

**Comment on Rezoning of Stoughton Center District
Submitted for Planning Board Public Hearing March 24, 2022**

(Sent electronically)

Chairman Scardino and Planning Board members,

I am writing to provide my comments for the record of the new public hearing of Thursday, March 24, 2022 on the proposed rezoning to create a new Stoughton Center District in the center of the town.

Before I express my point of view, I want to thank a member of your board who took the time yesterday to meet with me. While we did not agree, we did have a good conversation. It revealed two quite different views, not on the desired end product of the zoning but on the likely outcome if one or the other course is followed. Your proposal clearly lays out one path, I have produced amendments (to parking requirements and building heights) that would allow the zoning article to proceed with changes that Town Meeting could debate and vote on that would provide another path. If we were able to step back and describe the pros and cons of the paths and let the Town Meeting decide what course they wanted to pursue, perhaps we could have a thoughtful discussion of the strategy to achieve the endpoint the Town Meeting wanted and the sacrifices to get there. There's a higher opportunity to get to a win-win for the town if we could do this.

With that overarching thought stated, what follows are my thoughts on the two topics - parking and building height – stated as an advocate for a point of view.

PARKING

I will demonstrate below that the Planning Board's proposed parking requirements for residential development in the SCD is woefully inadequate and will contribute to issues the Townspeople (especially those people living in or near Stoughton Center now – and in the future) will have to contend with.

One downtown developer who between 2015 and now produced 68 housing units and provides 115 parking spaces for his renters, a ratio of 1.7 parking spaces per housing unit, because he says **That's what renters want – if they don't get the convenience parking provides, the renters move out and he has to start again. And if more renters continue to move out it lessens the value of the property.**

In about the same time period, the Planning Board approved parking for the TAJ, a large 40B development near the Hansen School with 180 housing units and 328 parking spaces, a ratio of 1.8 parking spaces/housing unit.

Yet the Planning Board is proposing only 0.5 parking spaces per housing unit in the Core Subdistrict and only one parking space in the Flex and Transition Subdistricts.

The questions I ask the Planning Board are:

- Is there something different about the renters that will live in the SCD than those who are asking for parking spaces now?
- Is the Planning Board willing to allow housing units to be built where people are likely to move out because of the inconvenience of not having a place to park on site?
- Is it okay to have a lot of rental units vacant in the SCD on a routine basis? The argument is made that more people are working from home and don't need a car – a true statement in Boston, not so true in the suburbs. How long will it take to attract the type of renter who will not want/need a car?
- You'll note that I've not addressed commercial parking. The Town did a parking study in 2018 that concluded there were 264 available on-street parking spaces. The downtown developer I mentioned above didn't rely on those spaces – he developed on-site spaces for his tenants. Those on-street

spaces traditionally are considered to be available for the commercial uses we expect to attract.

Stoughton as an MBTA Community – parking impact assessment

Stoughton recently received the proposed regulations from the State setting planning requirements for MBTA communities. These MBTA requirements for Stoughton as a Commuter Rail community clearly highlight the inadequacy of providing parking for Stoughton Center residential development. The State mandate was that Stoughton plan for zoning the Stoughton Center District to have 1761 multifamily housing units allowed by right without restrictions as to age or number of bedrooms in the proposed Stoughton Center District.

The Town Planner made a presentation to the Selectboard a few weeks ago. There are a few take-away messages that came from the presentation that I'd like to touch on.

First

The analysis shows we can meet or exceed the state mandate for having 1761 multifamily housing units in the proposed Stoughton Center District.

Second

The important number to focus on is the required 1761 housing units and the requirement that the buildings with these units need to be permitted:

- By right (which they will be)
- Without restriction on age (no 55 or older)
- Without restriction on number of bedrooms (to allow families of any size to have housing)

Third

Let's give a sense of scale to this number 1761. Let's look at a few multifamily projects developed over the past few years – some in the

Downtown and the TAJ (a 4 and 5 story project near the Hansen School).

