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# CITY OF CAMBRIDGE

Community Development Department

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To: Planning Board and Ordinance Committee

From: CDD Staff

Date: July 1, 2020

Re: Affordable Housing Overlay (AHO) Zoning Petition

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## Overview

On June 8, 2020, the City Council submitted a zoning petition to amend the Zoning Code of the City of Cambridge by adding a new Section 11.207 entitled “Affordable Housing Overlay” (hereinafter “AHO”), among other changes. This petition is substantially similar to a petition considered by the Planning Board and City Council in 2019, which was developed by CDD staff working in concert with the City Council’s Housing Committee. The Planning Board made a positive recommendation on that previous petition (attached), which expired with no action taken by the City Council in September, 2019.

The AHO would modify the underlying zoning provisions in all zoning districts within the City, except for Open Space (OS) districts, by creating an alternative set of standards for a residential development in which all dwelling units are Affordable Dwelling Units (defined as an “AHO Project”). All residential units in an AHO Project would be subject to permanent restrictions on income eligibility and rental or sale prices, enforced through a covenant. In exchange, AHO Projects would be permissible at a greater allowed height and density than the underlying zoning district standards, and other standards such as setbacks and parking requirements would be relaxed within specific limitations. Modified standards for an AHO Project would be “as-of-right,” but an advisory review procedure would be required with community input and iterative design review by the Planning Board.

This memo provides an overview of the standards that are proposed, including standards for affordability, land use, height and scale, yard setbacks, open space, parking, and building and site design, and the proposed review and approval process for an AHO Project.

This memo is supplemented by additional references, which were developed during the review of the 2019 petition and have been updated to reflect the current petition as appropriate:

- Zoning maps and charts summarizing current zoning standards in different districts in comparison with the proposed AHO standards.
- Site model illustrations meant to depict the scale and massing of buildings using the proposed AHO standards on prototypical sites with different conditions and assumptions.

## ***Background***

The idea of creating alternative zoning standards for 100%-affordable housing projects has been discussed by the City Council, City staff, and community stakeholders for several years. This approach was studied and recommended as a priority action in the “Envision Cambridge” comprehensive planning process in 2019, which set a goal of creating 3,175 affordable housing units by 2030, of which an estimated 1,000 units would be created with City funding in 100%-affordable housing developments. In particular, the following strategies were recommended for near-term consideration:

- Offer density bonuses and relief from other dimensional regulations for fully affordable housing developments through a citywide affordable housing overlay or other regulatory mechanism.
- Modify the development approval process for fully affordable housing projects to require design review instead of a discretionary approval.

## ***AHO Intent***

One of the current challenges in developing 100%-affordable housing is the difficulty of securing development sites due to rising land costs and competition from market-rate housing developers and investors. Affordable housing providers, who rely on subsidies from the City and other sources, cannot compete with market purchasers who can act more quickly and can pay much higher prices for land because they will recoup their investment through market rents and market sales prices.

A key element of the AHO concept is that it would allow larger buildings with more affordable units than would be allowed under the current zoning, which will improve the competitiveness of affordable housing projects against market-rate projects when sites become available. One of the tasks undertaken through Envision Cambridge was to study the scale of development that would enable affordable housing projects, with assumptions for the level of City subsidy needed per unit, to be competitive for sites in the current market. In general, it was found that a density of at least four times what is currently allowed in the most restrictive zoning districts and at least 2.5 times what is currently allowed in higher-density zoning districts would be needed to be competitive given current land costs.

Another element of the AHO concept is to enable affordable housing to be created as-of-right. Currently, most affordable housing developments require some special permits or other relief from zoning requirements, which can be granted through a “comprehensive permit” enabled by state law (M.G.L. Chapter 40B). The possibility of an appeal of a comprehensive permit or any other zoning relief granted, which can result in costly and time-consuming litigation, poses significant risk to an affordable housing provider. An as-of-right approval process provides a level of certainty about what can be built on a site in advance, so affordable housing providers will be able to purchase sites that they otherwise might be reluctant to consider due to the need to seek zoning relief. An as-of-right process would also allow developments to be permitted in a more predictable timeframe, making new affordable housing available in the community sooner, and it would reduce or eliminate certain pre-development costs, allowing City affordable housing funding to go further to create more affordable units.

