

Boston's Back Streets

By Lisa M. Hemmerle, CPA

SUPPORTING URBAN INDUSTRIAL

The Boston Redevelopment Authority (BRA) is protecting light industrial uses in Boston, which face substantial pressures from residential and commercial development alike. Boston's light industrial companies provide living wage jobs for its inner city residents and large immigrant population. Through innovative policy solutions, the BRA is guarding against the erosion of this important sector.

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boston's back streets

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INDUSTRIAL EROSION

For over a decade in Boston, like many cities, there was intense pressure on urban industrial parcel owners to either store their properties until the market favored residential development, known as mothballing, or pursue a zoning variance allowing them to sell immediately to a residential developer. From a developer perspective, residential development was viewed as the highest and best use regardless of appropriate locale or loss of employment opportunities. A developer could build, sell to a REIT (Real Estate Investment Trust) or private investor, pocket the funds, and walk away with no cares about consequences. However, there were consequences.

Mothballing of properties left a swath of vacant buildings in what otherwise might have been vibrant employment districts, degrading the job market for Boston residents.

BACK STREETS – BY THE NUMBERS

In 2011, Back Streets industries accounted for over 54,479 jobs and about 8 percent of Boston's economy, comprised of:

- 13,913 jobs in construction,
- 9,372 jobs in manufacturing,
- 9,325 jobs in wholesale trade,
- 18,806 jobs in transportation and distribution,
- 1,965 jobs in repair and maintenance, and
- 1,098 jobs in dry cleaning.

Other building owners began putting undue financial pressure on their industrial/commercial tenants by raising rents in hopes that they too could cash in on the residential conversion train. The result was a mass exodus of industrial/commercial companies and jobs from Boston. A 2002 study on the state of Boston's industrial noted that between 1962 and 1999 Boston's

“industrially zoned space declined 38 percent as a result of zoning and special permitting.”



Recognizing this trend and ever trying to protect Boston's core employment, Mayor Thomas M. Menino created the Back Streets program in 2001 specifically to help Boston's manufacturing, wholesale, construction, commercial services, logistics, and food processing businesses, ensuring attraction, retention, and growth of this vital sector. The name Back Streets is indicative of the location of many of these businesses in the periphery neighborhoods and areas outside typical downtown and neighborhood business districts. These businesses offer supportive services to Boston's restaurants, hotels, and healthcare and academic institutions on a daily basis. The Back Streets program assists industrial and commercial businesses with real estate, financing, and navigation of city services.

INDUSTRIAL PROTECTION

The 2008 real estate crash and gas price hike was perhaps the best thing that could have happened for urban industrial. For the food processors supplying to Boston area hotels, restaurants, academic and healthcare institutions, it suddenly became a great business decision to remain in the city, close to their ultimate customers, rather than trucking in from the suburbs, filling massive gas tanks at \$3.80 ¹¹/gallon, multiple times every day. The building owners also came to realize that mothballing their industrial buildings in hopes for a big payday in a residential flip was becoming a thing of the past, both from a market standpoint and a city policy

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SUPPORTING URBAN INDUSTRIAL

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one. The downtown market prices began to fall to a level much more approachable to investors, making the industrial properties on the periphery less desirable.ⁱⁱⁱ This is when the Boston Redevelopment Authority (BRA), the city's planning and economic development agency, recognized the opportune market shift as an opportunity to develop policy to protect the urban industrial land that was left.

BOSTON REDEVELOPMENT AUTHORITY BACKGROUND

In 1957, the Boston Redevelopment Authority (BRA) was established by the Boston City Council and the Massachusetts Legislature. The BRA assumed the development powers previously held by the Boston Housing Authority and expanded them beyond public housing. In 1960, the City Planning Board was abolished and its powers were transferred to the BRA. Its broad development authorities include the power to buy and sell property, the power to acquire property through eminent domain, and the power to grant tax concessions to encourage commercial and residential development.



The edge of the Newmarket Industrial District at Massachusetts Avenue and Southampton Street.

Photo credit: Sue Sullivan, Executive Director, Newmarket Business Association

recognized the opportune market shift as an opportunity to develop policy to protect the urban industrial land that was left.

