

Madalyn Letellier

From: [REDACTED]
Sent: Tuesday, February 6, 2024 2:48 PM
To: Planning1; Public Comments; Sarah Lewis; Matthew McLaughlin; Jake Wilson; Ben Ewen-Campen; Lance Davis; [REDACTED]
Cc: [REDACTED].com; Wilfred Mbah
Subject: Land Use Committee/Planning Board agenda #23-1827 and #23-1830, SomerNOVA; #24-0059, 321 Washington
Attachments: Fabrication zone map and text amendments - Valletta.docx

This email is from an external source. Use caution responding to it, opening attachments or clicking links.

TO Members of the City Council Land Use Committee and Planning Board:

The attached memorandum is submitted in opposition to these three agenda items, which would make text and map changes to the Fabrication District (SZO Chapter 6.1). It details the wide variety of issues that are raised by these proposed actions in the context of five more proposals (not yet applied for) but intended to change the Brickbottom zone and other areas now under the Fab zoning.

The specific request that this work recommends is that all of these separate actions be consolidated under one comprehensive revision of the Fab zone, under OSPCD control.

It also explains how the original concepts of the Fabrication zone have proven obsolete and irrelevant. The Fabrication zone was expected to allow technology start-up enterprises and arts/craft and cultural enterprises to operate side by side and cross-fertilize each other, sparking innovation. Its limitations of use and dimensional standards would preserve flexible and inexpensive space and protect both economic sectors from the stronger competition of residential development.

Instead, however, the two sectors have evolved separately and the strongly financed, dynamic technology enterprises now outbid the weaker sector of arts/craft and culture. All of the gimmicks built into the zoning that are intended to shield, direct subsidies and deliver precisely designed spaces at reasonable rents cannot remedy the strong economic imbalance or prevent displacement. Although the planners are always able to point to zones in bigger cities, where these mechanisms seem to have worked, the ability to recreate them effectively in our city -- with its tiny geography, modest development potential and limited regulatory capacity.

We should be abandoning the fantasy that complicated zoning can solve the problems of every sector of the local economy that has been declining for years and is now being given a stronger push out of town by COVID and the market downturn.

Thank you for your attention. Bill Valletta (Brickbottom resident)

Memo

To: Somerville City Council Land Use Committee, Planning Board, OSPCD

Cc: Councilmember Scott; Councilmember Mbah; Planning Director Sarah Lewis

From: Bill Valletta (Brickbottom resident, urban planner)

Date: 6 February 2024

Subject: **Citizen Comment on Fabrication District zoning text and map changes
#23-1830 and #23-1827 (SomerNOVA)
#24-0059 (321 Washington St.)**

Introduction and Summary

This memo is offered as citizen comment in opposition to these applications for zoning text and map changes and asks for their removal from the calendar, pending the completion by OSPCD of a comprehensive review of Fabrication zoning.

These three rezoning proposals have been submitted by the owners and potential re-developers of the parcels and buildings, which form a concentrated zone of Fabrication-designated land in the area of the Dane Street and the commuter rail line intersection. In substance, they raise legitimate questions about the continued viability and relevance of the Fabrication District rules and standards (SZO Chapter 6.1). They rightly direct the city's planners and leadership to re-consider all aspects of the zone. However, the specific arguments, which they are presenting to substantiate rezoning, are weak, incoherent and lack both factual grounding and professional-standard urban planning analysis. In particular, the proposed solution of a new zone – titled the *Climate Tech and Equity Overlay District* – is a fantasy concept that will be un-workable as a mechanism of municipal regulatory process.

In addition to these three applications, there are another four proposals for text and map changes and construction on Fabrication parcels elsewhere in the city, which are under discussion by OSPCD and landowners. Taken together, all the proposals identify problems with Fabrication zoning. But if they are processed separately, they will simply fragment and further confuse the Zoning Ordinance, exacerbating its time-consuming procedures and incoherent use and dimensional standards.

Unfortunately, the “streamlining” of zoning process, which was supposed to result from the overall revision of the Zoning Ordinance in 2019, has been achieved only with respect to small-scale residential rehabilitation projects. Most other multi-family housing and commercial, lab and industrial projects must run the gauntlet of ill-disciplined, open-ended and ad hoc procedures of plan formulation, permit and project reviews, public engagement and Planning Board and ZBA process. This has caused several of the most anticipated new lab/office projects to miss the market – after multiple years of plans, process and “community” negotiations, they have gotten into the ground and reached completion just when regional market demand is falling sharply and strong competition for fewer tenants is underway. Other cities, like Watertown and Waltham, where new developments can still be approved under by-right zoning and much

simpler procedures, appear to be leading in the regional competition for technology jobs and commercial tax base.¹

To the extent that Somerville continues to add obscure and jargon laden text to its Zoning Ordinance, and to stretch out and make more discretionary its processes of review, it will face more embarrassing outcomes like the forlorn, empty black lab at 10 Prospect Street and the abandoned Davis Square projects, mentioned recently at a meeting on the jargon-rich draft neighborhood plan.²

The Fabrication District zoning was supposed to create an effective set of controls for zones in which high technology enterprises and arts/craft and other “creative” or “innovative” activities would interact and flourish together, protected from displacement by the pressures of residential market demand. Instead, we are seeing that, in a period of four years, the original purposes and concepts have all been changed or frustrated. This memorandum argues that the solution cannot be a further complication of text, filled with more obscure jargon and an accompanying fragmentation of the existing “district” into two smaller zones and a remaining number of individual parcels/buildings, scattered around the city. Instead, this memo urges the City Council and Planning Board to the following actions:

- Put on hold the three pending calendar items:
 - SomerNOVA zoning text and map changes (#23-1827 and #23-1830),
 - 321 Washington Street (#24-0059)
- Encourage OSPCD to bring forward its alternative Fabrication/Innovation text proposal and re-mapping actions and incorporate all of the different proposals into this comprehensive planning and rezoning action;
- Insure that the OSPCD plans and text/map actions adequately deal with the additional related and contradictory proposals:
 - Unfinished Brickbottom Small Area Plan and Overlay Zone text amendment (SomerVOICE);
 - 200 Inner Belt rezoning proposal (#23-0940);
 - Over-the-rails pedestrian bridge proposal, related to 200 Inner Belt and defined in the City application to MassWORKS for funding, (submitted June 2023);
 - The strange situation of Fabrication designation of the two churches and parochial school sites at 262 Washington Street and 10 Properzi Way.

¹ See Boston GLOBE 30 January 2024), *The Real Estate Market in Greater Boston is stretching beyond Cambridge*; www.bostonglobe.com/2024/01/30/business

² See A. Clementi, *Stalled labs cast shadow over Davis refresh plan*, The Week for Cambridge and Somerville (2-9 February 2024; Cambridge Day.

Memorandum

Somerville’s Obsolete Fabrication District Zoning and the Flawed Proposals Intended to Fix It

by William Valletta

Brickbottom resident, urban planner/attorney (retired)

Part 1: The fundamental concept of Fabrication zoning and the reasons why it is already failing

Although the Fabrication District (SZO Sub-Chapter 6.1) has been a part of the Somerville Zoning Ordinance only since 2019, it appears that its regulatory concept has already become irrelevant and obsolete. The 43.6 acres of land that constitute the “district” have not evolved in their use and redevelopment as anticipated and they cannot achieve their stated goals:

- (i) expanding start-up small technology enterprises and bringing more job opportunities, and
- (ii) protecting arts/crafts and “creative” enterprises from the pressures of displacement.

Now there are six different proposals intended to remedy the shortcomings of the district, but when they are considered together with other flaws in the text and maps, it is more likely that they will result in a fragmentation and further weakening of the Fabrication District as a regulatory method and planning concept.

How did this fast deterioration of regulatory effectiveness occur?

When the text of the Fabrication zone was drafted and discussed in 2016, 2017 and 2018, its concepts grew out of a mistaken interpretation by local planners of the earlier experiences in the former industrial zones of New York and other large cities. In those places, the technological transformation of manufacturing and shipping in the 1970’s and 1980’s had emptied out the old mills and loft industrial buildings with substantial loss of jobs and real estate values. Renewal only began when a few dense neighborhoods with quality old buildings -- Soho, Noho, South of Market (San Francisco) – were re-occupied by a combination of arts/artisan and start-up technology activities.³ Boston followed with similar experience in its more modest size geographic zones – Leather District, Bullfinch Triangle, South End -- in the 1980’s and 1990’s.⁴

Around 2000, when Somerville confronted the decline of its warehouse, auto-repair, goods transport, and business support services, its planners sought to repeat the same revival

³ See R. Florida (2002), *The Rise of the Creative Class*, Basic Books, New York; and DeNatale and Wassall (2007) *The Creative Economy, a New Definition*, both texts are quoted in OSPCD, Somerville Economic Trends Report (2009), chapter on Knowledge Workers and Information Technology. See also Brookings Institute (2014), *The Rise of Innovation Districts*, www.brookings.edu/articles/, which supplied the planning jargon, used in the Somerville text.