Because the AHO is citywide in scope, it would better enable affordable housing development in areas of Cambridge where there are fewer affordable housing options for residents and where the current

zoning is too restrictive to make affordable housing feasible. For reference, a map showing where deed-restricted affordable housing is located in the city is provided.

**Explanation of Zoning Proposal**

*Introduction*

The AHO petition, if adopted, would have three overall effects in relation to current zoning:

- Establishing a set of development standards, as an alternative to the underlying base zoning, that would apply only to housing projects in which all units are subject to permanent, deed- recorded affordability restrictions.
- Allowing affordable housing projects to be built at a density and scale that would make them more feasible throughout the City, including in the most restrictive zoning districts, while establishing clear dimensional limitations and design standards.
- Providing an “as-of-right” permitting process for affordable housing projects that meet the required standards, as an alternative to the Chapter 40B “comprehensive permit” process or the need to seek other zoning relief.

*Affordability Standards*

An AHO Project would be required to meet specific standards for the ongoing affordability of the units including income eligibility levels, caps on rents, caps on sales prices, marketing, and occupant selection, among other standards. Eligibility would be limited to Eligible Households who meet the following income criteria upon occupancy:

- Rental Units
  - All units to serve households earning less than 100% Area Median Income (AMI)
  - At least 80% of units to serve households earning less than 80% AMI
- Homeownership Units
  - All units to serve households earning less than 100% AMI
  - At least 50% of units to serve households earning less than 80% AMI
  - For context, the following table summarizes 2020 income thresholds based on AMI:

Household Size	Minimum Income	80% AMI	100% AMI
1 person	Not regulated by AHO; set by affordable housing funding program	\$67,400	\$83,300
2 persons		\$77,000	\$95,200
3 persons		\$86,650	\$107,100
4 persons		\$96,250	\$119,000

The affordability standards would be enforced through an affordable housing covenant, recorded as a restriction on the property. The procedures for enforcement would be similar to those that have been applied under the requirements of the inclusionary housing provisions of the City’s Zoning Ordinance.

### ***Land Use Regulations***

#### *Current Zoning*

The Zoning Ordinance lists four use types in the general category of “family housing” – single-family and two-family detached dwellings, townhouses, and multifamily housing. Family housing consists of dwelling units with self-contained eating, sleeping, and living spaces intended for household occupancy. The AHO would not apply to other residential uses, like “group housing” such as dormitories, lodging houses, or elderly congregate housing, or “transient accommodations” such as hotels and motels.

Currently, multifamily housing is allowed in all districts of the City except the following (refer to the Zoning Map in the appendix for details):

- Residence A-1 and A-2 zoning districts only allow single-family dwellings, though the conversion of an existing single-family dwelling to a two-family dwelling is allowed if the exterior is not changed.
- Residence B zoning district allows single-family, two-family, and townhouse dwellings, though townhouse projects with at least 6 units require a special permit from the Planning Board.

Approximately 24% of land in the city is in one of the above districts that prohibits multifamily housing.

In other districts, multifamily housing is not always allowed as-of-right. In lower-scale multifamily districts (Residence C, C-1, C-1A zoning districts), a multifamily project of 12 units or more requires a special permit from the Planning Board (the same requirement applies to townhouse developments). In some industrial districts (Industry A, B-1, B-2, and B zoning districts), all residential development requires a special permit from the Planning Board.

Approximately 23% of land in the city is in one of the above districts where multifamily housing might require a special permit to approve the use (housing in other districts may also require special permits for other reasons, as discussed below).

#### *Proposed AHO Zoning*

The proposed AHO would allow multifamily AHO Projects as an as-of-right use in all zoning districts (except Open Space districts, where the AHO would not apply). An AHO Project could also include townhouses or detached dwellings.

Non-residential uses would be allowed at the ground floor of an AHO Project to the extent that they are otherwise allowed in the base zoning district. This would not be a significant change from current zoning, but would enable AHO Projects to include non-residential functions such as social services, education, offices or retail at the ground floor while still being able to use the provisions of the AHO.

## ***Height, Density, and Scale Standards***

### *Current Zoning*

The Zoning Ordinance currently regulates the overall scale of housing development through a combination of standards. Density limitations, including floor area ratio (FAR) and lot area per dwelling unit (effectively, the “unit density”), determine the amount of floor area and number of dwelling units that can be built on a given lot in a given district. Height limits, along with other dimensional controls (discussed below), define a physical “building envelope” in which the floor area and units can be built. The range of density and height limitations for different base zoning districts are summarized in the accompanying maps and charts in the appendix. A 30% increase in density, but not in height, is allowed for inclusionary housing projects.

