

COMMENTS RESOLUTION MATRIX: DRAFT ARLINGTON HOUSING PLAN 2022-2027

DOCUMENT: DRAFT ARLINGTON HOUSING PLAN 11-29-2021

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(Note: page numbers refer to the ones displayed in the upper right corner of each page)

REVIEWER			CONSULTANT	
Page	Comment	If Correction, identify the Source	Response	Status ¹
1-2	"Background". As a member of the ZBA for both comprehensive permit applications, I appreciate the acknowledgement of the board's efforts.			
2	"Affordable Housing: The Third Rail", first paragraph. This is spot on; a very accurate depiction of conversations about affordable housing in Arlington, as I have experienced them.			
4	Last paragraph of "Looking Ahead". In its decisions for 1165R Mass Ave and Thorndike Place, the ZBA made the affirmative choice that "no local preference shall be applicable". I believe this is worth mentioning.	Condition B.4 in https://www.arlingtonma.gov/home/showpublisheddocument/57930/637674725682730000 . Condition B.4 in https://www.arlingtonma.gov/home/showpublisheddocument/58852/637733574123030000		
10	Last bullet of "key findings". The teardown phenomenon may be	Zoning bylaw section 5.4.2(B)(6), and the		

¹ A=accepted; AM=accepted, with modification; NA=not accepted.

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	exacerbated by the ZBL's special permit requirement for large additions. Given a buildable lot (i.e., having adequate size and frontage), our bylaw makes it faster and easier for a builder to tear down and rebuild, than to re-use and expand the existing structure.	dimensional regulations in Section 5.4.2(A).		
12	"Race Ethnicity and Culture". Although Arlington is predominantly (75%) white, I think it's worth noting that the town is far more diverse now than it's been in the past. Arlington was 99.8% white in 1940, 99.7% white in 1960, 99.0% white in 1970, and 97.3% white in 1980.	Files available from https://www.census.gov/prod/www/decennial.html . (Requires downloading zip files, and spelunking through the pdfs they contain.)		
31	Paragraph about "age of householder". The last sentence is particularly true for my household. I purchased a home in East Arlington in 2007, at age 37. I was able to do this because I'd been working for a startup for a few years and had the opportunity to exercise \$200k worth of incentive stock options. The money from that transaction (after taxes) made up most of my downpayment. Without that stock, it would have taken several more years before I'd been able to afford a downpayment (and housing costs			

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	would have been higher).			
37	<p>Market Rents. It might be useful to have another chart that translates these rents into wages. For example, it looks like Arlington's 2BR rentals come in at ~ \$2100/month. $(2100 * 12)/0.3$ means that a household needs to earn \$84,000/year to avoid being cost burdened. $(84,000/52/40)$ implies having wages of over \$40/hour.</p>			
38	<p>"Housing Affordability". The last sentence of the first paragraph ends with "reduce confusion and misinformation". During the Dec 2nd meeting of the HPIC, a member of the public asked for examples of misinformation, and I'd suggest including one here. My understanding is that 40B was intended to ensure that all communities (even suburban ones) contributed to addressing regional needs for low- and moderate-income housing. Attempts to spread misinformation about 40B seem to go something like "The law was written as a gift to developers" and "40B allows developers to completely ignore our zoning". In short, consider adding an example or two for concreteness.</p>	<p>Having served on a ZBA through two comprehensive permit hearings, I understand that the process for obtaining waivers from local bylaws is much more nuanced. An applicant can request waivers for bylaws that would make the project uneconomic, and the ZBA has the ability to grant or deny those waiver requests.</p>		

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49	"Public Schools", first paragraph. "Arlington operations a well-regarded schools system with nine public schools: seven elementary schools, Ottoson Middle School, and Arlington High School. This list omits the Gibbs School.	https://www.arlington.k12.ma.us/schools/gibbs.asp		
50	Electrical Grid. It may be worth noting that one the High Priority Measures in Arlington's Net Zero Action plan is "Electrify fossil fuel end uses", which means converting things like gas heat to electric. Working with utility companies to ensure adequate grid capacity will be essential, whether we do additional development or not.	Net Zero Action Plan, section "Net Zero Buildings - High Priority Measures" (pg 17)		
51	Land Cost. The estimate of \$300k/acre seems low. Per 2020 assessors data, the average assessed land value was \$448k for single family homes and \$454k for two-family homes. These lots are typically much smaller than one acre. For land use codes 101 and 104, the per acre cost can be between \$2M and \$4M/acre depending on lot size (smaller lots have higher per-acre values).	See https://equitable-arlington.org/2020/10/04/arlington-2020-cost-of-low-density-housing/ , which was based on 2020 assessor's land values. Also 2020 assessment data: https://www.srevilak.net/wiki/images/f/f7/Assessors-data-2020.xlsx		
53--59	I like the maps that show the individual zoning districts in			

