

Date Received: 9/25/2024

Comment: I am encouraged that PBD is recognizing that the current system needs modernization. Boston is in a massive housing crisis and we urgently need solutions. The definition of insanity is doing the same thing and expecting a different outcome, right. However, I am worried that the new review process is tinkering around the margins, and represents continuity with the current process more than it marks a material change. It appears that BPD will still prioritize the voices of a few naysayers rather than allowing more needed housing creation by-right. The urgency of the situation appears to be lost. We need **DRASTICALLY** shorter approval processes, which increase the cost and uncertainty of new home construction. Our community will benefit the most if we prioritize creating homes for people over old fashioned aesthetic sensibilities. Of course safety rules and sensible codes should remain strictly enforced, but giving more opportunities for community input and multi-step approval processes is counterproductive. Research again and again has proven those community members who participate in these processes tend to be older, wealthier, whiter, and dramatically more obstreperous than the median resident. Stop further empowering these individuals and let housing be built.

Neighborhood / Zip Code: 02127

Age: 31

Gender: Man

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 9/25/2024

Comment: Thank you for your work putting together the Article 80 Action Plan document, seeking to improve and streamline the zoning regulations, thus allowing more affordable housing production in Boston. Effectively streamlining regulations that promote just, fair housing, helps our city with housing that benefits our neighborhoods and can make strides in arriving at housing costs of 30% of household incomes or below, which is HUD's federal definition of affordable housing. Within the Article 80 Action Plan, I appreciated seeing further anti-displacement plans are included and on the way! Also, CAT training is advantageous for ensuring those involved are well informed to advance priorities of affordable, quality housing in city development for the people currently living in Boston and those to come, as our Boston community rightly sees housing as having the largest benefit and one of the greatest needs is housing affordability, which helps our economy and environment by reducing carbon emissions by more people living nearby work/civics/activities. Thank you for including some of your next steps.

Can you please show how Actively Furthering Fair Housing (AFFH) fits in with the Article 80

modernization? Also, the Boston Interagency Fair Housing Development Committee (BIFHDC) was left off of the City of Boston groups. In addition to the ones listed in your document, another concern for aligning purpose includes the following: Could the BIFHDC's efforts to further fair housing through the AFFH process be thwarted by formulas such as the one referred to below?

I was troubled from an equity perspective with the 2B example of how a formula could be used for mitigation to make a development exempt from inclusionary zoning requirements, but it did not clarify that the exemption would apply if 60% of the units at 100% AMI were homeownership units (if so, it would be helpful for clarity to specify this). If this formula is for rental units, I am concerned because the Boston Planning Dept. Boston at a Glance 2024 document stated that our residents have Current Median Household Incomes of \$89,212 which is between 40-80% AMI for one to four persons in the household. Based on Boston City Council hearings, we have recently had closer to 30-60% AMI in our black and brown communities. Further, the Inclusionary Zoning formulas for rental units are around 50-60% AMI (max 70% AMI). By exempting developers of rental units with the higher 100% incomes, without any of the lower incomes, this is exempting them from helping meet the needs of the majority of renters in our city. Developers should be exempted when they are doing better than Boston's inclusionary zoning in Article 79 for income levels by including more lower income units, not by including exclusively larger AMI percentages for those with higher incomes, diminishing economic and racial diversity and promoting exclusion. With this example given, I am concerned that additional "formulas" like this could undermine Actively Furthering Fair Housing (AFFH) as well as other efforts to increasingly address the affordable housing crisis, including addressing housing those with greater needs, who would not find these rental units affordable.

I anticipate learning more as this process unfolds and further efforts to advance our city towards more affordable housing supply and stability for all current and future Boston residents.

Neighborhood / Zip Code: Hyde Park

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 9/25/2024

Comment: Housing ISD Permits (Length of time to permit) - Commit to a turnaround time to issue decisions on short and long form permits e.g week for a short form/ month for a long form). Many times, residents, subcontractors and contractors are trying their very best to have work scheduled and completed but the permitting process seems to be taking a very long time (even for minor renovations). This may be due to the number of reviews that are being performed sequentially.

Neighborhood / Zip Code: 02134

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 9/25/2024

Comment: I love the goal of making the process more predictable and easier. I appreciate that predictable was listed first. I think the uncertainty in the approval process is really limiting the supply of new housing development, particularly for smaller scale developments. I like that you recognize that the people who participate in public engagement are not representative of neighborhood demographics. They're older, richer, whiter, and more likely to own homes than the neighborhood as a whole. If you listen to the homeowners at any of these meetings, you'd think the biggest problem facing Bostonians is that buildings cast shadows. Most people I know think the biggest problem is the high cost of rent (exacerbated by limited housing supply), but they don't go to meetings or join IAGs. I don't think broadening community engagement is the way to improve this. The solution is to limit the ability of meeting attendees to stall or stop developments. People have a voice in the development process when they elect governments. Government leaders need to lead.

Neighborhood / Zip Code: 02131

Age: 30

Gender: Man

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 9/26/2024

Comment: I like the transparency you are trying to bring in. I am concerned that speeding up the process before the transparency is attained won't work. Who appoints the CAT team? This membership is critical and needs to be community members. The language "City staff adhere to clear deadlines for each step of review. The time from initial project proposal to building permit approval decreases." is prejudicial. It implies that every project will be approved. How about replacing the last four words with "decision." This would go a long way to helping me feel like this is a fair system. Right now I do not. Add email to the notification list. Have a way that citizens can register to receive info on projects in their area. This is a no brainer.

Neighborhood / Zip Code: 02130

Age: 70

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 10/15/2024

Comment: It seems to me that subjecting any property owner to the nearly always contentious community process, when the situation is that there is a requested change in occupancy type requested to be overly onerous on the property owner. For instance, changing from an existing commercial occupancy to a residential occupancy (or vice versa) both of which are allowed use under the zoning ordinances. A property owner should not be required to undergo the community process if both uses are allowed under zoning. As a rule abutters are opposed to any change. Several projects have been denied the change in occupancy type, in spite of no significant external building modifications and residential use is allowed. If the exterior of the structure is not modified the "parking requirements should not play into this. Two allowed uses under zoning with an existing structure regardless of preexisting nonconformities should not be placed in the community process...Nor should any project be denied based solely on community opposition, ultimately the planning and design professionals should make the informed opinion and determine the projects destiny, not loud-mouthed shrieking harpies from the area.

Neighborhood / Zip Code: 02127

Age: 62

Gender: Man

Race / Ethnicity: White

Housing Situation: Rent my home

Date Received: 10/16/2024

Comment: Regarding CAT groups: How will you recruit applicants for these teams? If only "those in the know" apply, then you will not get the diversity of view points that the teams need

Neighborhood / Zip Code: 02136

Age: 70

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 10/17/2024

Comment: Hello,

can you tell me how the CAT team members will be chosen?

Peg Preble

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 10/19/2024

Comment: I am extremely pleased that this process is being made so inclusive. Many long term residents of Boston are still amazed at the changes that took place in the Seaport district. Perhaps, I missed the process because I was still employed at that time. Perhaps there was no process at all? My compliments to Mayor Wu, and the Planning Department for their efforts to make all of Boston stakeholders!

Neighborhood / Zip Code: 02136

Age: 70

Gender: Man

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 10/21/2024

Comment: Still not informed of any specifics planned for my area. Not happy with the possibility of overcrowding or of tall buildings within my neighborhood of single and 2 family homes. Love my neighborhood the way it is. Don't appreciate others who live outside of our area, trying to tell us what we should accept as "improvements". M.Oser Lindall St

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 10/21/2024

Comment: Community meetings must be held in the community. Community members need sufficient notice to attend. These online surveys are skewed.

Neighborhood / Zip Code: 02129/Charlestown

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 10/21/2024

Comment: 87 pages is way too long if you want feedback on the action plan from the broader community! It's important, yes, and worth the time I'm sure but if the goal is to get people to weigh in it needs to be much shorter.

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 10/22/2024

Comment: I would like to know how to serve on your community advisory committee. Not just for myself, but for other North End/Waterfront community homeowners who are engaged, as I am, in the North End Waterfront Residents Association and the North End Waterfront Council. I helped lead the successful effort that in October 2023 landmarked our historic Nazzaro community building, which was the original North End Bath House. We care about the quality of life in our community, support reasonable development and affordable housing. But the system isn't working. At least one huge development is underway now to create a new skyscraper on Causeway St at North Washington St., which is at edge of the North End-- this is proceeding without engaging our community process even though it will have a huge impact on the quality of life with traffic, sunlight density etc. issues. This is an example of why North End residents need to be part of the community advisory committee.

Neighborhood / Zip Code: 02113

Age: 77

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 10/23/2024

Comment: In Brookline about 3 or so years ago the Planning Board developed some standards for “Counterbalancing Amenities” for large impact projects. Was intended to provide options for developers and a more rational process. Not sure how it has worked out, maybe good! Follow through is critical on these types of initiatives. -James Carr (Former Brookline Planning Board member) 617-595-6351

Neighborhood / Zip Code: 02115

Age: 60

Gender: Man

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 10/23/2024

Comment: Good evening,

In listening to the Q & A session at the end of tonight's meeting, it seemed to me like there were an awful lot of NIMBYs speaking - people who probably don't reflect the diversity (especially in terms of renter vs. homeowner, but also in terms of race) of Boston, something that your first item in the presentation speaks to. These are homeowners who "got theirs," and frankly, don't give a damn about anybody else being able to live affordably in the city of Boston.

I'm a renter in Jamaica Plain, and I shudder to think about my landlord raising my rent, as it's already about the maximum that I can afford. We NEED as much residential development as we can get in Boston, at ALL price points, including "affordable" units, but also units that cost more, as that's the only way we're going to satisfy the latent demand for more expensive housing.

I hope that you don't allow these self-appointed "voices of the community" to be the sole determinants of what happens in the future as far as development in Boston. These individuals have an irrational fear of height and mass, and they've apparently made it their goal to stop any reasonably sized building from being built, at least anywhere near them. To put it bluntly, and pardon my language, but it's the, "i got mine, ---- you" version of thinking of homeowners who have absolutely no conception of what it is to be a renter staring in the face of yet another rent increase.

I hope that you don't allow these self-appointed "voices of the community" to be the sole determinants of what happens in the future as far as development in Boston. These individuals have an irrational fear of height and mass, and they've apparently made it their goal to stop any reasonably sized building from being built, at least anywhere near them. To put it bluntly, and pardon my language, but it's the, "i got mine,---- you" version of thinking of homeowners who have absolutely no conception of what it is to be a renter staring in the face of yet another rent increase.

Thank you for reading,

Andrew Wiley

Neighborhood / Zip Code: Jamaica Plain

Age:

Gender: Man

Race / Ethnicity:

Housing Situation:

Date Received: 10/25/2024

Comment: Resident homeowners need to have increased power in the development process as they are most strongly affected by new development in their neighborhood. All too often their legitimate concerns are ignored by city officials or overturned in ZBA sessions.

Neighborhood / Zip Code: Brighton, 02135

Age: 81

Gender: Man

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 10/30/2024

Comment: I strongly support retaining the Advisory Group process which is selected from within the affected community. This is critical to a good outcome. The people living in a given area are best positioned to understand the context, needs and unique concerns of their local community. The use of a city-wide or quasi-professional panel undermines this important objective. The Advisory Groups are also an important vehicle for residents to engage with their city representatives. I understood that the Advisory Group structure would be retained but the draft seems to say otherwise.

Neighborhood / Zip Code: 02108

Age:

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 11/6/2024

Comment: I really don't think parking is a major priority to this administration. It seems they only care about housing with no parking. I believe this is a city issue not the developers issue. The city just need to update the zoning law that allow developments have at least 1 parking space unit instead of the 0.6 that currently is allow. This administration is just pushing people out of the city and at the rate of the residential taxes will increase...it seems like this administration will even drive people out of the city or you will be driven out at the next election.