⁴ See for example, A. Cohen (2015), *The Development of Boston’s Innovation District*; the Intersector Project; <https://intersector.com/reports/innovation-district/>

strategies.⁵ They looked for guidance in the ideas of Richard Florida and other urban sociologists, who defined the “knowledge economy” and “creative class” entrepreneurs and workers, as the foundational theories.⁶ They also drew from Massachusetts studies and reports that were promoting the state as a center of innovation and creativity.⁷ They sought to define a zoning “district” in which four elements of location, form and function would be combined:

- Older buildings in which flexible commercial and production spaces could be created, able to accommodate the needs of both artists/craftsmen and start-up technology enterprises;
- Location of clusters of these spaces close to the Boston/Cambridge research and innovation hubs, where start-up entrepreneurs could link to mentors, networks, and venture capital;
- Common work spaces and ground floor storefronts suitable for casual interaction, cultural events and entertainment, attracting young and creative folks from around the region;
- Architectural design, spatial arrangement, building material, colors and textures, which would preserve the spatial/visual sense of historic, work-a-day Somerville.

The problem with trying to replicate the success of innovation zones in larger cities has been Somerville’s tiny geography and limited growth potential.⁸ In Manhattan, San Francisco and Boston, the loft conversion and arts/technology innovation districts each covered multiple blocks with millions of square feet of densely clustered loft factories and warehouses. By contrast, Somerville’s Fabrication “district” was mapped with only two clusters of less than a dozen parcels each and other individual parcels, scattered along the rail lines around town. (See Appendix 1, below) Most of the buildings on these designated parcels were garages and sheds, rather than handsome old mills or loft factories.

	Land area	Existing Built (ft2)	Potential @FAR 3.2*
Dane Street/Somerville Ave	16.07 A	697,400	2.1 million
Brickbottom	11.09 A	554,500	1.5 million
Scattered parcels	16.00 A	730,530	2.1 million
TOTAL city-wide	43.16 A	1.9 million	5.7 million

*Note: The 3.2 FAR assumes 80% lot coverage and four stories per parcel

Somerville’s planners recognized that the preservation of old buildings and the limited scale of new development to four stories would strictly limit growth potential within the

⁵ See OSPCD (2007), *Edge as Center, envisioning the post-industrial landscape, Somerville MA*; Somerville Arts Council (2006), *Arts Union Economic Impact Analysis*, Center for Policy Analysis at University of Massachusetts at Dartmouth; L. Nicoll (2008), *Somerville’s Design Industry, Fostering the Creative Economy*, Northeastern Univ.

⁶ See Somer Vision (2012), at page 54; and see Somerville Economic Trends Study (2009), Chapter VII, sub-chapters “Knowledge Workers and Information Technology and Creative Industry; www.somervision2040.com/wp-content/sites/3/2018/11/Economic_Trends_Report1.pdf.

⁷ See, for example, MIT Industrial Performance Center (May 2015), *Strengthening the Innovation Ecosystem for Advanced Manufacturing: Pathways and Opportunities for Massachusetts*. See also Massachusetts Technology Leadership Collaborative, annual reports and its Innovation Institute annual index reports; State of Technology Reports 2015Collaborative (FY 2018), *Supporting innovative emerging technology in Massachusetts*.

⁸ In Soho and Noho and Tribeca, the vacant loft factories and warehouses covered more than 100 blocks and involved millions of square feet. The adjacent location of these zones to Wall Street and Midtown hubs, allowed their artists and tech entrepreneurs to link to multi-billion dollar trade, service and finance sectors

Fabrication zones. But they expected and planned for “transformative” redevelopment to take place in five other zones – Assembly Square, Union Square, Boynton, Brickbottom, and Inner Belt. New modern and large scale lab, office, trade and commercial services buildings would be ready to welcome the successful technology enterprises that would be “graduating” beyond the incubator and accelerator stages.

In part, this planning strategy has proven correct and many of the innovative technology start-ups have successfully matured. One or two have had spectacular growth to billion dollar “unicorn” status. A large number have moved through three steps of incremental growth:

- (i) spin off from MIT, Harvard, Tufts, Kendall or Longwood research labs;
- (ii) incubator and accelerator status with 2-15 employees at Greentown Labs or SomerNOVA, when they solidified their patents or NIH approvals and attracted seed and Series A venture capital;
- (iii) Graduation to the stage of product/service commercialization.

The third stage has usually occurred at the milestone of 20 employees and more, when the successful companies have moved out to larger and suitably designed and equipped premises.

As the planners and political leaders hoped, some of the expanding companies have been able to stay in Somerville. A few have found spaces in renewed older buildings such as 35 Medford Street and the former Union Square Post Office. Others have leased in new buildings in the transformation zones, for example Smart Bear at Assembly Square. Other companies have left Somerville for Charlestown and other Boston neighborhoods, or farther afield in the suburbs and out of state. Studies of business relocation in Massachusetts have identified a variety of reasons of cost, space suitability, shipping and transport, and linkage to customers, suppliers or a sector hub, as the reasons why each business makes its particular relocation decision.⁹

In Somerville, however, two key factors have upset the expected internal and external balance that the Fabrication District was supposed to achieve. Both problems have resulted from the unexpected speed and volume of the maturing technology enterprises.

First, within a mere four years (2019-2023), the number of active start-ups and accelerating enterprises has reached the capacity limit of existing space in the Fabrication zone.¹⁰ The programs of “incubator” and “accelerator” support provided by Greentown, and SomerNOVA have attracted enthusiastic entrepreneurs and their venture capital backers. At the same time, however, the arts/crafts and communications/marketing “creative” firms that were expected to share space and complement the technology firms (under the “creative class theory”) were in decline and disrupted by COVID. The balance was upset because the technology firms could easily outbid the arts/crafts entities for any space that become free and available.

Second, another unexpected situation has occurred because the rate of “graduation” of enterprises out of the Fabrication zones is outpacing the completion of new buildings in the

⁹ See B. Bluestone (2014), *What Makes Working Cities Work?*, study prepared for Boston Federal Reserve Bank, www.bostonfed.org/publications/

¹⁰ This is the essence of the argument presented in the SomerNOVA rezoning application.

transformation zones. The few older buildings in the transformation zones, most suitable for modernization, have all been rehabilitated and occupied. But the new projects of lab and technical office buildings at Assembly, Boynton and Union Square, have all lagged in their timetables, in large part, due to the complexity of planning and permit review. In conditions of cost inflation and tightening capital availability, every extra month of delay would mean that a higher rent would be needed to cover the escalating costs. Somerville's new buildings are coming to market at rents that are very little discounted from Kendall Square. The "we are not Cambridge" rent advantage that had been expected, no longer really exists.

Most of the growing, young companies that are graduating from Greentown and SomerNOVA are not yet ready for Boynton and Assembly rents.

This combination of spatial, economic and market-timing factors has upset the expected balance of Somerville's growth and planning strategies. The "creative class" theory, which assumed or predicted an essential symbiosis between arts/craft and technology at the core of "innovation" has simply proven wrong. When rents rise and space is tight, economics rules. The tech companies easily outbid their arts/culture neighbors and, apparently, the loss of the arts/culture subsectors to Lowell and elsewhere, does not appear to drain the productivity or creativity of the technology sub-sectors – even though the local restaurants may be a bit less "edgy."

Part 2: The multiple proposals for change in the Fabrication District text and maps

In January 2024, there are seven proposed planning and zoning actions, as well as an eighth example of non-action, all of which are intended to address the obsolescence and irrelevance of the Fabrication zone:

1. Application to rezone the SomerNOVA and Greentown labs complexes on Dane Street, Tyler Street and Properzi Way, and create a new Climate Tech Overlay zone (#23-1827 and #23-1830);
2. OSPCD proposed zoning text amendments, responding to the SomerNOVA proposal with a different re-writing of the Fabrication Zone use and dimensional standards.¹¹
3. OSPCD proposed map change to designate the SomerNOVA parcels in a differently defined Innovation zone.
4. Application for map change to remove 321 Washington Street from the Fabrication zone and re-designate it as Commercial/Industry (#24-0059).
5. OSPCD revival of the draft Brickbottom Small-Area Neighborhood Plan (SomerVOICE).¹²
6. Application for rezoning of 200 Inner Belt from Commercial Industry to High Rise Mixed Use as part of a Joy/Chestnut Street and Inner Belt consolidated campus linked by an over-the-rails bridge (#23-0940).
7. Application by the city to the state MassWORKS for funding for the over the rails bridge.¹³

¹¹ These proposals were presented at the Neighborhood meeting of

¹² SomerVOICE website. A draft plan was last presented in

8. Retention of Fabrication zone designation for two churches and a parochial school.

Each of these proposals is discussed in the following paragraphs.

