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To: [City Council](#)
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Subject: Volpe Petition - OUD-KS Rezoning Petition
Date: Monday, June 01, 2015 2:39:04 PM

My name is Ellen Shachter. I am writing to you today to provide a brief statement regarding my thoughts on the above-captioned petition as drafted by the Planning Board on May 27, 2015. In particular, I am writing in regards to the proposed Subsection 13.13.1.2 "*Special Affordable Housing Provisions.*"

As some of you know, I have spent the last twenty-five years at Cambridge and Somerville Legal Services representing low income clients in housing, emergency shelter and public benefits matters. Many of these clients were either homeless or were facing imminent displacement from the City. I am also a member of the Cambridge Community Preservation Act Committee and a member of the City of Cambridge Steering Committee of its Charette Process to identify steps for the elimination of homelessness in Cambridge. It is in these capacities and as a long-time Cambridge resident that I submit these comments.

The proposed requirements for affordable housing in the PUD-KS rezoning petition are insufficient and actually provide FEWER units to those most in need than would be developed under current inclusionary rules

A. **Too few units targeted to those under 80% of AMI:**

At present, without the proposed Rezoning Petition – approximately 11.5% of all housing units developed or 15% of the as of right housing units developed must be affordable to those below 80% of AMI (targeted to those at 65%of AMI). As proposed in the Rezoning Petition for PUD-KS, **only 10%** of the total residential "floor area" (see below) developed under the Volpe petition would be required for residential tenants below 80% of AMI. **Instead, the proposal shifts the requirement for 5% of the units away from those families earning \$69,700 for a family of four to those families of four earning up to \$118,200/year.**

While I agree that Cambridge does need to address the range of incomes in the City and to look at how to best preserve middle income tenants **it is unconscionable to do so by reducing the number of units available to those most in need.**

Ideally I think that ALL inclusionary zoning units should go to those under 80% of AMI and that middle class housing subsidies and programs should come from CPA funds or other sources of funding. However, even assuming IZ units were to be used in this capacity that should not happen until after there is a significant INCREASE in the number of units made available to those below 80% of AMI Those earning \$118,200 have approximately \$2,955/month to spend toward shelter expenses while still only paying 30% of income for such purposes. While this may not

enable such families to purchase a sufficiently large house/condo in Cambridge (I have no opinion on this matter) it does give them options for remaining in the City in rental housing. **Those with incomes below 80% of AMI often have NO options for remaining in the City and sometimes no options for avoiding impending homelessness.**

B. Too few total affordable units required:

While I am not an urban planner, it appears that the Volpe developer would be receiving significant zoning relief under the proposed Subdistrict. Under these circumstance and given the profitability of current Cambridge development in the Kendall Square area, a **minimum of 20-25% of all units built (or alternative floor area – see below) should be affordable with at least 17.5% going to those under 80% of AMI.** Given current market conditions and our existing affordable housing **crisis**, Cambridge should be at the front of similarly situated communities in regards to municipal inclusionary requirements. It should and must get all that it can for its residents in terms of community housing benefits from private housing developers who profit so much from all the amenities Cambridge provides its residents. To date Cambridge is far behind other similar municipalities and with this proposal would continue to lag significantly compared to other similar jurisdictions including Somerville.

*Davis California requires 25% of units in HUB areas targeted to 80% AMI

*Boulder Colorado requires a 20% inclusionary set aside for those at 60% of AMI

*Santa Monica has a 25% set aside for rentals under 60% AMI (and rent regulation for some units)

*Santa Fe NM has a 15% set aside for rental (low income)

*Burlington VT 15-25% city wide set aside under 65% AMI

*Somerville Massachusetts 17.5% between 50% and 80% in some areas

In its cover letter to the City Council the Planning Board states that 15% affordable requirement is appropriate “in recognition of the special constraints posed by the Federal ownership and equity transaction envisioned for a redevelopment plan”. While I look forward to a better explanation of this rationale, **nothing** should justify Cambridge lagging so far behind others in its IZ requirements in this overly heated market given the scope of our affordable housing crisis with about 3,000 Cambridge families with residential preferences on a waitlist for public housing that is frozen.

C. **Square footage v. minimum number of three bedroom units**

As noted in the Planning Board's cover letter, the proposed Subdistrict would move away from requiring a particular percentage of "units" set aside as affordable toward requiring a particular percentage of floor area to be affordable. I understand that the purpose of this shift is to try to create an incentive for the creation of larger sized units – a goal I strongly support.

However, given that the vast bulk of the cost of the creation of an affordable unit is the cost of the production of kitchens/baths (this is at least my current understanding) I wonder if a different and perhaps better approach might be simply to require a minimum number of two and/or three bedroom units to avoid the production of a significantly smaller overall number of affordable units.

Thank you so much for your consideration of these comments.