Neighborhood / Zip Code: 02127

Age: 54

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 11/7/2024

Comment: In a city with unreliable mass transit, not enough parking for existing housing, no plans to add parking for new massive residential buildings, frequent parking violations (blocking fire hydrants, blocking driveways, parking in no parking zones, parking in crosswalks, parking within 20 feet of intersections) that are never enforced, no community consideration for residents already residing in areas of new development, ignoring current standards set forth in Article 80 to push projects through without consideration for current residents, I question why new rules are being implemented, when the current, very explicit rules, in Article 80 are ignored to fast track housing that will impact current residents and the future residents of new housing construction. I agree that we need more affordable housing in Boston, but with current rules not being followed, I question how the new "improved" regulations will make any difference if there are no consequences for breaking them. BTW: as a senior citizen, I still drive. So the assumption, in the current Article 80, that parking for seniors can be waived in new construction, makes no sense. We may be older, but many of us still drive, like to drive, and have a need to drive. The T and the bus do not go everywhere we need to go.

Neighborhood / Zip Code: Jamaica Plain

Age: 65

Gender:

Race / Ethnicity: Prefer not to say

Housing Situation:

Date Received: 11/8/2024

Comment: I'm happy this major work is being taken! There's a lot in this beyond the developer aspects! I mostly focused in on the first half of the document here as it needed more than the last part. It was a lot of work getting through the doc as its quite massive being close to 100 pages! Please do read through the complete writeup as even my response is lengthy! The before the Article 80 Process is also important as we just don't have a firm foundation even today at the broader level as I've outlined here in the first part!

While the 80 Process needs work, there is still a set of fundamental issues still not being addressed that precede the Article 80 Process that also needs to be discussed! Effective Engagement also entails the foundation on what the Article 80 Process sits upon.

PLAN-X & Squares + Streets Processes also need addressing

The very first is having an outline for the community, I like to think it like how a writer writes a book. Having a framework of the story and within the story outline having the focus points of the story laid out.

This should have been done within the PLAN Process, and it shouldn't be a game of 20 questions to discover all of the cities goals. Staying focused and when the community clearly states NO! that means not to include alterations of other spaces as tag-on's.

The current Squares + Streets process also appears to fall into the same fundamental issues as well. The meetings I have attended had some of the same concerns.

Failing to understand the streets limitations being focused in on and not addressing it. And just like what we encountered the issue/s where tabled or dismissed as they where outside of the intended Cities goals and failed to address the communities fundamental needs. Yes! The city learned a bit in how they engage the community which is good! But in the end the results is all that matters.

It's one thing to have an objective, its another thing knowing it it fits the given space. If you alter the space is there a measurable betterment of the community as a whole besides enhancing the tax base?

Besides trying to make the space better can the alteration be sustainable either within the community or the general area without hardship of the surrounding neighborhood of the project?

These must be the fundamental goal's before you even start! Yes, any alteration is change! But it

mustn't carry hardship or degrade the collective community by the change.

Within Charlestown we started out trying to define two areas which the city wanted to develop, both spaces where reasonable, the issue was what would fit and scale within the limits of the community space. But beyond this other areas of the community Zoning was also altered! If the process had stayed focus just on the two areas then I think things would have been better.

Outside of the focus area, alterations should not be tagged-on as an after thought and was not offered a proper dialog when there where serious objections of these last minute alterations. Frankly, I would have suspended this part of the dialog and opened an independent dialog on the zoning of the space outside of the Industrial (south side of Rutherford Ave) and River spaces as in our case in Charlestown.

The alteration to the North of Rutherford Ave needs to be rolled back and open up as new dialog at a minimum! The Shopping District mustn't be altered without better definition of the Area (space) collectivity!

Here during the PLAN: Charlestown process the communities concerns where not addressed fully before finalizing The Plan! Sizable elements where added without any dialog in both the Plan and Zoning amendments at the last moment side stepping the process.

Yes! The process dragged on, but it was do to outside forces! COVID and working it within ZOOM also created a disconnect as the community could not raise the concerns in a unified manor as one could not see or support a person unlike a physical meeting. So we were all seeing the world in a myopic view!

Even today we are still too focused on ZOOM! Major efforts that effect large areas like Squares + Streets should have a mix and the finial dialog steps need be a physical meeting. I would even add a raising of ones hands within the meeting (or ZOOM) to measure the settlement of the community of the direction (a poll within a Zoom call). That way the city and the community see's clearly what is needed or the concerns which where not addressed and need fleshing out still.

There needs to be way to prevent this Ramrod effect from taking place again. This is still a sizable issue as the developers are now allowed to build a buildout that wasn't desired and the biggest issue was the failure to have a clear plan on dealing with the larger traffic expected created by the build out of our two development spaces when combined with the rest of the communities needs already present.

Even today the rebuild of Rutherford Ave which we call the Rutherford Moat locally as it only allows a few means of transit across and all of them is via a bridge! Is now a wreck due too Everett's pressures via MBTA/MassDOT.

Traffic!

Unlike many neighborhoods we are quite isolated! We only have three major egress pathways in and out of the community: City & Sullivan Sq's and the Gilmore bridge via Rutherford Ave. In addition, our Bridges via Maffa Way, Mystic and Rutherford Ave pathways are also shared with the regional traffic via Rt's 1,38, 93 & 99 which limits our ability to leave and enter into the community during the AM/PM Rush windows.

Our concerns were dismissed or just downplayed! Even the hired traffic consultants echoed our concerns with the population massing within these spaces. Note: this didn't add in the Everett Stadium or other development spaces expected on lower Broadway in Everett and its effect on us. At this point our Rutherford Ave rebuild is on hold as we can't move forward without dealing with the Stadium's impact upon us! Which will be massive on its own!

Traffic created is not just at the given development it spills into neighboring streets and our dependence on developer paid consultants addressing the community's traffic concerns as well as getting a clear breakdown of the different modes of transit to and from the site (walking, cycling or either public or supplied mass transit).

We are also over-focused on motor vehicles in a generic sense and that is still not well defined! As there needs to be a breakdown of workforce arriving/leaving Vs product shipment in and out. Ideally, the expected windows of movement for both. Clear tables when the project is well defined.

Within the public realm street space the developer working with the city needs to map out the expected pathways by three levels: Local Streets, Major Streets and Defined Routes (both Minor & Major as needed by Employees as well as good shipments). This needs to be in a table and the city needs to articulate what public realm enhancements will be required and/or the adjustment of the build as there is just no possibility of enhancing or recommending an alternative focus. As what the timeline is for the needed enhancements, the community shouldn't get bogged down by a development because the scale or needed public realm enhancements are not done before or during the build.

Within zoning we encountered two sizable issues:

The first is the scale of the two development areas will have far-reaching effects. The first is the loss of the views from Charlestown Heights which is one of the Olmsted parks! The second is the mass of buildings along Rt93 viaduct was not at the level desired as the hills likewise lose the view they have of the city and sunlight.

As an example today from Breeds and Bunker Hill's we can see the fireworks taking place in the Charles River on the fourth we will lose that!

The last is our current Shopping District was altered into a Multi-Use instead of what was agreed

to of splitting the space so it was more defined. In its current Multi-Use configuration we will likely lose our large grocery store and only one within the community! In fact this store needs to be enlarged! As its not able to support the needs of the community even today with the breadth of products desired. One needs to travel to neighboring communities stores and as our transit system is not designed to transport people to them if you don't have a car you need to hire a Lyft or Uber this is a hardship many within the community face!

It was clear our concerns were dismissed within the Process and then having these concerns not addressed before the sign off of the Plan just can't be accepted as that just points to a process that is not even willing to find a compromise!

To be clear: This wasn't a NO, this was SCALE down! As it was just too bold given the physical limitations of the community!

Altering the character of the community, given the communities handicaps and desired limits!

The added burden of transit within the community without addressing the core transit issues of the community, not so over focused on the regional aspects passing through us alone.

First the ability of the community to first absorb the size of the build out was beyond what the community is able to support just within its transit spaces, as our options of altering these transit corridors is quite limited we will suffer greatly and the city its self will also lose needlessly.

Embracing New Modes of Movement and Building Better Traditional Transit!

Independently we offered solutions to soften the effects of the buildout, focusing in on opening additional modes of movement of people with better walk & bike passages, and even an Intra Community mass transit solution reducing our reliance of a personal vehicle.

Our newly named William "Bill" Russell Bridge still needs enhancements on the Harbor side mirroring the River side with two off paths further along the bridge to soften the base of the bridge transits by both pedestrian and cyclist, by gaining access to the HarborWalk space just below. this offers the Tourist to the Navy Yard much better passage via Hull St crosswalk in the North End to the HarborWalk then up to the bridge and then exiting onto Charles River Ave onto the HarborWalk walkway just below to get to the Navy Yard. The proposal is to create a dual staircase with elevator onto the HarborWalk from the bridge Mirrored on each side so its visually balanced and also fits the overall design of the bridge. We had tried to get it done when the bridge was still in design but due to federal regulations it couldn't be done and would need to be appended after the completion of the bridge. To be clear these pathways were present on both sides many years ago for the bridges maintenance. But unlike the river side which were converted to public walkways, their metal stairs were removed for safety and forgotten! We need to recover them.

Our Gilmore Bridge corridor needs a second bridge element to serve both the cyclists but also

our Intra-Community transit system so access to the Lechmere station is achievable from Hub Station near 275 Medford St as the North side of the community has two massive hills to climb over to gain access to the communities shopping district and Orange Line via Community College Station as well.

We also need to widen the pedestrian walkway on the west side as its too narrow at some areas and we still need to open a passage from Glassworks Ave under the bridge so people can side step the risks of crossing at the base along monsignor O'Brian Highway. In fact, the sidewalk under the Green Line viaduct should be moved fully to the other side of the viaduct pillar so the crossing of monsignor O'Brian Highway is at a safer placement as the viaduct pillar blocks the drivers vision taking the right off of the bridge, by moving the cross walk back there is more time to react. This is a better layout of a very dangerous intersection for both pedestrians and cyclist.

Cambridge St Bridge needs additional passages for both pedestrian and cyclists to help bypass the heavy traffic flows on Cambridge St. Here an under street space tunnel parallel with the rails from Clinton Pl to Roland St as well as access up to the Cambridge St proper from both sides. Then on the eastern side a break across the Sullivan Sq Bus exit down to D St so both people can find their way down but also allow the C-LINK vehicles passage down as well exiting the station.

And lastly, Alford St Bridge needs more effective walk and cycle passage. Ideally, each side should have about a 12 ft of protected Multi-Use pathway and along the mid point a blister of a space for a view and fishing station on both sides just in front of the draw bridge space (south side). The travel lanes should stay as a two by two configuration as they are today for standard bus transit not Silver Line. Silver Line should end at a new Orange Line hub station within Everett to reduce the traffic congestion within Charlestown. More so with the sizable buildout of the Lower Broadway space will be imposing between a sizable Stadium and a rehab of a now defunct fuel farm space.

There is still a need for passage across Alford St bridge along the rivers edge connecting the MBTA segment of the Boston Mystic RiverWalk connecting it to the Ryan Playground segment of the Boston Mystic RiverWalk allowing connection to Draw Seven Park in Somerville which is just at the cities border. In addition this RiverWalk passage leads all the way to MacDonald State Park in Medford which is the largest open green space to us! And offers additional passages all the way to Lexington and Stoneham by bike locally and even North via the Northern Strand Pathway and Westward via into Central Mass by bike trails opening up more cycle transit possibilities for us as well as others! Ideally, it needs to be a under bridge passage, while there are some issues on doing that if the Alford St bridge is raised as part of climate mitigation then that should allow it, otherwise an over street passage will be needed.

As you can see the alterations of our bridges is to enhance both pedestrian and cycle use as our edge bridges limit or scare many trying to use what we have today. Each bridges base imposes hardship in some form being difficult to even cross side to side but also going deeper into the

area the bridge leaves you at.

The C-LINK effort was to break the dependence of a personal motor vehicle and it was welcoming to see it added to the PLAN. But, it missed the mark not offering isolated pathways we still have access to offering faster dependable transit and moving more than just the new developments population traffic, the community today has need of it as well to gain access to our own shopping options and neighboring shopping areas. Even if we delay the creation of C-LINK the pathways outlined need to be protected and when possible build the needed infrastructure so as the community grows it is ready to be enabled.

