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## Testimony of the Boston Municipal Research Bureau

Before the  
Joint Committee on Housing and Urban Development

June 6, 2001

**Regarding:** SENATE BILL No. 658 ~ An Act Regulating Development in the Commonwealth

The Boston Municipal Research Bureau would like to record our opposition to Senate Bill No. 658, An Act Regulating Development in the Commonwealth.

The Bureau has a long history associated with linkage in the City of Boston. In 1998, after a lengthy research process, the Bureau released a report titled *BOSTON'S LINKAGE PROGRAM: A New Approach to Managing Linkage Funds for Housing and Job Training*. This report explained in detail the legal linkage process, its history, identified problems with management of the linkage program and made recommendations for improvement.

Since 1998, the Bureau has issued Briefs and Updates on linkage issues as well as testified at various City Council hearings and worked in an advisory role to the Neighborhood Housing Trust. Recently we served on the Mayor's Linkage Commission that provided the first thorough public review of linkage since its inception in 1983.

We are in opposition of Senate No. 658 because it creates a new process that adds further layers and complexity to a program that already exists. This new process has the potential to jeopardize the future of the linkage program in Boston and the affordable housing it supports. We propose allowing the current process to work and the City to be held accountable for proper implementation of the process. The existing legal process does not allow for special agreements to take precedent over current law as was interpreted by many regarding the MOU of 1998. That process has not been tested yet by proposals for linkage from new development in the Seaport District and should be allowed to work.

The additional layers of process and complexity recommended in Senate No. 658 do not recognize existing requirements. For example, the bill provides for a more involved role for the Boston City Council even though the Council plays an important role in the existing process. A member of the City Council sits on the Neighborhood Housing Trust and information on linkage agreements are required to be submitted to the Council twice a year.

Senate No. 658 also attempts to regulate the community mitigation process associated with large-scale development. We question the advisability of attempting to regulate this process in legislation addressing linkage. We agree with the bill's intent and in a June 2000 Brief, the Bureau called on the City to improve its process for community benefits. The Boston Redevelopment Authority has established a new process involving creation of Impact Advisory Groups (IAG). We are not convinced that this is the best approach to this issue but feel that the IAG process should be given time to determine its effectiveness.

In our 1998 report, the Bureau highlighted the management improvements that we felt were needed to better manage Boston's Linkage Program. We recognize that some efforts to begin to address these issues have been made, however several key improvements are yet to be implemented. Nevertheless, in our opinion, Senate No. 658 will not achieve that end nor will it improve the process of linkage.

The intent of Senate No. 658 is worthwhile, but we believe the existing linkage process, properly administered, should be allowed to operate without added complexity and process. For that reason, the Bureau opposes Senate No. 658 as currently written and recommends the Committee to report the bill out unfavorably.