

East Boston Board of Boards

Eagle Hill Civic Association - Gove Street Citizens Association - Harbor View Neighborhood Association
Jeffries Point Neighborhood Association - Orient Heights Neighborhood Council

October 11, 2023

Arthur Jemison
Chief of Boston Planning & Director of BPDA
One City Hall, Ninth Floor
Boston, Massachusetts 02201

Dear Mr. Jemison,

In response to the release of DRAFT PLAN: East Boston on September 1st (the plan), the East Boston Board of Boards, representing five neighborhood associations and councils in East Boston, gathered to discuss and assess the plan. The following is agreed upon by the leadership of the boards and we hope you will ensure the feedback and concerns are addressed in the next draft, and that questions are answered in a timely manner, allowing for additional discussion during the comment period.

Overall Comments:

The plan promises to fulfill the goal to preserve, enhance and grow East Boston through zoning changes. However, preservation is missing entirely from the plan and the plan was drafted without a needs analysis to consider current and future needs. This puts existing residents at a disadvantage when trying to comment on what appears to be primarily a plan to increase housing at all costs. East Boston should be afforded the same opportunity as Charlestown and Mattapan who each received a needs analysis to help guide future zoning, allowing for appropriate consideration for services and infrastructure that benefits existing residents and allows for future growth. Additionally, although outside of your direct control, a high level of skepticism remains around the ZBA's ability to enforce zoning, given their track record of ignoring the community process and existing zoning. Our expectation is that your agency and our elected officials will offer clear direction to the ZBA around the importance of not setting future precedent in the variance dispensation process and putting the community back in the same position we are in today. Additionally, we request that the BPDA convenes the advisory group and community at no less than six-month intervals for the first year and a half to review and correct, if necessary, any future identified needs (based on needs analysis), loopholes or variances granted under the new code.

1. **Structural Massing** - we have seen enormous structures built throughout East Boston over the past 5+ years that are not comparable to what currently exists and now look grossly out of place. The attempt to use three primary zones for all of East Boston will result in some areas with diminished side yard and front setbacks eliminating the ability to preserve yard space, plant trees between houses to expand our anemic tree canopy, store and maintain trash barrels, etc. We appreciate the cap for EBR-1 at 1,800 sq feet

gross floor area and a max of 5,000 sq feet gross floor area total; however, the six-unit buildings that would currently be allowed on lots at or above 50 feet in the EBR-2 zone are different than what was communicated to the neighborhood. The BPDA's map shows that it is not the largest lots that would be eligible as communicated, but the average lot, which will lead to the destruction of many single and two family homes in the neighborhood and a total transformation of the existing streetscapes. Additionally, the MFR/LS zoning are unclear in the presentation.

- a. Proposed Action: We are requesting that requirements for MFR/LS zoning are included in the plan and discussed with the community. Additionally, we request that all buildings proposed in the MFR zones with 10 or more units consist of at least one unit of commercial space providing needed amenities or services, not office space (should be retail, restaurant, etc.).
- b. Proposed Action: The minimum threshold for six units on any lot in East Boston should be moved to “over” 50 feet in line with what was repeatedly communicated to the neighborhoods. Recommendation is to move it to lot widths at or above 55 feet so that it is the largest lots, and not the average lots, upzoned to six units.
- c. Proposed Action: The following adjustments:

	Adjustments
EBR-1	<ul style="list-style-type: none"> ● Make plan clear that it is capped at 1,800 gross floor area per floor (including basement and attic levels) and a max of 5,000 gross floor area or below. ● Since the residential zone is “car dependent” using walk scores and this zone is away from the subway, parking requirements should be in effect for this zone
EBR-2	<ul style="list-style-type: none"> ● Increase lot width that qualifies for 6 units to 55 feet ● Increase minimum front and side setbacks to 3 feet ● Cap maximum stories to 3 (inclusive of any parking levels that apply based on 4 or more units) ● Decrease maximum floor plate size to 1,800 square feet per floor ● Include total gross floor area of 7,200 sq ft (1,800 per floor including basement)
EBR-3	<ul style="list-style-type: none"> ● Decrease gross floor area from 8,000 sq feet to 5,000 sq feet per floor ● Increase setbacks on larger buildings to greater than 5 feet. ● Identify ways to encourage commercial space as recommended for MFR providing needed services/amenities

2. **Transitional Zoning** - the current housing landscape in East Boston comprises single family, two family, three family and multi-family within their designated regions. The plan upzones most, if not all areas of East Boston, with just three primary zones, running the risk of jarring, out of place and large buildings next to historic housing stock. This will be particularly evident in areas where the zone changes skip a level (e.g. portions of

Faywood Ave zoned as EBR-3 that abuts a EBR-1 zone, Bennington St as an MFR zone abutting an EBR-2 zone etc.) It will be even more jarring for the corridors where building levels exceed the standard proposal (up to 7 levels high).

