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WWW.WELLESLEYMA.GOV

BLYTHE C. ROBINSON
EXECUTIVE DIRECTOR OF GENERAL GOVERNMENT

November 13, 2017

Michael Busby
MassHousing
One Beacon Street
Boston, MA 02108

RE: 135 Great Plain Avenue, Wellesley, MA Site Eligibility Response

Dear Mr. Busby:

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 Northland Residential for the construction of 44 dwelling units on an approximately 12 acre parcel in the Town. It should be noted that 2.46 acres of the site contains wetlands and/or is located within a Flood Plain Zone A.

Previous Projects

As MassHousing will see from the submittal documents, the developer worked closely with the Town for the approval of a 12-lot subdivision. The Town Departments and Planning Board worked continuously with the developers to maintain open space and significant trees, protect natural resources, and mitigate impacts to directly abutting neighbors and their privacy. The Town continuously stressed the desire to mitigate stormwater using Low Impact Design (LID) methods and Best Management Practices (BMPs). While subsurface infiltration was the only solution palatable to the developer, the conditions imposed on the Planning Board’s approval of the Definitive Subdivision Plan required at least one LID BMP to be installed on each of the 12 lots. The developers are now before the Town with a project that will increase the density by over 3 times the previous proposal, so the Town continues to encourage that the new design embrace the maintenance of open space, retention of significant trees, protection of natural resources, and alternative stormwater mitigation practices utilizing LID techniques.

Traffic

The originally vetted traffic study for the proposed 12-unit subdivision anticipated 150 vehicles daily. The Town has not received a new traffic study, however it is anticipated the increased density will result in a significant increase in volume of cars entering and exiting the site, estimated (based on the previously submitted traffic study) to be 450-525 vehicle trips a day. The Great Plain Avenue corridor lacks pedestrian and bicycle accommodations and the community, through the Unified Plan, has been encouraging design to improve mobility, access, and health. The neighborhood from Brook Street to the Needham Line consists of 47 homes: 29 with frontage on Great Plain Avenue, 18 on Skyline Drive. The 44 units proposed will effectively double the size of the neighborhood.

The Town notes that warrant analysis has been conducted for the Town's Recycling and Disposable Facility (RDF) located approximately 700 feet to the southeast of the project site and is being considered for signalization. The Town is also working on the redesign of the Wellesley Avenue/Great Plain Avenue rotary/intersection to improve safety. This intersection has been found to have the highest number of crash incidents in Town and averages approximately 15 crashes a year. The additional volume generated from the site will increase safety concerns in this area.

Site access is challenging, particularly turning left into the site while heading northwest on Route 135 (Great Plain Avenue). Without updated traffic data it is difficult for the Town to evaluate the true impact, however concerns are centered around striking a balance between maintaining the residential road and accommodating significant increased traffic volumes. The increased volume from the site is compounded by the close proximity to high traffic generators such as the Wellesley RDF, Boston Sports Club, and Babson Ice Rink along a 40mph corridor.

The Town's initial mitigation considerations include the addition of a northwest bound turning lane to improve access to the site, and a deceleration lane heading southeast on Route 135 to allow for the flow of traffic to continue. The Town has concerns that stacking and queuing will be considerable within the site. Given the high rate of speed on Great Plain Avenue, existing traffic volumes, and the topography of the road, the Town has quite a few concerns over access and egress from the site.

Site Design

From an architectural standpoint, the project is well designed and is consistent with the quality and character of other homes in the area. The Town has concerns that the site layout is lacking in creativity, is too regimented, and does not provide variation in the height or siting of structures. For instance, the triplex units fronting Great Plain Avenue are inconsistent with the irregular street pattern. The Town would encourage the site to stagger the groupings throughout the site, or maintain duplexes for all units in varied square footage. The affordable units are also clustered in the triplexes; however, the Town encourages the affordable units to be dispersed through the site.

The Town encourages the developers to consider shared driveways, particularly in the Tier II area to reduce impervious cover and to improve the aesthetics and view of the Tier III properties which will front the rear of the Tier II structures. The Town would recommend a more diverse pattern in the entire site layout, which would seek to improve setbacks from abutting properties. Given the size of the site, side yard setbacks should be increased from 16 to 20 feet, particularly to directly abutting existing homes. As part of the previous subdivision process, abutters worked with the developers to provide increased setbacks of up to 50 feet. The current setbacks should be increased given the increased density.

The access into the site, with parallel parking immediately present upon entering the site, is a concern given the anticipated volume of vehicles accessing the property. The Town encourages all of the on-street parallel parking spaces (guest parking areas) to be reconsidered. Turning access is limited in the triplex areas, and there is concern that vehicles on the end units will not be able to exit or turnaround given the limited turning space. This concern is even more serious regarding the movement of fire trucks.

The Town notes the density of the site, which will serve a variety of residents, offers no active recreational amenities. The project site is removed from other Town amenities, excluding access to the Sudbury Aqueduct, and it is recommended that consideration be given to play structures or other active outdoor recreation infrastructure. The plan notes gathering spaces, but the Town also encourages additional gathering amenities to allow for communal outdoor activities (benches, fire pit).

Pedestrian/Bicycle Amenities

The sidewalk and paths interior to the site and connecting to the Sudbury Aqueduct are appreciated and should be widened to truly facilitate a multi-modal universal path that should be accessible to the public.

