, S4, and S5 districts. Instead, it moves the location of the list of Active Uses from the use table to a definition. Offices (which includes law offices, real estate brokerages, and insurance offices) and Banks are not currently Active Uses and they will still not be Active Uses in the proposed amendment; they would not satisfy the Ground Floor Active Use Requirement in S3, S4, or S5 districts.
11/8/2024 11:55:00	Barbara Parmenter	Brighton	<b>Note from Planning Department:</b> please see the letter from Barbara Parmenter provided below.	Please see the response to this letter from the Planning Department provided below.
11/11/2024 13:57:23	Eileen Boyle	Dorchester	Zoning should not allow apartment buildings going up in the middle of a residential neighborhood. Why are there two & three family homes being built in some neighborhoods and apartment buildings with 40 units in other neighborhoods?	This proposed amendment does not propose any mapping of Squares + Streets Districts and it does not change the locations of the existing zoning districts.
11/19/2024 11:27:31	Ben Bruno	Roslindale	<b>Note from Planning Department:</b> please see the letter from WalkUpRoslindale, Rozzidents for More Rozzidents, and Abundant Housing Massachusetts (AHMA) provided below. I'm writing to express my support for the letter, dated November 19, 2024, submitted by WalkUp Roslindale, Rozzidents for More Rozzidents, and Abundant Housing Massachusetts. The letter raises a number of important points about making ground-floor residential a conditional use in the S2 district. There are good reasons to desire active ground floor uses, but ground floor commercial presents a lot of uncertainty and risk, the City is currently using federal pandemic funds to pay businesses to fill vacant storefront space that hasn't otherwise been filled by viable businesses. There are policy options to help mitigate the potential for business displacement, as articulated in the letter. The Planning Department should think about its goals for streetscape activity and vibrant business districts holistically, rather than on a building-by-building basis. Activity is driven by people who live in the neighborhood being out and about. The more housing we allow, the more demand for commercial amenities is created.	Please see the response to this letter from the Planning Department provided below.
11/20/2024 8:38:04	Tim Czerwienski	Dorchester		Please see the response to this letter from the Planning Department provided below.
11/22/2024 11:57:10	Brian McCarter	Roxbury	The South End-Roxbury area is generally supportive of initiatives to increase ground-floor activation and improve neighborhood vitality. However, the proposed changes appear to have limited direct impact on this community. Community input is important. The process would benefit from clearer documentation, improved safety considerations, and consistent opportunities for meaningful engagement.  The documentation accompanying these zoning changes is complex and difficult to interpret. To facilitate community understanding and participation, we recommend providing materials that are clear, concise, and accessible. Consolidating proposed changes and presenting them in an organized, transparent format will help stakeholders understand the potential implications and make informed contributions. The Go Boston 2030 does not list the parking plan on the home page, further complicating the public's understanding. <a href="https://www.boston.gov/departments/transportation/go-boston-2030#overview">https://www.boston.gov/departments/transportation/go-boston-2030#overview</a>  Any reductions in parking capacity should be carefully evaluated and clearly communicated, especially in light of safety concerns that limit the practicality of walking or biking for some residents. A neighborhood-specific assessment of parking needs and potential impacts would provide valuable clarity and guide appropriate decision-making.  The South End-Roxbury area has been significantly impacted by public safety concerns, particularly related to the opioid crisis centered around the Mass and Cass intersection. This situation has led to increased crime rates and incidents, such as the recent fatal stabbing at Ramsey Park, which have heightened residents' apprehensions about walking or biking in the neighborhood. These safety issues not only deter vulnerable residents and visitors from engaging in outdoor activities but also hinder efforts to enhance ground-floor activation and neighborhood vitality. To effectively promote increased activity and community engagement, it is imperative to implement measures that improve street safety, address the opioid crisis, and ensure a secure environment for all.  Lastly, while this area already supports a significant proportion of affordable housing, a more balanced approach that incorporates both market-rate and affordable units could better address the community's long-term needs. Mixed-income housing has been shown to foster economic diversity and create stronger, more resilient neighborhoods. <a href="https://housingmatters.urban.org/research-summary/mixed-income-anticipated-and-realized-benefits">https://housingmatters.urban.org/research-summary/mixed-income-anticipated-and-realized-benefits</a>  Additionally, focusing on public safety improvements, particularly in response to challenges in the Mass and Cass area, is essential to ensuring that all residents, regardless of income level, can thrive in a safe and supportive environment.  