Different types and scales of development result from the interaction of these controls. For example, a 6,000 square-foot lot has the same 35-foot height limit in Residence A-1 and Residence C-1 districts. Due to the difference in density controls, the lot in the A-1 district would only be allowed to have one dwelling unit and 3,000 square feet of gross floor area, while the lot in the C-1 district would be allowed to have four dwelling units and 4,500 square feet of total gross floor area, or 1,125 square feet of gross floor area for each allowed unit.

Although height and density are usually regulated on an as-of-right basis, there are some thresholds that might trigger special permit requirements (in addition to the aforementioned townhouse and multifamily special permit requirements in residential districts):

- Planned Unit Development (PUD) districts and Alewife Overlay Districts (AODs), along with some other special districts and overlay districts, have more restrictive height and density controls that apply as-of-right while allowing greater height and density by special permit. Projects must demonstrate compliance with criteria that are particular to the planning for that district in order to receive approval for higher-scale development.
- Project Review Special Permit requirements in Section 19.20 require Planning Board review and approval of residential projects exceeding 50,000 square feet in most parts of the City and 20,000 square feet in the BA, BA-1, and BA-2 zoning districts. Projects are reviewed against citywide urban design objectives and traffic impact indicators, and requirements for mitigation are incorporated into special permit conditions.

### *Proposed AHO Standards*

The AHO petition would regulate the scale of development primarily by establishing a limit on the number of stories above grade, along with overall height limits in feet. This approach would place clear limitations on height and scale while allowing more flexibility in the density of an AHO Project; however, in lower-scale districts where there is an underlying floor area ratio (FAR) limit of less than 1.00, an AHO Project would not be allowed to exceed an FAR of 2.00.

Three sets of height and scale standards are proposed for AHO Projects, depending on the characteristics of the underlying zoning, as summarized in the chart below and in more detail in the accompanying map and charts for each base zoning district:

If the base district allows:	AHO Projects can be up to:
40 feet or less	4 stories above grade, 45 feet max. / 50 feet with active ground floor
Between 40 and 50 feet	6 stories above grade, 65 feet max. / 70 feet with active ground floor, stepping down to 4 stories within 35 feet of the property line where it abuts a residential use in a district allowing 40 feet or less
More than 50 feet	7 stories above grade, 80 feet max., stepping down to 5 stories within 35 feet of the property line where it abuts a residential use in a district allowing 40 feet or less

The first set of districts mainly includes 35-foot lower-scale residential and mixed-use districts (only one “special district” has a height limit of 40 feet). The proposed four-story limit would be one floor taller than the three-story character that prevails in most of these areas.

The second set of districts includes a range of moderate-scale residential and mixed-use districts, and the third set of districts includes higher-scale districts. Even in districts that allow heights taller than 80 feet, the AHO standards would only enable projects up to seven stories, so the AHO provisions would apply only to mid-rise construction. High-rise affordable housing developments, if proposed, would follow normal permitting processes under current zoning.

The overall height limit accounts for 10 feet per residential story plus an additional 5 feet for residential projects (to accommodate some elevation of the ground floor and/or slightly taller floor-to-floor heights on some floors), or an additional 10 feet for projects that might include an active non-residential Ground Story use (to enable taller floor-to-floor heights at the ground level). These heights are typical for contemporary residential or mixed-use projects with the corresponding number of stories.

**Yard Setback Standards**

*Current Zoning*

The accompanying charts attached summarize yard setback requirements in current base zoning districts. The way in which required front, side, and rear yard setbacks are determined can have significant impacts on residential development in various ways, often resulting in the need for variance or special permit relief:

- “Formula” setbacks: In many districts, required setbacks are based not on fixed distances but on a calculation using the height of the building and the length of the building parallel to a lot line. For example, a required side yard setback of “(H+L) ÷ 5” means the height of the building (e.g., 45 feet) plus the length along that side (e.g., 50 feet) all divided by 5 (in this example, 19 feet). The calculations are further complicated by provisos in Section 5.24.4 of the Zoning Ordinance, which allow variations for circumstances such as buildings with multi-plane facades. These requirements are difficult to understand and often do not establish a clear building envelope.
- Different setbacks for different uses: In some mixed-use districts, residential development follows one set of setback rules (usually those of a referenced residential base district) while non-residential development follows different rules, or does not have any requirement at all. This can result in

incongruous development patterns within a district, especially for mixed-use buildings (such as housing with ground-floor retail) where separate sections of the building are subject to different standards.