One developer has created three projects in our downtown since 2015 containing 68 housing units (studios to 2 bedrooms) with 115 parking spaces **on site** – a **parking space to housing unit ratio of 1.7**. This parking space to housing unit number of 1.7 is important. We need to compare it to the parking requirements in the proposed Stoughton Center Zoning District and evaluate the impact on our citizens.

I asked this developer why so many **on-site** parking spaces
His answer: That's what renters want – if they don't get the convenience it provides, they move out and I have to start again. And if more renters continue to move out it lessens the value of the property.

To give a sense of scale: These 68 housing units created over about 5 years represents only 3.86% of the 1761 housing units the State wants. Said another way, it would take over 25 of these three combined projects to satisfy the requirement to create 1761 units - that's 75 multifamily buildings.

The TAJ is a 180 - housing unit project (in 5 buildings) with a total of 328 parking spaces - a **parking space to housing unit ratio of 1.8**. It has 126 two-bedroom units and 54 one-bedroom units. It is situated on a 23-acre parcel of land. To get a sense of scale, these 180 housing units would be only 10.2% of the what the State-requires. It would take about 10 TAJ projects (5 buildings each) or about 50 multifamily buildings to meet the state requirement.

I'm not saying we can't create the housing the state requires in our plans, we've got many smaller apartments throughout the downtown.

I'd also suggest that you drive through Mansfield Center to see the several very recent four-story developments with parking on site to get

a sense of the development potential. These projects have on-site parking and don't have 5 stories.

Fourth

Let's give a sense of scale to parking, and its relationship to our proposed Downtown Re-Zoning.

The proposed zoning requires between a half and one parking space per housing unit. Yet because people want the parking, developers are building 1.8 spaces per housing unit. So, our zoning proposal doesn't require the spaces needed to accommodate the planned growth.

If you do the math on 1761 housing units, that deficit turns into between 1700 and 1400 fewer parking spaces than are required.

Let me remind you, the 2018 Parking study for the downtown indicated we had 264 public spaces available of which 248 were on-street and 16 were in the Freeman Street area. The on-street parking was on Park, Pleasant, Washington, Wyman, Freeman, Porter, Rose, Pearl, and Monk streets. Imagine 1700 cars circling the Center looking for one of these parking spots for the evening – every evening. **We'd be the Southie of the South Shore! Lawn Chairs, cones, would pop up everywhere.**

I see many - many couples with two cars. And if they have children, those children often-times grow a car when they reach 16. Look at the High School parking lot, or the parking at the Southeast Regional School if you don't believe this. Look at your friends and neighbors.

5-STORY BUILDINGS IN THE CORE OF THE SCD

The proposed zoning also allows a 5th story if certain concessions are provided by the developer. I've looked at the zoning bylaws of Stoughton and all (23 other) towns and cities surrounding Stoughton (ring 1) and those towns and cities touching the ring 1 communities (ring 2). The three cities (Brockton, Quincy, and Taunton) and the Town

of Walpole and perhaps Milton allow 5 story buildings in the town centers. **See map – with text at the end of this document.**

I would suggest that you reconsider the 5th story option. Our center has little to no options for setbacks, has small lots, and not wide vistas. What is the benefit to the citizens for this increased urban look at this time? Is the intent to appear as an extension of Brockton? I urge you to rethink this.

Please acknowledge my comments and include them in the record of your meeting and in your consideration along with the other comments you receive.

And I urge you to consider my suggestion that we begin the Town Meeting zoning debate by considering the benefits and dis-benefits of providing parking that currently seems desired in a suburban community versus less parking that might be desired in a suburban community like Stoughton ten or more years from now. And also consider if we want our community to present itself as a town or an extension of a city. Then based on those points, proceed to vote for the proposals that get us to the points we have chosen.

Thank you.

Louis Gitto
1261 West Street
2022-03-24

cc: Town Planner
Town Engineer

TOWNS WITH 5 STORY BUILDINGS - In RED WALPOLE DOWNTOWN and maybe MILTON
 CITIES 5 STORIES IN GREY WITH SQUIGGLES (Quincy, Brockton, and Taunton)
 Remaining towns in YELLOW NO 5 STORIES IN CENTER
 Yellow towns with dots have 5 or more stories not in downtown like Stoughton