- a. Proposed Action: Implement gradual transition zones - EBR-1 transitions to EBR-2 transitions to EBR-3, and so on.
 - b. Proposed Action: Implement a transition zone for Bennington St into the neighborhood. The areas of Bennington St. with single and two family homes should be reduced to EBR-2 and areas predominately consisting of 3 family homes should be reduced to EBR-3, while areas of largest open space/potential for development can be zoned applicably as MFR if an appropriate transition area can exist.
 - c. Proposed Action: Reduce zoning on the left side of Faywood to reflect the current 2.5 story homes and align to EBR-2 (max of 3 stories).
 - d. Proposed Action: Implement similar transition zones in other areas where zoned areas "skip" a level.
3. **Planned Development Areas/Squares** - higher density areas near transit are a good idea. However, without a needs analysis and requirements that the first floor of buildings provide needed services, amenities, and infrastructure it will just result in more people occupying parking spaces currently used to support local businesses and the need for an automobile to obtain basic needs will remain.
- a. Proposed Action: Reconsider how squares are being developed and outline key services that must be added to support the increased density. Ensure ground level floors of buildings provide amenities needed (restaurants, cafes, grocery options, fitness centers, etc.) and not just office space.
4. **Parking** - the BPDA is overlooking the reality that a car free environment in certain parts of the neighborhood is just not feasible due to the lack of amenities, infrastructure, demographics or topography. The plan calls for removing parking requirements for buildings under 3 units. With most large developments charging an additional fee to rent parking spots (e.g. Clippership Wharf, Casket Factory, Portside Complex, etc.) it results in new residents parking on the street, further reducing the availability of resident parking while buildings tout how few residents have automobiles.
- a. Proposed Action: BPDA to provide clear parking requirements (e.g., unit to parking ratio) for buildings with over 3 units and make a distinction in requirements between condos and rental units.
 - b. Proposed Action: Plan should identify areas where a municipal parking garage can alleviate current parking shortages and allow for future density with minimal parking requirements.
 - c. Proposed Action: Large buildings that own streets around them (ie Suffolk Downs, Portside, etc.) should be issued a specific parking permit only allowing parking on those streets and not in the residential areas if the developer has chosen to limit parking as part of their proposal. Additionally, multifamily residential buildings that do not provide adequate parking for resident needs

should be included in the city's list of buildings ineligible for parking stickers. Stacked parking should be used in any large building to accommodate more cars while minimizing the space required for parking.

- d. Proposed Action: Parking requirements in the EBR-1 zone are largely in an area deemed "car dependent" with a walk score in the 20s. Parking requirements should be reimplemented for this area given the car dependency and the BPDA should evaluate at what point a neighborhood is no longer car dependent and require parking outside of that zone.
 - e. Proposed Action: Rollback plan to earlier draft where only parcels within 1/10th or 1/4th of a mile were excluded from parking requirements which was also requested by Councilor Coletta.
5. **Additional Dwelling Unit (ADU)** - this is a topic missing from the PLAN as BPDA deferred it to the state level or future citywide changes. However, PLAN: Mattapan currently outlines the implementation of ADUs into their proposed zoning - we expect the same.
- a. Proposed Action: Implement ADUs into existing recommendations (up to 2 units should become 1 unit + ADU or two total units, up to 3 units should become 2 units + ADU or 3 total units, etc.). This cannot be deferred to future policy considerations in one plan and addressed in another.
6. **Protecting Affordable Family Housing** – Many developers favor studio and one bedroom units, increasing the unit count vs larger units putting additional pressure on families who rent. The plan fails to address how we deepen affordability and avoid the displacement of many of the middle to low-income residents and families in East Boston, other than a build, build, build mindset.
- a. Proposed Action: To combat displacement and encourage affordability, the City cannot just consider a total number of units when determining the affordability needs. It should require an overall percentage of square footage in addition to unit counts. We see developers proposing buildings with 75% studio and one-bedroom units, which allows them to skew the appearance of providing affordability when only unit count is considered. Additionally, the AMI levels should reflect the community.
 - b. Proposed Action: the number of affordable units required to allow for additional height is not defined in the plan. This should be defined and discussed prior to moving forward with the plan. Additionally, until the Mayor's requirement for additional affordable units is in effect in 2024, any units approved for additional height based on added affordability should be above and beyond the level required under her new plan and not based on today's requirement.
 - c. Proposed Action: the plan is silent to the development of senior housing. Target areas of senior/elderly housing should be considered, identified, and/or included as a factor within the affordable unit counts.
 - d. Proposed Action: Affordable housing should be built onsite rather than contributing to offsite locations.