The first step in this process was to research best practices in urban industrial policy elsewhere, including Santa Clara, California; Seattle, Washington; and Richmond, Virginia, among others. The BRA then pulled together the right internal team, which included all the individuals necessary to make appropriate recommendations with regards to zoning relief. These individuals included members of the BRA's planning, zoning, and economic development divisions. This was to ensure that not only were all the players aware of the development of a policy to

protect urban industrial land, but were all in agreement as to its importance. The outcome was the Industrial Conversion Criteria ("Criteria").

The Criteria's purpose is to provide consistent guidance for evaluating projects seeking land use variances for the conversion of industrial properties within a city of Boston industrial corridor. An industrial corridor is an area that contains industrial and commercial sector businesses as its defining characteristic. The policy protects these key industrial areas. In Boston, these areas especially include the South Boston and Hyde Park neighborhoods, as well as the Newmarket District. It is important to note that this policy does not change underlying zoning. Rather, it reinforces current zoning by creating a consistent policy throughout the BRA that must be followed in relation to requests for residential conversion of industrial zoned properties.

A three-tier system now exists to guide the BRA's response to requests for residential zoning relief to industrial zoned properties. This system helps the BRA's internal team, composed of planning, zoning, and eco-

nomic development staff, determine the suitability of a site for urban industrial uses that may depend upon its location, orientation, size, and overall relationship to its surroundings. Non industrial projects to be located on small parcels that are effectively isolated within industrial/commercial areas are prohibited. Zoning variances for properties that fall within the first Tier will not be supported. For Tiers 2 and 3, specific criteria must be met for any zoning change to be supported by the BRA.

WHY URBAN INDUSTRIAL IS IMPORTANT

The industrial sector has a tendency, at least in Boston, to employ at-risk populations such as immigrants and those with criminal records, while at the same time providing a "living wage." In addition, keeping your full supply production in proximity to the end use leads to a more environmentally sustainable supply chain.

Urban industrial provides employment opportunities that are low barrier to entry for Boston's large immigrant population. In 2010, approximately 27 percent of Boston's 617,594 residents were foreign born.^{iv} In fact, "11.6 percent of both naturalized and non-naturalized immigrants work in blue collar industries, including construction and extraction, production, transportation, installation and maintenance occupations."^v Many of Boston's urban industrial companies have a strong relationship with the mayor's Office of Jobs and Community Services (JCS) group and coordinate English as a Second Lan-

INDUSTRIAL TIERS

TIER 1: Definition: Tier 1 industrial is effectively a heavily concentrated area of industrial/commercial businesses within a zoned industrial district as defined within Article 3. Attributes will include, but are not limited to having excellent access to multi-modal transportation, such as truck, rail, and port access. Tier 1 zoning relief efforts are generally unsupportable because a zoning change in this area would result in an isolated designation and/or land use conflicts and/or conflict with adjacent employment viability due to the industrial cluster in the surrounding areas.

Criteria: Zoning relief will not be supported in areas designated as Tier 1.

TIER 2: Definition: Tier 2 is considered industrial property or properties which are adjacent to Tier 1 areas.

Criteria: Zoning relief is generally unsupportable in areas designated as Tier 2. Any change must meet the specific criteria in Tier 2 areas.

TIER 3: Definition: Tier 3 industrial is likely a lone industrial property that is not adjacent to or part of a larger industrial district zone. A Tier 3 property may be outdated and therefore cost ineffective to update for future industrial use and/or the available transportation modes do not support industrial/commercial uses and/or are in conflict with abutting residential/mixed use areas.

Criteria: Zoning relief from employment to other uses would not adversely impact the city's fiscal and economic situation. To be considered for zoning relief, specific criteria must be met. Proposals should demonstrate that changes in the designation(s) of a project site would not adversely affect nearby uses.

TABLE 1**BACKSTREET INDUSTRIES AND WAGES IN BOSTON: 2011**

	Average Weekly Wage	Average Annual Wage
Construction	\$1,787	\$92,924
Manufacturing	\$1,398	\$72,696
Wholesale	\$1,524	\$79,248
Transportation	\$1,015	\$52,780
Repair & Maintenance	\$795	\$41,340
Drycleaning/Laundry	\$531	\$27,612
WEIGHTED AVERAGE	\$1,336	\$69,462
Retail	\$598	\$31,096

Source: ES-202 wage and employment survey, Mass. Dept of Workforce Development
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guage (ESL) classes for their employees. “JCS provides workforce development and human service grants management, program development, and direct service, also working closely with the BRA to coordinate workforce with economic development projects.”