The site is located approximately 1 mile from Wellesley Square, and $\frac{3}{4}$ of a mile from the High School. Sidewalk connections are lacking on Great Plain Avenue, and it is recommended that a multi-modal connection from the site to Wellesley Avenue, along Great Plain Avenue, be installed. At a minimum, a multi-modal connection should be installed from the site to Brook Street along Great Plain Avenue. The higher vehicle speeds and volumes on Great Plain Avenue are also a concern for pedestrian and bike crossings. Crosswalk access is limited in the area, and with the increased number of residents, pedestrian and bicycle safety is paramount.

Stormwater Management

The submitted plans currently do not include information on stormwater calculations or management. The developer has made comments that the same system previously permitted as part of the 12-unit subdivision would be used. The Town believes the previous subsurface infiltration system will be of insufficient size to handle the significant increase in impervious cover under the new project proposal. As such, the increased impervious cover within an area with high groundwater will continue to be a primary concern. The Town suggests that the proposal seek ways to increase the use of LID techniques on the site to include practices for rainwater recapture, open drainage systems, bio retention, and pervious pavement.

Wetlands

It is important to note that Fuller Brook, which borders the property, is one of the Town's most valued natural resources. Fuller Brook and its associated wetlands provide critical wildlife and plant habitat, greenspace for our residents, and important water filtration and drainage capacity. Wellesley just completed a major multi-year restoration of Fuller Brook, together with its tributary, Caroline Brook.

The Wetlands for the project site set the precedent with the Wellesley Wetlands Protection Committee to have the 200-foot buffer be an arc from the end of the riverbank. The current plans do not align with the previous approvals. In addition, the Town seeks clarification whether the proposed grading and construction, particularly of the units on the western property line, will have grading within the riverfront area or whether there will be any discharge that will impact resources protected by the State Wetlands Protection Act and local wetlands bylaw and regulations. Given the topography of the site and the changes to grade with **extensive tree removal**, sedimentation and erosion must be considered and evaluated. The applicants are encouraged to file a RDA or NOI as it appears the wetlands are impacted by the development. The Town further notes that the existing ORAD will expire on June 15, 2018, so the applicant may want to have the ORAD updated or extended.

Landscape

The Town prides itself on being conscious of efforts to improve sustainability and preserve substantial and significant trees and vistas, and past and continued efforts have been recognized through the Tree City USA program, the EPA, Green Communities, etc. It is unclear from the current plans what trees, if any, outside of the protected Flood Plain and wetlands areas will be retained. The Town asks the developer to identify protected trees. The previous subdivision plan had areas where significant tree retention was planned. The Town encourages preservation of significant trees and encourages the replanting of a diverse array of native species including trees, understory plantings, and shrubs. It is also noted that any alteration or removal of public shade trees per MGL c. 87 along the frontage of the property will require approval.

Water and Sewer

The site is located in an area of Wellesley where there is a mix of public utility services. The Town requests that all existing septic systems and private wells on abutting properties be identified on plans to evaluate potential impact. Additionally, given the size and scale of the project, the abutting properties not currently on sewer or Town water should be given the opportunity to connect in the future if Title V fails, so connections should be provided and available to abutting properties not currently on sewer.

The Town notes there is concern over sewer capacity in the area. There is no information to analyze capacity, but the sewer connection shall be required to extend the existing gravity sewer in Great Plain

Avenue to the easterly side of the property. The Town would like to maintain gravity sewer where possible, but given the grades of the site, ejector pumps will be needed in some locations that must be privately owned and operated. The Town at present believes there is suitable capacity for water service, but must analyze data on projected water use once received.

Fire

A fire hydrant will be required at the front and likely the rear of the site. The site layout prevents maneuverability around the site with two dead end access points in the triplex (Tier I) section of the property. Information on the turning radii for the proposed access roadway to the Tier II and Tier III sections of the site has not been provided. Any on-street parking (not in designated parking spaces), given the 22 foot width of the roadway, could cause access issues. Guest parking, greater than what can be accommodated in driveways, should be restricted on the access drives.

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 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 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 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 (Added to SHI 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 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 2017 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. The Town is currently interviewing consultants.

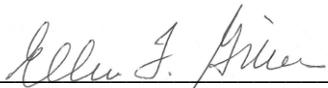
For reference, 40B projects currently in Project Eligibility are:

1. 680 Worcester Street (20 Units)- ~ 2 miles from proposed project (Masshousing)
2. 16 Stearns Road (36 Units) ~2 miles from proposed project (Masshousing)
3. 148 Weston Road (55 Units) ~ 1.8 miles from proposed project (Masshousing)
4. Delanson Circle (90 Units) ~ 1.4 miles from proposed project (MHP)

Other 40B projects being considered in Wellesley

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

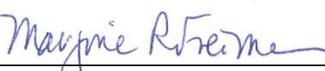
Sincerely,



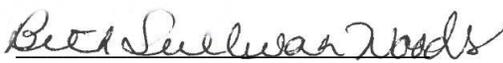
Ellen F. Gibbs, Chair



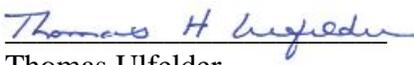
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Thomas Ulfelder