7. **Commercial Zoning** - these policies are not addressed in the PLAN and proposed residential zoning does not support current residents' needs. Commercial space dedicated to residents is not considered by the ZBA as a requirement. It needs to be more difficult for developers to convert a commercial space to residential. Jeffries Point, in particular, has seen much of the historic commercial space converted to residential, providing a void in neighborhood amenities. If we truly want a walkable neighborhood, with little need for cars, more consideration for this type of space is needed.
 - a. Proposed Action: the BPDA needs to include commercial space guidelines in the PLAN with a focus on amenities supporting the residents (i.e. grocery stores, marketplace, daycare, fitness centers, tutoring services, community/event space, etc.) for large developments. Also requesting clarity on commercial building of grocery stores and strict policy/requirements for converting commercial space to residential.

8. **Travel Gateways** – main roads in East Boston serve as the lifeline for the residents and also act as an evacuation route in some places. The proposals to decrease Meridian, Border, Bennington streets, etc. to 1 lane to accommodate “bikes” and turn lanes and the proposal to provide Logan Airport with a priority lane in the Ted Williams tunnel is concerning. The buildout of Suffolk Downs, increasing East Boston’s population by 1/3, on top of the growth this plan will allow, further heightens concerns around lane reductions.
 - a. Proposed Action: remove the recommendation to provide Massport/Logan Airport with a dedicated lane in the Ted Williams Tunnel. If this is a long-term priority, Massport must meet certain measurable goals proving the substantial increase in carpooling and alternative transport options to/from the airport. Any projects to increase carpooling or public transit connections to Logan should be completed and their effectiveness determined before any lane reductions in the tunnel favor airport traffic.
 - b. Proposed Action: the road diets should be reconsidered at a later time, once infrastructure services have been improved. Speeding measures through the use of speed bumps, as identified in the plan, should be trialed before removing one lane of major thoroughfares and major infrastructure projects should be completed (refurbishment of the Sumner Tunnel and replacement of the Tobin Bridge) so as to not strain neighborhood streets with commuting cars from the northern suburbs. Massport should be encouraged to keep bike lanes running through their land open later into the evening hours, particularly in warmer weather.

9. **Transportation** - the City’s push for residents not to drive needs to be supported by giving them a dependable, frequent, and sustainable transit system, which doesn’t currently exist. Orient Heights and Harbor View are currently excluded from the travel options section in the plan and Massport should be encouraged to implement additional options for facilitating the flow of people to and from the airport.

- a. Proposed Action: Orient Heights and Harbor View should be added to the travel section of the plan and additional recommendations should be made to include new entrances and exits to existing bike lanes/walking trails along the Greenway.
- b. Proposed Action: additional frequency and service should be provided for the 120 bus and all 120 buses should service the entire neighborhood and not exclude Orient Heights. Additionally, recommendations should be made for additional MBTA hours allowing for a rapid transit option to Logan Airport for early morning and late-night flights. Existing bike lanes should be open later, particularly those along the Greenway, allowing for bikers to utilize existing infrastructure. Ferry options should be explored for Chelsea Creek allowing for alternative options from the seaport/downtown to Orient Heights and the buildout of Suffolk Downs.

10. **Community Needs & Services** - the current PLAN focuses primarily on housing development, failing to include the foundational support needed to sustain growth or meet existing resident needs. There is little in the plan that addresses space for a growing senior population, new open space, green space, athletic fields, walking trails, cultural support centers, event space, medical and police services, schools etc. Nor is there anything to provide guidance on how a healthy and diverse business community can survive, other than addition to the population.

- a. Proposed Action: the BPDA must include a Community Needs & Service Enhancement section based on a Needs Analysis detailing recommendations for supporting existing and future residents.
- b. Proposed Action: City owned land and buildings that are unused should be used to meet the objectives in the Needs Analysis.