2.1: The SomerNOVA application for zoning text and map changes

The group of property owners, led by Rafi Properties/Somer NOVA, has filed the two applications, asking for a text amendment to create a *Climate and Equity Overlay District* and a re-mapping of about 7.7 acres of land. The details of the application have been published with the notice of the joint public hearing in January 2024 and they refer back to the elaborate report, titled the *SomerNOVA Community Master Plan*, which was issued by Rafi Properties in June 2023. The main changes of rules and standards from Fabrication to the new zone appear to be the following:

- A change in permitted building types from the single “fabrication building” now allowed to four building types, including a new “flex commercial building” along with general, mid-rise podium and block buildings. This range of building types is now permitted in other high rise commercial and mixed districts in the Zoning Ordinance.
- Permitted unlimited building heights instead of the 4 story limit now imposed on all development in the Fabrication zone.
- A mix of uses that will emphasize manufacturing and research as the primary uses. Inclusion of residential use in the zone at a limited quota of the development potential.
- A wider array of permitted ground floor retail and services.

Essentially, these changes would re-define the new zone as the location for industrial-style research and production activities, separately from the arts/craft, design and communications/marketing activities that the original Fabrication zone encompassed.¹⁴

The proposal offers substantiation for its new zone by asserting that the technology start-up activities in the city have evolved and they are outgrowing the limited space and restrictions of building design and functions that the Fabrication zoning has imposed. The following language from the SomerNOVA plan report expresses succinctly their intent and purposes:

...Our imperative is to assist scientists in addressing the climate crisis by fostering an environment that encourages companies to develop technologies that heal and regenerate our planet. We are dedicated to constructing resilient spaces tailored to accommodate Tough Tech and Climate Tech. Unfortunately, several companies, affiliated with Greentown Labs and MIT’s Engine community, have begun to outgrow the SomerNOVA campus, exploring opportunities elsewhere. We cannot allow this trend to persist. These companies play a vital role in climate action while supporting local businesses, generating employment, and offering mentorship opportunities to our residents and youth. It is these compelling factors that drive our imperative to expand the SomerNOVA ecosystem.¹⁵

¹³ Application of City of Somerville to MassWORKS for a \$19 million contribution to the estimated \$39 million cost of the over-the-rails pedestrian bridge, June 2023.

¹⁴ Somer NOVA Community Master Plan (June 2023)

¹⁵ SomerNOVA Community Master Plan Executive Summary at page 3.

At the heart of the argument is the idea that the original concept of Fabrication zoning – the necessary concentration within one zone of technology entrepreneurs and workers with artists, crafters and other creative workers – now is no longer the primary need. Instead, for the “tough tech” or “climate tech” entrepreneurs and workers, the essential relationships are to their science/technology mentors in the universities and mature companies, as well as to their business operations consultants and venture capital or equity investors. It is necessary and preferable for the start-up, incubator and accelerator enterprises to be located in same zone in which these mature and established companies, specialized finance and business support services can also be found. It is also necessary for the city to allow their concentration in order to avoid losing these critical sub-sectors of the “innovation economy.”

Inherent in the argument of technology clustering (but not stated outright) is parallel idea that the joinder of the sub-sectors of tough tech with arts/creative activities has become obsolete. Because of the limited space in the Fabrication zones and the “preservation” purposes that are limiting its expansion, the important technology activities are being obstructed. This stranglehold is likely to cause the entire sub-sector of “tough technology” to decamp to somewhere else.

It is these economic realities that are the basis for the shift in the concept of an “innovation” or “creative” economy.¹⁶ The *Somer NOVA Community Master Plan* does not completely abandon the original concept of an intangible linkage of tech entrepreneurs and workers with other creative workers. It continues to use the flowery planning jargon of creating spaces to “gather,” establishing a “youth-driven” community center, “bringing neighbors together,” and sponsoring “vibrant cultural festivals that celebrate diversity...”¹⁷ But the way that these pop-sociology benefits are to be advanced is very different from the original idea of the Fabrication zone.

The new zone will replace the previous mechanisms of by right uses and dimensional definition, which assumed parity between the technology sectors and the arts/creative sectors. It will replace them with the mechanisms that are used in the other Overlay and Special Districts, which view the arts/craft and cultural or “community” uses as subordinate amenities. They will be incorporated into projects by dedicating small percentages of space and offering some cross-subsidies or linkage payments, and subjecting the project review processes to discretionary Planning Board conditions and negotiations.

2.2: OSPCD proposed zoning text changes

A fundamental problem of the abstract and flowery phrases of the *SomerNOVA Community Master Plan* is that its ideas do not translate coherently into regulatory language. The proposed text, offered in the application #23-1830, is unable to describe how the city

¹⁶ Reading the *Somer NOVA Community Master Plan*, its veneer of planning jargon does not fully hide the new economic reality: The arts/crafts and creative activities that were once considered to be vital to the city, today are proving to be a drag on its growth and progress. Their needs for cheap space and constant subsidies were accommodated ten years ago because they provided the balancing value of inspiration for the digital IT, communications and marketing entrepreneurs, who were then the dominant start-up innovators in the zone. But today’s tough tech entrepreneurs are about hard facts and solid metal parts.

¹⁷ *SomerNOVA Community Master Plan* (July 2023), Executive Summary at page 3.

permitting and enforcement process can measure, categorize and determine the conformity of the activities and building features it is supposed to regulate. (These shortcomings of language are all detailed below.) Therefore, in response to the landholders’ application, the Planning and Zoning Division of OSPCD has issued an alternative set of preliminary draft text amendments.¹⁸ These would:

- create a new Innovation Zone, to be carved out of the existing geography of the Fabrication zone. The proposed text contains use regulations and dimensional standards that would (similar to the SomerNOVA proposal) try to accommodate the needs of technology start-up enterprises as they move through the stages of incubator and accelerator status with shared spaces, equipment, support and mentoring, and as they then grow larger.
- preserve the remaining parcels and buildings of the Fabrication zone for arts/craft and cultural uses with added protections against competition from the technical start-up subsectors, and from other industrial and commercial users and residential redevelopers.

In order to understand what the planners are struggling to do, the following paragraphs compare their alternative text with both the existing text of the Fabrication District and the proposed text submitted by the *SomerNOVA* landholders.

2.2.1: Comparison of texts that define zone intent, purposes and building types

Somerville Zoning practice offers any text draftsman the choice among three categories of regulatory zones: (i) standard residential, commercial and industrial zones; (b) “special” zones with use and dimensional standards that try to describe a “unique” or dominant land use activity or spatial/architectural character of the zone; or (c) an “overlay” zone that allows project specific adjustments of use and dimensional standards to supersede a lower-scale “base” zoning when the owner/developer of a proposed master-plan project agrees to meet a variety of conditions and provide extra amenities or community benefits. The first comparison of these zone texts, therefore, focuses on this zone-type choice:

Table 2.2(a): Comparison of texts – Description clauses

Fabrication Zone text (2019-2023)	OSPCD Innovation Zone (01/2024)	Climate/Equity Overlay (01/15/24)
<p>6.1.1 – Description The Fabrication District is characterized by moderate to large floor plate buildings up to four stories (4) in height. Buildings are set close to the sidewalk to create a defined street wall that supports pedestrian activity and a sense of place. The district is entirely commercial with buildings typically designed or retrofitted to support multiple tenants.</p>	<p>6x.1 – Description The innovation district is characterized by large floor plate buildings up to four (4) stories in height. Buildings are set close to the sidewalk to create a defined street wall that supports pedestrian activity and a sense of place. The district is entirely commercial with buildings designed to maximize flexibility for research and development uses.</p>	<p>8.4.19</p>

¹⁸ These were presented at a neighborhood meeting on ... January 2024.

The original Fabrication District describes the zone as one of the four standard zones in the Commercial category, alongside the other CB, CI, and CC zones. (SZO Chapter 6) The new Innovation District, proposed by OSPCD appears to continue this classification and the draft text labels the zone with a Chapter 6 notation. As a standard zone, presumably, the new zone will continue to use the straightforward regulatory mechanisms of traditional zoning – the lists of permitted and prohibited use categories, and the specific numerical measurements of building and lot dimensions. These can be applied to any individual project proposal or multi-parcel (multi-building) mast plan proposals as they are received.

