

TOWN OF WELLESLEY



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FACSIMILE: (781) 239-1043
TELEPHONE: (781) 431-1019 x2201
WWW.WELLESLEYMA.GOV
BLYTHE C. ROBINSON
EXECUTIVE DIRECTOR OF GENERAL GOVERNMENT

March 20, 2018

Katherine Miller
MassHousing
One Beacon Street
Boston, MA 02108

RE: 818-822 Worcester Street, Wellesley, MA Site Eligibility Response

Dear Ms. Miller:

On behalf of the Town of Wellesley (“the Town”) Board of Selectmen and Planning Board, please find the following comments with respect to the *Comprehensive Permit Site Approval Application* recently submitted by 818-822 Worcester Street, LLC for the construction of a 28-unit residential housing structure on approximately 1.12 acres of land in Wellesley.

Town Acquisition

The Town would like to notify MassHousing that the Board of Selectmen has initiated the process to acquire these parcels, 818-822, through negotiations and/or eminent domain for municipal purposes. The Town has been studying the reconstruction of three elementary schools for the past 7 years, including the abutting property Hardy School. The Town has been considering acquisition of these properties, along with 826 Worcester Street, for some time and given the pending 40B has determined they must proceed at this time. A Special Town Meeting has been called for April 9, 2018. Should Town Meeting **not** vote to appropriate the funds and to authorize the Board of Selectmen to proceed with the acquisition, the Town offers the following comments on the project.

Site Constraints

The Town has the site as having an area of 48,688 square feet and is entirely within the Single Residence District 10, which requires a 10,000 square foot minimum lot size. The proposed development has a gross floor area of 43,247 square feet, a Floor Area Ratio of 0.89, and height greater than 55 feet. The density for this project is 25 units per acre, not the 18.18 as indicated in the application. The proposed project will render over 54% of the site impervious, and retains 46% of the site as “open space,” which the applicant purports to be usable. The Town disagrees with the usable nature of the space given a significant green space area is at the entrance to the site along Route 9 between the entrance and exit of the site.

Density and Proximity to Other Affordable Housing Developments and Projects

The property is zoned Single Residence District - 10,000 Square Foot Minimum Area District, which has a maximum density under the Zoning Bylaw of 4.36 units per acre. The density for this project is five (5) times the density of the abutting and surrounding neighborhoods. The proposed structure is 2,662 square

feet smaller than the elementary school to the rear, which is located on 7.5 acres. The size and density of the structure is completely out of character with the abutting properties and residential neighborhood.

This project is within close proximity, 700 feet, from the Wellesley Housing Authority senior affordable housing at 315 Weston Road (32 Units), 1500 feet from Fells Hollow 55+ 40B at Route 9 and Russell Road (28 Units), and within approximately 3,000 feet to the developer's other proposed projects at 680 Worcester Street (revised proposal anticipated) and 16 Stearns Road (24Units). The project is also within approximately 3,300 feet from the proposed 40B at 148 Weston Road (55 Units), and less than a mile to the 90 unit 40B project proposed at Delanson Circle.

The Town is concerned that this particular neighborhood or small group of contiguous neighborhoods (Fells/College Heights/Weston Road) has become a magnet for 40B projects. The Town is in favor of affordable housing, but would prefer that its affordable housing developments be better distributed throughout Town and throughout the Town's Elementary School districts as opposed to siting all new projects in this one part of Town and within only one or two Elementary School districts. The Town firmly believes that such a dense cluster of projects is not in the best interest of the current and future residents of the above described developments.

Water Supply Protection District

The project site is located within the Town of Wellesley Water Supply Protection District. The Water Supply Protection District intent is to protect the public health, safety, and welfare of the residents by preventing contamination of and preserving the quantity of ground and surface water that provides existing or potential water supply for the Town's residents. This particular area of town requires recharge on-site through vegetated surfaces. Given the amount of impervious cover on the site, dry wells or leaching basins with grease and sediment traps will likely be required.

Traffic

The proposal includes direct ingress and egress from Route 9. Route 9, however, only allows for vehicles to access the site heading eastbound. Exiting the site, all vehicles must continue eastbound and make turnarounds through either the neighborhood at Woodbine Road or further down at Oak Street to alter course. Returning to the site from a westbound direction would require turnarounds at the Weston Road interchange which is a heavily congested area, particular during morning and afternoon school arrival and dismissal times. The access to the site is easily passed by, and the town would encourage MassDOT to consider requiring the installation of a deceleration lane for vehicles accessing the site from Route 9 due to the 50 mph speed limit and limited turning radius onto the decent size driveway. The driveway location is in direct conflict with the 826 Worcester Street properties sole driveway access and should try to be relocated further to the east to reduce the conflict. Additionally, the applicant should consider a single entrance rather than the dual u-shaped entry to save the large pine tree located on the site and to again, reduce conflict with the existing driveway at 826 Worcester St.