11. **Protecting Historical & Single Family Homes** - equity in Boston is important to city leaders and residents alike. Preserving our low stock of single family and historical homes is top priority for the residents who have seen developers demolish the opportunity for families to own a house. A small demolition fee alone will not deter destroying historic or architecturally significant homes, although it is a good start.

- a. Proposed Action: Policy and program need to be incorporated into the plan that protects historical and remaining single family home stock. The BPDA recommendation to pursue policies is a welcome start, but you cannot create a problem and incentive for the destruction of housing stock immediately, while deferring to an unknown future policy with an unknown timeline for approval. Single and two family homes, as well as architecturally irreplaceable or historic homes, must be protected.

12. **Squares and Corridors** – We understand that squares will undergo a separate review; however, there are elements that need to be considered as part of this plan, including current use and needs vs future use and needs. Developers are quick to pack the density in the squares without a plan that identifies what is needed other than housing. Additionally, not all squares can support the height in the current plans. Also, concerns

around the lack of information on the affordability component are heightened with regards to the squares and corridor development.

- a. Proposed Action: Orient Heights Square consists primarily of 1-3 story buildings. The current plan of allowing height up to 7 stories is not fitting with the surrounding areas and the height should be limited to a max of 4 stories.
 - b. Proposed Action: Emphasis should be provided in the plan on providing a diverse mix of retail and commercial service offerings for all residents.
 - c. Proposed Action: Squares should be treated differently depending on their current usage (destination vs pass through area) and development should ensure existing businesses continue to have the services they need (new housing should not displace parking for existing businesses).
 - d. Proposed Action: Article 53 redline appears inconsistent with residential zoning. These proposed uses (e.g. kennels, homeless/temporary shelters, transition housing, etc.) should be removed from residential zones and moved to squares and corridors.
13. **Data Request** - this PLAN was developed based on existing city data that has been shared minimally within East Boston. Some recommendations do not align with the real-life data that residents are exposed to daily.
- a. Proposed Action: we are requesting that the BPDA share additional data points that were foundational to the development of their recommendations (building massing, current use vs zoned use, etc.). Also, we are requesting city benchmarks for target population level and the number of units that East Boston must contribute overall, which was initially requested months ago by Councilor Coletta.

We have also included key prioritized concerns not addressed in the Plan that affect all of East Boston:

1. **Protect the Greenway** – current proposal would allow development to be built up to the property line of the Greenway and damage the character of the Greenway by casting shadows over this public space and encroaching upon the openness that currently exists. Restricting building height for surrounding lots below three stories to comply with the surrounding character of the neighborhood, creating sufficient setbacks away from the Greenway so structures do not impinge upon the park, and ensuring financial contributions to the beautification of the Greenway would help ensure the long-term sustainability of the park.
2. **Enhancements to pedestrian walkways** -The plan is unclear as to what this will entail at intersections and crosswalks.
3. **Airport (Massport)** – The airport encompasses a large portion of East Boston and impacts our daily lives. The PLAN currently doesn't address how this affects updated residential guidelines and how the plan protects existing residents from future airport expansion or impacts.

4. **Conservation areas** – knowing that the Belle Isle Marsh is an important area for East Boston, and knowing that there are developable areas around the marsh, the PLAN needs to visually add in these zones and define what is allowed to be built there.
5. **Chelsea Creek** – there needs to be more definition on what the plan is for Chelsea Creek and the area around it. Currently, guidelines are not included in the plan.

Association Specific Concerns and Open Questions:

Harborview

- **Bennington Street** - Upzoning to four stories or more will cause shadowing and promote demolition of existing structures (few empty lots exist today). Most homes on Bennington Street have illegal basement units. The four stories should include the current basement level to legitimize its existence. If the goal is to treat Bennington Street as a “major connective corridor”, and we want to connect sub districts through it (e.g. Day Square to Orient Heights), we cannot consolidate to one lane each way without a thorough traffic study conducted. Otherwise, more backup will be created.
- **Swift & Curtis Streets** - Will rightsizing remove existing lanes? How will it affect parking capability on these streets?

