

TOWN OF WELLESLEY



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BLYTHE C. ROBINSON
EXECUTIVE DIRECTOR OF GENERAL GOVERNMENT

July 19, 2017

Jessica Malcolm
MassHousing
One Beacon Street
Boston, MA 02108

RE: 680 Worcester Street, Wellesley, MA Site Eligibility Response

Dear Ms. Malcolm:

On behalf of the Town of Wellesley Board of Selectmen and Planning Board, please find the following comments with respect to the Comprehensive Permit Site Approval Application recently submitted by 680 Worcester Road, LLC for the construction of a 20-unit residential housing development at 680 Worcester Street within the Town of Wellesley. While the Town supports the creation of affordable housing options, the Town finds that the project is poorly designed and, as designed, is inappropriate for this site. We request that your office and the applicant consider our following concerns:

Site Constraints

The site has an area of 20,029 square feet. The proposed development has a gross floor area of 27,171 square feet, a Floor Area Ratio of 1.36, and height greater than 46 feet. The proposed project will occupy 68% of the site with impervious cover, and retains 32% of the site as “open space,” which the applicant purports to be usable; however, given the location along Route 9, the installation of retaining walls, and the slope to the rear of the site, much of the open space is unusable to the tenants.

Proposed stormwater management does not meet Best Practices

Given the dense development of the site, necessary stormwater management is proposed to be accomplished by placing subsurface detention within the foundation of the proposed building. The Engineering Division has significant concerns over the subsurface infiltration systems location under the garage slab. Our Wellesley Town Engineer, a licensed professional with close to 30 years of experience, has never seen this done previously. Access for maintenance may cause significant disturbance to the site. The setbacks from the foundation appear to be insufficient. The applicant has not submitted soil

testing; however, any soil testing should account for the compaction rate required for the construction of the building as well as address the possible hydrologic impact of the infiltration system on the building foundation. For drainage purposes, it should be noted that snow melt from open air areas will either drain into the subsurface system or be directed to the Town's sewer system and needs to account for suspended solids, filtration and volume.

Wetlands determinations should be revisited

Wetlands are located on the adjacent property to the rear of the site. In December 2015, the Town's Wetlands Protection Committee determined that the isolated wetland on the property is not jurisdictional and the Committee issued a negative Determination of Applicability. As this determination was based upon an inspection in the fall, the Town is of the opinion that an inspection for the presence of a vernal pool should be conducted in the spring, as well as evaluating the role of the wetlands in flood control. Filling of this isolated wetland will require additional permitting at the state level.

Proposed setbacks will cause unacceptable impacts to abutting properties

The setbacks of the proposed project are inadequate and juxtapose a 46-foot-tall building 8 feet from the property line of a single residence home to the east (total separation of buildings is approximately 22-24 feet) with the residential building having a height of approximately 28 feet. To the rear of the site two additional single family lots are present with only a 12-foot setback. The minimal setbacks leave no room for an adequate buffer. In addition, the proposal creates an elevated common terrace which will overlook the properties to the rear with minimal visual or sound mitigation.

Parking is poorly designed and will not function as proposed

The parking for the site includes 32 parking spaces or 1.6 spaces per unit. Tandem parking has been used in the site for 8 of these spaces. The tight configuration and poor layout of the parking lot creates difficult maneuvering aisles to move tandem parked cars if needed. Jockeying of cars may result in parking of cars temporarily on Route 9, **which is prohibited**. The applicant has provided no visitor parking whatsoever, and given the location and isolation of the site, visitors will likely park—illegally—on residential roads or in the abutting commercial property. Parking for deliveries is limited and appropriate turning radii for delivery trucks has not been accounted for in the design. The improper use of turning radii continues to be an issue for trash service, fire safety, and moving trucks, which if the development is constructed all such vehicles will be accessing the site located on Route 9. **Backing out of the site onto Route 9 is not an option**. Additional parking garage design concerns include the parking garage being only partially covered requiring snow removal in open air areas.

Limited accommodations for snow removal and storage

Snow storage is accounted for on the plans, yet in each instance is over a barrier including retaining walls and fencing. The minimal landscaped areas will be impacted by snow storage, further depleting available opportunities for screening. If snow removal is not done properly, snow banks will further reduce the size of parking spaces and maneuvering aisles making a precarious layout even more unsafe for drivers.