Another reason urban industrial is important is the potential for a “living wage” working in urban industrial. The average weekly wage of an urban industrial job is \$1,336 compared to the average weekly retail wage of \$598 (See Table 1).

In addition, urban industrial employers in Boston traditionally work more often with CORI (Criminal Offender Record Information) individuals. CORI represents a list of an individual’s criminal court appearances as recorded by the state of Massachusetts. “Willingness to hire ex-offenders is greater for jobs in construction or manufacturing than in retail trade and the service sector, and is strongly influenced by the extent to which a variety of tasks are required on the job – especially contact with customers.”^{vi}

Finally, supporting urban industrial in Boston is the economic and environmental sustainability of the supply chain. For example, the Newmarket District in Boston represents 526 businesses employing over 11,000 people and generating nearly \$3B in revenue. The top

WHAT IS URBAN INDUSTRIAL IN BOSTON?

The Industrial and Commercial Sector, known in Boston as Back Streets businesses, is comprised of manufacturing companies and supporting commercial service providers. The four main categories are **manufacturing, wholesale trade and transportation of goods, construction, and commercial services**. To consistently evaluate information related to labor market data, industry sectors were selected according to their 2-digit North American Industry Classification System (NAICS) codes. LINK: <http://www.census.gov/eos/www/naics/>

Source: Labor Market Assessment Tool 2.0, (BRA) Research Division Analysis.

five industry types include accommodation and food services and wholesale trade. These business types, which include Boston Salads, Katsiroubas Produce, Shanghai Raviolis, and many more, provide the perishable goods to restaurants, hotels, and academic and healthcare institutions, among others daily, in some cases, several times a day. Keeping these perishable food types close to the end user not only makes economic sense by reducing the amount of fuel purchased due to less mileage, but environmental sense as well. The lower mileage means less diesel particulate matter released into the air, lowering a company’s carbon footprint and improving the health of the neighborhood.

21ST CENTURY URBAN INDUSTRIAL

In taking a look at 21st century industrial, there is still the perception of smokestacks and tar factories. These perceptions are what the BRA fought to reverse, especially during rezoning processes that included protecting industrial uses. Further, the BRA focused efforts on “greening” the industrial companies, and in doing so made them not only more environmentally and economically sustainable, but also better commercial neighbors.

ZONING

Let’s face it: Industrial has a dirty reputation. In Boston, gone are the days of smokestacks and tar factories, but even in recent community processes, people have come out vocally against continued industrial zoning.

Recently, Hyde Park, a neighborhood of Boston, underwent a rezoning process, the first in decades. According to the U.S. Census Bureau there are over 600 employees in the Industrial sector in Hyde Park, the majority of whom work in companies as described below. One of the biggest challenges facing the neighborhood was trying to use zoning to increase residential density to aid the development of its main streets and other retail areas, while not eroding its industrial jobs base. The community groups in Boston have a very strong position in the rezoning processes (see sidebar). Hyde Park is no different, and there was an extremely vocal residential contingent that wanted to see a major reduction of all industrial land uses in the neighborhood. This of course caused the industrial landowners to become concerned.

Through discussions with the residents, the BRA team determined that the community group’s perception of industrial uses in Hyde Park was based on past uses, such

HYDE PARK STRATEGY PROCESS:

- 2008: BRA Board, along with Mayor Thomas M. Menino, vote to plan for and rezone Hyde Park.
- An 11-member Advisory Group, composed of residents from all over Hyde Park, appointed by the mayor after an extensive nomination process.
- Approximately 20 Advisory Group working sessions and full community meetings are held during this planning process.
- 2011: The Hyde Park Strategic Neighborhood Plan is voted on by the BRA Board and subsequently approved by the city’s Zoning Board.

as an asphalt plant and a tire factory in the area. The BRA held meetings with residents and industrial land-owners individually, to ensure they knew their concerns were heard. The team explained to both that uses like the asphalt plant and tire factory would be restricted in future zoning. For residents, BRA staff introduced them to the “new” face of Hyde Park industrial, which includes Sky Zone (a trampoline gym), Dancing Deer Cookies, My Grandma’s Coffee Cakes, Fire Fly (a custom bicycle manufacturer), and several “green” manufacturers. For industrial parcel owners, BRA staff literally went line-by-line through the zoning code building agreement on what would be considered job-intensive uses the city would continue to support. In the end, everyone was brought back together in the broader community group meeting, reaching consensus.

