



a better cambridge

Dear members of the Housing Committee, other City Councillors, and CDD staff:

As you know, Cambridge is in a housing crisis. Rents are rising, we are short tens of thousands of homes, and families are being forced to choose between displacement and substandard or exploitative living conditions.

We are in desperate need of more multi-family housing to provide more options to households hoping to live or stay here. We need to build this housing near transit, and we also need to build this housing in areas that have long been racially and economically exclusive. In short, we need to build this housing citywide. Doing so will make every neighborhood a more affordable and available place to live, and will make Cambridge a more equitable and sustainable city.

A Better Cambridge is grateful that you are holding this hearing. Despite the urgency of our housing crisis, it has been almost two years since these discussions began, with few concrete decisions to show for it. In addition, Cambridge must soon comply with the new state [transit-oriented housing law](#), which requires an Action Plan by January 2023 and compliant zoning enacted by the end of this Council term. At this juncture, **we urge you to come up with a concrete timeline and a plan for passing Council-led reforms before the Summer 2023 legislative break**. These reforms should both comply with state law and meet the Council's goal of meaningfully promoting more multi-family housing in every neighborhood. Please see our more detailed comments below.

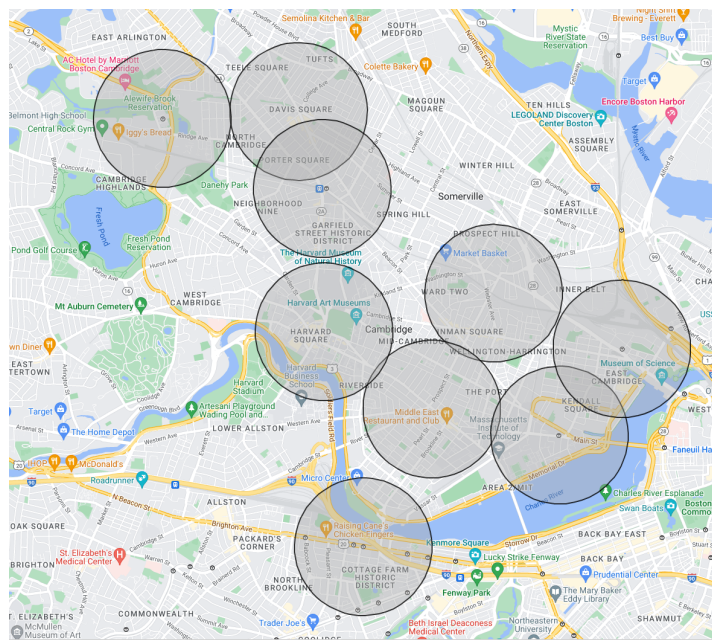
Thank you,
The A Better Cambridge Board

What the MBTA Communities Law Means for Cambridge

The Massachusetts legislature recently enacted a new law ("Section 3A") that requires all MBTA communities to have zoning for multi-family housing near transit. As the Department of Housing and Community Development (DHCD)'s [summary page](#) notes, Massachusetts is in a housing crisis - and this is not just good housing policy, it is good climate and transportation policy, too.

On August 10, DHCD issued [final guidelines](#) to determine if an MBTA community is in compliance with Section 3A. The key requirements for Cambridge, as we understand them, are:

- We must define a zoning district or set of zoning districts with combined as-of-right zoned capacity for at least 13,477 units of housing.
- “As-of-right” means without discretionary special permit requirements or discretionary neighborhood conservation district approvals.
- “Zoned capacity” does not include university-owned land.
- These districts must allow a minimum gross density of 15 housing units per acre.
- At least 90% of the 13,477-unit capacity must be within a half-mile of a transit station (though additional capacity may of course be added beyond the transit areas). Some bus stations may count as transit stations if DHCD grants permission.
 - If [sheltered bus stations](#) are included, we believe all of Cambridge is within a half-mile of a transit station; it is certainly the case that most of Cambridge is within a half-mile of a subway station.



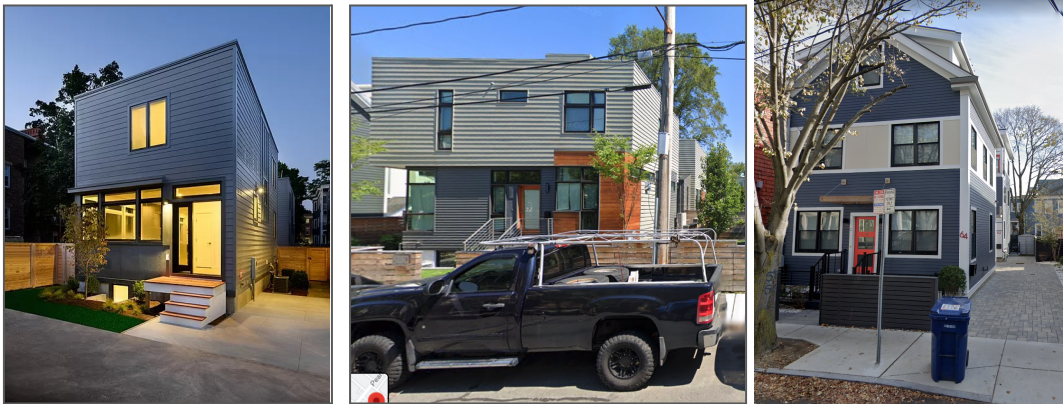
(Figure: A map of Cambridge with half-mile circles drawn around subway stations. Most of Cambridge is covered; the most exclusionary neighborhoods like West Cambridge and Francis Ave are not.)