Refer to the original C-LINK project outline and even the updated Generation Two design which incorporates the evolution based on the PLANs impact. Basically, it offered an Intra-Community transit with small 12~15 person vehicles over a set of routes emanating from a Hub location along Medford St connecting our disjointed areas of our neighborhood from the Navy Yard, Lost Village and Austin Lots to the core of the communities resources as well as offer the community at large access to the Orange and Green lines and the MBTA buses which are dispatched from both Sullivan Sq and Lechmere T stations. The last element is also offering shuttle services to nearby grocery and shopping centers. Thus allowing our community to ditch owning a personal vehicle or at least not need it for local shopping needs. Trying to build a second sizable grocery market is not practical as we just don't have the physical space for it and the major grocery chains won't build in such a small community when they have offering nearby, as such we need to get to them! And without using a personal vehicle/

To the point here!

The community came to the table with recommendations as you can see here, as we fully understand the need for growth, we didn't expect the plan to ignore what the community needed to even have a chance, nor did we expect instant soup either!

We had already "On the books" development that needs transit very soon! And without having a game plan laid out to address just our collective needs makes the plan incomplete and very flawed.

TBD is not something the plan should have within it on something so fundamental as transit. And neither does piece meal efforts make sense either without having a full vision of the communities needs.

Then and only then! Apply the regional transit needs but they must fit harmoniously not be ramrodded into the community. We don't want a deeper or wider chasm running down our community with harder points to cross either just locally but also to exit out of our community by foot, bike or car with the few points we have which are all over bridges!

Any dialogs of major regional transit infrastructure that alters our street spaces massively needs be discussed BEFORE any development efforts are even entertained. It's one thing to have an

exploration or a concept, its another to force it onto the community! More so in our case with Rutherford Ave rebuild project. That includes under passes and overpasses we currently have, we need them you can't take them for the betterment of the regional transit! We already have a good workable design for Rutherford Ave as shown in 2019. Yes, there are a few missing pieces but the foundation is sound! The Moran Spur railway crossing area and the needed crossing into the industrial space via Dunstable still needed work so our C-LINK system has better passage.

If you make it harder for us to just live here because of either over expansion of the population from the current 21k we have to day to the already expected growth of 32k just for residents in the next few years and then adding 8k more of work force entering our community to work you have failed by bursting the bubble with 40 ~ 50k which is what the plan is aiming for! With just some good investments instead would make the community thrive with a healthy future! The first action is solving Everett's transit needs via the extension of the Orange line back into Everett that we took away years ago. Then have the Silver Line meet up with it in Everett!

Panic Function!

I'm proposing the state political representatives of the community need to be entrusted with the Panic Function! To halt the Cities or Developer process until a finite list of concerns by the community are addressed in the effort. The lack of the panic process to slowdown things so a limited list of issues are given the needed time to be properly addressed and not again dismissed is needed!

The word here is finding Compromise! Find an agreeable middle and/or define an action plan that needs to be done. In our case the building heights and traffic effects of the new development areas given the expected population built-out exceeded what the community was (still is) willing to agree to.

Simply Put ... One may have a grand idea of building something, but the ground it sits on needs to physically support it and the services it requires need to be present or one needs to address the failings.

But, it also can't over shadow the area where it will be placed, as such what area enhancements are needed. Not the projects transit alone needs, but how the communities transit is also effected. As unlike many of Bostons communities we are very isolated! East Boston is in the same boat as we are encircled with water or major transit systems to support the cities core limiting our egress in and out and even across parts of our community!

Addressing Generic Issues of the Development Process

TIME

Time is a fickle thing! While its important to smooth out the process, there still needs to be windows of time for a good review process by all the parties. With that in mind a default

minimum time of review should be defined and if there is a major holiday within that window the time needs to adjust for it for the community review (focus group or general public). We don't want to rush things to the point people can't chew on things before responding. Reading a lengthy document and then expected to have a clear vision on the matters, plus dealing with ones own life's needs can be taxing when faced with a short window! Its also important to help by having a tick off listing of already offered responses when that is an option. So the temper of the concern is visible to others so they can either agree or disagree with the trending!

The city also needs to have enough staff to manage and review the given project and if needed contract experts and additional staff to help out if there is a sizable shift of need, so they are able to deal with all of the active projects. We have been caught a few times with a person over stretched as well as not having the time to do diligence on the feedback or the requested missing data to even have a framework to make a good response.

Likewise the Project's developer needs to set some goals of when they will push forward to either address the outlined concerns and/or get to the next step. In addition if the developer is unable to move forward instead of canceling the effort they should see if there is someone willing to take on the project as agreed to, if not then the city needs to cancel the agreements to resubmit the space. Projects should not be suspended as a way for the space to be locked in. Yes, there are outside forces that can disrupt the process or even alter what makes sense. A good example is the shift of work from home from the more traditional work at office.

Transparency

What is a private dialog and one that needs to be disclosed? There appears there is a lot of private dialogs with a city worker and a developer that should be documented that stacks the deck when the community gets involved in the project as the developer has one idea that has been formed and the public clearly see something different or its just obtuse or wishy-washy.

The firmness of the RFP should outline the communities needs as well as any constraint the given site has. It should also offer what the city is willing to do to help with the burden within the public realm space (water services & street enhancements being the major at the given site). These concessions need to be disclosed to the community when it effects the immediate neighbors. Depending on the building use the developer/business needs to have a documented agreement with the abutters which addresses the abutter space (at least acknowledged publicly).

ZOOM

One of the issues I often see within the ZOOM meetings is outside of the community Teamster/Union people trying to influence the developer and the others on the call. I would like to acknowledge there presents, but not having them take the precious time we have within the Zoom meeting. Some have been short and to the point, others have dragged on and on.

I would like at the beginning after acknowledging the elected officials present, then have the

Teamster/Union people acknowledged (one per group) to voice their desire for involvement in the build as well as their support for the project, as short and sweet as they can be. This is not to say they can't as a member of the public not also ask focused questions of the project in its self if they are part of the immediate area/s of the project (just without their Teamster/Union hats on).

It's also important the people who live or would be effected directly should have priority in the dialog. People who are speaking for a group on issues like open space, tree's, climate or health should also give their voice (as an example the two watershed groups) and they should be acknowledging as being present and given a short window of time at the beginning.

I would like to see spot polling during the presentations so those on the call can see how the group feels. The questions should be generic like: "How do you feel with this section" Positive, Negative, Neutral or Needs Work. If there is an option like: "Do you like" A or B or Neutral.

Now onto the Article 80 Process - Issues!

The Three core values as outlined on Page 8 is a sign we are moving in the right direction! Lets make sure they are not hollow!

Page 9 - I don't remember having been invited to a focus group or being made aware of any here in Charlestown. I did partake on a few Zoom calls but they really didn't allow substantial dialog.

Page 11 - Early No's also need to address scale, developers often press for over the top builds that while might fit the metrics of FAR, are still too big for the space do to transit limits either at the site or going deeper into the community outwards without over stretching the communities own transit as well as already existing regional transit in the AM/PM rush.

Some spaces need to have a set of metrics values of transits by foot, personal locomotive device bike, scooter, etc. As well as nearby mass transit or the requirement of creation of a shuttle solution to move people to the nearby mass transit options and lastly how personal vehicles also impose onto the community, defined by the city planners and also worked out as a process at the Step 1: Pre-Concept Design stage. The values also need to be published independently of the developers efforts to build if needed to them in Step 2: Concept Design stage. as seen on page 12 Traffic and Safety and Mobility Constraints where both high on the list! Which is why in Step 1 The transit limits need to be defined. This is true even with a small or mid sized project as well as the much larger ones when the street space is nothing but a small dead end alleyway! Or, a community which only has three points of Egress! As in the case of Charlestown: City & Sullivan Sq's and Gilmore bridge corridor and all of them are heavy traveled through by regional traffic as well.

Page 13 - Transportation & Infrastructure is much more than signalized intersections! It might be opening up multi-use pathways as well as dedicated micro-transit (MicroBus) pathways to shuttle people around without running on the already congested street space (our Moran Terminal rail space is an example). It also might be creating a dock space for a ferry or water taxi to berth at, or

even a public boat ramp and parking space to support it as well as help with the expenses of running based on the population of the site and working with other development efforts in the community.

I realize this is nothing more than an example here the scale of options is the point!

Page 15 - Effective Engagement

Barriers is a big one! Having a centrally accessible calendar online that people can access so people see at least a few weeks out the meetings and the given development based on what they want to be notified would help.

While I feel some of the same feelings around the IGA process, most of it is not having a true voice to move the needle or even gain what's needed to make an intelligent dialog, often we are side stepped in the process. I also think the selection process needs more work as there are people who do have a centrist balanced view and even those that appear to be biased are willing to bend if given the hard data to support the other direction, then it's a matter of finding compromise.

Clearly Height and Density is a high priority for many! This gets back to how the development mass is defined! FAR is not the ideal method in all cases. the density of the neighborhood also needs to be viewed as well as what a sizable building would impose.

Over the years we have lost historic views like the view of the Old North Church from Charlestown to even gage what our founding fathers did on that fateful day. Or even a master of public spaces, Frederick Law Olmsted of his vision along Charlestown Heights is now a narrow view instead of the intended vista, granted the far side shore line is nothing great to look out to today, but some of it is slated to change! Likewise the views into the city from either Breeds or Bunker hills will be intersected with large structures blocking the views. As an example the fourth of July fireworks from the Bunker Hill Monument many people watch from. We mustn't dismiss these view corridors, ideally make them more accessible to the public at large!

(Height, Density, and Use) are project design decisions that are set very early on, or oftentimes entirely before the development review process begins (during planning or design studies that lead to new zoning).

Spot on! Which is where I started from in my response here! But, it's where the City and the population of the given neighborhood or larger community set the tone! As we have a failure before the developer even walks into the process here! It's not always we (city) know better! and often times it's addressing the deficits a given space has. We also have the after the fact development concerns which always appear to get lost. Like quality of life for the people living in a new space or even addressing years later a failure like air pollution effects once we discovered them. A case in point Lead pipes in our water system any where along the pathway to the faucet someone is taking a drink, cooking or washing!

New Methods of input shouldn't also cherry pick transit stations alone, it might be neighborhood shopping areas and also making sure it is known beyond the popup its self.

Your graphic on Page 17 is not very clear! As the Left and Middle positions don't make much sense! I can read this is the left column is biased to the White, Homeowner, Over 55 and Long-Term Resident, yet in the middle column Non-White, Renter and Under 55 appear to be getting the benefit. These or polar opposites! Yet, the right column shows an out of balance framework of the city by population. The proportions should be reasonable no matter whom!

One of the factors is many of the Renters are college students, while their concerns are important are they the ones that hold the most value in the dialog? And likewise how about the home owners should they have more value in the dialog? As they have skin in the game!

Low-Touch is useful! But often times the questions are heavily biased! As one is often trying to build (subconsciously) a driven narrative! So be careful in how you roll it out. As you saw in my first part of this write up stick with generic "Feelings" during a given ZOOM dialog And during a physical meeting a show of hands! Instead of a survey or questionnaire approach. I'm not against the examples proposed on Page 19, I'm just not sure it can offer context to base a valid option.

The High-Touch models I think offer more useful input! Before COVID we had a collection of stations setup at a meeting so people could focus in on what they have concerns seeing the presenters presentation and then talking one on one on about the presentation. I think that meeting helped the community see things and well as the city likewise learn what was on the minds of the community.

The failure of community meetings is trying to cover to big a subject in unison! Having a collection of stations to nibble on something offers more! And lastly, not make too many stations so people have enough time to get to a good portion.

Even offering fleshing out sessions (Open House?) which don't have a development in mind, but allow both the population and the city to learn on their leaning!

While the young are more into Social Media, I personally don't find it effective. Even YouTube feeds of the City Council meetings are hard to watch between the limitations of the camera and sound.

The CAT Process

Today the process is often longer than two years so there is a fear of a rotation of the participants will loose the insight of the flow and direction.

The Transportation and Infrastructure 2B element needs to not just be of the site alone but to the nearest major street's and its impact onto them.

Concept design needs to define people and vehicle volumes expected to be clearly identified entering and leaving the development site and the expected direction these people will be traveling. So as an example getting to a major T station how does one get to it and what infrastructure corrections are needed to make the pathway viable and safe for both these entering or leaving the site as well as the community at large.