In the OSPCD proposal, the Innovation District will be a fifth standard zone, with a list of permitted/prohibited uses and dimensional standards, directly applicable to any project that is presented for review. By contrast, the SomerNOVA Climate and Equity District is to be placed among the “overlay” districts, (SZO Chapter 8.4). However, its text proposes several unusual adjustments and exceptions to the rules of process. These are stated as exceptions to chronology of stages of process – preliminary meetings and neighborhood meetings, followed by master plan studies and public review, followed subsequently by individual parcel/building project and site plan reviews. The intent is to avoid the long years of process by allowing the stages to be collapsed into simultaneous whole “campus” and constituent building approvals.

The proposed Climate/Equity Overlay text does not have a description section that matches the other two zones, but from other parts of the text it is clear that it anticipates buildings much higher than 4 stories and buildings that can house both multiple small immature enterprises alongside larger mature organizations. By embedding the Climate/Equity Zone in the “Master Plan Overlay” sub-category, the zone definition picks up the general rules and ideas that it will enable developments that are multi-building campuses rather than individual parcel projects.

Table 2.2(b): Comparison of texts – Intent clauses

<p>6.1.1 – Intent a.To implement the objectives of the comprehensive plan ... related to the arts and creative economy</p> <p>b.To protect buildings that are key assets to the creative economy of Somerville from residential conversion, preserve existing workspace, and retain incubator spaces for start-up, entry and mid-level businesses</p> <p>c.To create, maintain and enhance areas appropriate for small and moderate scale single and multi-use buildings; activities common to the arts and creative economy and supporting commercial activities, and a variety of employment opportunities in the arts and creative enterprises.</p>	<p>6x.2 – Intent a.To implement the objectives of the comprehensive plan... for commercial development</p> <p>b.To conserve areas appropriate for large-scale , single and multi-use commercial buildings, light industry, research and development principal uses developing new science technologies into workable products or services that are difficult to commercialize, and a wide variety of employment opportunities.</p>	<p>a—Intent To redevelop a former factory campus with primarily commercial and mixed use high rise development that will enhance the sub-area while conserving the type of innovative commercial ecosystem already established within the existing campus.</p>
---	---	---

The “Intent” section of any zoning text is provided as a guide to interpretation when the rules and standards are applied to specific parcels and projects. They reflect the core concepts that the planners expect to achieve. Thus, these three texts illustrate how ideas of “innovation” (and related planners’ jargon) have evolved in five years.

The original intent of Fabrication was “to protect buildings that are key assets...” from residential conversion, to “preserve” existing workspaces, and to “retain” incubator spaces. Each parcel and building, designated Fabrication, was already in use for shared start-ups or art/craft activities, or was potentially suitable and in a use expected to change, but vulnerable to residential conversion.¹⁹

Today, the OSPCD no longer describes its intent as preservation or protection of buildings but as the need to “conserve areas” for light industry research and for development, which “transforms science into products/services that are difficult to commercialize...” It is difficult to determine what this garbled syntax means, but the clause seems to say that buildings in the zone can now be removed and replaced with new buildings, which will be suitable for large operations, not just incubator or “creative economy” spaces. In essence the text embodies the same idea that Somer NOVA has been advancing – that is, the contemporary sub-sectors of clean energy, robotics and similar “tough tech” must pass through a third stage mid-level growth and maturity (after the initial start-up, incubator and accelerator stages). During this further stage they should be kept in Somerville in buildings that permit their expansion and keep them in close proximity to more mature companies.

The problem with the text of the OSPCD is that its vague jargon terms are unable to link the functional, business operation ideas to a meaningful set of regulatory rules and standards. What are the measurements of building scale, lot dimensions, and the list of permitted and prohibited uses that can distinguish a space as an “innovation” space, rather than a routine manufacturing space or a bio-tech or robotic lab research space?

Instead of descriptive words that clarify measurable physical elements and functional performance, these intent statements use words describing the character or structure of the enterprises that will function inside the buildings. The OSPCD cleverly tries to describe a singular sub-category of research uses that “transform science into services that are difficult to commercialize.” Does it mean that the enterprises in the zone will only remain conforming to the law, so long as their activity does not lead to any products, which are highly desirable and profitable, and thus easy to commercialize? This is an absurd distinction on which to fix a permit/prohibition decision.

Even more obscure and absurd is the language that is used in the SomerNOVA text, which is intended to accommodate development “that will enhance the sub-area while conserving the type of innovative commercial ecosystem already established ...” This is simply nonsense.

¹⁹ Two Catholic churches and their adjacent parking lots and schools were zoned Fabrication because they faced the possibility of de-commissioning and being put on the market. Subsequently, however, the reorganization of Saints Joseph and Zelig Martin Parish has removed the immediate threat of conversion of these buildings.

Table 2.2(c): Comparison of text – Purposes clauses

<p>6.1.3 – Purpose</p> <p>a.To permit the development of single and multi-use buidlings that do not exceed four stories...</p> <p>b.To provide quality commercial spaces and permit a mix of uses common to the arts and creative economy and supporting commercial activities.</p> <p>c.To prohibit residential principal uses.</p>	<p>6x.3 – Purpose</p> <p>a.To permit development of single and multi-use buildings that do not exceed four stories...</p> <p>b.To provide quality commercial spaces and permit light and moderate industry, commercial uses common to the science-based innovation economy, and supporting commercial activities.</p> <p>c.To prohibit residential principal uses.</p>	<p>8.4.19(b)—Purpose</p> <p>--To permit the redevelopment of the former factory campus to support the commercial goals of the city, particularly to advance climate-tech and tough tech innovation</p> <p>--To require a new community center to be included in any redevelopment as contemplated by Somer vision</p> <p>--To require new civic spaces within the sub-area</p> <p>--To permit additional building types, taller principal buildings, and larger building floor plates than would otherwise be permitted in the underlying zoning</p> <p>--To permit use categories and principal uses than would otherwise be permitted by the underlying zoning district</p> <p>--to require at least one commercial parking facility in the redevelopment</p> <p>--To permit flexibility in compliance with certain district and building type standards</p> <p>--To establish a streamlined and expedited development review process for Development that addresses critical climate and equity goals</p> <p>--To require a minimum land area for Master Plan based redevelopment</p>
--	--	--

The same evolution of planning jargon can be seen when comparing the “purposes” sections of the texts. Originally the Fabrication District was to permit a “mix of uses common to the arts and creative economy...” The new formulation by OSPCD is to permit “light and moderate industry, commercial uses common to the science-based innovation economy.” By contrast, the Somer NOVA purpose is to permit “redevelopment of the former factory campus ... to advance climate tech and tough tech innovation.” The jargon has become more hollow as it has evolved. For some reason the Somer NOVA drafters have expanded this section into what is a redundant outline of all the other subsequent sections in which they have made changes to the use and dimensional standards. This is unnecessary and simply wastes space in the text.

Of course, the language in these sections, which guide interpretation, is less important than the precise statements of permitted/prohibited uses, building types and numerical dimensional standards that are fixed for the zone. It is in these details that the significant differences emerge. The two most important elements that SomerNOVA proposes to change are (i) the limitation of all building heights to four stories and (ii) the total prohibition from the Fabrication District (and the new OSPCD Innovation district) of any residential use. There is no nuance of intent or impact that requires analysis of these two different approaches.

One area that does merit further discussion is the way the three texts describe the “building types” that are to be permitted in the zones. Both the Fabrication District and the

OSPCD Innovation zone proposal allow a single building type of four story height, while the SOMerNOVA proposal would permit any of four commercial and residential building types, similar to the list that is in the High Rise zone and at the same scale or unlimited height.

Table 2.2(d): Comparison of texts – permitted building types

Fabrication District	OSPCD Innovation zone proposal	SomerNOVA proposal
6.1.6 – Building types b. The following principal building type is permitted by Site Plan Approval ... (i) Fabrication building	6x.6 – Building types b. The following principal building type is permitted by Site Plan Approval ... (i) Flex Commercial	g.—Building types The following additional principal building types are permitted in the Climate and Equity sub area: --Flex Commercial Building --General Building --Mid-Rise podium --Block building

One highly nuanced difference among the zones is the omission of the Lab building type from all three texts and the attempt in the new proposals to fit a category of “flex commercial” building in between the fabrication and the lab. The distinction is focused not on any exterior elements of design or function; but rather on the interior arrangements and occupancy.

