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December 28 2016

Brian Golden, Director
Boston Planning & Development Agency
City Hall, 9th Floor
One City Hall Square
Boston, Massachusetts 02201

Dear Mr. Golden

The Jamaica Plain Neighborhood Council (JPNC) requests that there be in Plan JP/Rox the strongest possible commitment to housing affordability, including requirements that set-asides in private development sites meet or exceed the Inclusionary Development Policy of the JPNC; the continued advocacy for the release of land at the Arborway Yard for the development of affordable housing; and the use of public subsidy vouchers to allow greater access to deed-restricted units.

The very first Community Priority Statement in Plan JP/ROX is to "Promote new affordable housing and retail that supports the social and economic diversity of the area." In order to reach that goal, Plan JP/ROX needs a strong affordability component. The current average market rent for a 2-bedroom unit in a new development in Jamaica Plain is \$2600-\$3000/month. Over half of the households in Jamaica Plain cannot afford rents that exceed the \$700-\$1600/month range.

Historically, the Jamaica Plain Neighborhood Council has maintained a strong affordability commitment from all private developers of housing of 10 units or more by holding them to the following expectations:

1. 25% of the units in their development should be affordable to persons earning 80% or less of the area median income (AMI) with the average

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household income of all the affordable units being 65% of AMI.

2. All affordable units to be constructed or reconstructed within the proposed development and no cash payments will be accepted in lieu of providing the affordable units.
3. Require all affordable units to remain affordable for 50 years.

In Plan JP/ROX, the BPDA proposes substantial height and density allowances for developers in exchange for an IDP/Density Bonus Incentive (DBI). The IDP, which is the city-wide policy, applies to the base zoning: 13% of units in the base zoning need to be affordable at 70% AMI. The DBI applies to units built above the base zoning: 30% of these units need to be affordable at 50% AMI.

We appreciate this recent increase to the DBI, which gives new projects a combined IDP/DBI rate that will bring them closer to JPNC's goal of 25% affordability. However, not all projects will meet that goal, depending on size and whether they build beyond the base zoning. For example, a project has to be at 3.4 FAR to reach 25% affordability in the Plan. We ask that all new projects meet the JPNC affordability goal of 25%.

Our experience supports strong IDP/DBI requirements. Over the past several years, before the Plan JP/ROX planning process started, several for-profit developments in Jamaica Plain pledged to exceed the City's IDP requirement of 13%, including Olmsted Place (161 South Huntington Avenue), 3383 Washington Street, and 3200 Washington Street. An additional development, at 3521-3529 Washington Street, promised significant landscape and access improvements in addition to meeting the City's IDP. Serenity (105A South Huntington Avenue) also exceeded the 13% IDP, but, in opposition to JPNC policy, all of its affordable units will be off-site. This history indicates that the IDP affordability rate can exceed the current 13%.

The value created from planned growth also supports strong IDP/DBI requirements. Plan JP/ROX proposes that developers consider affordable housing as the primary Brian

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community benefit expected of them. That community benefit is part of the value created from new zoning, which allows more height and density and new residential and commercial use of land formerly zoned light industrial, land that lies alongside easy access to the MBTA's Orange Line. It is part of the value created by the City's recommendations for improvements in transportation and open space, and support for business and commercial activity. It is part of the value that comes from promoting development of an entire area, rather than one project at a time. As the primary community benefit, and as a result of the new opportunity for growth, it is reasonable to ask that the city's IDP/DBI rate for the Plan JP/ROX area meet or exceed the JPNC's goal of 25%.

The JPNC will work with the city and the BPDA in advocating for affordable housing on the Arborway Yard. The JPNC is committed to pursuing the goals of the Memoranda of Understanding signed by and between the City, MBTA, and the Community Planning Committee for the Arborway Yard that promised improvements to the bus facility and release of at least 8 acres for community use. Use of the Arborway Yard site for the creation of affordable housing is a lynchpin to the city's reaching the expected overall affordability goals it has set for Plan JP/ROX.

The JPNC supports setting a goal and plan for a more aggressive match of public subsidy voucher holders to deed restricted units in private developments. Voucher holders, whose income is mostly at 30% AMI, often cannot find market rate units within their rent range. Using vouchers with deed-restricted units helps tenants remain in the area and allows deed-restricted units to be available to tenants in need of a deeper affordability level.

The JPNC appreciates that that the BPDA has set a goal that 35%-40% of new units be affordable. To set an overall affordability goal for the entire Plan area is an important step, and is something we acknowledge and value. If the BPDA increases this goal further or decreases the AMI requirements in the Plan, the JPNC would support these improvements as well. The Plan combines private and public investment, and the JPNC appreciates the increased commitment from the city to fund

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affordable housing.

Reaching the affordability goal in the Plan will need to rely on collaboration between the BPDA, the city, and the community. Such a collaboration would benefit from the city's collecting and releasing data concerning affordable housing for all new projects within Jamaica Plain, including data on the number of units constructed, the number of deed-restricted units, the respective AMI level of the units, demographic data (race and income) of the occupants, and the overall percentage of affordability.

We also request that there be an annual meeting of the BPDA, the city and the JPNC to discuss the progress towards this goal and explore alternative solutions, if necessary.

Very truly yours,

Jamaica Plain
Neighborhood Council



Kevin F. Moloney, Chair

cc: Hon. Martin Walsh, Mayor
Representative Liz Malia
Representative Jeffrey Sanchez
Councilor Matthew O'Malley
Jullianne Doherty, MONS
John Dalzell, BPDA
Marie Mercurio, BPDA