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	isolation. They make it easier to appreciate how little land is zoned for more than two dwellings per lot, and where those districts are located.			
60	Minimum lot size and frontage. This paragraph points out that the minimum lot size for a townhouse structure in the R4 district is 30,000 square feet. It may be worth noting that the largest parcel in R4 is 25,979 square feet (condo conversions excluded). So, there are no lots in the townhouse district that are large enough to build a townhouse.	2020 Assessors data (based on zoning code and total acreage)		
61	Yard and Open Space. This paragraph notes several of the challenges posed by open space regulations. There are two additional aspects of usable open space that may warrant mention. First, usable open space requirements are based on a percentage of gross floor area; it is a FAR-like regulation that excludes lot areas devoted to traffic, structures, and parking; it's partially a massing regulation. Second is the way Usable Open Space is treated w/r/t alterations of non-conforming structures. Adding gross floor area (eg. a dormer) normally increases the open space requirement. If an	<p>Zoning bylaw section 5.3.22(C) for the calculation of usable open space.</p> <p>For the treatment of pre-existing non-conformities w/r/t usable open space, most ZBA cases that involve adding a dormer to a home in an R2 district will have to discuss the non-conformity.</p>		

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	applicant has no UOS before the addition and no UOS afterwards, the we treat this as not increasing the non-conforming nature. That's actually a benefit for folks with small non-conforming lots.			
62	<p>Building Height and Floor Area Ratios.</p> <p>https://www.srevilak.net/wiki/images/9/9e/Advocate-19751002.pdf is a Oct 1975 interview with the planning director who oversaw Arlington's zoning bylaw rewrite in the mid 1970s. During the interview, the director talked about doing build-out studies under both the old and new bylaw, and how the new bylaw limited the opportunity for population growth. At a certain level, I think regulations that limit multifamily development may have been enacted precisely for that reason.</p>			
66	"Impediments to housing choice", first bullet. I presume that "definitely declining" refers to HOLC C-grade (yellow districts). If that's correct, I'd suggest mentioning that this is a concrete way in which the legacy of redlining lives on today in Arlington.			
67	Goals, second bullet. I agree that			

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	Arlington's strategy should facilitate the creation of affordable homes in all neighborhoods, including ones where no affordable housing currently exists.			
67	Problem: Limited capacity. The second bullet begins "there is considerable misinformation about housing affordability". I'd suggest including some examples, for clarity.			
69	Regulatory Reform. The second sentence reads "allowing more housing and more types of housing along main corridors". I'd suggest striking "along main corridors". I don't think we should confine our efforts to former "definitely declining" districts.			
71	"Encourage the Arlington Housing Authority to expand opportunities under its Section 9 Housing Voucher Program". I believe "Section 9" should be "Section 8".			
72	Last sentence, second to last bullet. "Some cities and towns have embraced a policy of dedicating as much as 90% of their unrestricted CPA receipts for affordable housing". It may be helpful to expand this with a specific example or two, for concreteness.			

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79	Development Opportunities in Arlington. The Somerville Housing Authority is planning to redevelop their clarendon hill estate as a mixture of affordable and market rate dwellings. I wonder if a similar approach might be possible for the Arlington Housing Authority's Menotomy Manor Property (I believe the "brick" section of Menotomy Manor is of similar vintage to Clarendon Hill).	http://clarendonhill.org/		
Page 91 of the pdf (no number on the page itself)	Last page of implementation plan, in the row for "Actively implement the Connect Arlington plan". Consider adding the Arlington Liveable Streets Coalition to the list of potential advocates.			
88	There's no address given for the middle parcel (2.39 acres in the R1 district)			
91	I'd like to propose a few additional parcels. (1) Russel Common Parking Lot, (2) Parcel id 033.0-0002-0005.B, which is a 1.35 acre parking lot located behind the Lahey clinic at 33 Broadway, and (3) Parcel id 033.0-0003-0002.0, which is located at 1 Broadway.			

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-	A general comment on page numbers. It would be nice if the numbers that appear on each page matched the page number of the pdf. (If DHCD's submission guidelines would prohibit such a thing, then it's fine as is).			
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