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EXECUTIVE DIRECTOR OF GENERAL GOVERNMENT

October 6, 2017

Katherine Miller
MassHousing
One Beacon Street
Boston, MA 02108

RE: 16 Stearns Road, Wellesley, MA Site Eligibility Response

Dear Ms. Miller:

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 16 Stearns Road, LLC for the construction of a 36-unit residential housing development at 16 Stearns Road within the Town of Wellesley. The Town finds the location of the proposed project unacceptable given the limited access to the site and proximity to the 680 Worcester Street project (proposed by the same developer) currently in Site Eligibility review with MassHousing. The Town finds the project's density, scale, and height incompatible with the neighborhood and finds the project will have a detrimental impact on abutters due to mass, scale, and traffic based on both its independent construction and relationship to the 680 Worcester Street Project. We request that your office consider the concerns outlined below, as well as consider this project as a joint submittal with the 680 Worcester Street project given the dual ownership by Jay Derenzo and the one parcel separation of the two sites.

Site Constraints

The site has an area of 44,578 square feet. The proposed development has a gross floor area of approximately 97,000 square feet with a Floor Area Ratio of 2.18, and an average height of 70 feet. **The west side of the project measures 81 feet in height.** The site has approximately 5,000 square feet within a 0.2% Flood Zone, with the remainder of the site being comprised of steep grades and ledge. The elevation change from Stearns Road to the peak of the property is 18 feet. The proposal will regrade the site to be at street grade of 152 feet above sea level. This will require a tremendous removal of site material and the installation of 7-11 foot retaining walls along the abutting properties with no fencing proposed.

Fire Access

The Fire Department has expressed concern over the height of the structure and ability to access the structure from multiple sides. One elevation of the structure is over 81 feet in height, and will be the highest residential structure in Wellesley. The Fire Department will consider the structure as a high rise for construction purposes. The Fire Department finds that additional access will be required to the sides and rear of the structure to meet the Fire Code, as access is limited with 14-15 foot setbacks within 150 feet in either direction from the front door. An access road is required and at present cannot be accommodated. Further, given the height of the structure, the Tower Truck must respond to all calls at the site, therefore the Tower Truck will also be required to make the turns around the building when a fire access road is added. In addition to the turning radius required for the sides of the building, the turning radius at the access driveway is not adequate to accommodate the Tower Truck, and given the limited access to the site from Francis Road and Stearns Road, turning around must be accommodated on the project site.

Site Access Exacerbates Existing Traffic and Circulation Problems

The proposal includes direct ingress and egress from Stearns Road, a narrow dead end street located directly off Francis Road, a narrow and dead end street, with direct access from Route 9 eastbound. Stearns Road and Francis Road are heavily traveled pedestrian routes for access to the Sprague School heading south, and Middle School heading southeast. The neighborhood is currently comprised of 17 single family structures (excluding the lot in question) largely 1.5 stories in height. The neighborhood has limited vehicular access, as it can only be accessed from Route 9 eastbound. The limited access to Route 9 is also a concern with traffic backup onto Francis and Stearns Road during peak commuting hours that coincides with pedestrian and school traffic.

It is unclear whether the applicant is proposing to add any sidewalks within the neighborhood. The additional volume of 36 residential properties on a narrow road with significant pedestrian traffic, and no sidewalks is a concern given the current width and limited access to the property. There currently are no sidewalks on either Francis Road or Stearns Road and both rights of way measure approximately 40 feet in width, with pavement widths of approximately 20 feet in width. Sidewalk installation should be a consideration given the increased vehicular and construction volume. The proposed project adds over 200% more residences and vehicular activity to the neighborhood at the current pedestrian access point to both the Sprague elementary school and Middle School. Many residents along Worcester Street also use this neighborhood for access. The adjacent project proposed at 680 Worcester Street, if constructed, will also add pedestrians to the neighborhood as it is a safer route to the schools and fields than along Route 9 where there is no current sidewalk extending westbound. Residents currently access Sprague School by walking through the end of Stearns Road through to the school property via a stone path. The installation of sidewalks is feasible given the 40-foot right of way, but will have significant impact on the existing streetscape and require the removal of established Town trees located within the right of way.