We encourage the city to engage with residents and neighborhood groups during this process to ensure these changes reflect community priorities and are implemented in a way that benefits all stakeholders.  Sincerely, Brian McCarter Adam Powell On behalf of the 881 Harrison Ave Harrison Garden Condo Trust	Thank you for your comments. The Planning Department intends to continue creating and improving upon materials to explain zoning initiatives as well as the details of how zoning works to support community engagement, input and involvement in zoning reform efforts. Additionally, your comments regarding public safety and mixed-income housing are duly noted and important to how the Planning Department and other City departments think about overall community development and stability efforts. For additional information on work being done specific to public safety, please refer to the Mayor's Senior Advisor for Community Safety webpage at <a href="https://www.boston.gov/departments/community-safety">https://www.boston.gov/departments/community-safety</a> . For additional information on work being done on mixed-income housing, please refer to Mayor's Office of Housing's webpage at <a href="https://www.boston.gov/departments/housing">https://www.boston.gov/departments/housing</a> and the City of Boston's Affordable Housing in Boston Guide at <a href="https://www.boston.gov/affordable-housing-boston">https://www.boston.gov/affordable-housing-boston</a> .
11/22/2024 16:38:32	Elaine Coveney	Hyde Park	Thank you for the time and work on advancing the Squares + Streets initiative.  On behalf of residents who have submitted a Petition for amendments to section of the City of Boston Zoning Code governing Squares + Street zoning districts, we are writing to provide comment and a recommended way forward in this important, positive initiative.  To summarize, Petitioners respectfully recommend and request that Planning/BPDA merge the current pending "Minor Text Amendments" and the proposed provisions of Residents Petition into a single, unified, and consistent set of S+S zoning district code amendments.  This single, unified, and consistent set of S+S amendments would be presented first to the BPDA Board and thereafter to the Zoning Commission (should the Board so decide) and Mayor Wu (should the Commission so decide).  Resident Petitioners recommend this approach for the following reasons:  1. Residents are committed to full, meaningful engagement with all Boston residents, property owners, and neighborhoods.  2. We have made every effort to advance S+S amendments that only add to S+S zoning district options, and which do not require any modification of already approved S+S Districts, as in Mattapan.  3. Residents' proposed amendments reflect meaningful best effort to ensure active commercial districts and to provide support for existing and potential future local businesses (the S2.5 District)  4. Our proposed amendments recognize the value and need for lower density housing in transitional areas (the proposed S0.a District) than the current lowest density S+S District (S0).  5. Propose Use, Dimensional, and related amendments to the Tables related to these new S+S zoning district options are included in our Petition.  6. Elements of BPDA/Planning and Petitioners proposed S+S Amendments may be either duplicative or conflicting, and resolution of these issues in a single, unified amendment seems most practical to advance S+S implementation.  7. We seek to ensure strong, meaningful measures to address displacement risk and move forward on all related provisions of S+S, such as protecting urban tree canopy and historic / cultural resources.  Petitioners believe that a collaborative approach is the most effective way forward to reflect in the S+S zoning code provisions all widely-shared priority goals for the S+S initiative. We look forward to continued progress with Mayor Wu, BPDA/Planning leadership and staff, and all community partners.  Thank You for your time and attention in this matter.  Elaine Coveney  for Resident Petitioners	Thank you for these comments and your continued work and engagement with Squares + Streets. We plan to move forward on our amendment to the BPDA board in December because we think it's important to not delay these changes. Codifying these changes now will help avoid confusion for residents who will soon be seeing draft zoning maps for Roslindale Square, and later Cleary Square. The proposed table formatting changes will also affect other zoning amendments that are currently underway, such as Chinatown rezoning, and codifying these changes now will also bring clarity for residents engaged in these processes.  Additionally, the proposed amendment that we hope to take forward in December has just undergone a public engagement process, during which we presented at the Greater Mattapan Neighborhood Council, had a citywide public meeting, and received thoughtful community input. We are grateful for your participation throughout that process, including the deep engagement on specific zoning content, which have helped us draft and advance these minor amendments to Squares + Streets districts in the code.  Please let us know whether you would like to continue, withdraw, or revise your petition, we want to be responsive to your requests as petitioners of your own text amendment.



