

To: The Honorable, the City Council
From: Stash Horowitz, VP, Assoc. of Cambridge Neighborhoods *SH*
Re: Keeping the 50,000 sqft IPOP threshold for both design and traffic review in the proposed Planning Board special permit, to replace the IPOP permit.
July 22, 2000

Ms. Larissa Brown, Chair,
Mr. Thomas Anninger, Vice Chair,
Mr. Kevin Benjamin, Ms. Florrie Darwin,
Mr. Hugh Russell, Ms. Barbara Shaw,
Mr. William Tibbs, Ms. Pamela Winters

At last week's Planning Board meeting on growth management/city-wide rezoning, I expressed informally to three Board members my doubts about the CDD-proposed method of determining thresholds for requiring a Traffic Impact Special Permit in the Project Review section of newly proposed Cambridge Zoning Ordinance (CZO) Article 19.000, Section 19.33, which refers to a Table I. The three members asked me to put my comments in writing for the July 25 discussion on Project Review, and I have done my best before leaving for a trip to Finland.

Table I replaces the 50,000 sf unitary threshold of the current IPOP Ordinance (Section 11.502 of CZO) with a complex list, four pages in length, of 103 different square footages depending on use, and 21 different types of dwelling units, rooms, or seats.

Thresholds for square footages range from 25,000 to 300,000 sf to 300 acres, with most at 100,000 sf or above. The key threshold of general office use has been raised from 50,000 to 60,000; and that of R & D from 50,000 to 80,000. Telecom facilities have been set at 100,000 sf.

These figures were derived from land use codes (LUC) estimating the number of trips per 1,000 sf per usage type. Based on this, "60 trips in peak hour, or 400 daily trips" are said to be "trip generation thresholds." Last week you heard testimony that it is very difficult to estimate the number of trips to a telecom hotel because of the lack of experience with this usage.

Table I opens up the proverbial "can of worms." Obviously we are permitting, for future use, square footage for commercial, residential, or institutional. We cannot mandate that a number of years down the line, the owner will not find it economically advantageous to lease to tenants for one of the other uses in Table I. Nor can the City be reasonably expected to monitor these changes in uses between commercial types, or to require new Special Permits once the buildings are already constructed and occupied.

The IPOP threshold of 50,000 sf has been accepted as workable and well-chosen, and has led to a generally acceptable level of project review, which we now are altering from an interim to a permanent provision of the CZO. Traffic consultants have used the most "conservative" estimates (i.e., higher intensity uses) in doing their anticipated traffic calculations for the studies required by IPOP, and no one has complained about this conservative approach, which best protects public interests regarding traffic impacts.

The number of IPOPs considered over the past several years, less than 20, has not overwhelmed the Planning Board, nor will future proposals with a 50,000 sf threshold. Valid, reasonable criteria have been established by the Board, and have become a source of valuable traffic information. These successful measures should not now be abandoned in favor of a Pandora's box of complexity and unenforceability.

As an example, using the new Table I thresholds, the 300 Bent Street telecom hotel proposal at 97,000 sf would become as-of-right, as far as its Traffic Impact Special Permit requirements. This proposal would have too large an FAR should the growth management FAR changes currently being considered be implemented. Its density, height, and parking have met with significant neighborhood opposition, witness the letters from the East Cambridge Planning Team, Ms. Donofrio, Ms. Broussard, et al.

A word about the so-called "bypass" between 50,000 and 150,000 sf for design review. Separating design review from traffic review within these dimensions invites a legal morass. Keep the Growth Policy Document criteria for successful design integration of any proposal with its surrounding neighborhood, and you have all the authority a planning board needs to keep a meaningful, unitary public review process for a combined Design & Traffic Special Permit for all projects over 50,000 sf. Adequate public oversight is thereby insured through public hearings, oral and written testimony, and transcripts of same, as is the current process.

Do not allow behind the scenes CDD - developer "consultations" for design review for proposals between 50,000 and 150,000 sf to occur, thereby removing the scrutiny of the Planning Board, the public process and the public interest.

I wish you well in your deliberations on city-wide rezoning, which will critically shape life in Cambridge for the next two decades or more.

Very best regards,



Stash Horowitz

Vice President, Association of Cambridge Neighborhoods

Copies: Cambridge City Council, c/o Margaret Drury
City-wide Growth Management Advisory Committee (CIGMAC) c/o Stuart Dash

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Consent Communication #19

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A communication was received from Stash Horowitz, VP, Association of Cambridge Neighborhoods, relative to keeping the 50,000 sq. ft. IPOP threshold for both design and traffic review in the proposed PB special permit, to replace the IPOP permit.

In City Concil July 31, 2000

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