Clear site and shadow maps and how the neighboring properties might be effected. I would like to see within the drawing the scale of the building marked per floor

Neighborhood / Zip Code: Charlestown

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 11/8/2024

Comment: On behalf of the 21 academic and cultural institutions of the Fenway Alliance, we appreciate the recent opportunity to participate in two BPDA focus groups for educational institutions designed to provide information and solicit recommendations on the modernization of the Article 80 process in Boston. As requested, we are submitting this comment letter regarding the transformation of Article 80 as it impacts educational institutions. We applaud Mayor Michelle Wu, BPDA Director Arthur Jemison and the BPDA planning directors for their rigorous effort to make the Article 80 process more predictable, more transparent, and more equitable for every citizen in Boston. We look forward to its new iteration in the coming months.

Educational institutions in Boston provide unique benefits to the collective economic, social, and cultural well-being of our city. We also face unique challenges in developing and rehabbing campus buildings that fit appropriately into the fabric of the city, while fulfilling the social and educational needs of our students in accordance with our educational missions. Within the newly established Article 80 process, we ask the BPDA to consider seriously the following recommendations articulated during the two-part engagement process and in various other communications with the BPDA. We appreciate this opportunity to summarize our recommendations here.

I. Institutional Master Planning (IMP) Timeline

1) We request that the timeline for master planning application submissions align with campus timeframes including planning and capital funding, and to revise the IMP procedures to align more closely with campus planning processes that tend

to occur over a five-year planning process versus a two- or ten-year process as is currently required to submit to BPDA. Academic institutions need to pivot much more quickly now in anticipating the needs of students. We believe a five year timeline for Master Planning aligns more closely with campus planning and capital funding of larger scale projects. Among other issues, the current 10-year filing requirement by the BPDA requires us to seek numerous “amendments” to project building development.

2) In connection with this issue, we would ask you to consider a change in the language as it relates to the term “amendment”. Using the term amendment can be perceived by community members to mean that institutions are uncertain of their building plans, or worse, are trying to undercut the community process. Changes to building plans are normal and inevitable particularly over a ten-year period, and do not imply any error or negligence on the part of institutions. We would like language that reflects this.

3) We request that BPDA implement its own recommendation to accelerate projects that align with City policy priorities, such as housing more students on campuses.

4) We would like the BPDA to recognize the difference between internal rehabilitation of buildings and new building development. Under the current Article 80 process, relatively simple interior renovation projects trigger an IMP process with an accompanying extensive community mitigation plan. We believe that renovations of interior buildings on private property should be exempt from an extensive city-led process and mitigation plan.

5) Similarly, we recommend that BPDA establishes a higher threshold for Planned Development Areas (PDAs).

II. Article 80 Process

1) We ask that the BPDA establish clear, predictable Article 80 process steps for institutions that minimize uncertainty and provide transparent tracking measures and approval standards.

2) We request that the BPDA ensures greater collaboration, consistency and coordination between all city agencies involved in the Article 80 process. The process may be assisted by having all involved agencies at the table initially with institutional leaders so standards and approvals can be set with institutions. III. Community Advisory Committees: We endorse the recommendation from the focus group discussions that reported on the success of institutions that establish standing Citizens Advisory Committees, so that CACs are not created whole cloth for each individual building project, but are longstanding and thus provide a broader, more in-depth, and more knowledgeable participation from the community. We also endorse a term of service or other method for community members to transition off CACs so that new members may join to ensure more citizens are enabled to be involved in the process.

IV. Community Benefits

1) We strongly urge the BPDA to endorse community benefits that are tied to institutions' mission and areas of expertise, and that most frequently benefit neighboring communities. We are concerned that a creation of committee or council charged with creating standardized community benefit packages would create a "one size fits all" cookie cutter approach that would inevitably detract from actual benefits accrued to neighbors and community members, and fail to capitalize on educational institutions' special abilities, and unique skills and expertise in assisting our neighbors and the wider city of Boston. 2) We urge that local community members be the primary consultants with the institutions on appropriate benefits as they have a much keener sense about the actual needs of their neighborhoods than anyone else. Recent excellent examples of

this type of community-led process include the newly planned public library in the Fenway created through a partnership of West Fenway community members and Samuels & Associates.

3) The BPDA might want to establish a set of guidelines and/or guardrails for acceptable community benefits versus dictating standardized benefits. 4) We ask that the BPDA recognizes that many excellent community benefits programs and community partnerships do not align with a singular project timeline but evolve over years, and institutions should be credited for such long term investment and efforts.

5) If the nature of the project itself is a widespread community benefit such as returning housing stock to the neighborhood or creating a home for a major cultural or public health resource, we do not believe there needs to be an additional community benefits package required. Of course, institutions may still choose to offer certain community benefits in accordance with their mission and to retain their good neighbor status.

6) We ask the BPDA to align its significant community benefits requirements with the PILOT program, specifically in enabling Article 80 community benefits to count toward the PILOT program allowance for community benefit contributions. Thank you for this opportunity to comment on the Article 80 modernization process. We look forward to working with you on next steps.

Sincerely,

Kelly Brilliant

Co-Executive Director

Genevieve Day

Co-Executive Director,

The Fenway Alliance

Neighborhood / Zip Code: Fenway

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 11/8/2024

Comment: The CJAB Article 80 Working Group thanks the Boston Planning Department Article 80 Modernization team for its hard work. In general, we strongly support the recommendations of the Draft Action Plan. We are particularly pleased that many of the issues we identified in our report sent to you in September 2023 have been thoughtfully addressed in the Draft Action Plan. We believe that the Action Plan recommendations can result in both a more efficient timeline for development and a more equitable process for residents of Boston. In a separate detailed report emailed to the Article 80 Modernization Team, we offer suggestions, concerns, or questions regarding different aspects of the Draft Action Plan for consideration in the Final Action Plan. We would be happy to meet with the Planning staff to discuss these.

Neighborhood / Zip Code: Brighton, 02135

Age: 66

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 11/8/2024

Comment: General comments • Need more engagement with students and young adults • The reality is there are many residents in Boston who have lived here for years or even decades, who work, study, pay taxes, volunteer in their community, raise their families, etc., but they are here on non-resident visas, are undocumented, or otherwise don't have a path to residency/citizenship. How do you engage these residents, make them feel safe and welcomed? Ways to reach people in non traditional ways • Engaging students in local colleges and universities • QR codes on the T, Grocery stores, Coffee shops, theaters, community festivals • Youtube, podcasts • Shouldn't all three methods be required (print, digital, in person) as engagement methods, not just one? Community advisory teams (CAT) • Terms should be at least 2 years, with option to extend. 0.5- 1 year is barely enough to learn about the planning and development process. • Clarify if people need to be American citizens or permanent residents to be a part of CAT. Other CAT education topics • Educate public about sustainability and resilience principles and why they are important. • Accessibility and equitable design principles.

Neighborhood / Zip Code: Chinatown, 02111

Age: 34

Gender: Woman

Race / Ethnicity: Asian

Housing Situation: Rent the home I Live in

Date Received: 11/8/2024

Comment: Attached please find the Coalition for a Just Allston Brighton (CJAB) comments on the Article 80 Modernization Draft Action Plan. We are strongly supportive of the efforts that the Report describes, and you'll see we offer many suggestions we hope you will find helpful, as well as some questions, the answers for which might help clarify the Final Action Plan. We'd be happy to meet with you or the Planning Staff if that's helpful.

Article 80 Modernization Draft Action Plan - Comments from Coalition for a

Just Allston Brighton (CJAB) Article 80 Working Group

November, 2024

The CJAB Article 80 Working Group thanks the Boston Article 80 Modernization team for its hard work. In general, we strongly support the recommendations of the Draft Action Plan. We are particularly pleased that many of the issues we identified in our report sent to you in September 2023 have been thoughtfully addressed in the Draft Action Plan. We believe that the Action Plan recommendations can result in both a more efficient timeline for development and a more equitable process for residents of Boston.

In this document, we offer suggestions, concerns, or questions regarding different aspects of the Draft Action Plan. We would be happy to meet with the Planning staff to discuss these. Please contact Barbara Parmenter (barbara.parmenter@gmail.com) if you would like to do that. Note: we include a special section on Institutional Master Plans (IMPs) at the end of this document. We suggest that the Article 80 Modernization Team meets with this group and/or Task Forces to develop more detailed recommendations for IMPs.

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Effective Engagement

1A - Introduce modern methods of engagement to reduce barriers to participation We are very supportive of this approach in the expectation that it brings in a wider set of community voices. CAT members or community-based nonprofit organizations may be able to suggest other creative strategies as well.

We reiterate that the Planning Department should make very clear the purpose and limits

of community feedback, and how it can shape projects.

We reiterate that the Planning Department should set measurable goals for community engagement, track and annually publish how we are performing against those goals, and also do periodic assessments of how community engagement is working, in terms of the CBPD's goals and also in focus groups with CAT members and community-based nonprofits. Low Touch Engagement

We support the Action Plan's recommendations.

Suggestions:

- Please work with CATs or a broad spectrum of community nonprofits to develop and pilot effective signage, survey questions, and poll approaches.
- Work with CATs to explore how to best distribute the results of low-touch and high-touch engagement.
- Planning staff charged with community engagement should inform proponents of the forms of engagement used, rather than developers deciding on these. ● Publish the results of low-touch engagement on an Article 80 Dashboard or other easily accessible web site
- Set goals for low-touch engagement and track and publish results compared to goals/expectations
- Periodically assess how this approach is working by having a focus group or surveys of community-based nonprofits and organizations.

Questions:

- How will language and disability access be addressed in these materials?

High Touch Engagement

We support the recommendations outlined in this section of the Action Plan. We understand that there is an intention to hold both workshop-style meetings and more traditional public meetings. In particular, we like that at workshops and public meetings,

staff will share feedback to date, developer responses, and decisions already made, and will summarize some of the feedback at the end. In addition, as proposed in the Action Plan, it will be important and beneficial that staff take minutes via a standardized template which will be published. Also as proposed, we like that these in-person meetings could then lead to useful surveys or polls of the wider community about issues

3

raised. We also are very happy to see that norms will be set for public meetings. Also, as proposed, it will be very important to have summaries posted on the project website so that community members will understand the range of opinions.

Suggestions:

- Work with CATs to Continue to allow written feedback through the website or addressed to a project manager, and make these public
- Consider adding a method whereby someone can phone in to record a voice comment - voice recognition now is good enough that these can be translated into text easily, even if in a language other than English.
- A good summary of a workshop or public meeting will prove challenging to do in real-time at a workshop. Please follow up with a structured summary by posting it on the website and email to participants, CATs, and those on CBPD lists - these published summaries should be translated into the most commonly spoken languages in the community.
- Work with city staff to develop a notes template and train workshop staff to take good notes (and keep mentoring them to get better) - don't just assume people know how to take good notes. Test these with CAT members to get feedback on how they can be improved.
- Work with CATs and experienced city staff to develop the community agreements used in CAT meetings and in public meetings - these may vary depending on the

community, culture, and context. A number of community organizations likely have experience with community agreements - work with them if city staff don't have experience.

- Consider offering virtual office hours
- During public meetings, use the “flipped classroom” model. In a flipped classroom model, students look over the material on their own time and come to class with questions and comments. The instructor then addresses the issues raised by the students with clarifications and further details. In the context of development projects, have the plans/modified plans/new ideas available at a given site (virtual and/or physical, for instance, in posters displayed 30 min previous to the start of the meeting), and the meeting STARTING with the public's input.
- Periodically assess how the high-touch approach is working through discussions with CATs and/or other community organizations and advocacy groups.

Earlier engagement

We support the requirements to have earlier engagement. In-person site walks are particularly useful for pointing out known neighborhood issues or concerns.

Signage is critical!

Suggestions:

- Make clear very early how the proposed project addresses identified city and community planning priorities, and make this a requirement of the pre-concept design filing.

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- Work with CATs or community-based nonprofit organizations to refine early engagement strategies and the menu of options for projects that take into account any specifics of the community.