The companies that are now thriving in Hyde Park are not the heavy industrial businesses of the past. Many of these companies provide valuable goods and services enjoyed by area residents. These companies include:

- Commercial bakeries: Dancing Deer, Boston Baking, My Grandma’s Coffee Cakes, Sweet Cupcakes;
- Gym and fitness centers: Sky Zone, Broderick Gymnastics, Boston Rock Climbing Gym, Solid Body Fitness;
- Light manufacturers: Custom Metalcraft (lighting manufacturer), Firefly (bikes), Moda Cucina (cabinets), Solos Endoscopy, The Great American Rain Barrel Company; and
- Warehouse, logistics and distribution: Global Prints, CSN Stores, and others.

This is how Boston was able to use zoning to encourage job creation, additional investment, and expansion in the local economy.

ENVIRONMENTAL

BRA staff knew it was not enough just to update the zoning to change the reality and the perception of urban industrial. During the height of the recession, the city of Boston instituted Boston Buying Power, an aggregated buying pool for businesses to purchase electric and gas. Additionally, the BRA, with grant support from the Environmental Protection Agency (EPA) and in partnership with the Newmarket Business Association^{vii}, worked with



FW Webb Sustainable Warehouse in Newmarket.

BIDFA	Boston Industrial Development Financing Authority
BizHub	Boston Business Hub (web portal)
BLDC	Boston Local Development Corporation
BRA	Boston Redevelopment Authority
CRM	Customer Relationship Management (software)
EI	Economic Initiatives (implements and manages key economic sector projects)
IDFA	Industrial Development Financing Authority
JCS	Jobs and Community Services (agency within the city's Economic Development Cabinet)

business owners in the Newmarket District to improve the resource efficiency, profitability, and public health of the district for local businesses and residents. In particular, BRA and Newmarket businesses collaborated to identify cost-effective strategies to achieve local emissions reductions, focusing in particular on opportunities to incorporate energy efficiency, solar energy, waste reduction and recycling, and transportation use strategies into the district.

Then in 2011, Mayor Menino committed over \$2.2 million for infrastructure improvements in Newmarket Square, a central thoroughfare in Newmarket District, to improve the roadways, sidewalks, lighting, signage, and safety of the area. The 30 business abutters along with the Newmarket Business Association worked closely with the Back Streets staff to ensure the improvements will not impact business but rather enhance efficiency and safety by modernizing vital infrastructure through the heart of the industrial area.

ADDITIONAL TOOLS IN THE TOOL BOX

FINANCING

Discussion has included the city’s zoning and planning, policy behind zoning variances, as well as environmental and infrastructure projects. Financing provided by the Boston Local Development Corporation (BLDC) is another great tool the city uses to not only support but promote urban industrial.

The BLDC is a private 501(c) (3) non-profit corporation governed by an independent Board of Trustees. The day-to-day operation is provided by the BRA’s Financial Services Department. The BLDC’s principal objective is to create increased employment opportunities for residents by providing small business loans. The BLDC targets companies in the commercial, industrial, and service sectors of Boston’s economy. In the last 15 years, the BLDC has provided \$14 million in loans to over 100 businesses, while successfully leveraging over \$81 million through collaborations with Boston’s banking community. The loan funds have helped create and retain more than 2,800 Boston jobs. Most recently, the BLDC provided loans to industrial companies such as Seafood Specialties, the first LEED certified seafood processor on



Inside of Greater Boston Food Bank.

the Boston waterfront, and Imported Foods, a South Boston wholesale specialty products company serving local restaurants.

One BLDC program incentivizes companies that create new jobs for residents by offering principal reduction during a two-year period that is also interest-only. During that period, the borrower receives, upon each new Boston resident full-time or full-time equivalent hire completing one year of employment, a principal reduction of \$2,000, with a \$4,000 maximum per new Boston resident employee.

The BRA also administers the Boston Industrial Development Financing Authority (BIDFA). MassDevelopment is the Commonwealth of Massachusetts' finance and development authority. However, under Massachusetts General Laws, Chapter 40D, a municipality, in this case Boston, is allowed to form an industrial development financing authority (IDFA) separate from MassDevelopment. The resulting organization is BRA's BIDFA.