- Unique district requirements: Some districts have complex, detailed provisions that do not apply elsewhere. One prominent example is the Residence C-2B district, where the setback requirements apply to portions of the building that are above and below grade. A result of this provision is that because residential development requires parking, and parking is usually provided below grade, it can be difficult to provide parking without violating the below-grade setback requirements. This provision does not apply in other residential districts, but it affects Business A (BA) districts where residential development must follow the C-2B district standards.

#### *Proposed AHO Standards*

The AHO would establish “baseline” setback requirements of 15 feet in the front yard (as is currently required in Residence B districts), 7.5 feet on each side yard (as currently required in most lower-scale residential districts), and 20 feet in the rear yard (comparable to the minimum requirement in Residence C-1 districts if the “formula” calculations are disregarded). These baseline setbacks can be modified in the following instances:

- If the underlying zoning establishes a less restrictive numerical setback (not counting the “formula” requirements), the less restrictive standard applies. The result would allow buildings to match the prevailing setbacks in different districts. For example, the required front setback in Residence C-1 districts is 10 feet, and in areas such as mixed-use corridors, buildings might have a further reduced front yard or might be built to the lot line.
- Where the average front yard setbacks of the four nearest adjacent buildings to a lot are less than what is otherwise required, then an AHO project’s front yard may be reduced to the average of the two adjacent buildings. This concept is applied in the current zoning for the Residence A-1, A-2, and B districts.

#### ***Open Space Standards***

##### *Current Zoning*

Current requirements for open space usually establish a minimum ratio of open space area to the total lot area of a site (expressed as a percentage of lot area). Different types of open spaces might be required for a particular development depending on the district in which it is located or the type of development that is proposed. Zoning requirements may also distinguish between the type of open space required (e.g., Private Open Space, Permeable Open Space, or At-Grade Open Space).

##### *Proposed AHO Standards*

For an AHO Project, the required open space would be 30% of a lot, except where the underlying zoning establishes a lower requirement. This is commensurate with the required open space ratio in the Residence C-1 district, and less than the requirement in the Residence A-1, A-2, B, and C districts.

The ratio may be reduced to no less than 15% to accommodate surface parking if it is provided, or to accommodate the preservation of a designated historic structure. This exception provides flexibility in the event that parking and historic preservation are in tension with open space requirements.

The proposed AHO simplifies and clarifies the complexity in the current zoning by setting the following standards in place of the varied standards that might apply in current zoning, depending on the project and the district:

- Most of the required open space must be at the ground level or the level of the lowest story above grade; only up to 25% can be above-grade if it is accessible to all building occupants.
- All of the required open space that is located at grade must be Permeable Open Space.
- The 15'x15' dimensional standards for Private Open Space would not apply.

### ***Parking Standards in Proposed AHO***

#### *Current Zoning*

Article 6.000 of the Zoning Ordinance contains many standards that regulate parking, bicycle parking, and loading facilities. Residential development is typically required to provide one off-street parking space per dwelling unit. Spaces usually need to be provided on-site, with some flexibility for off-site arrangements. Zoning also requires long-term, secure bicycle parking for residential projects at a rate of one space per unit, with a slight increase for larger projects. In general, loading bays are not required for residential projects.

Although there are many detailed standards for parking and bicycle parking, including standards for layout and access, many standards can be modified by special permit. Because parking can be both physically difficult and costly to construct on many sites, residential projects often seek special permits for parking reductions, off-site parking, modifications to layout standards, or other types of relief.

#### *Proposed AHO Standards*

The proposed AHO establishes no absolute minimum number of off-street parking spaces for an AHO Project. Parking would be allowed as part of an AHO Project, but the number of spaces provided could depend on the particular needs of that project. In the case of an AHO Project with 20 or more units and no parking provided, facilities for on-street or off-street vehicular pick-up, drop-off, and deliveries would be required, subject to review by the Traffic, Parking, and Transportation Department. Also, an AHO Project providing parking at a ratio less than 0.4 space per dwelling unit would need to implement a Transportation Demand Management program that includes subsidized transit passes or bicycle sharing memberships and information for residents about alternative transportation options.