While we think of the law as targeted primarily at suburban municipalities, it may be shocking to note that according to [CDD's April 11th presentation](#), **none of Cambridge's residential neighborhood districts (Res A-1/A-2/B/C/C-1) clearly meet the minimum gross density standard** even without considering the effects of NCD's. The higher-density residential districts are dominated by university-owned land, which doesn't count. And while it may be possible to cobble together enough of our “business” or “industry” districts to meet the 13,477-unit threshold, even that is not guaranteed. (Furthermore, it would certainly be a violation of the spirit of the law, as these districts in practice primarily feature special-permit-driven mixed-use or commercial development.) Cambridge will likely need to implement zoning changes in order to comply. If we do so proactively through a citywide housing growth policy, we have the opportunity to become a regional model for successful compliance.

CDD has not yet dived deeply into the process of determining whether Cambridge complies with state law. However, if we do not comply, **an Action Plan for achieving compliance is due by January 31st, which is quite soon**. Given that CDD is currently working on many other zoning initiatives and staff capacity is an issue, rather than conduct two multi-family housing processes in parallel, we believe it would be extremely beneficial from both a policy and a process point of view to leave no room for doubt as to Cambridge's compliance by expeditiously passing meaningful, compliant reforms to our residential neighborhood districts.

Standards for Meaningful Reform

Currently, even in the zoning districts where multi-family housing is ostensibly allowed, it is in practice strongly discouraged in favor of single-family and two-family housing. Projects like Sennott Park, 125 Brookline Street, and the Pearl Street Market demonstrate the trend, and across the city, we are seeing non-conforming multi-family housing gradually get down-converted to single- and two-family housing. The vast majority of Cambridge's existing housing stock is denser than would be allowed by current zoning.



(Figure: examples of new single-family housing built in ostensibly multi-family districts.)

In order to get to a place where small-scale multi-family housing is encouraged, significant changes to minimum lot area per dwelling unit, maximum floor area ratio (FAR), setbacks, and parking standards will be required. Given tighter building code requirements for multi-family housing, it may also be necessary to add specific incentives for multi-family housing over single-family or two-family housing.



(Figure: examples of small-scale multi-family housing that should be used as benchmarks for assessing zoning proposals.)

While we will refrain from suggesting specific dimensional standards reforms at this time, we encourage you to pursue reforms that would, at minimum, allow buildings like [10 Bowdoin St](#) (a six-plex on a 3,500 sqft lot near Porter Square) or [464 Green St](#) (an 18-unit building on an 11,000 sqft lot near Central Square). The Planning Board has suggested that increased height may be a good idea in order to build while retaining strong open space protections - we are inspired by [OneCity Vancouver](#)'s "six floors and corner stores" approach.

The biggest framework question before you is whether to create a single minimum citywide standard for multi-family housing, or whether to establish different standards in different areas. There are trade-offs here: while it may be appealing to leave the A-1/A-2/B/C/C-1 designations in place and adjust each zoning district separately, for instance, doing so would require coming up with up to five different sets of new dimensional standards. Similarly, while it may be appropriate to encourage a higher level of density nearer to subway stations, the neighborhoods in Cambridge furthest from subway stations are also the most exclusionary neighborhoods most in need of multi-family housing. Most ABC members favor a one- or two-zone approach.

Timeline and Next Steps

The MBTA Communities' 2023 deadlines align well with the Mayor's commitment at her 2022 State of the City address that "this will be the Council that passes comprehensive Zoning reform". After two years of these ideas being debated in an unfocused process, we are heartened by the urgency. However, the legislative calendar presents challenges. Passing legislation before the Summer 2023 break means that a zoning petition must be ready to file by January, which is quite soon.

We urge the Housing Committee to come up with a plan of action - including follow-up hearings - that ensures a petition is swiftly drafted and ready to file by January. We believe it is most appropriate for Councillors to take the lead, rather than CDD, as the primary task here will be one of defining a vision and articulating specific policy goals.

We also urge the Housing Committee to get any technical questions or speculative policy ideas to CDD as soon as possible. For instance, previous discussions have brought up the question of whether this multi-family housing can be harnessed to create additional deed-restricted affordable housing, through a “city right of first refusal” or a payment in lieu of inclusionary zoning for properties too small for inclusionary zoning. If the Council is interested in these ideas, their feasibility will need to be assessed sooner rather than later, as will DHCD’s opinion of their compatibility with MBTA Communities standards.

Neighborhood residential zoning reform is a key part of building a city where housing is available and affordable to all. Cambridge must also pursue additional tenant protections, stronger investments in affordable housing, and policies to promote more abundant denser housing outside of neighborhood areas. But in this moment, we have a historic opportunity to erase discriminatory zoning lines that have existed for decades, fight climate change, and encourage the multi-family housing we need in every neighborhood. We urge you to work to make sure that opportunity is realized.