

ZBA FY2020-39, Valley CDC, Comprehensive Permit Application for 132 Northampton Road

ADDITIONAL PUBLIC COMMENTS:

Additional Comments received from August 6, 2020 at 9:30AM until August 21, 2020 at 2:20PM:

1. Maura Keene, Comments Submitted via Email, Dated August 14, 2020;
2. Anonymous, Comments Submitted via Town Website, Dated August 17, 2020;
3. Aimee Gilbert Loinaz, Comments Submitted via Memo, Dated August 18, 2020;

Pollock, Maureen

From: Maura Keene <keenemaura@gmail.com>
Sent: Friday, August 14, 2020 1:14 PM
To: Pollock, Maureen
Subject: 132 Northampton Road

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Pollock and the rest of the ZBA,

I have been following the proceedings on the Comprehensive Permit for the Supportive Studio project at 132 Northampton Road; and although I appreciate the great care given to the details of this complex application, I am worried that getting so bogged down in where the smoking bench will be or where snow will be placed during the one or two large storms we now have each winter, I worry that the big picture of the great need for this type of housing will be overlooked. As Valley CDC pointed out, they had over 200 applicants for a similar project, Sergeant House, in Northampton. Amherst has been building a lot of high priced one bedroom units lately, with a few affordable units being thrown in on some of the proposals, but this project would provide 28 units for both the neediest of our residents and some of our single workers who can not afford to live in town.

I am glad the ZBA is giving this application thorough consideration, but I hope it is in the spirit of making it a better project and not in the hopes of making it impossible to build.

Thank you very much,
Maura Keene

Print

132 Northampton Road - Comments on 40B Comprehensive Permit Application - Submission #15616

Date Submitted: 8/17/2020

Comment Form

Dear Zoning Board,

I live close to the 132 Northampton Road development and frequently walk on Northampton Road and in the adjacent track and field area. I support the development of this site for affordable housing, including to meet the needs of people experiencing homelessness.

I am writing to thank the board for asking constructive and careful questions in the August 6th ZBA meeting. It was very helpful to hear questions that finally began to attend to the site-specific considerations and concerns including transportation options for residents, the supportive services plan, parking considerations, and whether a safe and private location for smoking is possible. I also thank the board for publicly stating their accumulated follow-up questions at the end of the meeting—such as wanting to know more about the details of the tenant selection process—and for posting them in a transparent fashion.

I urge the board to follow through on their questions with specific conditions that will address the concerns of the board and the public. In particular, I urge you to:

1) ****Ensure that the resident services coordinator position will be secure.**** In the August 6th meeting, we heard convincing arguments from Valley CDC about the great work that the resident coordinator will do and testimony from John Hornik about the crucial importance of access to services. We also heard that this position is not mandated by any of the funding sources. That means that the resident services coordinator could easily be cut if funding becomes scarce from the State or within Valley CDC. The ZBA should condition their approval of this development on a written and binding commitment to this position.

2) ****Ensure a smoke-free development.**** I was very happy to hear Valley CDC Director Jane Loechler state that Valley CDC is willing to make this development smoke-free during the August 6th meeting. She stated this in response to board questions about the current proposed location of the smoking pavilion, which a board member characterized as unacceptable due to its proximity to the outdoor patio area, the building, and the property line. Since Valley CDC is willing and able to make the development smoke-free, I urge the board to adopt this as a condition. Other successful developments in Amherst that provide crucial affordable housing—notably Rolling Green and the North Square at the Mill District, are also smoke-free, illustrating this is possible and locally appropriate. This property simply isn't large enough or situated in a spot where it is possible to have smoking that is private and safe for others, so a smoke-free development is the best solution. This would protect other residents of the development and also respect the adjacent use as an athletic facility and—when not in athletics use—a site for recreation for families with young kids and for people from around town who need a soft and level track surface for walking.

3) ****Make a clear plan for overflow parking.**** The board expressed concern about the number of parking spaces, given the lack of easy access to public transportation. Valley CDC is proposing 16 parking spaces. However, since they plan to have a resident coordinator using one space, the management company using one space, and service providers or contractors using one space, that really only leaves 13 parking spaces for the 28 planned units. Their analysis of parking demand rests heavily on the idea that this site is “close” to services and transportation. Their submitted materials draw on their properties in Northampton as a comparison. However, 132 Northampton Road is substantially further from bus stops than the properties listed, is 0.6 mi up a steep hill from the closest grocery store, and is in a town where there is overall a much less robust public transportation system. (Note: the four tenants currently living at 132 Northampton Road appear to have three cars for the four of them.) Ultimately, it is impossible to know exactly how many spaces will be needed. So what is necessary is a plan for what happens if more spaces ARE needed. Where would the extra cars go? E.g. could Valley CDC build extra parking over their drainage swale or widen the parking area if that is necessary in the future? What recourse would there be for abutters if parking demand is not met and cars of residents or guests are routinely parked on nearby streets?