Sewer service is undersized and the proposed building encroaches on the existing easement

The existing sewer connection to the site runs from an easement in Francis Road. The proposed structure is located over the easement and the existing line, while adequate to serve the four residential structures that are currently served through the easement, will not meet the municipal standard for a sewer main when the additional 19 units are added. The site also includes a slope easement which is held by the MassDOT, and a portion of the proposed building is located within the easement. The Building Inspector has noted the building cannot be located over any easements, and it should be further noted relocation of the sewer easement would require Town officials to sign off on the abandonment as well as Town Meeting approval.

Moratorium on opening of Route 9 may impact water service

An existing water line is present in Worcester Street. MassDOT will commence repaving Route 9 in the spring/fall of 2017 and the Town anticipates there will be a moratorium on cutting into the pavement.

Site access by Fire Department staff and apparatus is inadequate

The Fire Department has significant concerns regarding the ability for a Ladder Truck to access the site and notes the site **cannot** accommodate the prerequisite turning radius. The site is largely covered by the building with parking at grade. The ceiling height of the covered parking is 12 feet which **does not meet the minimum clear height** for the fire truck. The site must have a minimum of two access points for the Fire Department. An access point can be Worcester Street, although it is a state highway. The secondary access must be from the proposed parking lot at 680 Worcester Street given a fire truck cannot access the remaining two sides of the building.

Site access exacerbates existing traffic and circulation problems

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 at Kingsbury and Route 9 or access residential neighborhoods to alter course. Returning to the site from a westbound direction would require turnarounds at Oak Street or access via neighborhood roads west of 680 Worcester Street. 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 driveway length.

Pedestrian access to and from the site is limited

The applicant is proposing to continue the sidewalk from Francis Road to the access driveway of the site. Pedestrian access will be critical to access open space, schools, and shopping located within walking distance of the isolated site. Sidewalks should be continued to School Street along Route 9 to accommodate pedestrian traffic should the project move forward. The applicant should also be responsible for plowing all stretches of sidewalk from the site to major roads as MassDOT does not plow sidewalks. Access from Francis Street to Town paths is only useful in good weather conditions as the Town does not plow paths.

Accommodations for public access should be considered in the project design

The MetroWest Regional Transit Authority does have the Route 1 commuter bus which travels along Route 9. The site should have bus accommodations adjacent to the site on Route 9 for tenants seeking public transportation. Commuter rail access is within walking distance if sidewalks are enhanced and plowed along Route 9.

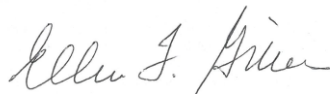
Construction of the project will have significant impacts on adjacent properties and streets

The Town has significant concerns with respect to the practicality of constructing this project. The size of the site makes it impossible to stage cranes or other construction equipment, or to stockpile materials on site for construction. Additionally, parking for construction workers cannot be accommodated on site and therefore will significantly impact the adjacent neighborhoods as parking is not allowed on Route 9 and both sides of Stearns Road. Deliveries will need to be expertly coordinated and offsite parking of workers will be required. Parking, even of a temporary nature in the shoulder of Route 9 represents a significant safety concern to the Town and has the potential to significantly impede residents accessing the Francis and Stearns neighborhoods which has limited access from Route 9. The developer has not stated in the site application how construction would be staged and coordinated.

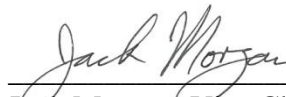
The density of the proposed developed is significantly inconsistent with adjoining development and will result in destabilization of the larger single family neighborhood

Twenty (20) residential units on a 20,000 square foot lot equates to a density of 43.47 units per acre. The density of the abutting residential neighborhood, not including the subject property, is 2.76 units per acre. The project will have a destabilizing effect on the current single family use of the abutting properties, likely making them unmarketable for continued single family owner occupancy, or for redevelopment as single family homes.

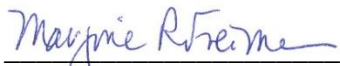
Based on the above, it is apparent that the proposed development is too intense for a site that is less than ½ acre in size. There is no doubt that more affordable housing opportunities are necessary in the Town of Wellesley, but such opportunities should be more respectful of existing neighborhoods and land uses, as well as the eventual residents of the development. This proposal effectively creates an island separate from the larger community, and is contrary to best practices for affordable housing.



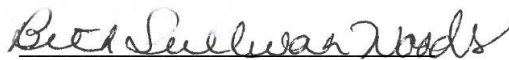
Ellen F. Gibbs, Chair



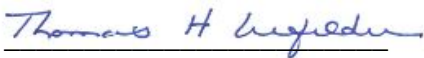
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