The AHO would also provide greater flexibility than current zoning by allowing accessory parking to be located off-site if it is within 1,000 feet of the AHO Project. This could allow for greater use of shared or pooled parking facilities in cases where an affordable housing provider controls multiple sites within a given area or where underutilized parking facilities are available to be leased. Any new parking that is created would need to conform to the design and layout standards in Article 6.000, except that where



modifications are currently allowed by special permit, those modifications could be allowed as-of-right for an AHO Project.

Bicycle parking would generally be required for an AHO Project as under current zoning, with additional flexibility allowed in the location of required spaces and the potential for a reduction in required spaces where a Public Bicycle Sharing Station is provided.

### ***Design Standards in Proposed AHO***

#### *Current Zoning*

The Zoning Ordinance contains many standards related to project design that are more refined than the use, scale, and dimensional limitations discussed earlier. Some standards apply citywide, such as the Building and Site Plan Requirements in Section 19.50 that apply to projects of 25,000 square feet or more. Other standards are applicable in specific areas, including the Central Square, Harvard Square, Massachusetts Avenue, Prospect Street, and Parkway Overlay Districts, and other special zoning districts. There are also design standards related to environmental performance, including the Green Building Requirements in Section 22.20 and the Flood Plain Overlay District standards in Section 20.70.

Many of these standards (with some exceptions, such as Green Building Requirements) can be modified or waived by special permit from the Planning Board, and often the projects that are subject to these requirements trigger some other threshold requiring Planning Board review. Therefore, even though these existing design standards can be applied administratively in some cases, they often receive attention through a special permit review process that accounts for the particular characteristics of a site.

#### *Proposed AHO Standards*

The proposed AHO design standards are modeled on standards applied elsewhere in the Zoning Ordinance, but for simplicity they are consolidated into one list and tailored to apply to affordable housing projects in particular. These standards would serve as minimum baseline requirements, and would be supplemented by a set of design guidelines that would inform the project design and the advisory review process (discussed further below).

The environmental performance standards that currently apply to other residential projects are not modified in the proposed AHO and would continue to apply. The City recently adopted increased minimum standards for Green Building Requirements that are recommended in the Net Zero Action Plan. Also, a Climate Resilience Zoning Task Force is working to recommend zoning changes to mitigate increasing flooding and heat impacts.

The following summarizes the proposed AHO design standards, aside from the environmental performance standards, and how they relate to other standards in zoning:

- **Site Design and Arrangement:** These standards are similar to those in Section 19.50 and other district standards where the intent is to promote a pedestrian-friendly character along the street. They would require appropriate functions along a site's street frontage, ensure that access and egress is primarily pedestrian-oriented, and avoid long unbroken stretches of building. Building

footprints exceeding two hundred and fifty (250) feet in length must contain a massing recess of at least 15'x15' so that the maximum length of an unbroken façade is one hundred fifty (150) feet. The previous iteration of the AHO zoning petition required that any footprint exceeding one hundred fifty (150) feet in length contain a forecourt of at least thirty (30) feet wide and forty (40) feet deep.

- **Building Façades:** These standards focus on elements of design that promote residential character, such as clear windows on public-facing façades, and articulation along exterior walls to avoid flat façade planes.
- **Ground Floors:** These standards are similar to those in Section 19.50 and other district standards where the intent is to have a positive relationship between the functions at the ground floor of the building and the streetscape. They are intended to avoid “sunken” ground floors, structured parking along the ground floor frontage, or unbroken stretches of ground floor frontage without windows and doors. The petition proposes a 30% requirement in Business A, Business A-2, Business B, or Business C districts only for the non-residential portions of the building.
- **Mechanical Equipment, Refuse Storage, and Loading Areas:** These standards are essentially the same as in Section 19.50, requiring sensitive placement and screening of mechanical systems and other facilities that could be visually or acoustically intrusive.

### ***Preservation of Existing Buildings in Proposed AHO***

The proposed AHO would only regulate zoning requirements, and AHO Projects would still be required to comply with other historic preservation and conservation requirements. Among other requirements, all proposed AHO Projects that require a demolition permit for buildings that are at least fifty years old would need to apply to the Historical Commission for review pursuant to the City’s Demolition Delay Ordinance, Chapter 2.78, Article II of the Municipal Code.