Table 2.2€: Comparison of texts – building types

6.6.7 Fabrication building	6x.7 Flex Commercial Building	8.4.19 Flex Commercial building	5.1.9 Lab building
A moderate to large floor plate, multi-story building type typically designed with tall ceilings, expansive windows, wide corridors, service elevators and loading docks. Fabrication buildings are sometimes naturally lit with a monitor, clerestory or saw-tooth roofs.	A large floor plate, multi-story building type purpose built to maximize flexibility in accommodating the needs of primarily research and development principal uses. Flex commercial buildings are typically designed with floor space that may be demised in various ways, high floor-to-floor heights, expansive windows, wide corridors, service elevators and multiple loading docks.	A large floor plate multi story building type purpose built to maximize flexibility in accommodating the needs of primarily research and development principal uses. Flex commercial buildings are typically designed with floor space that may be demised in various ways, high floor to floor heights	A large floor plate, multi-story principal building type purpose built for occupancy by laboratory and research and development principal uses. Floor space is typically custom designed as complex, technically sophisticated and mechanically intensive wet or dry labs or vivariums for animal research.

What are the differences among these building types that are considered to be significant for regulatory purposes? Because all of these building types would have windows, elevators and loading docks, you cannot tell them apart by looking at them from outside. What then does the building inspector need to look for when deciding to issue or reject a permit?

Despite their level of detail and nuance, all these clauses fail. They are garbled and they refer to factors that are meaningless to the regulatory concerns of zoning – that is, the impacts of use, dimensions and building performance. The description of the Flex building type begins to veer off into elements that are irrelevant to zoning – the building is “purpose built to maximize flexibility.” What does this mean? Does it require the building inspector to reject a permit for a building that is purpose built to maximize rigidity? Perhaps it seeks to exclude buildings that are not purpose built -- put up on a whim or a fantasy? As the questions illustrate, the key phrase is meaningless.

A second obvious feature of these definitions is the way that they each reflects a building type that has been in vogue at a particular moment in the cycles of economic and urban planning cycles. The Fabrication building is an old mill or loft factory that everyone wanted to convert in the years between 1990 and 2008. The Lab building describes a Kendall Square corporate lab that made up the hot bio-tech construction boom until 2020. The “flex building” inarticulately struggles to define another fad, which will probably be over in a year or two, if Mayor Wu is successful in re-filling downtown buildings with technology enterprises.²⁰

A third problem with the attempt to define these separate categories of buildings is that there is no evidence that the different types of enterprises, of different structures and different stages of their growth, have precise location needs and attractions. Looking around the Boston region, the same types of buildings that Somerville is attempting to describe with great nuance, are found in other cities and towns within broad categories of zoning definition. Bio-technology break-throughs and exciting new clean energy ideas are occurring in standard office buildings, academic and hospital institutional buildings, and ghastly suburban office parks all over Massachusetts. In lots of cities and towns like Watertown and Waltham, it appears that standard Commercial, Industrial or Mix Use zoning can achieve the same outcomes with much less procedural complexity and without exaggerated or fussy zoning text. (See Appendix 2, below)

It seems clear that the category “fabrication building” has outlived its due date because the tiny supply of these buildings in Somerville has already been exhausted. There is need for a redefinition, but it would be better to go back to the straightforward and practical categories of “lab,” “manufacturing” and “office commercial” which are already in the zoning. Trying to base building permit and project approvals on the non-building aspects of expected future occupants - corporate structure, sub-sector classification, methods of management and employee relations, or capital funding sources – will be a futile task, and will inevitably lead to frustration.

2.2.2: OSPCD text intended to keep alive an arts and crafts in a hollowed out Fabrication zone

A second purpose of the OSPCD in its proposed text appears to be the strengthening of protections for arts and “creative” uses in what will be left of the Fabrication District when the Dane Street area and Joy/Chestnut in Brickbottom will be removed. The parcels and buildings that will then remain will be scattered and each will largely stand alone. The magic of their clustering in a zone (as the inspiration of creativity) will be gone. Therefore, these spaces will need to be supported by an array of other subsidies and reinforcing regulatory mechanisms.

The city’s planning and policy document, *Somerville Arts Space Risk Assessment (2019)* has already identified this profound shift in planning theory and city policy, and has criticized it as highly inadequate.²¹ Therefore, in this new text, the OSPCD appears to be trying to bolster

²⁰ See B. Percelay (12 December 2023), *Outside-the-Box ideas for downtown Boston: injecting new life into the financial district*, www.commonwealthbeacon.org/opinion/

²¹ Essentially the risk report has found that of the existing arts/creative space in the city in 2019, over 3 million square feet were at risk of being lost, following the plans and zoning decisions already taken. Offsetting new space – mandated by inclusionary arts requirements of zoning or Planning Board conditions and community benefits agreements would total only 275,000 square feet. Most of these new spaces would be little scraps of empty space tucked away in the inconvenient corners of office buildings and labs.

the protective rules for the left over fragments of Fabrication. Some of the specific text changes that OSPCD has proposed are the following:

- In Article 2.2 of the Zoning Ordinance (definitions section) the use category of “creative studio” is changed from a home occupation use to a more general commercial space for use by an Arts and Creative Enterprise ...
- Also in Article 2.2 a new category of Live/Work Studio is added, which is a dwelling unit ... integrated with a creative studio space...

These changes are related to the proposed repeal from Article 9.2.2 of the category of Work/Live Creative Studio, which has been a permitted use in the Fabrication Zone. The proposal is to remove this use from zoning entirely – since no one has ever built or applied for a permit to designate this use in the city. Its removal from the Fabrication zone, in theory, will further reinforce the protection of the zone from any residential use incursion. Meanwhile, the Live/Work Studio would be permitted in all the other residential and mixed use districts as a variant of residential use.

Another mechanism intended to protect arts/craft and culture uses from incursion by technology enterprises appears in the revised text of Article 9.2.10, which defines two new categories of Business incubator (Art. 9.2.10.a) and Co working space (9.2.10.b). These uses are defined as “organizations” that provide office and workplace spaces for multiple small enterprises with shared equipment and support services. They are to be permitted uses in the standard commercial zones and mixed use zones but will be prohibited from the Fabrication zone. In contrast in the Fabrication zone two revised categories of Arts Shared Workspaces (Article 9.2.2.f and Arts Education Spaces (Article 9.2.2.b) will be the permitted uses for spaces with shared worktables and equipment.

Again, the problem of these definitions is that in measurable aspects of design and dimensions, the spaces will be indistinguishable. Somebody sitting at a workbench banging a sheet of metal makes the same noise (annoying neighbors) and has the same traffic impacts of material supply delivery and shipments, regardless of whether the final product is a casing for a lithium battery (“tough tech”), a piece of sculpture (arts/creative), or a repaired fender (undesirable auto-related use usually carried out by a non-English speaking immigrant). Basing municipal planning and zoning regulatory decision on these irrelevant and easily-biased differences is irrational.

2.3: OSPCD proposals for map changes to create the Innovation Zone

Tied together with the proposed text changes that define the Innovation Zone, OSPCD has published a map of the stretch of Somerville Avenue and the rail tracks, centered on Dane Street that shows the group of parcels, proposed to be changed from Fabrication to the new Innovation Zone. Included are the six or seven parcels that now are part of the Somer Nova fabrication complex (without the extra small residential parcels that have been added for its expansion. Also shown within the new zone boundary lines are the Greentown lab buildings and adjacent warehouse/storage parcels at 444 and 460 Somerville Avenue and two small parcels at 8 Kent Street and 8 Garden Court.

In total this draft map shows 9.68 acres of land to be taken out of the Fabrication zones total of 43.6 acres; a higher amount than proposed by Rafi/SomerNova. This version of a proposed new technology zone is more logically consistent with the idea that the shared technology start-up activities are a separate land use category from the arts/crafts and cultural uses and require their own particular design and functional standards.

2.4: Proposal to remove 321 Washington Street from Fabrication designation

At the end of December 2023, the City Council and Planning Board received an application from the owner of 321 Washington Avenue to remove its Fabrication designation and rezone it into the CI district (#24-009). The parcel covers 2.91 acres and is improved with a group of single story old factory, garage and shed buildings, currently occupied by small machine-shop and repair enterprises.

The substantiating documentation for this change is a single paragraph in the applicant's letter to the City Council (attachment to Land Use Committee Agenda #24-009). The reasons given for the change is stated as follows:

... to greater utilize the property under CI zoning, opening up the use possibilities to better attract business use. The property has been underutilized in recent years, due to shifts in the economy and business landscapes... I feel that the additional use categories under CI will help attract new business to the location ...