Fire

The Fire Department raises concern that access to all sides of the building is limited based on this design. The height of the covered parking is unknown, and likely will not allow for fire access to the far corner of the structure. Given the existing utility configuration discussed below, the Fire Department further raises questions as to whether adequate water supply and pressure is available for the structure at this location.

Utilities

An existing water lines is present in Worcester Street in front of the property. Portions of Worcester Street do have sewer, however this site does not have direct access along Worcester Street MassDOT will commence repaving Route 9 in the spring/fall of 2018 and the Town anticipates there will be a 5-year moratorium on cutting into the pavement. 818-822 properties have a common tie in to a sewer line that runs through Town (School Department) property at Hardy School with an 8" line that connects to a 12" line in

Hickory Road. There is no easement present, and modification to that line could significantly disrupt the Hardy School play areas and would require Town and School Committee approval.

Abutting Properties

Two primary residential abutters are significantly impacted by the proposed structure. The proposed structure has been setback from the road, but encroaches significantly on the rear yard of the 826 Worcester Street abutters. The 5 story building with balconies surrounding the structure invade on personal space of the abutters at 814, 826, and 830 Worcester Streets. The parking lot has been located directly against the west property line of 814 with a minimal setback of approximately 4-5 feet. The approximate 55-foot-tall building (could be taller) is too confrontational with the abutting single family homes whose ridge heights are approximately 30 feet or less in height.

The design is still largely out of context for the neighborhood which is an eclectic mix of 2 story Colonials, Bungalows, and Capes.

To the south of the properties, the abutting land is owned by the School Department and abuts the current school's playground. The change in topography towards the school and the location of the building will make the structure appear as though it is approximately 6 stories in height from the Hardy School play yard.

Proposed Parking

The parking for the site includes 52 parking spaces or 1.86 spaces per unit. The proposal does include visitor parking spaces and an area for deliveries which is critical since **on-street parking along Worcester Street is prohibited**.

Public Transportation

The Route 9 site has limited public transportation access. The MetroWest Regional Transit Authority has the Route 8 commuter bus, which will be modifying its route in the fall and will no longer serve the Weston Road Corridor. The MetroWest Regional Transit Authority does operate the Route 1 bus along Route 9 with a limited schedule Monday through Friday. It should be noted that the MWRTA bus does not pull off of the street to pick up or discharge passengers. If the Route 1 bus is to service a building at 818-822 Worcester Street, the applicant, working with MassDOT would have to provide a pull-in bus stop at the site. In summary, there are limited public transit options in the vicinity of the proposed project.

Landscape

The existing site is largely cleared of trees, except along the perimeter of the site. Particularly to the rear, significant trees are present to create a screen and noise abatement to the Hardy School site. The project will eliminate existing trees along the property line with 814 Worcester Street and current plans show a row of arbor vitae. Shrubs are not a buffer for a 55-foot tall building. Given the close proximity of the parking lot along the entire length of the 814 Worcester Street property line, more care should be taken in improving the landscape buffer. This is also true along the property line of 826 Worcester Street.

Wellesley's Progress on Affordable Housing

As you are more than aware, the Town has recently been inundated with 40B Site Eligibility notices. The Town has not met its 10% threshold, but would like to convey the efforts it has made to increase the Town's affordable housing inventory. The Town of Wellesley has been making steady progress over the last 15 years in increasing the Subsidized Housing Inventory. On November 21, 2017 the Board of Selectmen, Planning Board, and Wellesley Housing Development Corporation approved the hiring of two housing consultants to conduct research, create a needs assessment analysis, and develop a Housing Production Plan to assist the Town in expanding its range of housing, including affordable, suitable for elder residents and those who wish to downsize and remain in Town, accessible to members of the local workforce, and more. We anticipate this plan to be complete September, 2018. The Town has also passed a number of zoning provisions to assist with affordable housing as redevelopment opportunities in Wellesley's commercial

districts occur. The Town as of October 18, 2017 is at 6.33% of its 10% goal, with upwards of 36 units in the process of being added to the Subsidized Housing Inventory within the next several months. Below are the Town's actions that have supported development of affordable housing:

- The 2007-2017 Comprehensive Plan was adopted in 2007 with actions for affordable housing.
- The Inclusionary Zoning Bylaw (IZB) was adopted in 2004 which requires residential projects in commercial districts to provide 20% affordable housing, and commercial projects over 10,000 square feet to provide 2% affordable housing (1 unit for every 50,000 square feet constructed).
- 2004: the Town's Community Preservation Committee funded \$65,000 in addition to HUD funds to create a DMR house at 4 Marshall Road (SHI).
- 2005: the IZB was modified to require subdivisions having more than 5 lots to comply with the Bylaw at 20% threshold.
- 2007: the definition of Floor Area Ratio in the Zoning Bylaw was modified to exclude affordable units developed under the IZB from being included in the FAR to increase density and increase opportunities for affordable housing units in commercial districts.
- 2007: the Linden Square project was completed, wherein 7 affordable housing units were created under the IZB (Units have recently been found to be missing from the Town's SHI, but are being added now).
- 2007/2008: permitting began for projects at 978 Washington Street and the former Wellesley Inn site at 576 Washington Street in Wellesley Square; these projects were delayed due to the recession, but both have now been completed, resulting in 7 SHI-eligible units at 978 Worcester and 5 SHI-eligible units at 576 Washington Street. Both projects were developed under the Town's Zoning and subject to the IZB; 978 Worcester St. also resulted in payment in-lieu funds for 1 unit.
- 2009: the permitting of a CVS resulted in the payment of in-lieu funds under the IZB.
- 2011: a 40B project was approved at 65-71 Washington Street resulting in 1 SHI-eligible unit.
- 2012: a project was permitted at 27 Washington Street, resulting in the development of 82 SHI-eligible units, as well as 7 assisted living units not SHI-eligible but permanently deed restricted to be affordable.
- 2012: the Wellesley Housing Development Corporation purchased a two-family dwelling at Peck Ave and a single-family dwelling at 6 Mellon Road, renovating the homes and creating 3 affordable units; at this time the Town also purchased 9 Highland Road, although it is not on SHI, but it is affordable due to deed restriction not complying with DHCD requirements (Must wait to add on resale per DHCD).
- 2013/2014: a 40B project was approved at 139 Linden Street and added two SHI units in October 2017.
- 2013: Wellesley Square Zoning District was amended to create a special permit to increase density; this benefited and allowed the previously stalled Wellesley Inn project to proceed.
- 2016: the Planning Board approved a Definitive Subdivision plan for 135 Great Plain Ave. that included a payment in-lieu for 2.4 units.
- 2016 to present: the Town has developed the first Unified Plan in the Commonwealth that brings together the Town's strategic plan and comprehensive plan. The complete draft is available on www.wellesleyunifiedplan.com and the Selectmen and Planning Board will adopt the final plan this month that includes a housing strategy that employs a variety of mechanisms to increase housing type and affordability.
- March 2018: the Board of Selectmen with assistance from the Planning Board will be releasing an RFP to develop the Tailby and Railroad Parking Lots for affordable housing and parking.
- March 2018: the Planning Board is seeking FY19 funds to develop a sub-area study and plan, with additional funds to be provided from the Community Preservation Committee, with a focus on development/redevelopment opportunities in a defined area to support the development of additional affordable housing.

- March 2018: the Wellesley Housing Authority is seeking \$200,000 from the CPC with support of the Board of Selectmen to study the redevelopment potential of the Barton Road site.
- Housing Production Plan: the Town is underway on the Housing Production Plan and has three public workshops scheduled for March 13 (rescheduled due to snow), May 3, and June 12 with an anticipated adoption of September 2018.

For reference, 40B projects currently in Comprehensive Permit Review are:

1. Delanson Circle (90 Units)
2. 148 Weston Road (55 Units)
3. 135 Great Plain Avenue (44 Units) - MassHousing

40B Projects currently in Site Eligibility

1. 16 Stearns Road (24 Units)- MassHousing

Other 40B projects being considered in Wellesley:

1. 136 Worcester Street (44 Units)
2. 680 Worcester Street (Previous proposed 20 Units) - MassHousing

Based on all of the reasons articulated above, the proposed development is poorly designed and too intense for a site that is just over an acre in size. There is no doubt that more affordable housing opportunities are necessary in the Town of Wellesley, but such opportunities should be more respectful of existing neighborhoods and land uses, as well as the eventual residents of the development. This proposal creates a significant aesthetic concern, significant conflict with the driveway of 826 Worcester Street, poses potential risks to the local groundwater supply, and must be denied at this level of density.

Sincerely,

Ellen F. Gibbs, Chair

Jack Morgan, Vice Chair

Marjorie R. Freiman

Beth Sullivan Woods

Thomas Ulfelder