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## Squares+Streets November 2024 text amendment comments

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Barbara Parmenter <barbara.parmenter@gmail.com>  
To: abdul-razak.zachariah@boston.gov

Fri, Nov 8, 2024 at 11:55 AM

Dear Abdul and the Zoning Team,

Thank you for the opportunity to comment on the Squares+Streets zoning text amendment proposals of November 2024. There may be more to this than I understand at present, but I will be out of the country during office hours, so below are my comments. Thank you for all your work, I really appreciate it.

I **oppose** the proposed amendment to make housing conditional in S2 districts on ground floor primary footage. *See reasoning below.*

I **support** the reformatting and clarifications - they are very helpful.

I **support** the proposals for reducing the restrictions for some uses on the upper floors. I understand that clinics and offices would be allowed by right, and that the other proposed uses (Extra Small, Small, and Medium Entertainment/Events, Large Grocery Store, Indoor Recreation, Small and Medium Office, Small and Large Restaurant) are conditional on upper floors (could be allowed after review). This would give greater flexibility for a diversity of uses.

### **Justification for opposing S2 housing change:**

I oppose the proposal to make housing conditional in S2 districts on ground floor primary footage. I oppose this because S2 is by design an option for a primarily residential district on streets that connect business centers. It currently allows certain *commercial uses AND housing* on the ground floor primary footage. I live in Allston Brighton, and we have several examples of streets that already partially match this and which are currently zoned with a hodgepodge of different Article 51 districts. S2 would be appropriate for these, in my opinion, and would standardize the zoning along these mainly residential connector streets with some small businesses and offices. I would also note that artists in Allston Brighton worked hard to include artist live/work space as a ground floor use, and in the proposed amendment, all dwelling units on primary footage would be conditional, including artist units.

Granted, housing is still allowed as a conditional use, but the amendment would create an extra step in review, and open any proposed projects to uncertainty, which will increase the cost of housing that is produced. Why do this? The justification for this change is that it was requested by some residents of Mattapan, Cleary Square and Roslindale Square who are concerned about displacement of existing businesses along main streets. I share these concerns, but the solution is available to them - zone these areas as S3, which *requires* ground floor commercial/active uses. Or leave them as S2 and *encourage* ground floor commercial. Or utilize the anti-displacement tools that the city is developing.

At the public meeting, it became apparent that these residents don't want to use the S3 district classification because it *might* result in taller buildings (S3 has a 7 story maximum). It seems the request is more about height. They prefer to use S2 (5-story maximum) as their main street business corridor

classification. But it was not designed to serve that use - S2 was literally designed for connecting corridors that are mainly residential, of which there are many in Boston. Why would we make housing more difficult in these? We are in a housing affordability crisis - we need to make building housing as easy as possible.

If it is not possible to keep S2 as it is, I would like to see a city-wide zoning multifamily (MF) district category that is essentially the same as S2 with both ground floor primary footage and some commercial uses allowed by right (including artist live/work space).

Thank you,  
Barbara Parmenter  
Brighton, MA



*A Call to Action to Make Roslindale 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