Significantly, nothing is said in this letter about the continued usefulness, economic viability or desirability of this property for arts/craft or cultural users, even though its Fabrication designation five years ago was supposed to mean that the property is a “key asset to the creative economy of Somerville...” (SZO 6.1.2) In fact, the 2.95 acre site has two buildings – one a 78,000 ft² warehouse and the other a 6,200 ft² wood frame building that houses the Washington Street Arts Center. The arts organization is currently active and retains its Massachusetts corporate registration. However, its non-profit status reporting ended in 2013 and, therefore, its current economic status is unknown.²² The warehouse building now appears to be vacant is listed for lease as industrial space in the usual commercial real estate advertisements.

2.5: The Brickbottom Sub-Area Plan

The Brickbottom neighborhood planning process has been underway since 2008 with no final product of an agreed-upon “vision.”²³ When adopting the revised Somerville Zoning Ordinance in 2019, the drafters reserved blank pages for a *Brickbottom Overlay District*, which have not yet been filled in. (SZO Art. 8.4. 13) All of the previous draft documents, student studies, consultant economic projections, and city staff presentations on Brickbottom have rested on the idea that the zone should become a mixed use area with high density development clustering near the new East Somerville T station.

²² See Massachusetts Attorney General Not-for-Profit Organization registry.

²³ The first plan was the *Edge as Center* competition in 2008 and there have been seven or eight different draft plans in process ever since.

This idea is inconsistent with the present Fabrication zoning of nine parcels fronting Joy Street and backing against the T-station. These parcels cover all of the following:

- 4 Joy Street -- the Cataldo Ambulance garage
- 12-48 Joy Street -- six immigrant-owned auto-repair and used car sales lots
- 86 Joy Street – artists’ building with 105 working studios
- 20 and 28 Chestnut Street – site of a small garage occupied by Neon Williams lighting design, the MBTA rail yard vehicle easement, and vacant land awaiting redevelopment.

The expected plan will likely remove all of these parcels from Fabrication designation and allow their redevelopment at higher than 4-stories and with housing, office, lab, other commercial and standard ground floor retail.²⁴ These parcels total 4.7 acres.

2.6: The North River - Leerink Campus Plan and Inner Belt Rezoning (#23-0940)

Among the Brickbottom parcels in the Fabrication zone, 86 Joy Street and 20 and 28 Chestnut Street are joined in common ownership with the adjacent parcel now designated as 100 Chestnut and improved with the newly-built laboratory building. These parcels (4.52 acres) also are joined in ownership with 200 Inner Belt, on the other side of the MBTA Green Line and Commuter rail tracks (5.9 acres). Their combination totals 10.4 acres. This land is being envisioned and planned as a connected “campus” for mixed use, large scale redevelopment.

In September 2023, the City Council Land Use Committee and Planning Board opened hearings on an application from the property owner – North River/Leerink. The application requested a rezoning of the westernmost portion (2 acres) of 200 Inner Belt to High Rise Mixed Use from its existing 4-story limited CI zone. The rationales presented were: (a) that an unlimited height standard would be consistent with the policy to cluster dense development adjacent to the T-station; and (b) that large scale activity would justify the construction of an over the rails bridge, connecting the Brickbottom and Inner Belt sides and giving entry to the T.

This application had its first hearing at the Planning Board, followed by a Neighborhood meeting in later September, but then its return to the Planning Board has been indefinitely delayed. The Planning Board Chair has stated that the applicant and city are trying to determine an appropriate scale of redevelopment height and density, as well as clarification of the cost and financing feasibility of the over the rail bridge. By mid-January 2024, the application has not yet come back on the calendar.

What the applicant has revealed is that the future vision for this “campus” will not retain the old buildings and limited 4-story scale of the Fabrication zone. Even though the developer’s consultants at the neighborhood meeting sought to reassure everyone that no decisions have been made to vacate artists from 86 Joy Street or to rezone this parcel out of Fabrication designation, they gave no reassurance that this was not the ultimate goal.

²⁴ Somer VOICE (2022), draft *Brickbottom Small-Area Plan*.

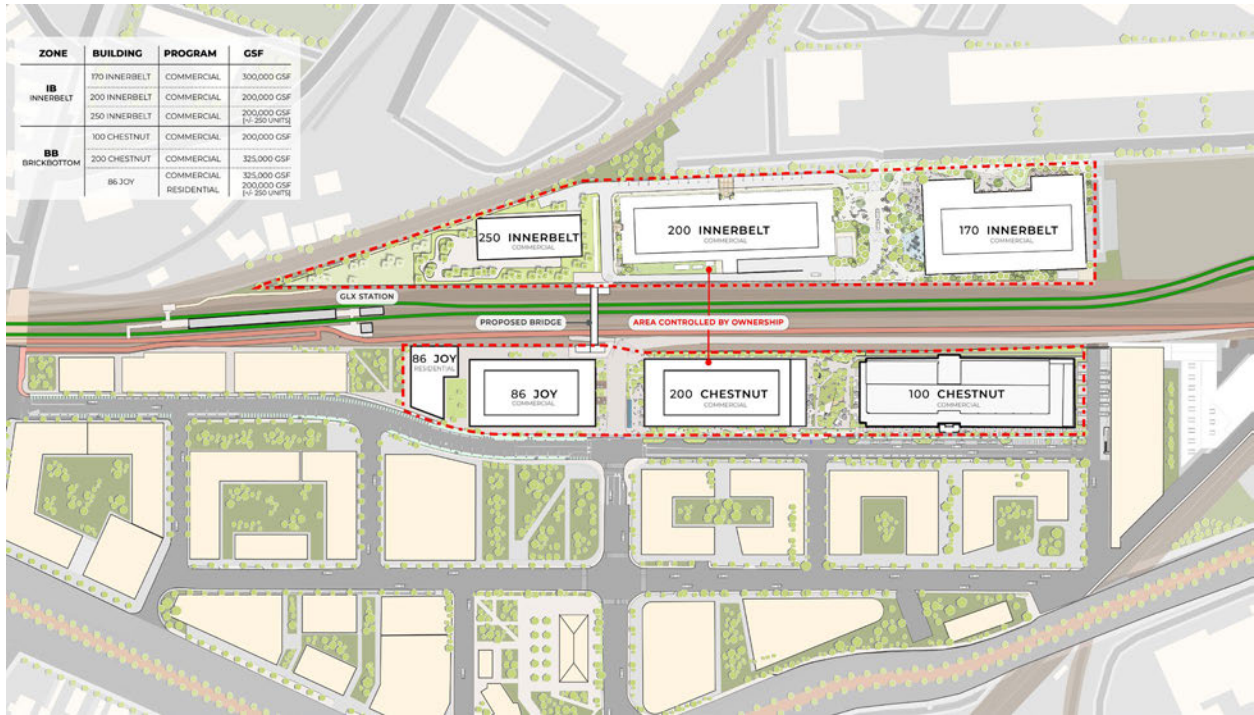
2.7: The City application to MassWORKS for an over the rails bridge connecting 86 Joy Street and 200 Inner Belt Road.

In the September 2023 Planning Board hearing on the 200 Inner Belt rezoning, the testimony revealed that the city had already, five months before, submitted an application for \$19 million of funding to the state's MassWORKS program for the over the rails bridge. The developer/applicant cited this city document as the primary rationale for its insistence on the highest scale of rezoning at Inner Belt. In essence they said that MassWORKS would only make such substantial funding available for a project that would create multi-family housing at the highest scale and density.

What did the city application form to MassWORKS actually say? The grant proposal, signed by the Mayor in June 2023, described the over the rails pedestrian bridge as a necessary "back door" to the T-station and as the way to "unlock the millions of square feet of development potential" in Brickbottom and Inner Belt. Both sides were described as "distressed and underutilized" zones.

Two additional documents were appended to the MassWORKS application form. The first was a sketch of the North River/Leerink "campus" as envisioned for the future, showing the proposed over the rails bridge connecting a new 250 Inner Belt with a new 86 Joy Street alongside other new and existing buildings. The author of the sketch is not identified but the sketch matched, in style and format, another sketch that was presented by the developer's consultants at the neighborhood meeting on September 27, 2023. It had all the same features except 86 Joy Street, which was shown with its existing size, shape and placement on the land.

The existence of these two, inconsistent sketches exposes a deliberate duplicity of the city and the developer/applicant. They are another element of the planning and project review process that is chipping away at the Fabrication zone and undermining public trust in OSPCD and the city's leadership.



This sketch is copied from the June 2023 Somerville application to MassWORKS.