Gove Street

- **Upzoning the Gove Street Neighborhood Design Overlay District from three to four stories** - The Gove Street Citizens Association recommends the zoning be changed from EBR-3 to EBR-2 within the Gove Street NDOD. Reasoning follows: Given the new zoning criteria for measuring building height is proposed as number of occupied stories, the prevailing built form within the proposed EBR-3 is three stories not four. A recent survey of all existing buildings was conducted using City Assessor On Line Data and walking the neighborhood. The survey, provided to BPDA, found that out of 124 existing buildings, some 88 (71%) are three occupied stories or less, while 33 (27%) are four and 3 (2%) are five occupied story buildings. Only Cottage Street between Porter and Gove Streets had prevailing 4 and 5 story buildings. Therefore, up-zoning to four stories for the entire 6 block neighborhood would not accurately reflect the predominant existing built form and would be inconsistent with the Plan’s Key Recommendation for Land Use and Built Form. Furthermore, allowing 70% (3 story or less) of the existing historic red brick buildings, which comprise the NDOD, to be redeveloped into four or more occupied stories would significantly impact existing scale, character of the Gove Neighborhood, and concentration of historic buildings.

Jeffries Point

- The plan states, “New dimensional regulations will allow for the diversity of housing types that exist”. What are those regulations?

- “Transition residential districts will allow a modest increase in height and density and encourage active ground floor uses.” What are the increases? What are ground floors used for?
- **Waterfront Mixed Use** - there are two lots at the end of the Point (at the end of Sumner and the end of Maverick) that are designated Waterfront Mixed Use. It’s concerning because this designation allows for a planned development area, despite it being the furthest possible point from the T and also almost right on top of the harbor. We’re proposing it be zoned as EBR-2 like most of Jeffries Point and not include it in that same blanket Maverick Street zoning.

PLAN Clarifications Needed:

- Is there a difference between 4 stories and 4 residential stories?
- How will head-houses be factored into the plan and building height?
- There appears to be a large number of units proposed for flood zones; yet, the plan mentions the need for additional housing due to the number of units in flood zones. Are we going to allow additional units/density in flood zones?
- Future parking requirements have not been detailed in the plan. Spaces per unit and by zone need clarity. Also, what are the requirements for commercial spaces?
- Please quantify “modest increase in height and density” for all applicable regions including Squares & Corridors (e.g. Orient Heights Square, Day Square, etc.).
- What is the impact for Central Square of moving property west of Border Street into a mixed-use Waterfront subdistrict?
- “Relocate portions of the Corridor Enhancement and McLellan Highway Economic Development Area subdistricts into Neighborhood Residential zoning to better match the existing context.” What does this mean?
- What is the correlation between granting additional stories based on additional affordable units (higher IDF %)? For example, could Bennington Street development get up to 5-7 stories if they offer up additional affordable units and, if so, how many? We need a cap and ratio of square footage, unit count and height.
- Proposed Zoning Regulation Section 53-42 still provides for the establishment of Neighborhood Design Overlay Districts (“NDOD”). However, the narratives which provided a description and context for the four existing NDODs in East Boston (Belmont Square, Gove Street, Putnam Square, and St. Andrews and Baywater) have been removed. The Districts are still shown on the proposed zoning maps. However, without the narratives, there is no context to communicate the history or importance of these areas to preservation of East Boston’s cultural heritage. Clarity is needed on why the narratives were removed and requesting they be added back in.

As the plan mentions, East Boston’s population is growing twice as fast as any other Boston neighborhood, so it is pivotal that we set a foundation that can balance this growth. The expectation is that PLAN: East Boston serves the existing community and paves the way for healthy and paced growth, while balancing the needs of all. The current draft of the PLAN is a good start; however, it fails to strike a balance of benefit to existing residents vs developers. We

hope this letter and recommendations will help to swing the pendulum allowing existing residents to benefit from future zoning and the city to continue to grow.

We understand there is much left to discuss before this PLAN can be voted on, so we are requesting that the PLAN timeline accommodate additional time to work through the neighborhood's collective concerns in a second draft and we look forward to a robust conversation with the BPDA and elected officials around these concerns and how we can make Plan: East Boston something that we can all proudly support.

Lastly, we would like to thank the BPDA's Community Engagement Manager, Jason Ruggiero who has answered countless questions, facilitated conversations with all our groups, and worked hard to provide clarity when possible.

We look forward to your collaboration and responses.

East Boston Board of Boards

CC:

Michele Wu, Mayor of Boston
Aimee Chambers, Director of Planning, BPDA
Tiffany Chu, Chief of Staff to Mayor Michelle Wu
Board, Boston Planning & Development Agency
Councilor Gabriela Coletta, Boston City Council, District 1
Senator Lydia Edwards, MA State Senator, 3rd Suffolk
Councilor Michael Flaherty, Boston City Council, At-Large
Manuela Villa Gomez, East Boston Neighborhood Liaison
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Representative Adrian Madaro, MA State Representative, 1st Suffolk
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