I hope that continued questions and negotiations on these points and issues raised by others can have a very constructive impact on the ultimate success of the development.

Please type comments in the box above.

Attachments

No files attached

Please upload attachments above

Aimee Gilbert Loinaz
14 Orchard St.
Amherst, MA 01002

August 18, 2020

Dear Members of the Zoning Board of Appeals,

I want to thank you for taking the time to conduct a detailed analysis of Valley Community Development Corporation's (VCDC) proposal for 132 Northampton Rd. As an abutter, and as outlined in my letter of June 24th, I strongly support utilizing section 53G of Massachusetts General Laws to ask for an independent review of VCDC's proposal in the areas of land use and population density, a fair tenant selection process, and a service plan meeting the needs of the residents for the duration of their tenancy. I also propose that the board request a Pro Forma statement to outline how VCDC's financial model would operate under diverse circumstances. Possible variables include different configurations of income levels among tenants (as VCDC has said throughout public meetings that there is a ceiling on income but no floor at each allowable percentage level of median income)*, fluctuations in tenancy, and various degrees of service needs and assistance. I continue to believe this level of transparency and objectivity is critical to the success of this project.

I won't use this space to reiterate the points I made in my last letter, but I do want to address some of the statements of the developer regarding the tenant selection process and their supportive services plan. During the ZBA meeting of August 6th, VCDC stated that they use an affirmative fair housing marketing plan to bring tenants into the process. During the June 25th meeting, however, Laura Baker was very clear that they would receive all of their most vulnerable residents from a few select organizations they have pre-arrangements with, so that those organizations would follow clients and provide 9-12 months of services. They said that these service providers would refer people who were ready for "independent living." This raises many issues:

1. Is there a clear, unbiased process for selecting and recommending tenants at the service provider level? Does each provider have a similar detailed process, or is it ad hoc?
2. What is the criteria for "being ready for independent living" when there is an expectation that some residents will come with significant challenges, as outlined in all of VCDC's supportive housing proposals dating back many years?
3. How do you assess readiness and independence without discriminating based on disability, especially since this housing was publicly financed, in part, to serve the homeless?
4. Is the criteria outlined clearly so that personal relationships and subjectivity don't play a significant role in who gets housed?
5. Why does the service provider drop services at one year? Does this have something to do with budgets and funding from outside sources?
6. How does this policy not violate affirmative fair market housing as outlined in CFR 24 Chapter 5 part 583 subpart D, which requires equal opportunity for tenancy in supportive housing? The ADA? The Olmstead Act?

I believe that only working with select providers for a certain subsection of your housing population (the homeless and extremely low income) is inherently biased and limits opportunities for those not in the care of these select agencies. It allows for the pre-selection of residents that meet the developer's needs, and not a supportive housing program that meets tenants' needs. I am not asserting that VCDC

has designs to be biased, but the program is vulnerable to it at a basic level, and is in danger of violating the law at a more critical level. VCDC has not provided a copy of their affirmative fair housing plan, nor the criteria for determining eligibility for their most vulnerable residents. They stated at the August 6th meeting that they do not receive funding from the Department of Housing and Urban Development (HUD), and are therefore not subject to its rules. VCDC may not feel they are subject to its rules, but as a major recipient of HUD funding, DHCD most certainly is, and its selected projects at the state level are presumably held to the same standards. Furthermore, HUD rule CFR 24, is based on the McKinney Homeless Assistance Act; a federal law which, along with the Olmstead Act and the Americans with Disabilities Act, is a hallmark of fair housing.

Regarding the Supportive Services Plan outlined by VCDC on August 6th, I feel strongly that it lacked a clear framework for how residents would achieve housing stability and independence. I am familiar with the model of supportive housing, which makes services optional, but this plan is missing some of the core elements included in evidence-based best practices for supportive housing developed by the Substance Abuse and Mental Health Services Administration (SAMHSA); an agency which was referenced in VCDC's most recent presentation; and which outlines best practices in this area. Notable omissions in VCDC's presentation were answers to the following:

1. Who are the stakeholders?
2. What are the program goals?
3. Do you have an action plan?
4. Is there a plan for ongoing monitoring and evaluation?
5. How do you measure success?

Valley Community Development Corporation spoke often during the August 6th presentation about its proposed part-time resident services coordinator. This is a good but limited start, and there are still many unknowns about the scope of this position, and the programming necessary to be effective. VCDC also referenced the narrow nature of what they are required to provide, which is a linkage to community resources. Even so, a truly comprehensive plan requires great detail. I think it's very important for the ZBA to be given more details on how the supportive services plan would operate successfully.

Sincerely,
Aimee Gilbert Loinaz

*This letter adds a correction to my letter dated August 16, 2020. In that letter, I mistakenly switched the terms "floor" and "ceiling." The correct version is included in the letter above.