Proposed Setbacks Will Cause Unacceptable Impacts to Abutting Properties

The setbacks of the proposed project are inadequate and juxtapose a 70-foot-tall building 15 feet from the abutting property line and 45 feet to a single residence home located at 10 Stearns Road to the east. The Town owns land to the east, south, and west, and the structure will be located 14.9 feet from the Sprague School Parking Lot and Sprague Fields access

drive. The minimal setbacks leave inadequate buffer or screening from abutters, particularly given front access will be 160 feet from the rear of a proposed 20 unit 40B located at 680 Worcester Street with minimal landscaping provided to the rear of the site. The two projects proposed by Jay Derenzo significantly impact the properties located at 11 Stearns Road and 9 Stearns Road, which will have projects to the rear and across the street from their low profile single-family structures. In addition, the proposal creates exterior balconies that will overlook the abutting properties with minimal visual or sound mitigation. The Town reiterates its view that the two projects should be considered as one project as the proposal will eliminate all privacy for 11 Stearns and 9 Stearns Road.

The Density of the Proposed Development is Significantly Inconsistent with Adjoining Development

Thirty-six (36) residential units on a 44,578 square foot lot equates to a density of 35 units per acre. The density of the abutting residential neighborhood, not including the subject property, is 3 units per acre. The single-family structures directly abutting the site will be significantly impacted due to the close proximity and potential shadow effects from the development. The developer previously discussed with the Town the potential to subdivide the lot into 2 or 3 units, which would have been consistent with the existing neighborhood density. The 2017 Annual Town Meeting altered the Town's Large House Review zoning provisions, and as a result, the developer has stated his perceived size limitations on residential construction necessitated the current proposed project. This zoning change does not align with the need for the density of 40 units per acre at the 680 Worcester Street site.

The 16 Stearns Road application largely references the Alzheimer's Center as neighborhood context. The site, although within close proximity on a map, has no vehicular neighborhood connection to the Alzheimer's Center and contextually is separated from the proposed 36-unit development because of the street patterns.

Water and Sewer Service

The Town has preliminarily reviewed the water and sewer infrastructure in the immediate area. While DPW/Engineering believes sewer can be handled with the existing 8" main, there is significant concern that the existing 6" water main will not provide adequate flow with the necessary sprinkler system, while maintaining appropriate service levels for the neighborhood. Replacement of the line to an 8" or 10" line will be required from Route 9, thus impacting both the Stearns Road and Francis Road water lines and road surfaces. Given the location of the project and required infrastructure upgrades, there is no section of the neighborhood unaffected from the proposed projects.

Proposed Stormwater Management Concerns

Given the dense development of the site and the significant amount of impervious material, stormwater management and groundwater management are significant concerns to the Town. There is likely a presence of ledge where the underground garage is proposed, and the dense site configuration will limit the available locations for subsurface infiltration. Ground water has largely been located in the area at depths of 5 feet below grade. On-site mitigation must be considered, although the Town will be opposed to the location of subsurface infiltration underneath the foundation of the proposed building. Although stormwater management is neglected in the application, the developer has proposed similar subsurface systems at the 680 Worcester Street 40B site. The subsurface recharge of that

site, also over 85% impervious within close proximity, will further impact the water table. The front of the property is the only location where subsurface infiltration can be located. At this time, there is no information on soil conditions or percolation capabilities of the site. The site is within close proximity to the McCracken Brook culvert that is currently at capacity. Unmanaged stormwater will exacerbate the problems associated with the McCracken Brook culvert and could have significant impact on the small residential neighborhood with potential ground water disturbance. McCracken Brook will be impacted by runoff and stormwater from three projects including 16 Stearns Road, 680 Worcester Street, and Delanson Circle which also proposes 90 Units along Linden Street through a Comprehensive Permit.

Flood Zone and Wetlands

As noted above, the site is partially located within a Flood Plain. The applicant states that he is seeking a Letter of Map Amendment, but as no LOMA has been issued it should be noted that the lower level of the parking garage is at the Flood Plain elevation. The plans also show that there is a common exercise room with access to an outdoor community space in this flood plain area.

Wetlands are located on the adjacent property at 694 Worcester Street across the right of way from the project 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. The buffer zone for this potential wetland would largely impact the 16 Stearns Road property.