The Zoning Ordinance regulates what new buildings can be built and how existing buildings can be modified. Zoning does not regulate whether buildings can be demolished, but can create incentives by making the preservation of buildings less cumbersome from a regulatory standpoint.

### ***Current Zoning***

The first Cambridge Zoning Ordinance was adopted in 1924, when the city was already developed in large part. Pre-1924 development was varied and the Zoning Ordinance has been amended many times since then. The result is that many buildings – including most residential buildings built in the 19th and 20th centuries – do not meet some current standards in the Zoning Ordinance, making them non-conforming buildings.

The Zoning Ordinance contains provisions that allow for legally non-conforming buildings to be maintained for their existing use. However, altering or reusing an existing building can often require zoning relief. The following are some typical zoning issues that might arise when an existing structure is being repurposed for a new residential use:

- If a project increases the number of dwelling units or amount of floor area, even within the existing structure, it could require a variance. Non-residential structures can be converted to residential use by special permit, but with requirements and limitations. Even where dwelling units can be added

without a variance, it may be difficult to add parking spaces, resulting in negative impacts to the building or the site or requiring a special permit for relief.

- Making additions or alterations to a non-conforming structure could require a special permit or variance, depending on the circumstances.
- Because of the complexity and variation in setback and open space requirements, making a change to a residential use can affect these requirements in unexpected ways whether or not physical changes are being made to the building, sometimes triggering new non-conforming conditions that would require relief.

### *Proposed AHO Zoning*

The following aspects of the AHO proposal remove some of the typical zoning barriers when repurposing existing buildings:

- Large existing buildings could be more easily adaptively reused without the need to obtain variances or special permits due to new density, setback, open space, or parking requirements.
- Conforming additions and alterations to a non-conforming structure would be allowed as-of-right, without needing a special permit. Existing buildings could also be moved on the lot if they do not exacerbate any existing non-conformities.
- Flexibility is provided for typical improvements that are usually necessary or desirable for an affordable housing project but can otherwise require zoning relief, such as adding to a building's insulation to improve energy performance or making accessibility improvements for people with disabilities.

Affordable housing projects often include the preservation of existing buildings, because reusing a building is a cost-effective way to provide housing, or because there is a historic preservation interest in reusing an existing building instead of demolishing and building new. The proposed AHO makes these types of projects more feasible without needing zoning relief through the comprehensive permit process.

### ***Design Consultation Process***

#### *Current Zoning*

Article 19.000 of the zoning ordinance contains several different project review processes applicable in different cases, some conducted by staff, some conducted through a non-binding review by the public or by an appointed advisory committee (or in some cases the Planning Board), and in the largest cases through a special permit approval process. Projects that require non-binding review are often subject to other prescriptive design standards that are administratively applied, so the review process is helpful to provide site-specific input to complement those prescriptive standards.

Affordable housing projects seeking comprehensive permits are reviewed by the Planning Board, which provides a recommendation to the Board of Zoning Appeal (BZA). As part of their review, it is typical for the Planning Board to consider the urban design objectives and guidelines that normally inform a special

permit review and to recommend ways in which the design could be improved. Those comments are incorporated into a report that is sent to the BZA, and in the interim, CDD staff works with the developer to review improvements made in response to the Board's comments.

### *Proposed AHO Zoning*

The proposed AHO consultation process is modeled on the current non-binding "Large Project Review" design consultation in Section 19.40, but with a few key differences:

- The process would be conducted by the Planning Board. Public comment would be taken.
- There would be required community engagement meetings prior to Planning Board review, similar to the engagement currently described in the Planning Board Rules for special permit projects.
- A developer would have to meet at least twice with the Planning Board, first to make an initial proposal and receive comments and suggestions, and then to present any changes made in response to the initial comments.

In practice, the process is expected to be similar to how the Planning Board currently reviews affordable housing projects, with the notable exception that the comments are made directly to the developer and to staff instead of to the BZA. Another key difference is that the review process would be informed by a set of design guidelines developed specifically for the review of affordable housing developments, described below.

### ***Design Guidelines***

Last year, CDD engaged with urban design consultants to develop a set of design guidelines specific to affordable housing projects that might be built under an AHO. The purpose of these guidelines was to inform affordable housing developers in designing projects that respond to the City's objectives, as well as informing CDD staff and the Planning Board in the process of reviewing and providing feedback on the designs.

The most recent set of Design Guidelines for AHO Projects was presented to the Planning Board and Ordinance Committee in September, 2019.