

24 October 2018

Hon. Martin J. Walsh  
Boston City Hall, Suite 500  
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Boston, MA 02201-2013

Brian P. Golden, Director  
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Dear Mayor Walsh and Director Golden:

This letter reflects the views of the Brighton Allston Community Coalition (BACC) articulating our deep concerns related to the surge of residential housing development in Allston-Brighton. The BACC is a newly formed community group with more than 350 members – all residents of Allston or Brighton -- focusing primarily on the need for more affordable housing and more owner-occupancy housing in Allston-Brighton. The BACC unites renters and homeowners, seeking to shape future development in a way that corresponds to the needs of our community.

Reflecting the views of BACC membership, we have significant reservations concerning the Mayor's support of, and the BPDA's resulting approval of, housing developments that do not reflect the interests and desires of Allston-Brighton residents. This has occurred despite the BPDA's frequently emphasized assertion that its planning processes seek to be responsive to community concerns. Sadly, our members define the BPDA's actions in approving housing development proposals, and the Mayor's support of such proposals, as far more responsive to developers rather than Allston-Brighton residents.

A striking example of this tendency was the approval of a largely rental development on the former site of St. Gabriel's Church, despite widespread community opposition as well as the opposition of Councilor Ciommo, Representative Moran, and Representative Honan. The St. Gabriel's site was a prime opportunity for the construction of much needed owner-occupied housing in Brighton. Sadly, the BPDA, under the direction of the Mayor, squandered this opportunity.

We stress that Allston-Brighton is a **community at risk**, with an increasing transient character and with a low and perceptibly declining level of owner-occupied housing. Absentee investors are purchasing owner-occupied homes almost as soon as they come on the market, and prices of condominiums and single and two-and-three-family homes have been driven up so much by eager investors that individuals, couples and families are barred simply by price from purchasing property in Allston or Brighton. Moreover, the housing built since the election of Mayor Walsh is simply not affordable for the overwhelming majority of Allston-Brighton residents. Given escalating rents and home prices, working and middle-class residents of our community

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increasingly are displaced from our neighborhood, despite their desire to stay and contribute to Allston-Brighton's vitality.

Unfortunately, the BPDA has not taken a comprehensive approach to recent residential development in Allston-Brighton, and the Mayor has not directed the BPDA to do so. Instead, the approach has focused on single projects, ignoring the wave of development sweeping our neighborhood. Sadly, the BPDA consistently has neglected widely expressed community concerns related to inadequate urban planning concerning the following pressing issues in Allston-Brighton: the need for affordable housing; the need for owner-occupied housing; and the need for improvements in public transportation to accommodate large, new residential developments.

This pattern of inadequate and poorly conceived urban planning needs to stop. We intend to mobilize the Allston-Brighton community to oppose housing developments that ill-serve our neighborhood.

Before defining our major concerns, we stress that we are not a NIMBY group. We recognize the need to build more housing in our community and in the city as a whole. We also stress that a comprehensive approach to Greater Boston's housing crisis needs to include a commitment by suburban communities to sharply increase their construction of new housing, including affordable housing. The striking disparity between the number of new housing units being constructed in Allston-Brighton in particular and Boston in general compared to the number of units being constructed in suburban communities represents a social justice issue that demands attention.

We organize our subsequent discussion into four main categories, focusing first on the current situation and the failure of the Walsh Administration's approach to housing in Allston-Brighton, followed by the need to create more owner-occupied housing, more affordable housing, and on the need to integrate significant improvements in public transportation to accommodate the current wave of residential housing development in Allston-Brighton.

### **The Stark Failure of the Walsh Administration's Theory of "Trickle Down" Affordability and Availability of Housing in Allston-Brighton**

We understand that the Walsh administration had/has a theory that the mere building of more rental housing -- no matter how expensive the rents may be -- will have what can only be described as a "trickle down" effect on the Allston-Brighton rental market as a whole and result in more affordable rentals and more available rentals for residents and for those middle income workers and families who want to move to Allston and Brighton. We have heard this theme at meetings. But now we are past the theory stage and well into the reality, and the Walsh Administration's "trickle down" theory for housing in Allston-Brighton has been as much of a failure as "trickle down" economics nationally.