BIDFA issues bonds to finance the capital needs of the city's businesses and institutions including construction, capital expenses and working capital needs resulting from expansion. Through BIDFA, the city can make its tax-exempt status available to qualified borrowers though there are a variety of taxable bond options as well. The city's credit does not support these bond issues and the company must show the financial strength to support the bond. Due to the cost of issuance, these bonds are usually over \$3 million. The most recent urban industrial example is a bond issuance for Brookline Ice and Coal, an 87-year-old, family-owned and operated company that serves the food service and hospitality industry with ice, charcoal, gourmet flavored woods, fuels, and refrigeration products. The BRA, through BIDFA, is issuing a \$5M bond to develop a 55,000-square-foot

The Back Streets manager acts as the case manager for all industrial/commercial businesses in the city, tracking any interactions in the BRA's customer relationship management (CRM) system, including inquiries coming from the city's web portal, the Boston Business Hub.

parcel by building a 30,000-square-foot, state-of-the-art fully automated ice manufacturing facility in the Newmarket District, producing 40 new jobs for the city.

CASE MANAGEMENT

The BRA employs a system of sector-based case management for business interactions. Each priority economic sector, such as industrial/commercial, is represented by a program. One example of an economic sector program is Back Streets. The Back Streets manager acts as the case manager for all industrial/commercial businesses in the city, tracking any interactions in the BRA's customer relationship management (CRM) system, including inquiries coming from the city's web portal, the Boston Business Hub.

The BRA's Economic Initiatives (EI) team, which includes seven sector-focused managers under the Economic Development Department, implements and manages key economic sector projects to promote a strong economy in Boston. These initiatives attract, retain, and grow retail, industrial, commercial, life sciences, and creative economy and high technology sector businesses, and promote environmentally sustainable growth to ensure continued growth. This is accomplished by working in partnership with neighborhood residents, business owners, community-based organizations, developers, and others. The initiative managers each act as a city point-of-contact, provide financial and/or site location assistance, and promote the city through sector outreach. The goal of Economic Initiatives is to assist the Economic

Development division in providing a clear and integrated approach to economic investment that addresses the city's current and future needs. In addition to helping to identify and package together financial assistance, the managers help with:

Site Selection – In addition to helping identify possible locations for Boston businesses in one of the city's 17 neighborhoods, the BRA offers a range of very competitive real estate.

Business Advocacy – The EI experts help businesses to navigate the city's services and facilitate access to technical assistance and funding. The BRA's EI staff walks businesses through the process.



Newmarket Seafood Processing.

Photo credit: Sue Sullivan, Executive Director, Newmarket Business Association

Each of the EI managers works with businesses while they are trying to open, while they are operating, and when they need to move or expand. The businesses have comfort knowing that regardless of the issue – permitting, zoning, financing, site finding, water/sewer, etc. – they have one point of contact, a case manager, whom they contact. This person coordinates efforts within the city and the state on their behalf.

In recent years, these efforts have been enhanced by the addition of Customer Relationship Management (CRM) software, in this case Salesforce.com. This CRM system allows the managers to seamlessly track all interactions with the companies and to interface with each other on services where there is potential for collaboration. For example, Ginkgo Bioworks primarily is a life sciences company that received a \$150K loan from BLDC. Additionally, the company began working on a project funded by the Department of Transportation on how to modify E. coli into biofuel. The system allowed seamless cross-coordination between the cleantech and life sciences managers, as well as the BLDC loan manager.

This system has been enhanced by the development of the Boston Business Hub (BizHub), the city's small business web portal. The portal actually uses Salesforce.com as its platform, allowing business constituents to easily connect to the right people, right away, with a guaranteed response within two business days. The Salesforce VP of government relations and marketing director called the Boston Business Hub "the most comprehensive public sector implementation of our technology in the country." Should a business customer enter an inquiry into the system, it auto-responds with an email providing an inquiry number, the name of the person who will respond, and their contact information. Other services the portal provides to customers include:

- Tracking the status and history of their inquiry(ies);
- Creating a permitting and licensing checklist based on business type, which includes details and links to the relevant departments, and downloadable application forms and a personalized checklist that can be saved or emailed;
- Compiling available resources so businesses can conduct market research based on a specific business type and location; and
- Conducting site searches and research demographics to find the best location for their business.