1B. Replace Impact Advisory Groups (IAGs) with Community Advisory Teams (CATs) We

appreciate that this reform attempts to address many of our stated concerns with IAGs. Specifically, it addresses having broader representation that more nearly matches the neighborhood, training, code of conduct, conflicts of interest, and limited terms. We also like that they will be reviewing multiple projects in a geographic area, and will be connecting projects to planning and needs assessments.

However, the devil will be in the details. We have some fear that the CATs are a more complicated solution to the problem than IAGs were, and will, with time, start having the same issues as IAGs due to limited community capacity and ill-defined roles.

We also have serious concerns about the capacity of community members to “fill up” a CAT and to have new people ready to serve when existing member terms expire. We fear the CAT will end up more like the current IAGs with the same people participating. That’s why limited roles, stipends, child care, and translation are so important - see below.

Suggestions:

- Consider whether CATs are necessary at all, given the other engagement methods above and the standardized approach to mitigations and benefits. Can other engagement tools and standardized mitigations and benefits take the place of CATs?
- Assuming CATs are formed, very clearly delineate and limit the CAT’s role in the review process so that they are perceived by the rest of the community as fulfilling a monitoring and advisory role, but not a decision-making role. Make it very clear that mitigations and benefits are strictly constrained (formulas for mitigation, cap, and guardrails for community benefits on standard projects). Otherwise, there will potentially be a lot of game-playing to try and get on a CAT or influence a CAT, potentially building distrust from other members of the community. Emphasize that the other engagement methods are available, tracked, and the results posted.
- Plan to reassess how the CAT process is working citywide on a regular basis.

The IAG role was never revisited and became messy and distrusted over time.

Learn from practice - if it's not working as planned, try a different approach. If

CATs in one area are working well but not in another, find out why.

- Regarding the suggestion that ONS appoint “community experts” - do not limit this pool to local civic organizations and Main Streets organizations. Encourage representatives from other community-based non-profits and community and citywide advocacy groups, especially those related to city priorities (e.g., mobility, housing, tenants rights, climate, health, food access), to nominate members for 5 consideration by ONS (or encourage the members to nominate themselves).

They are also “community experts” and this will help increase and diversify representation.

- Work with social service organizations and other nonprofits to help reach out to and identify potential CAT members who would not normally be involved or know about the opportunity.

- Providing a stipend and child care will be very important.

- Training should be co-developed with the Boston Planning Department but should be outsourced to experienced trainers, with planners present. This will help build trust, improve the quality of training, and help train planners in what good training looks like. People are not automatically good teachers, so don't put that burden on CBPD staff.

- Translation and interpretation will be important. Translating tools and AI are making written translation easier, so don't let it be a barrier to participation. ●

Use geography combined with the recent density of development projects to create CAT “territories”. Using heat mapping techniques based on square footage or units could be a good way of mapping CAT areas.

- Assuming a neighborhood has a lot of development (e.g., Allston Brighton a few

years back), they may need multiple CATs, but these CATs should keep in touch with each other and have joint training and common discussions/ information about community needs and development across the whole neighborhood. • Require (encourage?) developers to share pro forma or at least some general financial numbers with the CATs to help them gain a deeper understanding of the tradeoffs and financial realities. It's very difficult to participate in the process if you don't have a full understanding of the finances.

- Ensure that CATs have a good executive summary of each project they consider (at each of the timeline points), and full information about the area they represent.

- A major CAT responsibility should be to inform construction mitigation planning on an area basis. There is no mention of construction mitigation in the Draft Action Plan. Besides the normal mitigation issues, it should include mitigation for small businesses affected or potentially displaced DURING construction. The construction mitigation plan should be community-informed and include a pre-construction survey of abutting and nearby properties. In Allston Brighton, with so many projects, we have suffered from individual project construction mitigation efforts that are not coordinated. Also, some developers do it well, some do it poorly. The city of Boston needs to assume more responsibility for construction mitigation in areas with multiple construction projects ongoing, • Likewise, if multiple parcels are proposed for development by different developers, it is important to address the sequence of construction. • Related to the above, have someone with expertise in construction mitigation be on the CAT or have construction mitigation experts help educate the CAT about the issue (Ed LeFlore of CSL Consulting has been excellent in Allston Brighton and is a good communicator - he works on Harvard projects)

- The CBPD needs to think about how to balance the tradeoffs between “seasoned” CAT members/content area experts and newer/novice CAT members (who may or may not have English as a first language) in being able to work collaboratively throughout the process with the same foundation of understanding and knowledge. There are likely equity and access questions that need to be answered/figured out/planned for. One approach is to use a “buddy system” to pair more seasoned members (or a former CAT member) with new members to provide support

Questions:

- Clarify how many members will be nominated by elected officials. The Plan does not mention nominations by state elected officials - will these legislators still be nominating CAT members?
- Can people who prove very valuable and constructive be renominated (other than nominating themselves) for another term? We think this will come up, so it would be good to think about it in advance.
- Can previous CAT members nominate themselves for CAT after sitting out a term? Again, this will come up so good to think about it now.
- Will there be a set percentage of neighborhood members for a CAT?
- Would CATs have any role in considering variance requests?

Consistent Standards - standardizing mitigation and community benefits This is very important to us and is a very well-reasoned and welcomed approach that will, we hope, clarify and make more equitable the mitigation and community benefit process. We strongly support these recommendations in the Draft Action Plan, taking into account our concerns, suggestions, and questions below.

We reiterate that mitigations and benefits be monitored and enforced, and the results be made clear to the public through reporting on project websites or on some other public

dashboard that the Planning Department maintains. And, very important, when something is delayed or not done, it is important for the community to understand why and what happened, and what to expect.

Note that we have specific comments and questions about Institutional Master Plans (IMPs) that we will address in a special IMP section at the end since it involves all three sections of the Action Plan.

2A. Create new definitions for community benefits, mitigation, and update eligibility criteria
We are satisfied with the proposed definitions and the addition of “enabling infrastructure”.
These are very helpful.

7

We appreciate the attempt to update the eligibility criteria. We have concerns about the large-scale projects still being negotiated but we understand the need for flexibility (see especially the section on IMPs at the end of this document).

We strongly support exempting projects that are of clear benefit or priority for the city or community (as in the example of a project with 60% or more of the units being at or below 100% AMI). We would like to see objective criteria for what would be exempt.

2B. Establish clear formula-based policies for mitigation

We support the formulaic approach to mitigations and the addition of transportation and open space/public realm to the mitigation categories.

Concerns:

- We are very concerned about how “in-kind” contributions can be monetized. The Plan calls for the Planning Department to be studying this, but in our experience it is nearly impossible to give dollar amounts to these. Once the city’s study is completed, we suggest a 3rd party review of any proposed methods.

- We feel that Open Space/Public Realm are narrowly defined. These could be more broadly defined to include mitigation related to impact on climate resilience,

heat, and health.

- Specifically regarding health, there was a city staff comment that hospitals address health needs through the state requirements for community benefits, but not all neighborhoods have hospitals, and not all health needs are addressed. We suggest that health be looked at as a category here or under community benefits.

Questions:

- Clarify whether mitigation funding goes toward the community since that is where the impacts are felt? Or is there also a citywide distribution component here? • Will there be a “menu of options” for mitigation to fulfill the formula amount? Or how is it decided where the money will go (e.g., contributions to a local shuttle service vs contributions to bicycle infrastructure)? And who makes those decisions?

2C. Create stronger connections between recent planning and community benefits We support connecting community benefits to priorities laid out in previous planning or community needs assessments, creating a menu of options to choose from (guardrails). This addresses the issues of a small group of IAG members influencing community benefits without the tools to actually assess community needs, and we hope this makes the community benefit process more equitable.

8

We also understand the need for a cap on community benefits. This will help set expectations for community members and across projects.

We reiterate that community benefits should never be of the type that can be privatized by individuals, families, or non-profits.

Concerns:

- We would like to understand the balance between citywide distribution of community benefits and local distribution. We recognize that the entire city should

benefit from development within the city, and that some neighborhoods (like ours) have a lot of valuable development happening, while others don't. And that we benefit from development in ways that other neighborhoods don't. But at the same time, we are also burdened by it. Also, development here pays the city large amounts through linkage fees and property taxes which are already distributed citywide. So finding a balance between distributing community benefits citywide and within the neighborhood is important. In city budget allocations, Allston Brighton comes last year after year, despite having the second largest population in Boston neighborhoods. We do not have a fully functioning BYCF community center while other neighborhoods have multiple centers. So this issue is important to us and being able to discuss the balance of benefits is important.

Suggestions:

- Include public health as a category for community benefits - there is a huge need and it is not met by state-required community benefits from hospitals, and not every neighborhood has a hospital. The Boston Public Health Commission is a valuable resource to partner with on this.
- Educate CAT members about city requirements versus community benefits. There has been confusion in the past about this - what is required, for example in Complete Streets, versus what is on a menu of options.
- Related to the above, educate CAT members about the general benefits of new development, and requirements of new development, specifically:
 - How certain developments and aspects of new development are in general beneficial for the city. i.e., new housing is a good thing, and beneficial, but in itself, it is not a “community benefit” in the the Article 80 definition of the term.
 - New requirements like Net Zero, BERDO, and Complete Streets, are

good for city residents and are the result of previous advocacy. But they also add costs to projects, so the CAT should understand that outside the Article 80 community benefit process, developers are increasingly required to incorporate beneficial components.

Questions:

- How will the cap for community benefits be determined?

9

- How will neighborhoods without recent plans or needs assessments create a community benefit menu of options?

- How do community members with great ideas get them considered during a planning process or needs assessment? And how do we make sure that people know that that's how they should advance their ideas?

- How will the community benefit “menu of options” be updated over time? We can see that the list may get out of date as time passes and new needs arise.

2D. Require proponents to file a new disclosure on displacement impacts We support this requirement and we believe it will be a critical issue to address for both our residents and our small businesses. We also support the inclusion of cultural displacement, a major issue in Allston Brighton.

Suggestion:

- Ensure that the displacement disclosure (and the AFFH report if it is different) is described in plain English, with easy to understand text and data, and in a prominent place in the accompanying documentation for the Pre-Concept Design phase. Currently the AFFH is buried in an appendix of required documents, and is in a format that is not easy for community members to understand.

Questions:

- How does the displacement impact disclosure requirement differ from or

complement the Affirmatively Furthering Fair Housing (AFFH) zoning requirement? AFFH already requires identifying displacement risks for both residents and businesses, and has a menu of intervention strategies to choose from.

- Will the disclosure report apply to the Small Project Review process where AFFH does not currently apply?

- What actions will be taken if there is displacement of residents or businesses?

Can we assume that will be addressed in Boston's Anti-Displacement Action Plan?

Coordinated Review

We STRONGLY support the recommendations in this section. We urge that the city adhere to tight timelines for review and that city departments coordinate in the proposed Portfolio Review Team to make coordinated, timely decisions on development. This will be critical to lowering development costs and building trust in the development process for community members as well as developers.

We like the outline and timing of filing requirements and the phases that allow community engagement to come earlier when it will be more effective and less costly for the developer to address it. We think the sequence is appropriate for both community engagement and efficient development.

10

3A. Formalize the pre-file process and align the filing sequence with industry practices

Suggestions:

- Include in the Pre-Concept Design filing a paragraph on how the project meets city and neighborhood priorities and planning

- As noted earlier, make sure the Displacement Disclosure and AFFH reporting is in a prominent place in the Pre-Concept Design filing, and is in plain English. ● Include

a construction mitigation plan, with input from the CAT - most likely in the Schematic Design phase.

- Developers should be required to do a pre-construction survey of properties that could be impacted during construction to accurately document pre-existing conditions.

Developers should help neighbors, if necessary, to prevent damage, and also be responsible for damage that occurs. The City needs to hold developers accountable for damages to their properties during construction. • Specify a certification step that shows that community benefits and mitigation have been fulfilled. Or at least specify reporting requirements and timeline. 3B. Lock in key decisions through a “Concept Determination” for clear and early “no” to inadequate proposals

We strongly support this recommendation.

3C. Update and enforce response times

We strongly support this recommendation. What can community members do to make this happen?

3D. Create interdepartmental portfolio review teams, enhance data-driven performance monitoring

Again, we strongly support these recommendations. This will be critical to the ultimate aim of reducing development review time, costs, and frustration.