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All but a small percentage of new housing units built, or approved to be built, in Allston-Brighton under the Walsh Administration have been rentals. Hundreds and hundreds of new rental units already have been built in Allston-Brighton under a Walsh Administration BPDA. But these rental units, rather than creating a trickle or ripple of more affordable housing opening up in Allston and Brighton, have merely created building after building of expensive (and not necessarily luxury) rentals. Agents report that some developer/owners have been resorting to various incentives, such as free rent for a month or two, to try to induce people to move into these expensive apartments. Continuum, for example, at Barry's Corner at 219 Western Avenue in Allston, faced serious vacancy issues and finally turned to short-term rentals to boost vacancy.

Nova – a newly constructed apartment building at 1505 Commonwealth Avenue in Brighton– is openly listing its apartment units for travelers on Booking.com and Agoda.com, travel-booking sites. Here is a partial screen capture from October 21 from Agoda.com:

The screenshot shows the Agoda.com listing for 'Nova Brighton Apartment'. At the top, there is a search bar with 'Nova Brighton' entered, and filters for dates (22 Oct 2018 to 23 Oct 2018) and occupancy (2 adults, 1 room). Below the search bar, there are tabs for 'Rooms', 'Facilities', 'Guest policies', 'Reviews', and 'Map'. The main listing area shows the name 'Nova Brighton Apartment' with a location pin icon and the address '1505 Commonwealth Avenue, Allston-Brighton, Boston (MA), United States, 02135 - View on map'. There is a 'Very good location' badge. To the right, there are two rating boxes: 'Excellent 8.5 /10 From 89 reviews' and 'Exceptional cleanliness 9.5'. Below this, a 'Good to know' section contains a table with the following data:

Value for money	6.0
Location rating	7.5
Nearest airport	Logan International Airport (BOS)
Distance to airport	10.5 Km

At the bottom, a 'Things you'll love' section lists four amenities with icons: '180 meters to public transportation', 'Air conditioning', 'Fitness center', and 'Elevator'.

On Booking.com, Nova uses its address of 1505 Commonwealth rather than the name “Nova Brighton” and says it has been “welcoming Booking.com guests since February 6, 2018.” The apartment building has been rented out so frequently to travelers through Booking.com that as of October 21, it had 102 guest reviews on the site. Here is a partial screen capture:

The screenshot shows the Booking.com interface. At the top, there's a navigation bar with 'Accommodations', 'Flights', 'Flight + Hotel', 'Car Rentals', and 'Airport Taxis'. Below that, a breadcrumb trail reads: 'Home > USA > Massachusetts > Boston Metropolitan Area > Boston > Vacation Rentals > Apartments > Allston/Brighton > Brand New Studios and 2 Bed Apts Close to Boston University and Boston College with Private Parking Apartment, Boston (USA) Deals'. The main content area features a 'Check available dates' button, a 'We Price Match' badge, and a 'Search' button. To the right, there are tabs for 'Apartment Info & Price', 'Facilities', 'House Rules', and 'Guest Reviews (102)'. The title of the listing is 'Brand New Studios and 2 Bed Apts Close to Boston University and Boston College with Private Parking Apartment'. Below the title, the address is listed as '1505 Commonwealth Avenue, Allston/Brighton, Boston, MA 02135, United States of America' with a 'Good location - show map' link.

While the upcoming restrictions on such rentals (if they are effectively enforced, and that remains an open question) may curb the practice of Nova and others treating new rental units as hotel rooms, the underlying situation remains: the BPDA's and the Mayor's support for the building of new expensive rentals are not creating a trickle-down effect on affordable housing, or on housing availability in general for middle income and low income wage earners in Allston and Brighton.

To summarize, there is a significant mismatch between the residential housing being approved by the Walsh administration and the compelling need for more affordable and owner-occupied housing in Allston-Brighton.

### **The Need for More Owner-Occupied Housing in Allston-Brighton**

Despite widespread community concerns about low and declining home-ownership in Allston-Brighton, concerns repeatedly reflected in BACC letters on individual housing developments in Allston-Brighton, the BPDA approval process has produced new housing in our community that is, as pointed out above, overwhelmingly rental in character.