Another technical document, appended to the MassWORKS application was a financial feasibility report, showing calculations of costs for the over the rails bridge and of the anticipated property value gains and developer contributions that would be realized by the redevelopment. The pertinent data is shown on the following chart:

Chart 1: The master plan of future development

Note: The existing buildings are in BOLD type' the future building heights are estimated by calculating the lot areas and complying building coverage with the building floor area (ft2) numbers)

Address	Land parcel	Building	Use	Estimate height	
200 Inner Belt	7.94 A = 333,400 ft2	200,000 ft2	Lab/Indus/Storage	4 story	65 ft.
170 Inner Belt		300,000 ft2	Lab/Commercial	--	--t.
250 Inner Belt*		250 DU	Residence	Up to 20	--
<i>Brickbottom side</i>					
100 Chestnut		200,000 ft2	Lab	4 story + mechanical	
200 Chestnut	1.21 A = 50,820 ft2	325,000 ft2	Commercial	9 story	155 ft.
86 Joy St.	1.77 A = 74,340 ft2	325,000 ft2	Commercial	9 story	155 ft.
		200 DU	Residential	6 story	75 ft.

It obviously shows that the city's future property value and revenue expectations will require removal of the Fabrication zone designation from all the parcels in the North River – Leerink “campus.”

2.8: Two churches and a school

Amidst all of these proposed and pending actions that consider changes in the Fabrication zoning, the status of three oddly defined parcels – two churches and a parochial school – remain mysterious and ignored.

In the years 2015-2019, when the revised Zoning Ordinance was being drafted and discussed, the city’s planners followed a standard method of map making around town by putting most of the city’s religious buildings (except some that had already been clearly converted to non-religious uses) into the Civic zone designation. This was initially done for the church at 262 Washington Street in Union Square and the church and parochial school at 10 Properzi Way. These properties are owned by the Catholic Diocese of Boston.

In the early draft versions of the zoning Map, these parcels were noted with their previous residential zone designations and then with Civic designation. However, when a revised draft map was published in September 2018, they appeared with Fabrication zoning. Nothing in the public record that can be found today has an explanation for this change.

What is evident is that at the time the parochial schools had already closed and the fate of the two churches, continuing in religious use, was uncertain. Both had declining congregations and the diocese was closing other churches around the region. It seems likely that the Fabrication designation was intended to forestall any plans for residential re-development of these parcels and perhaps to encourage reuse of the buildings for arts or performance, if they were put onto the market.

Today, both church buildings remain in religious use and the empty schools have been re-occupied by social-services uses. Thus, the Fabrication zoning of these parcels does not reflect reality. These parcels total 3.3 acres.

Part 3: Concluding analysis

The combination of these seven pending actions and an eighth inaction lead to the conclusion that the Fabrication zone is failing to achieve its purposes and that, as these actions are taken, the existing 43 acres of Fabrication land around the city will likely be reduced to 23.6 acres.

Total existing Fabrication District	43.16 acres	1.8 million ft2
--removal of Dane Street area	--9.68 acres	
--Brickbottom Joy Street parcels	--4.7 acres	
--321 Washington Street	--2.9 acres	
Reduced total by rezoning	26.98 acres	
--two churches	--3.3 acres	
Effective remaining coverage	23.6 acres	990,000 ft2

More significantly than the numbers, the integrity of Fabrication as a “zone” with two concentrated hubs of activity at Dane Street and Brickbottom will be lost. The “district” will shrink to a series of scattered spot parcels, each with one or two buildings standing alone with no linkage to the residential, commercial or technology/industrial uses around them. This is inconsistent with the legal, economic and practical concepts of “innovation” or the “creative economy” that were the foundational ideas of the Fabrication zoning.

In conclusion, the Fabrication District regulations have proven themselves to be irrelevant and ineffective and should be revised or repealed, rather than chipped away in separate actions.

Essentially, the idea that arts/craft and cultural uses could be preserved and helped to flourish by use of zoning tools has proven wrong for two reasons. First, the factors and trends that have made these uses economically weak and declining have been the result of economic, social and cultural trends in the region and the nations, way beyond the ability of a modest size municipality to remedy.²⁵ Second, unlike the models of zoning for theaters, culture and the arts from New York, Boston and other large cities, Somerville’s tiny geography and “transformation” growth potential will generate cross-subsidies, sufficient to carry the losses of only a few arts organizations. The competition for developer contributions to a widening multitude of worthy causes – of which housing must be the priority – is likely to continue to erode arts subsidy in the future.

Therefore, in undertaking these planning and rezoning actions, the OSPCD should be considering outright repeal of the Fabrication District. The two main concentrations of Fabrication-designated parcels – at Dane Street and at Brickbottom -- should each be reconsidered with some properly scaled dimensional recalculations and re-definition of their lists of permitted and prohibited uses. These can and should include all the varieties of arts and cultural uses, alongside the technology and other “innovation” categories. But the text should avoid complexity and faddish planning jargon and it should not pump up expectations that arts/culture uses can gain significant subsidies or protections from zoning conditionality or linkages. Essentially, the zoning should treat these uses as any other category of commercial, retail, service or entertainment. They should compete for space in rent and cost terms.

All of the individual parcels of Fabrication-designation around town should be absorbed into the standard residential, commercial or industrial zones that surround them, following traditional zoning practice. We should recognize that the experiment of trying to use zoning to micro-manage economic decisions, inspire human creativity and re-shape social behavior has failed.

Appendix 1: Fabrication Zones and Parcels shown on the evolving drafts and final version of the Somerville Zoning Atlas (December 2019)

Sources of data: SZO Maps; Somerville Assessor’s database (VGSI)

	Existing conditions		Zoning map status**			Notes and comments
	Land	Built ft2	02/16	01/18	12/19	
<i>Somernova “campus”</i>						
--24-28 Dane Street	1.02 A	39,000	IA	Fab	Fab	Buildings of Somer NOVA, including former Artists Asylum
		6,168	IA	Fab	Fab	
--8-14 Tyler St	4.51 A	193,300	IA	Fab	Fab	
		48,900	IA	Fab	Fab	
		7,700	IA	Fab	Fab	
<i>Adjacent owners in rail-line Fabrication Zone</i>						

²⁵ See, for example, D. Aucoin, (4 February 2024), *Empty Seats threatening to bring down the house (Pandemic accelerated decline in season ticket subscribers ...)*, Boston GLOBE page A1.

--474 Somerville	0.29	9,400	RC	UR	Fab	Church rectory
--8 Properzi	1.56 A	39,000	RC	UR	Fab	Church and school
--55 Properzi	0.04 A	1,700	RC	UR	Fab	House
--57 Properzi	0.04 A	1,700	RC	UR	Fab	House
--30 Dane St	1.27 A	55,900	IA	Fab	Fab	
--44 Park	1.05 A	10,800	RC	UR	Fab	
--50 Park	0.62 A	23,700	RC	Fab	Fab	Peter Forg, Mfg.
--321 Washington	2.91 A	78,800	RC	Fab	Fab	Industrial warehouse on rr track, propose rezone to CI, #24-0059
		6,230	RC	Fab	Fab	
--Lake Street			RC	Fab	Fab	
<i>Greentown labs campus and other Somerville avenue frontage</i>						
--438R Somerville	0.37 A	18,100	IA		Fab	RILO LLC
--440 Somerville	--	9,500	IA		Fab	Industrial condo
--444 Somerville	0.84 A	55,500	IA		Fab	Greentown Labs
--460 Somerville	1.32 A	86,800	IA		Fab	Warehouse
<i>Conway Park area</i>						
--594 Somerville	0.08	6,100		MR3		Storefront and apartments 3 story
--596 Somerville	0.08	3,200		MR3		One story club
--622 Somerville	0.85	18,100		MR4		One story strip commercial
--624 Somerville	1.11	38,300		MR4		One story commercial
--642 Somerville	0.09	3,800		MR4		House
--644	0.21	1,200		MR4		Office
--8 Kent Street	0.94	33,000		Fab		Commercial
--8 Garden Court	0.05	2,000		Fab	MR4	Warehouse
<i>Scattered sites on Washington Avenue</i>						
--264 Washington	0.23	6,100	RC	MR4	Fab	Rectory Catholic Charities is MR5
--13 Webster Ave.	0.49	28,000	RC	MR4	Fab	St. Joe church—October 2018 map
--15 Webster	0.77	42,800	RC	MR4	Fab	School building
--55 Bow	0.32	11,200	NB	Fab	Fab	Stanhope Frame
--285 Washington	0.56	21,200	NB	Fab	Fab	Rug store 2018 Fab
			RB	NR	Fab	Added between Jan 18 and Oct 18
			RB	NR	Fab	
--377 Washington	0.19	4,800	RB	MR3	Fab	Garage 2018-MR3 change to Fab 2019
--381 Washington	0.17	--	RB	Fab	Fab	Parking 2018-Fab
--387 Washington	0.31	12,700	RB	Fab	Fab	Industrial garage and house
<i>Central Street zone</i>						
--20 Vernon	4.12	225,967		Fab	Fab	Rogers Foam factory
--191 Highland Ave	0.92	20,500		Fab	Fab	Arts at Armory – Assessor shows as NR
<i>Brickbottom</i>						
--1 Fitchburg	2.5	200,000		Fab	Fab	Brickbottom Artists building
--28 Fitchburg	--	200,000		C1	C1	New bio-lab building – 100 Chestnut
--28 Chestnut	--				C1	
--20 Chestnut	0.64	--		C1	Fab	Proposed expanded life sciences campus
--26 Chestnut	0.57			C1	Fab	
--86 Joy	1.77	57,800		Fab	Fab	Joy Street studios
--48 Joy	0.24	5,100		Fab	Fab	Auto repair
--40 Joy	0.45	7,000		C1	Fab	
--30 Joy	0.14	--		C1	Fab	
--24 Joy	0.28	--		C1	Fab	
--12 Joy	0.11	4,600		C1	Fab	
---4 Joy	0.25	4,900		C1	Fab	
--77 Linwood	0.64	--		C1	Fab	Utility
--71 Linwood	0.66	18,800		C1	Fab	
--15 Linwood	2.37	39,800		C1	Fab	Auto-fabrication
--30 Alston	0.47	16,500		Fab	Fab	Warehouse
Tufts Street	--	--		Fab	UR	Garage/office
<i>East Somerville</i>						
--13/15 Garfield	0.81	21,700		Fab	Fab	Pasta factory
--11 Blakeley	0.22	9,100		Fab	Fab	