Reconsider the sequence of other permitting departments, boards, and commissions This would be helpful to the community as well. For example, the BCDC reviews do not seem timed well with community engagement, and the purpose of their review and explanations for their decisions are rarely conveyed or understood by community members. Likewise, given the scale of the housing crisis, the role of the Boston Interagency Fair Housing Development Committee (BIFDC) seems like it should be important and better conveyed to community members.

11

Update Review Procedures

Again, we strongly support these recommendations.

Updated internal data and reporting systems

We strongly support good data-driven monitoring. This is critical and will also build community awareness and trust.

Suggestions:

- Include mitigation and benefits tracking in the data-driven performance monitoring.
- Make the results visible on a public dashboard

Questions:

- What happens when a developer sells a permitted, unbuilt project? Where does this fit in with CAT's and Planning Department staff oversight?

Institutional Master Plans

These comments pertain to pages 63-67 of the Draft Final Action Plan.

The section on Institutional Master Plans is less detailed than other sections of the Action Plan, and we understand why - as the plan states, these are large, multi-year plans involving institutions with particular priorities and needs. But for Allston Brighton, with its many institutions,

this is at the CORE of Article 80. These are very large powerful landowners asking that exceptions be made to the Zoning Code every time a university or hospital decides to grow its footprint. It affects EVERYTHING in nearby neighborhoods, which for Allston Brighton is most of our neighborhood.

We appreciate the honesty of the Action Plan in addressing IMPs and acknowledging that they are challenging to do, and we also like that some of the recommendations are being applied to IMPs.

However, given the experience we have with IMPs and community engagement, we would like to meet with the Article 80 Modernization Team to discuss these issues more fully. We think,

together with other neighborhoods that may be similarly impacted, that we have constructive experience to offer.

Here are some preliminary thoughts:

For hospital IMPs, the recent IMP process with Franciscan Children's in Brighton was deemed very successful by Task Force participants. Studying this project and meeting with its Task Force members may highlight good procedures and approaches that will be useful for the Article 80 Modernization Team.

12

St. Elizabeth's Medical Center, which is now part of the Boston Medical Center system, could be a useful pilot of the new IMP process if it needs to undergo a new IMP.

We are not in complete agreement with the need for a separate Community Advisory Team (CAT) to address major IMPs. Since IMPs are critical to our neighborhood, it seems like CATs looking at the rest of the development in the neighborhood should be involved in IMPs. But we also recognize that the IMP process will need some specialist knowledge (especially hospitals) and would benefit from the knowledge of long-serving members since they are multi-year projects. We can discuss this more, but one option might be to have these "specialist members" join existing CATs during IMP discussions. We are also concerned with how commercial development on land leased from institutions (e.g., Harvard's ERC and Beacon Park Yards) will be treated under proposed new Article 80 process. It fits under a large complex project category but is not an IMP per se. Again, since our neighborhood has experience with this, it would be good to talk in person as a group.

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 10/31/2024

Comment: Dear Chief Kairos Shen,

I am writing to provide my comments on Boston's Article 80 process, which governs the city's review of large development projects. Article 80 is a critical tool for ensuring responsible development that meets Boston's comprehensive needs. The modernization draft plan highlights several areas for improvement to better serve our communities and facilitate a more effective development review process. This letter advocates for necessary changes that are urgently needed to address inefficiencies in the development review process.

Enhanced Community Engagement:

Community input is a vital part of the Article 80 process; however, current data indicates that we lack mechanisms to invite feedback that accurately reflect the diversity of Boston's populations

While the draft proposes investing in surveys, quick poll texts, and signage, it is crucial to ensure that these tools are accessible to a wide range of individuals. This strategy is a key part of creating successful engagement practices. All documents should also be translated into the languages primarily spoken by Boston residents according to the corresponding census tract.

Additionally, encouraging participation from renters and residents who rely on multimodal commuting is essential to gathering feedback that informs our housing affordability and mobility goals. Transitioning from Impact Advisory Groups (IAGs), which review projects individually, to Community Advisory Teams (CATs) that are trained to review a portfolio of projects over a two-year term may foster a more robust approach to community engagement. We must remain committed to ensuring these teams are inclusive and accessible, amplifying the voices of those often unheard in development discussions.

Furthermore, providing clearer information on how community feedback influences

decision-making would enhance transparency and engender trust in the community. Currently, it is difficult for residents to understand the full evolution of a project. There is no centralized hub for comments to be shared in real time, and therefore no opportunity to track what feedback has been included in the final iteration of a proposal. Implementing application technology for project submissions and reviews could significantly enhance resident's user experience and provide greater transparency of decision-making. An online public portal for submitting documents, tracking progress, and communicating with city officials would create a more organized and transparent system, benefitting both proponents and residents. Clearer

Guidelines and Standards:

The existing criteria for evaluating projects is vague and often dependent on the strength of the project manager, leading to inconsistencies in reviews. It is encouraging to see the draft plan includes ideas for standardizing the review process, particularly with respect to mitigation and community benefits. Establishing clearer guidelines and standardized metrics for assessing project impacts will facilitate a more uniform evaluation process and help proponents understand expectations from the outset, potentially reducing the need for revisions and resubmissions. This will ultimately lead to better outcomes for the community who have clearer expectations and stability of more definitive timelines.

To this end, the Planning Department must maintain a keen awareness of community requests, neighborhood needs assessments, and city departmental data to effectively identify how developers can address existing city service and capital infrastructure gaps. Many projects require input from multiple city departments, which can lead to conflicting timelines and requirements. Creating a more cohesive framework for interdepartmental communication could streamline reviews and minimize bureaucratic hurdles. Consistently leveraging the Planning Advisory Council to establish a framework for annual mitigation and community benefits should be a key component of how these recommendations are developed. Our community benefits and mitigation efforts must address local needs with a citywide perspective on what is urgently

missing from our urban landscape.

Embedding Arts and Culture and Focusing on Resilience:

Throughout my tenure as City Councilor, I have witnessed the growing, yet inadequate investments in the proliferation of arts and culture space in new development and protection of it in existing buildings. In early 2021, the Mayor's Office of Arts and Culture (MOAC), published the Boston Creates report which highlighted an urgent need for new affordable arts spaces and facilities, and challenges in maintaining existing ones. The report also emphasized an increasing lack of affordable housing and work space for Boston artists, and considerable gaps in funding for artists and arts and culture organizations²

. In the years since this report was published, artists from my district, specifically in Charlestown and East Boston, have reached out for my assistance as they face displacement from artist workspace and housing. These threats remain persistent and require the City of Boston to enact policies that systemically prioritize arts and culture, particularly within development.

If one of our city's goals in modernizing the Article 80 process is to increase Boston's vibrancy, it is imperative that arts and culture be considered as part of the equation. As the draft plan notes, thirty-four percent of Article 80 modernization survey respondents indicate that this is a desired and necessary community benefit. Arts and culture must be embedded in the standardization of community benefits. The modernization of this process should amplify and protect and create space for arts and culture, allowing our artistic and cultural hubs to thrive in Boston. Furthermore, as Boston prioritizes sustainability, incorporating green building standards and climate resilience measures into Article 80 can promote more environmentally responsible development.

Establishing incentives for projects that exceed baseline sustainability criteria would encourage innovative solutions. For instance, Boston has seen a growing movement, in partnership with GrowBoston, for rooftop farms, which not only provide healthy, sustainable produce, but also absorb stormwater and reduce a building's carbon footprint. Retrofitting a building for green

infrastructure is often more challenging and costly than including it in the original design. Innovative solutions to the ongoing climate crisis must envision development as crucial to our efforts. We can and should make Boston both affordable and resilient; buildings should not be designed at the expense of either.

In conclusion, by addressing these areas we can improve the Article 80 development review process to better meet the needs of Boston's evolving landscape. Reforming our Article 80 review process is a significant and necessary undertaking. I want to thank Nupoor Monani, Kristiana Lachiusa, and the Planning Department for their ongoing work in this effort. I look forward to seeing how the current comment period will be integrated into the draft modernization plan, bringing the City of Boston closer to our desired goals.

Sincerely,

Gabriela Coletta

Boston City Councilor

District 1

East Boston, Charlestown, North End, and Wharf Distric

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 11/15/2024

Comment: Though I moved to Cambridge 3 months ago to pursue my masters degree in urban planning, I am a Bostonian through and through. I grew up, went to high school, university, and eventually worked in the city. For about 2 years of that time, I worked at the Allston Brighton Community Development Corporation as community engagement manager. A significant portion of my work was dedicated to involving low-income tenants in the city's development review

process, work served as my first introduction to Article 80 and its IAG advisory bodies. I saw first hand how confusing the process was, how unproductive these meetings often were for ensuring equitable development in the city, and most of all, how disempowered and demoralized many of the volunteers I had helped to recruit to these boards felt throughout it. I would like to focus my comment on the community engagement elements of the proposed reforms here, as my experience has allowed me to see some potential gaps emerging from the Draft Action Plan. (Generally speaking, the rest of the Article 80 proposals are excellent!) I do want to begin by stating that many of the proposed engagement reforms are steps in the right direction. I am particularly supportive of the measures designed to increase the scope and diversity of community inputs, such as the developer-led early engagements and the low-touch/digital techniques to garner more feedback. The proposed IAG replacement, the “CATs”, is also a promising concept. The selection process in particular promises to ensure that these bodies are at least somewhat more representative.

However, all the tinkering in the world with the advisory body selection process won't make much of a difference in the composition of the board if the Planning Department doesn't also take proactive efforts to expand their pool of applicants. If the same tiny minority of Boston's community that comprise current IAG members continue to be the only ones applying to these roles, I am afraid that CATs will continue to be made up of the same, tiny slice of our city's community, and the decisions they make won't represent their community's wishes. The Planning Department should be more explicit about how they are going to expand their applicant pool for the CAT, considering the use of mass mailing recruitment campaigns, or even door-to-door style in-person engagement efforts prior to the start of each term. An additional gap I see relates to the central tradeoff made between CATs and IAGs. What CATs have gained in clarity, they have lost in scope. These bodies are now limited to solely consider the distribution of community benefits, defined in the Action Plan as “Voluntary contributions by a developer for the enhancement of public goods and services”. Even further, the dollar amount of

benefits a developer could be expected to pay has a hard cap, and the range of benefits CATs can direct these dollars towards is limited by standards set by the planning department!

I recognize that there has historically been tension between strong IAGs and Boston's development goals. Many of these advisory bodies have pursued exclusionary, NIMBY-informed goals, and they have been one of the many factors that make Boston one of the slowest and most expensive cities to build in. However, though the responsibilities of the advisory body certainly needs to be reconsidered in light of this, stripping away so much scope from the role without any compensation will do nothing to promote trust, transparency, and community trust in the process. In light of this, I suggest that CATs should also be involved in monitoring developer compliance with their cooperation agreements, specifically as it relates to community benefits. Currently, my understanding is that compliance monitoring largely takes place on the private market. Private investors make sure that developments are fulfilling the terms of their contract, but there is no mechanism in place to ensure that developers do so not only in letter, but in spirit. This is a problem: developers can and do game the system in their favor, as evidenced by the actions taken by Boston College after they created a "Neighborhood Investment Fund" as part of their community benefits agreement with the city as a result of their latest Institutional Master Plan. After agreeing to distribute the Fund's \$2.5 million dollars to a variety of Allston-Brighton community projects in 2019, the university went on to disperse nearly a million of this amount to a singular park, one conveniently adjacent to their own properties. Involving CATs in compliance would achieve several objectives at once. It would make the process public, increasing trust and transparency in development review. By providing a channel for development skeptics to regulate developer behavior, it would harness their energy in a way that complements rather than conflicts with planning objectives. The work of these motivated volunteers, in turn, would reduce administrative costs for all parties currently involved in compliance monitoring.

For these reasons, developers should be required to submit a report on benefits compliance

every six months to the Planning Department until their obligations are fulfilled. Reports should be discussed at CAT meetings, where CAT members can share with planning staff areas they believe implementation could be improved. CAT members should also receive compliance-related training and be encouraged to further investigate outside of their CAT obligations.