Owner-occupied housing would help stabilize an increasingly transient neighborhood. According to the latest available statistics, Allston's owner-occupancy rate as of 2016 – before many of the BPDA-approved apartment complexes opened – was already one of the lowest in the city at 11.3 percent. Brighton's owner-occupancy rate fell from 26.8 percent in 2010 to 23.2 percent in 2016, before hundreds and hundreds of new rentals approved by the City entered the market. These owner-occupancy rates are significantly lower than the citywide average of 35 percent. The BPDA approvals of large-scale rental housing developments over the last several years will only continue to worsen Allston-Brighton's troubling owner-occupied rates.

*BACC's Recommendation on the Creation of More Owner-Occupied Housing in Allston-Brighton*

- Given Allston-Brighton's low and declining percentage of owner-occupied housing, the BACC recommends a significant increase in home-ownership units in new developments, with new condominium projects required to have high percentages of owner-occupancy to prevent them from being treated solely as rental housing. We call for deed-restricted units in these developments, preventing investors from purchasing these units as a means to generate rental income.
- Our discussion of new initiatives to create additional affordable housing in our community also contains proposals related to the creation of affordable home-ownership opportunities in Allston-Brighton (please see below).

**The Need for More Affordable Housing in Allston-Brighton: the Mayor's stated goal of 23% income-restricted units on new production is doomed to failure in Allston-Brighton unless the outdated 13% onsite rate under the Inclusionary Development Policy for Allston-Brighton is increased now, while the neighborhood is in the midst of a tidal wave of housing development**

In the latest 2030 housing report, the Mayor specifically stated:

**"The City is committed to continuing to target 23% of the new production as income-restricted units."**

But Allston-Brighton, faced with thousands of new units constructed and approved, is falling far short of this explicit 23% income-restricted goal. There is a path to achieving this goal, but the city must act to achieve it.

The creation of more affordable units is an acute concern in Allston-Brighton, given that Brighton's median income is \$56,729 and Allston's is \$42,722. Given the high cost of rental and home ownership, increasing numbers of working and middle class people have been forced to leave our neighborhood.

Allston-Brighton's problems associated with affordable housing and owner-occupied housing are linked, in part, to a decades-long failure of Boston universities and colleges to house their undergraduates on campus. This failure has made Allston-Brighton a magnet for investor/absentee landlords who purchase two-and-three-family homes in our community, thus reducing owner-occupancy rates, and who charge rapacious rents to undergraduate students, thus significantly reducing the supply of affordable housing. Consequently, the continuing failure of Boston University and Boston College, for example, to house their undergraduate students has contributed to our neighborhood's housing crisis.

The city's current goal to reduce in half the currently estimated 36,000 undergraduate students living in off-campus housing by 2030 is both inadequate and timid.

Similarly, the rapid expansion in the number of graduate students attending Boston universities and college has placed additional pressure on the city's residential housing stock, increasing rents and home prices.

*BACC's Recommendation on the Creation of More Affordable Housing in Allston-Brighton*

- The City of Boston should mandate that all new residential housing developments in Allston-Brighton make 20 percent of their on-site units affordable, rather than the now required 13 percent under the Inclusionary Development Policy. The current 13 percent figure, instituted many years ago, is outdated and woefully out of sync with an area such as Allston-Brighton where development is booming.
- Current definitions of affordability exclude many Allston-Brighton and Boston residents from renting or purchasing new affordable units in our neighborhood, given that these definitions are based on income levels in greater Boston, including the city's more affluent suburbs. We, therefore, recommend that developers proposing large-scale residential projects (for example, the Stop and Shop development) agree to increase subsidies for 20 percent of the affordable rental and deed-restricted owner-occupied condominium units. These increased subsidies would create affordable units at a price far more consistent with the incomes of most Allston-Brighton residents.
- The City needs additional financial resources to spur the construction of *affordable* rental **and** owner-occupied housing. Therefore, the BACC endorses the following proposals to secure new tax revenue for the creation of affordable housing. We join other housing advocates and groups, including the Institute for Policy Studies, in proposing a modest tax surcharge on new high-end residential and commercial properties that exceed \$3 million in value. We also endorse the Institute of Policy Studies' recommendation that a 1 percent surcharge on the taxable assessed value of luxury condominiums be applied when these units are used as second or third homes (and, as a consequence are empty most of the year) or when these units are investment properties used for rental housing. A recent study by the Institute for Policy Studies revealed that only 36 percent of owners of luxury condominium units in Boston applied for the city's residential property tax exemption. In response to similar trends, Vancouver implemented this proposal and has now raised \$30 million for the creation of affordable housing. The BACC also recommends that the City assess a "flip tax" on large multi-unit residential developments when these properties are sold within a short period of time. This proposed tax would exclude single-family homes and individual condominium units. Revenue from this tax would be directed toward the creation of affordable rental and owner-occupied housing. Vancouver has implemented such a tax and San Francisco is considering this tax. The need for such an initiative is underscored by a recent "flip" of a large rental development

