

I. INTRODUCTION

A Better Cambridge (ABC) has had the opportunity to review the proposed citizens' zoning petition on new Floodplain Overlay District requirements and a new Green Factor zoning section to address the climate change impacts of increased flooding, stormwater management, and the increased heating of our environment. This petition's recommendations are based, in part, on both Cambridge's recent Envision Cambridge planning study and Climate Change Vulnerability Assessment (CCVA), and are a sincere, but nevertheless deeply flawed effort to address the consequences of climate change identified in these two reports.

Much of what is proposed in this petition deserves serious review and discussion by the Planning Board and City Council. ABC is very encouraged by their inclusion of reduced parking ratios, green roofs, and allowances for increased building heights. We support these concepts wholeheartedly and look forward to working with the proponents to strengthen these areas of the petition.

However, many of the petition's environmental recommendations severely undermine other critical city policy goals, such as the creation of much-needed affordable housing. Going forward, the petition's complicated recommendations will require a much more complete understanding of the impact they may have, particularly in combination, on the viability of future building and housing development in the impacted overlay district. ABC looks forward to that discussion in the months ahead, and hopes to craft an ordinance together with all interested parties that reflects our city's shared goals of both sustainability and an affordable Cambridge.

Many of the petition's goals and overly-stringent recommendations are crafted *solely* through the narrow lens of flood and heat buildup protections, as if other critical city needs - such as affordable housing and other environmental quality goals - are not equally important. Furthermore, many of its proposed flood mitigation measures far exceed the required remedies of our Commonwealth's own environmental regulations, which are already some of the most rigorous in the country. Such burdensome new requirements will stifle most new housing, and significantly increase costs for both property owners, developers and residents of the new units that are built. A more expensive Cambridge is not a more liveable Cambridge.

Furthermore, many of the petition's recommendations seem to ignore, impede, and even economically stifle many other major recommendations and smart growth practices called for by the Envision Cambridge Plan that address these other critical needs – such as a much needed increase in the supply of new housing for our city's

residents – particularly in smart growth and TOD zones, such as Alewife, which are located near transit stations, both existing and proposed (a new commuter rail stop at Alewife now in the discussion stage), and major bus commuter routes.

The Alewife District, particularly the Quadrangle, is one such transit-rich location that must certainly be environmentally protected, but also utilized as one of the city's last available large-scaled land resources that can help meet our critical housing needs for present and future generations. Further responsible development within transit-rich smart growth zones such as Alewife perhaps offer even greater environmental benefits and protections for our city than achieved by the petitioners' flood zone protection measures. Such Smart Zones do so by discouraging new automobile travel, thereby improving city and region-wide air quality as a consequence of such reduced trips. In this regard, the petition laudably recognizes the possibility of lowered required parking ratios for new development in such transit-rich areas, but then simultaneously restricts or impedes the viability of such new development in such advantaged locations.

Any petition which proposes responsible increased flood plain protections is welcomed, but must be crafted in a way that simultaneously allows smart growth and responsible housing development to meet Cambridge's critical current and long-term housing needs. New housing construction *can* be built resiliently, even within flood plains. We know how to do this responsibly. Such resilient new housing construction is being successfully developed around the country, in Boston, and yes, even in Cambridge today. But overly-stringent flood plain protections and open space requirements, as many proposed in this petition, may all but economically and physically stifle new housing construction, particularly affordable housing, due to the imposition of both significantly increased development costs and dimensional restrictions. This cannot be allowed.

We believe that it is feasible to achieve strong environmental protections in Cambridge while adding new economically-viable housing. And so, ABC looks forward to working with the Council, the Planning Board, city staff, the petitioners, resident groups, and other experts and stakeholders to achieve these two critical city goals simultaneously. Let's work together to achieve that draft a zoning ordinance that addresses *both* long-term and near-term critical concerns - such as flooding, climate change impacts, *and* our affordable housing needs for current and future generations.

II. HOW SOME PETITION MEASURES WILL STIFLE AND MAY ALL BUT PROHIBIT NEW HOUSING CONSTRUCTION IN ALEWIFE AND OTHER PARTS OF THE CITY

1. The petition's recommendations *expand the geographical area of flood plain protections beyond Alewife to many other parts of the city* that may experience flooding events in the future for a variety of reasons - including Cambridgeport and East Cambridge. If the petition's measures are passed, not only will Alewife development be severely restricted, but also much development throughout parts of Cambridgeport,

East Cambridge and other neighborhoods of the city included on the city's updated flood maps – many of which are located near transit stations and bus lines where responsible smart growth development should be allowed to occur.

2. The petition makes almost all new construction within its expanded overlay district subject to the lengthy SP / Special Permit process (with a few exceptions). As-of-right zoning within the expanded portions of the overlay will no longer be allowed. This SP requirement will add significant permitting time and money costs to land owners and future developers, not only in the Alewife District but throughout significant expanses of Cambridgeport and East Cambridge as well – particularly developers of moderately sized projects, and will contribute to the economic non-viability of these projects.