Neighborhood / Zip Code: Cambridge

Age: 26

Gender: male

Race / Ethnicity: White/Caucasian

Housing Situation: rent

Date Received: 11/14/2024

Comment: Please scroll to AHMA's Talking Points on Article 80 via this link:
<https://www.abundanthousingma.org/city-of-boston-agenda/>

Development review in the city of Boston is currently a lengthy and unpredictable process. Additionally, when paired with an outdated and broken zoning code, it actively creates barriers for a more abundant city.

Article 80 of the Boston Zoning Code, which sets guidelines for larger development projects across the city, has not been updated since 1996. The Article 80 Modernization process is the Planning Department's effort to update the developmental review process into a process that is transparent, accessible and predictable.

We applaud the Mayor and the City of Boston's Planning Department for starting a comprehensive effort on modernizing the Article 80 process within the Zoning Code. By modernizing this process, we are hopeful that development in Boston will be transparent, accessible and predictable, while also creating much-needed new homes for current and future residents.

To that end, the City of Boston's Planning Department should consider the following things as they conduct this process:

1. Refocus the process so that it prioritizes homes

- the construction of more housing units in and of itself is the project's community benefit. Additional contributions towards capital projects or programs that do not impact the housing market should be minimized.

2. Article 80 should not be used to enforce zoning compliance in areas of the City with outdated zoning

- The majority of Boston's land has not been rezoned within the [ast 20 years, meaning that the zoning in those areas does not reflect today's conditions and context

3. Ensure Article 80 allows building sizes reflective of recently adopted zoning amendments

- Neighborhoods studied under Square + Streets and the recent PLANs, the Article 80 process should not decrease the entitled dimensional and square footage rights of a residential proposal.

4. Update timelines from outdated standards with specific requirements and targets

- Timelines can be enforced through incentives for planning department employees to hit on-time targets, or by updating weekly or monthly dashboard that tracks the percentage of projects that are on track with their project timelines.

5. Issue incremental approvals to lock in key decisions through the review process

- If paired with well-enforced timelines, the overall process will become streamlined. In the development process, time is money so by reducing the time around obtaining approvals, permitting, etc. This reduces the overall cost of building

Neighborhood / Zip Code: 02131

Age: 26

Gender: woman

Race / Ethnicity: Hispanic or Latino/a

Housing Situation: Rent my home

Date Received: 11/17/2024

Comment: While it's admirable to streamline the Article 80 process to create a more expedited development system, creating a cookie-cutter process negates the multifaceted variables that can affect a certain area, zone, and neighborhood. It appears the City of Boston is trying to curtail opposition at any level of potential development projects by eliminating negative feedback and/or concerns from abutters and neighbors directly affected by said projects immediately within their area. I am writing to express my strong opposition to any proposal or policy that seeks to curtail or eliminate feedback from abutters in matters concerning land use issues, such as zoning changes, land use developments, or other community decisions affecting neighborhood outcomes. As a concerned resident, stakeholder, and Co-President of the WSANA, I believe that abutter input plays a critical role in ensuring balanced, transparent, and inclusive decision making processes. As it has been historically, this feedback is crucial to ensure a successful outcome for

all shareholders. Abutters are directly impacted by the decisions made regarding nearby properties and developments. Whether it involves environmental changes, property values, traffic patterns, or the general character of a neighborhood, abutters bring essential, firsthand perspectives that can help shape outcomes that work for the greater good. Their voices are vital for:

1. Identifying Local Impacts: Abutters often understand the specific nuances of a neighborhood better than external developers or decision-makers. They can provide detailed insights into how proposed changes may affect the area.
2. Ensuring Accountability: Public input, including that from abutters, holds developers and governing bodies accountable, fostering transparency and trust in the process.
3. Promoting Equitable Development: Allowing those directly impacted by decisions to have a voice ensures that developments are considerate of existing communities and do not disproportionately benefit outside interests. By excluding abutter feedback, decision-making risks becoming one-sided, potentially alienating residents and fostering mistrust in local governance. This approach could lead to decisions that fail to account for the needs and concerns of those most affected, undermining the long-term success and sustainability of projects.

I urge the City of Boston to uphold the principles of participatory democracy and transparency by preserving and valuing the input of abutters. Their feedback strengthens the decision-making process, enhances community collaboration, and ensures that outcomes align with the values and priorities of the people who live and work in our neighborhoods. I am confident that you will consider, value, and maintain the significance of community voices in shaping the future of Boston. Faithfully yours, John W. Stillwaggon, Co President 10 Worcester Square Boston, MA. 02118 617.314.1444

Neighborhood / Zip Code: 02118

Age: 56

Gender: Man

Race / Ethnicity: White/Caucasian

Housing Situation: Own the home I live in

Date Received: 11/18/2024

Comment: Dear BPDA and Mayor's Office Team.

Please see below for my suggestions on modernizing Article 80 process, as requested. I tried submitting via the webform but I never received a confirmation email.

Thank you,

Sandeep Karnik

Modernizing Boston's Article 80 Process with Global Best Practices

Boston's Article 80 development review process, designed to assess and mitigate the impacts of large projects, is a critical tool for urban planning. However, as Boston revisits its urban redevelopment strategies, there is an opportunity to modernize Article 80 by integrating best practices from world-class cities renowned for their innovative urban policies. These updates can streamline the process, enhance community engagement, and ensure that projects contribute to a sustainable and inclusive Boston.

1. Streamlining Review Through Data-Driven Decision Making

Cities like Seoul and Helsinki employ advanced analytics and digital tools to evaluate development proposals. Boston could adopt similar technologies to enhance the efficiency and transparency of the Article 80 process. Implementing geospatial data analysis, predictive modeling, and digital platforms for application submissions would enable faster and more accurate assessments of project impacts, such as traffic, environmental sustainability, and housing needs.

2. Enhancing Public Participation

Drawing inspiration from Vienna and Barcelona, Boston could create more inclusive and dynamic public engagement mechanisms. Virtual town halls, interactive online portals, and augmented reality tools could allow residents to visualize proposed projects and provide meaningful feedback. This would ensure that community voices are heard and incorporated earlier in the planning process.

3. Encouraging Sustainable and Green Development

Building on the green urbanism seen in Stockholm and Melbourne, the Article 80 process could prioritize developments that integrate sustainable design elements. Projects could be evaluated for their contributions to climate resilience, such as energy-efficient buildings, green roofs, and urban forestry. Developers could be incentivized with expedited reviews or density bonuses for exceeding sustainability benchmarks.

4. Promoting Mixed-Use and Transit-Oriented Development

Inspired by cities like Amsterdam and Zurich, Boston could align Article 80 criteria with broader goals for mixed-use and transit-oriented development. Projects near public transportation nodes could receive priority, fostering walkable neighborhoods that reduce reliance on cars and promote community vibrancy.

5. Adaptive Reuse and Heritage Preservation

Boston's historic character is one of its greatest assets. Drawing from best practices in Edinburgh and Prague, Article 80 could include guidelines for adaptive reuse of historic buildings. This would balance modernization with the preservation of Boston's unique architectural and cultural heritage.

6. Incentivizing Public-Private Collaboration

Hong Kong and Singapore have demonstrated the benefits of leveraging public-private partnerships (PPPs) in urban development. Boston could use Article 80 to encourage collaboration between developers and public agencies, ensuring projects include affordable housing, public spaces, and infrastructure improvements. Such partnerships could also provide funding for community benefits.

7. Prioritizing Equity and Affordability

To address displacement and gentrification concerns, Boston could take cues from Vienna's social housing model. Article 80 could require more robust commitments to affordable housing, ensuring that large-scale developments contribute to equitable growth and economic inclusivity.

8. Establishing Clear Metrics and Benchmarks

To enhance accountability, Boston could incorporate clear, measurable benchmarks into the Article 80 process. Metrics for sustainability, affordability, public space creation, and community engagement would allow for consistent evaluation and continuous improvement.

Tailoring the Vision to Boston

Modernizing the Article 80 process requires balancing global best practices with Boston's unique needs and governance structures. By incorporating data-driven tools, promoting sustainability, and fostering inclusivity, the process can evolve into a model of 21st-century urban planning. These updates would not only streamline project reviews but also ensure that new developments enhance the quality of life for all Boston residents, preserving the city's historic charm while embracing its future as a sustainable, equitable, and vibrant urban hub.

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Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received:

Comment: Kairos Shen, Chief of Planning

Boston Planning Department

One City Hall, Ninth Floor

Boston, MA 02201

Dear Chief Shen:

Please accept Pine Street Inn, Inc.'s comments on the City of Boston Planning Department's Article 80 Modernization Plan.

Since its inception in 1969, Pine Street Inn, Inc. (PSI) has served persons experiencing homelessness in Boston, providing a variety of community-based supportive services. PSI is the largest nonprofit homeless services agency in New England. PSI offers food, clothing, shelter, day and night-time street-based outreach, access to health care, job training, affordable housing, and other critical resources for nearly 2,000 individuals each day and night at its 45 locations, most of which are located in the City of Boston. PSI's mission is to end homelessness by making permanent housing a reality for all. To that end, PSI currently operates 1,100 permanent supportive housing units in Boston, as well as in the City's surrounding communities.

Pine Street Inn is deeply committed to initiatives that create affordable housing for all and therefore supports the Article 80 Modernization Plan, while requesting that it include more initiatives to end the City of Boston's affordable housing and homelessness crises. The Plan's proposal to enhance diversity and equity in the development process will amplify the voices of the individuals PSI serves. Introducing new engagement methods, structuring in person meetings, creating CATs, and providing the option to attend meetings virtually will increase access to the development process for low-income communities, communities of color, new arrivals, and renters, populations whom PSI serves extensively. The efforts towards transparency

and timeliness throughout the Plan, including updating the filing structure, standardizing mitigation and community benefits, and organizing the Planning Department's internal operations, will benefit PSI as a nonprofit housing provider and developer. For example, the exemption from mitigation and community benefits for affordable housing with 60% or more income restricted units would be highly beneficial. PSI has limited resources with which to navigate the development process; streamlining the process will increase the impact of our resources and efforts to provide affordable housing to all. PSI requests that the Planning Department add specific actions to the Plan to address the City's housing and homelessness crises more directly. The Greater Boston region faces a serious shortage of all housing opportunities, in particular affordable supportive housing, and is experiencing unprecedented increases in the number of individuals experiencing homelessness. To address these issues, PSI recommends reviewing land use classifications, density, building codes and enforcement practices, housing typologies, and permitting practices, and conducting a process review of affordable housing programs and initiatives. This review will promote affordable housing initiatives such as infill development by-right, mixed-use developments, decreasing minimum lot size for developments, and using modular housing and accessory dwelling units. The City of Boston has the highest development standards in the region, and directly addressing homelessness and affordable housing in the Article 80 Action Plan will set a strong precedent for neighboring communities.

Enacting these items will promote diverse, spatially efficient housing, which is essential to addressing the City of Boston's homelessness and lack of affordable housing. Including these reviews, amendments, and changes in the Article 80 Modernization Plan is essential to the most equitable and efficient development of affordable housing in the future.

Pine Street Inn appreciates the opportunity to comment on the Boston Planning Department's Article 80 Modernization Plan, and looks forward to continuing to provide housing services and develop supportive housing to move disabled individuals out of homelessness throughout Greater Boston.

Sincerely,

Lyndia Downie
President and Executive Director

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 11/18/2024

Comment: As a North End resident, home owner and community activist, I am asking that your reforms actually live up to your stated intent of submitting project approvals to the planning process and adjusting them based on the informed concerns of resident community property owners. Replacing the often disregarded voices of our neighborhoods with "community advisory teams" of uncertain quality (who will appoint these people? What are their qualifications? How can they be held accountable to the community they allegedly represent?) is concerning. In my neighborhood, the North End Waterfront Residents' Association and North End Waterfront Civic Association are well-attended community forums that should have real influence on the decisions made by developers. Salient community input should be taken into account by Boston development /zoning officials from the beginning of the project, not just after the project is already baked and ready to go. We oppose the North Station Gateway Project at 251 Causeway St., for example, as completely inappropriate height of 447 feet for a location that the Boston city planners not long ago studied and concluded should be kept to 100 feet! This outsized project at the gateway to the North End was allowed to get far along--thanks to private meetings between the developer and city officials, without regard for the existing city planning parameters, and ignoring significant negative public reaction. We have the great challenge of getting it scaled back now, to what the planning department and our community envision as appropriate for this location. Is planning real, or are you just window dressing for the development people? If you have a real role, then show us, starting with this project and with a specifically delineated, genuine community voice in the development and zoning process going forward.