in Allston, Trac 75. Marketed in May 2017, this development cost \$26 million to build, with an additional cost of \$3.25 million for land acquisition. Despite the developer's often-expressed commitment to Allston over a prolonged period of time, this development was flipped only 15 months later for a profit of \$13.25 million. This type of tax would discourage real-estate speculation that fuels escalating rents and home prices.

- The BACC recommends that the BPDA secure binding commitments from Boston University and Boston College to house their entire undergraduate student populations on their campuses by 2030 as a means to alleviate our neighborhood's housing crisis. Both universities have the resources (ample endowments) and land to accomplish this goal. Boston University has multiple surface parking lots that could accommodate undergraduate housing. Boston College could replace its modular housing, created in the 1970s as *temporary* housing, with taller dormitories and, when the college opens its new recreation center, it has the ability to construct new student housing on the current site of the Flynn Recreation Center.
- The BACC also urges the BPDA to work with Boston universities and colleges to spur the construction of housing for their graduate students. The creation of housing for graduate students by Harvard University and other universities would help alleviate our neighborhood's housing crisis.

### **The Need for Significant Improvements in Public Transportation in Allston-Brighton**

Despite the unprecedented wave of residential housing development in Allston-Brighton, there has been a profound failure to engage in an urban planning process that ensures improvements in public transportation in order to accommodate new residents. As a consequence, our streets increasingly are clogged with traffic, slowing commuting times and increasing air pollution. Moreover, given the lack of improvements in public transportation, we have witnessed an increasing reliance on Uber and Lyft, producing even more traffic congestion.

The need for dramatic improvements in public transportation in Boston as a whole is underscored by the fact that Boston is the world's 14<sup>th</sup> most congested city in the world in terms of traffic and the 7<sup>th</sup> worse in the United States.

We also are deeply concerned about the potential reliance on private van services as a major transit option. It has become commonplace for large residential developers to pledge their support for the Allston-Brighton Traffic Management Association as a potential means to reduce traffic congestion. However, there is no actual transportation being provided or arranged by the Allston-Brighton TMA as far as we know. Beyond that, and even more serious: we know of no effort by the City to study how private vans, to the extent they may be provided at some point, combined with Ubers, Lyfts and taxis, will influence vehicular traffic in our neighborhood. Also, the City needs to examine the plans of residential developers in Watertown to employ vans to bring their residents to the Boston Landing commuter rail station. For example, the developer for the proposed Stop and Shop project presented troubling data related to the departure of vans

every 7 to 10 minutes during the morning and evening rush hours from Watertown developments to Boston Landing. This commitment by Watertown-based projects will only add to the traffic congestion in Allston-Brighton.

**Significantly, we have deep concerns that -- to the extent that private vans do indeed provide transportation from various housing developments -- reliance on these vans will produce a two-tiered transportation system, especially if the MBTA does not improve the frequency and reliability of its bus services.** Briefly put, we fear that the residents of these new and expensive residential buildings will have access to a form of transportation unavailable to other Allston-Brighton residents who depend on publicly financed buses. This outcome would produce a class-based transportation system, and this needs to be avoided by proper urban and transportation planning.

*BACC's Recommendations Concerning Improvements in Public Transportation*

Given the above concerns, there is an urgent need for the Mayor and the BPDA to work with, and push, the MBTA to dramatically improve public transportation in our neighborhood. The recent initiative, the Allston-Brighton Mobility Study, has potential promise, but unfortunately this initiative related to improving public transportation is just beginning and it followed rather than preceded the wave of residential housing development in our community.