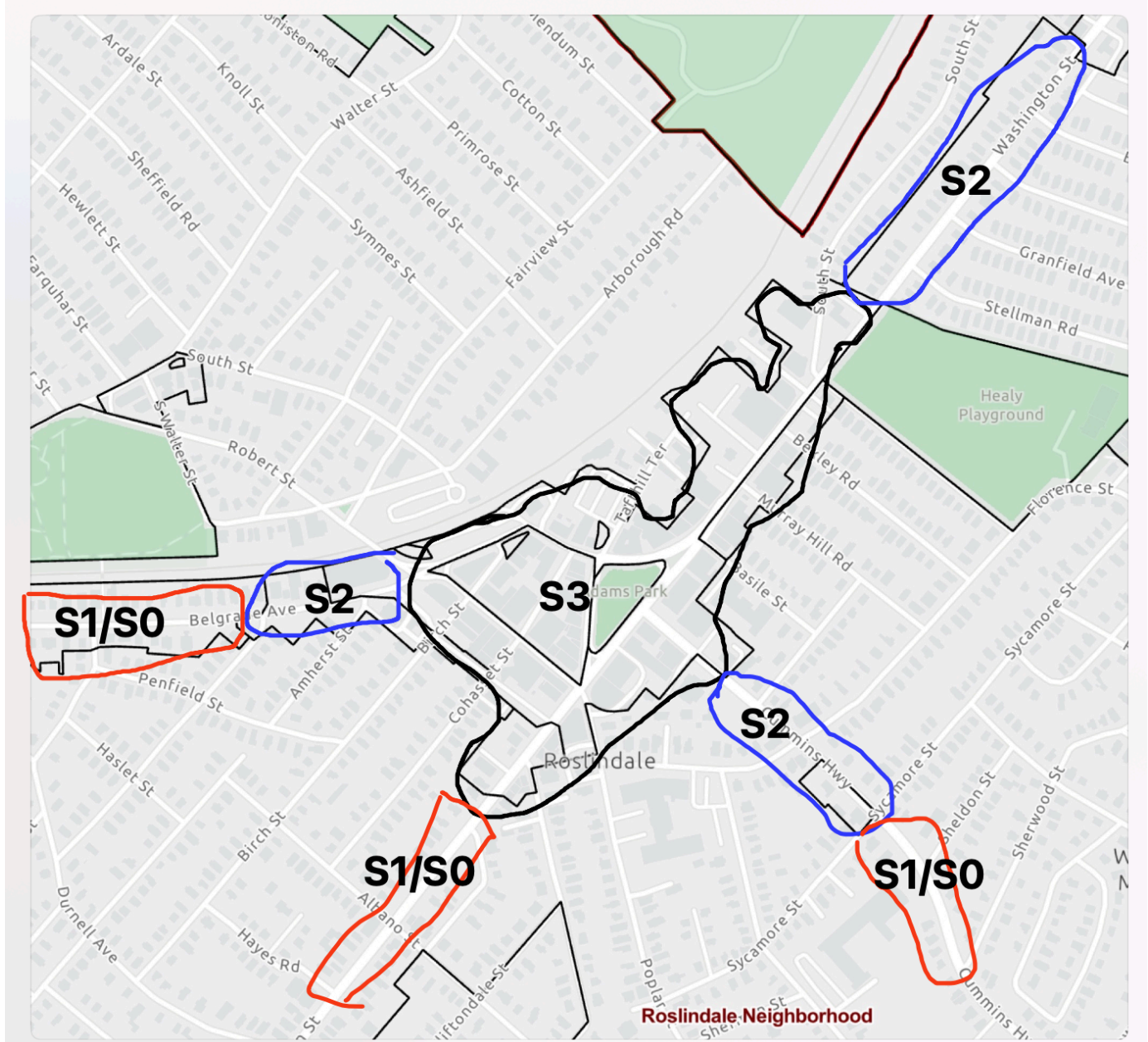
We oppose restricting ground floor residential use under S2 on two grounds:

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 [Roslindale Square](#), 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 [already mapped S2 in Mattapan](#). 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 [130 residents who signed a pro-housing open](#) 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 [www.walkuproslindale.org](http://www.walkuproslindale.org). 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.



**Copy to:**

Mayor Michelle Wu ([michelle.wu@boston.gov](mailto:michelle.wu@boston.gov))

Roslindale Liaison Josh McCorkle ([joshua.mccorkle@boston.gov](mailto:joshua.mccorkle@boston.gov))

District 5 City Councilor Enrique Pepén ([enrique.pepen@boston.gov](mailto:enrique.pepen@boston.gov))

City Council President and Councilor At-Large Ruthzee Louijene  
([ruthzee.louijeune@boston.gov](mailto:ruthzee.louijeune@boston.gov))

City Councilor At-Large Julia Mejia ([julia.mejia@boston.gov](mailto:julia.mejia@boston.gov))