3. While some market-rate development *may* still be feasible (although at a much higher cost and lower density, seriously restricting the City's capacity to meet urgent housing needs), affordable housing projects will be infeasible under these regulations. In order to compete for state and federal funding, new affordable housing projects must be 40+ units (to maximize public funding, leverage economies of scale etc.). Based on high land acquisition costs throughout the City and the lack of large parcels, the petition's new requirements for increased open space, permeable land, tree cover, setbacks etc., new affordable housing development - especially non-profit affordable development - will become impossible.

4. The petition suggests setting the ground floor elevation of Class II Critical Facilities 3 feet above future anticipated flood stage elevations. This is overly rigorous and far exceeds state environmental requirements. This proposed requirement may also encourage environmentally unfriendly building practices - such as buildings constructed on stilts - which cause buildings to generate more heat and thermal pollution - obviously not an environmentally friendly outcome.

5. The petition appears to allow construction of underground flood storage tanks and pipes to retain 50% of flood waters (the other 50% retained on ground surface via green infrastructure) during flood events so that flood waters can be retained on-site. However, the petition then requires that these storage tanks be sized 50% above their anticipated flood volume capacity. This standard far exceeds state standards and adds considerably to building construction development costs.

6. The petition restricts the amount of land that can be filled with soil on a site in order to maintain the site's existing natural flood storage capacity, and yet, then in contradiction, requires a Class II building's ground floor to be raised 3 feet above future flood stage - which may require significant new amounts of fill. These requirements are contradictory and often will be difficult to achieve – thereby limiting the potential for viable new development.

7. The petition requires a combination of 25 foot yard setbacks for mature shade trees, plus minimum requirement for 30% open space on a site, and a minimum of 30% of lot

area for tree canopy coverage on private properties. Again, these may at first appear as admirable environmental goals, but, in fact, added together, could severely dimensionally restrict portions of a site remaining available to locate a building footprint. The likely result – many sites would become dimensionally infeasible for development.

Furthermore, when reviewing the petition’s new increased open space requirements on private properties, we should remember the nearby availability of existing major open spaces, networks, and park resources such as Fresh Pond - which unlike the petition’s new private open space requirements, are publicly accessible to all neighbors.

8. The petition favors on-site stormwater capture and containment methodology via green infrastructure over underground tanks and pipe solutions. This preference for green infrastructure may seem to have merit. However, it ignores the fact that the provision of such on-site green infrastructure would consume much of a site’s land area that would otherwise be available for building footprint - thereby significantly dimensionally restricting the amount of land available for viable building footprints. And, the deployment of such green infrastructure increases both the initial and long-term operating costs of the property. As a result of all these proposed measures, many sites could be rendered entirely unbuildable.

9. Perhaps in recognition that new housing and other uses should still be allowed to occur in the proposed overlay zone despite reduced areas for building footprints, the petition allows for increased heights beyond the existing limitations of underlying base zones. However, the petition simultaneously prohibits additional allowed density / FAR. Without additional building square footage achieved only by provision of additional density, developers will not likely have sufficient economic incentive to offset the extra development costs imposed by the petition’s increased regulations. And so, not only should additional heights be allowed, but more importantly, additional density to offset the costs of increased regulatory requirements and construction.

10. The petition prohibits ground floor residential use within the Overlay. Presumably, this would still allow for ground floor retail / commercial uses in commercially viable locations and streets; and in non-commercial areas, ground-level parking beneath the building above. This prohibition, however, may lead to visually unpleasant and inactive street frontages. Where feasible, first floor residential development should remain an option in sections of the Alewife District and the Cambridgeport and East Cambridge neighborhoods. And, where economically feasible, mixed-uses should be encouraged.

11. The petition requires that the overlay zone’s infrastructure and public streets be raised above future flood plain levels unless access to buildings from existing public streets can be certified safe by public safety officials during flood and storm events. This requirement to raise public streets will impose enormous future capital and fiscal costs on the city – not only throughout Alewife, but also in major parts of the existing Cambridgeport and East Cambridge neighborhoods. More incongruously, raised public streets and roadways will not work with the ground elevations of adjacent existing

private properties without significant alterations to those properties, if such alterations can be achieved at all.

12. The proposed section on site access (20.722) does not allow any new development on “dead-end roads.” Given that much of Alewife consists of single roads that terminate, this proposal may effectively prohibit any development on these roads until Cambridge connects them into the larger street network. Therefore, in practice, this proposed zoning section may serve, in fact, as a moratorium posing as climate adaptation protections.

III. SUMMARY

In summary, some of the petition’s provisions are certainly worthy of consideration, but many others will likely have dramatic negative impact on housing development viability and overall livability in Alewife and throughout other areas of the city, and may impede the City Council’s, the CDD’s and Envision Cambridge’s critical smart growth and affordable housing investment goals. Again, a more expensive Cambridge is not a more liveable Cambridge. We believe that the Envision Cambridge Plan, and all the shared community effort that went into crafting it, serves as the basis for moving forward. ABC looks forward to working with all concerned parties to craft a petition achieves the important environmental goals with other critical city needs such as affordable housing – all while seeking a city of which we can all be proud.