Neighborhood / Zip Code: 02113

Age: 77

Gender: Woman

Race / Ethnicity: White

Housing Situation: Own the home I live in

Date Received: 11/19/2024

Comment: The Boston Tenant Coalition thanks the Boston Article 80 Modernization team for its hard work.

This document offers suggestions and questions regarding a few aspects of the Draft Action Plan - specifically those concerning AFFH. Some of the suggestions offered below support areas for improvement identified by BTC partners including the Coalition for a Just Allston Brighton and Reclaim Roxbury. We would happily meet with the Planning staff to discuss these in greater detail. Please contact Kathy Brown (kathy@bostontenant.org) if you would like to schedule a meeting.

1A - Introduce modern methods of engagement to reduce barriers to participation Community meetings and writing comment letters have been the only ways community members have had the opportunity to participate in and engage with, the Article 80 process. However, many Boston residents experience a myriad of challenges and barriers that limit meaningful participation. We appreciate the approach with the expectation that it brings in a wider set of community voices to the process. We also appreciate your commitment to alleviating barriers to engagement, specifically for CTA members who may be LMI, non-native English speakers, and/or BIPOC (such as offering stipends, interpretation/translation, etc.). Low Touch Engagement

Suggestions:

- Coordinate with the broad spectrum of nonprofits and community groups to develop and pilot effective signage, survey questions, and poll approaches - to ensure that they reach and engage intended audiences.
- Work with community groups and CATs to explore how best to distribute the results of low-touch and high-touch engagement.
- Planning staff charged with community engagement should inform proponents of the forms of engagement used, rather than developers deciding on these.

- Publish the results of low-touch engagement on an Article 80 Dashboard or other easily accessible website
- Set goals for low-touch engagement and track and publish results compared to goals/expectations
- Periodically assess how this approach is working by having a focus group or surveys of community-based nonprofits and groups.

Questions:

- How will language and disability access be addressed in these materials?

High Touch Engagement

Suggestions:

- Beyond submitting written comments, the Planning Department should consider adding a method whereby someone can phone in to record a voice comment - voice recognition now is good enough that these can be translated into text easily, even if in a language other than English.
- Work with CATs and experienced city staff to develop the community agreements used in CAT meetings and public meetings - these may vary depending on the community, culture, and context. Many community organizations likely have experience with community agreements - work with them if city staff don't have experience and/or aren't familiar with cultural or contextual differences between neighborhoods.

2D. Require proponents to file a new disclosure on displacement impacts We are in full support of this requirement and we believe it will be a critical issue to address for both our residents and our small businesses. We also support the inclusion of cultural displacement, a major issue in many of the neighborhoods in which we work (specifically Allston, Dorchester, East Boston, Mattapan, and Roxbury)

Suggestion:

This new "disclosure on displacement impacts" seems similar to the AFFH assessment reports currently required during Large Project Review, but there is no specific mention of AFFH or the BIFDIC's role in this process (whether staying the same or expanding). To this end, we would like for the Planning Department to ensure that the displacement disclosure (and the AFFH report if it is different) is described in plain English, with easy-to-understand text and data, and in

a prominent place in the accompanying documentation for the Pre-Concept Design phase.

Currently, the AFFH is buried in an appendix of required documents and is in a format that is not easy for community members to understand.

Questions:

- How does the displacement impact disclosure requirement differ from or complement the Affirmatively Furthering Fair Housing (AFFH) zoning requirement? AFFH already requires identifying displacement risks for both residents and businesses and has a menu of intervention strategies to choose from.

- Will the disclosure report apply to the Small Project Review process where AFFH does not currently apply? If it doesn't - it should.

- What actions will be taken if there is displacement of residents or businesses (whether directly or indirectly)? Can we assume that will be addressed in Boston's Anti-Displacement Action Plan?

3A. Formalize the pre-file process and align the filing sequence with industry practices We are generally supportive of the recommendations in this section. We like the outline and timing of filing requirements and the phases that allow community engagement to come earlier when it will be more effective and less costly for the developer to address it and make any potential substantive changes to the project to better meet community priorities and needs. We think the sequence is appropriate for both community engagement and efficient development.

Suggestions:

- Include in the Pre-Concept Design filing a paragraph on how the project meets city and neighborhood priorities and planning initiatives.

- As noted earlier, make sure the Displacement Disclosure and AFFH reporting is in a prominent place in the Pre-Concept Design filing and is in plain English. - Ensure that BIDFC plays a role in pre-concept design/earlier in the overall process. This will be crucial to ensure that strategies identified in the AFFH Assessment affirmatively further Fair Housing in Boston (such as increases in 2+ bedrooms)

3C. Update and enforce response times

Suggestions

- Responses to anti-displacement plans/AFFH assessments should be included in this recommended strategy but aren't mentioned in the draft report.

Neighborhood / Zip Code:

Age:

Gender:

Race / Ethnicity:

Housing Situation:

Date Received: 11/19/2024

Comment: Kristiana, Kevin and Devin:

I have attached some comments on Article 80 reform, combining my most recent comments with past comments that raise issues that have not yet been addressed in the current draft of Article 80 reform. These comments include the need to operationalize the broad commitments currently in the draft plan, the need to define the power of the CATs, and the need to ensure that the CATs better reflect the communities they represent than current IAGs. I hope you find the comments helpful.

I thank all of you and other BPDA staff members for their work related to meetings of the BPDA Transformation Advocates Committee. Particular thanks to Kristiana for her work in organizing and moderating the committee.

I expressed to Kristiana my disappointment with the decision to end the committee's meetings, especially given the good deal of work still needed to complete Article 80 reform and the broader need to continue overall BPDA reform.

I encourage bringing the committee together one more time to review revisions of the current draft of Article 80 reform.

In keeping with a conversation with Kristiana, I encourage the BPDA to develop other ways to engage Boston residents, including those historically underrepresented from civic forums, in discussions of development and urban planning issues.

Cordially,

Kevin

Comment letter attached:

Carragee Notes on Article 80 Draft Action Plan 19 November 2024 Introductory Comments This draft is worth reading because it does include information related to several subjects/issues that have not been included in previous BPDA documents relating to Article 80 reform, including a process that is designed for the BPDA to provide an early rejection to projects that do not meet BPDA guidelines. Positive Aspects • Well organized • Makes a good case why the current Article 80 process needs to be reformed • More detailed in some places when compared to earlier BPDA documents on Article 8 reform, including information on formula-based transportation/infrastructure mitigation and public realm mitigation as well as information on interdepartmental coordinated review by portfolio review teams comprised of city officials from multiple departments. • For the first time, the BPDA makes a commitment to reform the Institutional Master Planning process, including the creation of CATs to replace Task Forces and the need to term limit members of these CAT and to develop conflict of interest standards. Also, there is some discussion of how to better align PILOT payments with community benefits from non-profits. These are important improvements related to Article 80 reform. • There are some useful examples of what peer cities do to enhance and simplify development review. Limitations • There remains a lack of detail about basic details relating to development review. For example, the BPDA does not define how, in specific ways, it will diversify the composition of the CATs or what specific power these groups will have. Also, there remains no definition of how many CAT teams will be created. For example, given the scale of development in Allston-Brighton, I think a single CAT would be overwhelmed by the number of development proposals. • Once again, the BPDA says that developers will lead the early engagement process, a problem in my view (also please see the more detailed discussion below of this issue). • Given the nature of this draft, much work still needs to be done to provide needed specifics. We are still a long way from the implementation of Article 80 reform. Beyond these comments, I include a discussion of other issues that I raised previously as a member of X that remain not fully resolved in this current Article 80 Draft Action Plan. Questions Questions Related to Early Engagement What specific steps will the BPDA take to ensure that the early engagement process is inclusive in nature so that publics often underrepresented in BPDA processes (for example, people of color, younger residents, renters, and working-class residents) participate in early engagement? Questions

Related to Consistent Standards What steps will the BPDA take to ensure that the mitigation and community benefit agreements defined in the development process will, in fact, be carried out by the developer, especially given past shortcomings associated with BPDA oversight of promised mitigation and community benefits? Questions Related to Coordinated Review In the discussion of coordinated review, the BPDA assumes that two Community Advisory Team workshops will be held per project. Why does the BPDA expect that only two workshops will be needed, especially given experience in which multiple community meetings are conducted related to proposed projects? How will the Community Advisory Teams workshops be conducted? How will these workshops be similar to or distinct from the current IAG community meetings focused on proposed development? Questions Related to Community Advisory Teams (CATs) What does the BPDA mean by accountability measures in its definition of CAT? What are examples of these measures? How will the BPDA identify the community groups that are authorized to submit nominations for CAT members? Does the BPDA have any reservations that this proposal might result in some cases with a recurring set of nominations that do not reflect the residential composition of specific Boston neighborhoods? How will the BPDA identify CBOs that will be involved in training members of CAT? What kind of CBOs have the necessary expertise to provide this training? Recommendations Broad Recommendation In enacting Article 80 Reforms, the BPDA should design specific guardrails that prevent future Mayors and BPDA leadership from manipulating the redesigned Article 80 process to serve their interests at the expense of Boston residents. Rationale: While I have confidence that the current initiative to redesign the Article 80 process is a good faith effort to create a more inclusive, democratic, and transparent development process, I highlight the need to ensure that the resulting reforms prevent future administrations from exploiting the reforms to advance an agenda divorced from the initial intent of the reforms. Recommendations Related to Early Engagement • The early engagement process should be led the BPDA, a public entity, rather than by developers. Rationale: The BPDA ideally seeks to guide development so that it serves the people of Boston. Developers advocate for their proposals, not necessarily for the public interest. A developer led early engagement process could be manipulated by developers to advance their interests. • The initial meeting of the early engagement process should be organized by the BPDA, not by neighborhood community groups. Rationale: This recommendation is in keeping with the fact that ultimately the BPDA has decision-making power regarding development, not community groups. Moreover, community groups may not be representative of their communities and may not engage in extensive efforts to reach out to community residents to attend their meetings. Finally, the BPDA has resources that exceed the resources of community groups, including translation services. Recommendations Related to Consistent Standards • The definition of mitigation needs to be expanded to include issues/problems related to construction mitigation to protect residents who live near construction sites. This would include, for example, plans related to traffic management, sound abatement, and rodent control. Rationale: The expansion of the definition of mitigation is needed given harms associated with construction sites. • The BPDA needs to clarify its discussion of enabling infrastructure by distinguishing it from community benefits. Rationale: Currently, some

developers identify legal or regulatory requirements for projects as community benefits, including the project's compliance with the Americans with Disabilities Act or compliance with environmental regulations. This type of compliance should not be defined as a community benefit.

- Discussions of community benefits at BPDA meetings should be deferred until a community consensus emerges about the merits of a proposed development. Rationale: Currently, at many BPDA meetings, advocates for specific community benefits, including benefits for community-based organizations or non-profits, raise these issues prematurely, preventing a substantive discussion of the merits of proposed developments. In the worst cases, these advocates prioritize benefits for favored community organizations rather than grappling with whether the proposed development serves community residents and the City as a whole.
- Discussions between the BPDA and relevant stakeholders (community groups, residents, advocacy groups) should be conducted regarding whether neighborhoods are better served by concentrating community benefits of some projects on one category (for example, affordable housing or improved public transportation) to result in better outcomes for neighborhoods rather than dispersing community benefits across multiple categories. Rationale: Under the current system, community benefits tend to be dispersed across multiple categories given the advocacy of community groups and non-profit organizations to advocate for their causes, including at times in exchange for their support of projects. This dispersal of community benefits frequently results in relatively small benefits for multiple groups, preventing the concentration of community benefits that would have decisive positive outcomes related to significant community needs.

Recommendations Related to Community Advisory Teams (CAT)

- The BPDA needs to develop a specific definition of what constitutes a conflict of interest related to membership on a CAT. This definition should be informed by public feedback on an initial BPDA draft defining a conflict of interest. Rationale: Currently, IAG and Task Forces are