<i>Gilman Square</i>					
--343 Medford	0.19	15,700			Warehouse
--2 Bradley	0.34	21,500			Mad Oyster Pottery
<i>Davis Square</i>					
--22 Clifton	0.44	13,000			Light industrial
--32 Clifton	0.18	12,500			Studio coop
--115 Willow	0.19	8,100			Rosewillow
--600 Mystic Valley	2.14	153,000			Warehouse

Analysis of this data, showing the evolution of mapping of parcels with Fabrication designation can give insight into both the intent and expectations of the city’s planners and the ways that the zone has fallen short.

The first draft map, issued by OSPCD in 2016 showed the Fabrication designation, applied to parcels that were then zoned Industrial A (light manufacturing) and were loft factories or mill buildings. Some other warehouses, sheds and industrial garages, sitting alongside rail tracks, also got painted with the Fabrication color. Inconsistently, many similar types of rail-adjacent parcels and shed/garage buildings were given the TOD designation, instead of Fabrication.

In general in this early version of 2016, the Fabrication designated parcels were clustered in the two areas – (i) at Dane Street and Somerville Avenue, covering about 10 acres; (ii) at Brickbottom and nearby Tufts Street, covering only five parcels, which then had active arts and manufacturing uses, about six acres. A few more individual manufacturing/arts use buildings scattered around town were also given the Fabrication designation.

During 2017 and 2018, on later draft maps, more parcels were designated Fabrication. The Dane Street agglomeration of older and newer factory, warehouse and garage buildings was expanded to about 12 acres, including several house lots that had been acquired by the owners of adjacent factory/warehouse and were expected to allow “campus” expansion. Sometime between January and December 2018, the two Catholic churches with former school buildings on Somerville Avenue and at the Washington and Webster intersection (Union Square), were also given Fabrication designation. No explanation can be found in the public record for these two church designations. However, it is probable that these actions were taken to forestall housing redevelopment and to keep open the possibility that the schools and the church buildings would be preserved and acquired for arts and civic uses, if the diocese were to release them from sacred use.

The acreage covered by Fabrication zoning was also expanded in 2018 in the Brickbottom zone in the context of the on-again, off-again neighborhood planning. More acreage on Joy Street, Chestnut and Linwood Streets was changed from Commercial Industrial, increasing the aggregate total to just over 10 acres. At the same time, however, the stretch of land with garages on Tufts Street near Brickbottom had its proposed Fabrication designation removed. There is no record of why.

Other scattered individual parcels appeared on the maps in 2017 and 2018, including three garages along Washington Street, moving toward Beacon. There was a rezoning petition, filed by the landholders, to remove the Fabrication designation from the pasta factory at Garfield

Avenue and Cross Street, but the city staff did not agree and the change was not made. This parcel and an adjacent lot with a factory/garage is a one-acre oasis of Fabrication in a residence and shopping plaza zone.

Appendix 2: Comparative building types and their categorical designations in zoning ordinances around the Boston Region

Facility/address	Program ft2	Building ft2	Building type	
<i>Cambridge</i>				
The Engine 750 Main Street	155,000	155,000	4 and 5-story rehab loft factory Rehab 2019	Industry-B (FAR 2.75-4.0)
Cambridge Innovation Center One Broadway	14 th floor	275,000	High rise, podium office and lab Built 1980's	ASD -- Ames Street District/MXD
Alexandria Launch Lab One Kendall Sq. #200	20,000	660,000	4 and 5 story, rehab mill and loft factories Rehab 2006	Industry A-1 (FAR 1.25-1.5)
CoGo Labs One Cambridge Center #200	-?-			
GRO biosciences 780-790 Memorial Drive	100,000	100,000	3 story, lab building Built 1998	O-2 (FAR 1.5-2.0)
Boston Innovation Center 255 Main Street	* 20,000	230,000	12-story high rise office Built 1986	MXD - Mix Use Develop
Lab Central 610 Main Street 700 Main Street	95,000 33,000	480,000	2-story mill building – condo units Rehab and expand 2012	Industry-B (FAR 2.75-4.0)
Z-Park Innovation Center 1000 Massachusetts Ave	66,000	108,000	4-story mix retail/office Built 1983 renovate 2018	BB-1 (FAR 2.75-3.0)
<i>Boston</i>				
Cambridge Innovation Center 50 Milk Street 16 th floor	118,000	312,000	20-story Class A office building Built 1082?	Midtown Cultural District – Protection Area
Harvard Innovation Lab 125 Western Ave, Allston	30,000	101,000	... lab building Built 2021	Institutional Master Plan
Mass Challenge 10 Fan Pier	19,500	344,900	17-story office building Built 2020	General Area Harborpark Fort Point Waterfront; PDA#54
Learn Launch (Edinno) 55 Court Street		47,000	4-story Class B Office building Built 1968	Government Center, Sears Crescent Protection
Idea Lab (Northeastern Univ) 360 Huntington Ave				Fenway Neighborhood Institutional
Venture Development (UMass) 100 Morrissey Blvd			... story college campus building	Dorchester Neigh. Community Facility
Roxbury Innovation 2300 Washington St. 2d floor				
<i>North of Boston</i>				
Mass Medical Device (M2D2) 600 Suffolk Street, Lowell	14,000		5-story mill building on UMass campus	Institutional zone (FAR 2.0, 100 ft.)
Mass Medical Device (M2D2) 110 Canal Street	22,000	46,000	4-story concrete loft factory rehab	HCD – Hamilton Canal Form-Based Code
Innoventure Labs 100 Cummings Center, Beverly	15 tenants	1,300,000	5-story concrete loft factory Re-built and expanded 1999	Industrial General

What this comparison reveals is that buildings filled with incubator/accelerator facilities and with a variety of artists' studios and workshops are found around the region in a variety of zones. Some are in manufacturing, warehouse or office buildings of mid-century suburban style in standard Manufacturing, Industrial or Commercial Industrial zones, which allow light and/or heavy manufacturing alongside research, trade and warehouse activities, but with no residential. Some are located in old central city mills and manufacturing loft buildings that have been re-designated as "special" districts to emphasize their architectural, tourism or contemporary arts/crafts character. Residential is usually allowed in these zones. Many are located on institutional campuses, where they are called "research" uses in zones where industrial and manufacturing uses are prohibited but dormitories and student/faculty housing and other residential is permitted.

This variable experience of location and classification of facilities, similar in size, design and functions, contradicts the approach that Somerville planners have adopted. The data does not back up their theories or expectations. Instead, it suggests that the location of both the arts/craft and start-up sub-sector enterprises is simply opportunistic and random and that, no matter what complex or careful phrasing will appear in the Zoning Ordinance, there will be no precise control over what kind of enterprises fill the spaces. Instead, uses will come and go as the real estate markets and sub-sector product/investment cycles evolve. Less profitable activities will always be at risk of displacement.