We intend in the near future to send a comprehensive definition of BACC's recommendations concerning improvement in public transportation in Allston-Brighton to the MBTA. Given this, we simply identify some of our major priorities in the following discussion, sketching our vision of a significantly improved public transportation system that would effectively respond to significant residential housing development in our neighborhood:

- An increase in the number of commuter trains serving the Boston Landing station to accommodate current and future residential and commercial development in this area. Although this train service is repeatedly cited by the BPDA and developers in pushing for developments in our area, the reality is that the train service is so infrequent at times during the day that it cannot seriously be regarded as regular reliable transportation in an urban setting. For example, on the fall schedule that is about to take effect on October 29, there is an inbound train at 7:54 am, and not another one until more than 35 minutes later, at 8:30 am. After the inbound train at 8:40 am, a rider would have to wait 43 minutes to board the next train at 9:23 am. Midday, the inbound schedule has only occasional runs. There is a train at 1:23 pm, but then a rider would be stuck waiting nearly 1 hour and 45 minutes for the next train at 3:07, and if that were missed, the next train does not come for nearly two hours later (5:07 pm). This is not a schedule for meaningful urban transportation.
- An enlarged and improved "kiss and ride" drop-off area at the Boston Landing station to accommodate increased use of this station. The current area is clearly inadequate given the planned developed in the immediate area;

- The construction of a multi-modal transportation hub at West Station in Allston *prior* to the construction of Harvard's new Allston campus and *prior* to other residential or commercial developments in this area. The current traffic congestion in the Seaport District serves as a reminder of the severe negative consequences of large-scale development occurring prior to adequate public transportation being built;
- Improvements in trolley service on the B and C lines through traffic light signalization, dramatically improving travel times for trolleys along these heavily used lines;
- Large-scale residential projects should supply residents of the planned apartments and condominiums free T passes to promote the use of public transportation.
- The City should accelerate its efforts to enhance pedestrian and bike safety in Allston-Brighton. For example, there is a compelling need to create additional bike lanes, particularly protected bike lanes. In addition, more bike racks are needed at major transit hubs, including Boston Landing.

In addition, we urge the City, the Boston Transportation Department and the MBTA to engage in a **complete re-design of bus lines** that serve Allston-Brighton; this re-design should be informed by bottom-up planning, providing ample opportunity for Allston-Brighton residents to inform this planning. BACC urges that the following issues be considered as part of this re-design:

- The re-routing of existing bus lines or the creation of new bus lines to reflect current and planned housing developments in our neighborhood. For example, there is an urgent need for additional bus service to the Boston Landing commuter rail station, including bus service from Watertown, given the extensive new and planned housing development there. These enhanced bus services would reduce the need for private van service to Boston Landing, while simultaneously increasing the number of people served per trip, and, thereby, reducing traffic congestion.
- A review by the BTD and the MBTA of streets in Allston-Brighton that can accommodate bus-only lanes in an effort to significantly reduce bus travel times;
- A review of all bus stops throughout Allston-Brighton in an effort to significantly reduce the number of unnecessary stops. Some buses have stops on consecutive streets. The reduction in stops would have multiple benefits, including decreasing travel times for buses, reducing air pollution and creating additional on-street parking;
- The creation of a 57 Express bus service connecting Kenmore Square and Watertown. The 57 bus service is heavily used, but it suffers from slow travel times and overcrowding. We propose a 57 express bus with the following *limited stops*: Kenmore Square, Packard's Corner, Allston Village, Union Square, St. Elizabeth's Hospital,

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Brighton Center, Oak Square, Newton Corner and Watertown Square. This express service would significantly reduce travel times for passengers to these locations.

## **Conclusion**

We hope this letter provides you with a detailed sense of BACC's vision for Allston-Brighton's future. We underscore our view that Allston-Brighton is a community at risk. We need to create an urban planning process that reflects the needs and interests of Allston-Brighton residents. Sadly, we are far from that goal.

Cordially,

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Cc: Representative Kevin Honan; Representative Michael Moran; District City Councilor Mark Ciommo; State Senator Will Brownsberger; State Senator Sal DiDomenico; Sarah Myerson, Director of Planning, BPDA; Jonathan Greeley, Director of Development Review, BPDA; Michael Christopher, Deputy Director of Development Review, BPDA; Jerome Smith, Director of Neighborhood Services and Chief of Civic Engagement; Warren O'Reilly, City of Boston, Allston-Brighton Liaison, Neighborhood Services; City Council President Andrea Campbell; City Councilor Annissa Essaibi-George; City Councilor Michael Flaherty; City Councilor Michelle Wu; City Councilor Ayanna Pressley