Urban industrial, even light industrial, can produce noise, smells, and truck traffic that is antithetical to residential living. Creating what are known as "buffer zones" between Boston's urban industrial and residential uses is a challenge in such a dense, built environment.

Photo credit: Sue Sullivan, Executive Director, Newmarket Business Association



Boston Medical Center is a Newmarket Industrial District buffer use.

LESSONS LEARNED AND REPLICATION

BUFFERING URBAN INDUSTRIAL

Urban industrial, even light industrial, can produce noise, smells, and truck traffic that is antithetical to residential living. Creating what are known as "buffer zones" between Boston's urban industrial and residential uses is a challenge in such a dense, built environment.

The BRA's Artist Space Initiative is particularly interested in projects that create spaces that are located in buffer zones between industrial and residential neighborhoods in locations that do not support traditional family housing. Artists help make Boston a more livable city – a city of people and neighborhoods, a center of cultural life, and a vital economic center. But, the city recognizes that space/real estate concerns are a primary issue for local artists.

One lesson taken away from the Initiative is that artists are like any other resident. They do not want to be woken at 3 a.m. by heavy truck traffic, food and flower processing, noises, and smells, among other distractions. In one example, a local high-end cabinet maker had been in a large building that for years had been zoned light industrial. More recently, artist/live work lofts became co-located in the same building. When the cabinet maker would perform the work he had been doing for years, the complaints started coming in almost immediately from other tenants/artists about loud and distracting noises, paint fumes, dust, etc. Eventually, the manufacturer had to find new space and a once industrial building is now purely residential. This was a painful lesson learned at the cost of much needed light industrial space in Boston. Since then, BRA staff has made a more concerted effort about how close these artist "buffer" zones are to light industrial uses, more often suggesting ancillary office, then artist housing, to buffer the "buffer."


REPLICATION

The great news is that most of these programs can be successfully replicated in other cities. Boston's largest focus for urban industrial is providing the complete supply chain needed to support the other major sectors that exist around the city. In other words, to be the means to

the end (i.e., the produce for the restaurant) as opposed to just the end. Perhaps the most difficult to replicate would be the financial services piece since the BRA is a quasi-public agency of the city of Boston, which generates the majority of its revenues from its own assets and development fees, instead of property taxes. This gives the agency more freedom to delegate funds for revolving loan programs. In addition, Boston formed its own Industrial Development Financing Agency, as allowed under Massachusetts General Laws, Chapter 40D, known as BIDFA, as described earlier. BIDFA brings in funds in the form of origination fees on bond issuances.

In taking a look at 21st century industrial, there is still the perception of smokestacks and tar factories. These perceptions are what the BRA fought to reverse, especially during rezoning processes that included protecting industrial uses. Further, the BRA focused efforts on “greening” the industrial companies, and in doing so made them not only more environmentally and economically sustainable, but also better commercial neighbors.

CONCLUSION

The BRA is protecting light industrial uses in Boston, which provide living wages for city residents, including at-risk populations such as immigrants and those with criminal records. Protecting light industrial is a environmentally and economically sustainable solution to providing local products to local end-users. By identifying a mix of appropriate tools, such as zoning, financial incentives, and policy, other municipalities can focus efforts on this vital sector. 

ENDNOTES

- ⁱ “Boston’s Back Streets Planning a City Program to Preserve and Enhance Boston’s Industrial Health.” Ronald Mallis, 2002.
- ⁱⁱ US Energy Information Center - http://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=PET&s=EMD_EPD2D_PTE_NUS_DPG&f=A.
- ⁱⁱⁱ “Report: Boston’s commercial real estate market leading national recovery,” Nov 19, 2012, 11:45am EST, Craig Douglas, Managing editor/online vertical products and research- Boston Business Journal http://www.bizjournals.com/boston/real_estate/2012/11/report-bostons-commercial-real.html?page=all.
- ^{iv} “New Bostonians 2012,” Mayor’s Office of New Bostonians; Sources: U.S. Census Bureau, American Community Survey 2008-2010. U.S. Bureau of the Census, 2000 SF1. BRA Research Analysis.
- ^v Ibid.
- ^{vi} The Urban Institute Reentry Roundtable Discussion Paper: 10, “Employment Barriers Facing Ex-Offenders,” Harry J. Holzer, Steven Raphael, and Michael A. Stoll.
- ^{vii} Member organization that supports the planning and development growth of the Newmarket District.



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