City Councilor At-Large Erin J. Murphy ([erin.murphy@boston.gov](mailto:erin.murphy@boston.gov))

City Councilor At-Large Henry Santana ([henry.santana@boston.gov](mailto:henry.santana@boston.gov))

Planner I Maya Kattler-Gold ([maya.kattler-gold@boston.gov](mailto:maya.kattler-gold@boston.gov))

Deputy Director of Zoning Kathleen Onufer ([kathleen.onufer@boston.gov](mailto:kathleen.onufer@boston.gov))

Director of Planning Aimee Chambers ([aimee.chambers@boston.gov](mailto:aimee.chambers@boston.gov))

Chief of Planning Kairos Shen ([kairos.shen@boston.gov](mailto:kairos.shen@boston.gov))

Director of Stakeholder Engagement Mohammed Missouri  
([mohammed.missouri@boston.gov](mailto:mohammed.missouri@boston.gov))

**In response to public comment letters (provided above) submitted by:**

- Barbara Parmenter
- WalkUpRoslindale, Rozzidents for More Rozzidents, and Abundant Housing Massachusetts (AHMA)

This specific update aligns with the S2 district's intent as the "Main Street Mixed Use" district as it further promotes development proposals with ground floor non-residential uses that are appropriate within a commercial area.

We hear and understand the concerns outlined in these letters, particularly these concerns:

**Regarding the potential financial burden of making ground floor dwelling units on the primary frontage a Conditional use:**

- Many fully residential development projects will not require zoning relief under the proposed amendment, as long as the primary frontage is occupied by non-dwelling units (such as mailrooms and lobbies). For some projects, this will result in little to no change to the number of dwelling units or length of the approval process, but can improve the urban design of projects along a main street by requiring that developers place these essential, non-dwelling unit spaces on the primary frontage rather than dwelling unit entrances.
- There is a much lower legal threshold to receive a conditional use permit than a variance, which makes it a comparatively streamlined process if it is the only zoning relief a project requires. The purpose of adding a conditional use process for these types of projects is to look at local area plans and determine whether commercial or residential should be prioritized in any given S2 location, taking into account existing buildings and plans. While we acknowledge that some projects are working on small margins, this is a small trade-off to help ensure that zoning is helping to implement plans.

**Regarding the mapping of S2 vs other districts:**

- Areas where S2 is more appropriate than S3, S4, or S5: Because the S3, S4 and S5 districts require Active Uses on the ground floor primary frontage, these districts are not appropriate for areas with a contextual mix of residential and commercial ground floors. They are also not appropriate for areas with commercial but non-active ground floors (like banks, offices, and clinics). The S2 district is more appropriate for these types of areas. If there is a desire to allow for land use flexibility on the ground floor primary frontage, the S2 district would be necessary for this since the S2 district would conditionally allow ground floor dwelling units as well as allow ground floor primary frontages with active uses (like restaurants and retail), non-active uses (like banks, offices, and clinics), and non-dwelling unit residential uses (like lobbies and mailrooms) while not restricting uses with a ground floor Active Use requirement.
- Areas where S3, S4, or S5 are more appropriate than S2: Because the S3, S4 and S5 districts require Active Uses on the ground floor primary frontage, these districts are most appropriate in areas where there is a desire for consistent ground floor activity. Because the S2 district will still



not have a ground floor Active Use requirement, this proposed amendment does not make the S2 district an adequate replacement for the S3 district. If there is a desire to maintain or develop ground floor uses which promote consistent and high levels of activity, the S3, S4 and S5 districts are still necessary to achieve this due to this ground floor Active Use requirement.

- Areas where multifamily residential districts are more appropriate than S2: In their comments, community members identified properties with existing building dimensions similar to S2, but with primarily residential ground floors. They expressed concern that making dwelling units a Conditional use on the ground floor would not be appropriate for these areas. To address these concerns, we would like to clarify that S2 is intended to be a main street mixed use district with most commercial uses allowed on the ground floor. Therefore, the Planning Department is researching future improved multifamily residential districts for use in primary residential areas such that there are more areas in the City that allow for this kind of fully-residential multifamily development.