Parking Garage and Visitor Parking

The parking for the site includes 78 parking spaces, configured in 5 surface spaces and two levels of underground parking having 36 and 37 spaces. The applicant has provided minimal visitor parking. It should be noted Stearns and Francis Roads prohibit on street parking. Overflow visitor parking would likely try to locate at either the private Alzheimer Center or Sprague School/Field. Sprague School/Field already has a shortage of parking during events and does not allow for overnight parking. Trash is proposed to be located on the eastern side of the property with an exterior dumpster, located at the closest point to the abutting residential property. It is important to note that Wellesley does not have municipal trash removal, but relies on residents or private trash haulers, as licensed by the Board of Health.

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 and location of this site will make it difficult to stage cranes or other construction equipment. The significant removal of site material also poses a problem with the number of anticipated trucks needed to haul the soil and blasted ledge material off site with limited access. In addition, the two-tier parking proposed will require significant concrete work, and staging of trucks will be difficult given the limited access to the site from Route 9 and the small neighborhood streets used to access the project site.

Additionally, parking for all construction workers may not be completely accommodated on site given the size of the project, and as previously noted parking is prohibited on Stearns Road and Francis Road, as well as Route 9. Deliveries will need to be expertly coordinated and offsite parking of workers may be required. The developer has not stated in the site application how construction would be staged and coordinated. This construction effort, in concert with the potential construction of the 680 Worcester Street project, will make project logistics impossible. Construction parking will have to be accommodated off site for both projects.

Historical Soil Concerns

The project site is located within close proximity to a landfill remediation site located at Sprague Field. Given the proximity to McCracken Brook Culvert, and the amount of fill proposed for removal, the Town believes the site should conduct a 21E to verify the soil at lower levels has no contamination from the historic landfill located adjacent to the property.

Conclusion: Based on the above, the proposed development is too intense for a site that is approximately 1 acre in size.

Wellesley's Progress on Affordable Housing

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 continually 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 and consistently passing zoning provisions to assist with affordable housing as redevelopment opportunities in Wellesley's commercial districts occur. The Town as of August 24, 2017 is at 6.3% of its 10% goal, with upwards of 38 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 be 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 providing 2 SHI units (to be added to SHI).
- 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 is developing a new Comprehensive Plan; known as the Unified Plan, the Plan is combining typical land use planning with all aspects of the Town's government to serve as a master strategic plan for the Town. The Plan is expected to be adopted in the Winter/Spring 2018. www.wellesleyunifiedplan.com
- July 2016 to present: the Planning Board, Board of Selectmen, and Housing Development Corporation, have aggregated \$35,000 for the creation of a Housing Production Plan for the Town. An RFP was released by September 25, 2017.

More affordable housing opportunities are necessary in the Town of Wellesley and the Town is currently working on a Housing Production Plan. The proposed density in a neighborhood with limited access is unreasonable and incongruous with the 1.5 story residential structures on .25 to .5 acre lots. In addition, this second proposed 40B development is within less than 160 feet from a proposed 40B development, by the same developer, at 680 Worcester Street which has already significantly decreased the economic value of these properties. The developer is systematically seeking to purchase abutting properties, and given the detrimental effect the two projects might have on the quiet single-family neighborhood, residents feel pressure to sell. This proposal, along with the four other 40B projects currently in site eligibility at MassHousing and MHP are far out of character with the community.

For reference, 40B projects currently in Project Eligibility are:

1. 680 Worcester Street (20 Units)- ~160 feet from proposed project
2. Wellesley Crossing – Delanson Circle (90 Units) ~2100 feet from proposed project

3. 148 Weston Road (55 Units) ~ 3000 feet from proposed project
4. 135 Great Plain Avenue (44 Units) ~ 1.6 miles from proposed project

Other 40B projects being considered in Wellesley

1. 136 Worcester Street (44 Units) ~3 miles from proposed project

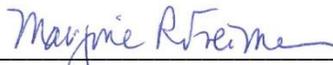
Sincerely,



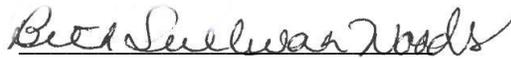
Ellen F. Gibbs, Chair



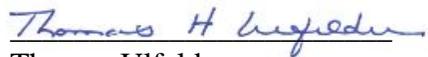
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Marjorie R. Freiman



Beth Sullivan Woods



Thomas Ulfelder