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EXECUTIVE DIRECTOR OF GENERAL GOVERNMENT

November 27, 2017

Katherine Miller
MassHousing
One Beacon Street
Boston, MA 02108

RE: 148 Weston Road, 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 Wellesley Park, LLC for the construction of a 55-unit residential housing structure on an approximately 0.82 acre parcel in the Town.

Site Constraints

The site has an area of 35,967 square feet and is entirely within the Zone II Wellhead Protection Area for Wellesley College. The proposal does not acknowledge how the project will protect groundwater recharge or mitigate for non-source pollution. The proposed development has a gross floor area of 65,756 square feet, a Floor Area Ratio of 1.83, and height greater than 62 feet. The density for this project is 66 units per acre. The proposed project will render over 77% of the site impervious, and retains 23% of the site as "open space," which the applicant purports to be usable. The Town disagrees with the usable nature of the space given its limited area and dual use as a fire access road.

Density

As proposed, this project is the densest of the five (5) pending projects with a density of 66 units per acre (or 654 sf of lot area per unit); comparatively, the second densest project, immediately across the street from a commuter rail station, is at Delanson Circle with 63 units per acre (or 686 sf of lot area per unit). The property is zoned Single Residence District - 15,000 Square Foot Minimum Area District, which has a maximum density under the Zoning Bylaw of 2.9 units per acre. The density for this project is far too great given existing traffic volumes, queuing and stacking issues, at an area in Town where there is already a high accident rate. In the immediate area of 148 Weston Road, there have been over 26 accidents in the last 5 years, including a fatality of a bicyclist just past the Weston Road/Linden Street intersection. The area has a number of multi-family structures; however, all are located on Linden Street.

Within close proximity to the project site along Linden Street, multi-family housing exists at reasonable densities and heights. At 2-20 Linden Street, there are 10 units at a density of 6.78 units per acre. These units are housed within two-story structures. At 3-25 Linden Street, there are 10 units at a density of 8.7

units per acre. These units are also housed in two-story structures. Along Linden Street other multi-family dwellings have similar densities and two-story designs with the highest density along the corridor currently at approximately 17.7 units per acre at 37-63 Linden Street.

Wellhead Protection Zone and Stormwater

The project site is located within Wellesley College's Wellhead Zone II. Under the Massachusetts Drinking Water Regulations, 310 CMR 22.21(2)(b)(7), land use controls for Zone II must prohibit land uses that result in rendering 15% or 2500 square feet of a lot impervious, whichever is larger, unless a system of artificial recharge of precipitation is provided that will not result in degradation of groundwater quality. The project will render 77% of the site impervious. The small "open area" that could be an area for the subsurface infiltration will also be the fire access and turnaround. The subsurface area would therefore have to withstand the load of one or more fire trucks and other emergency vehicles. The Town wants to note it will be completely opposed to any stormwater systems located underneath the foundation/garage of the building. (See 310 CMR 22.21(2)(b)(6) requiring prohibition of removal of soil, loam, sand or gravel within four feet of the historical high groundwater table elevation¹.) It should also be noted that snow melt from surface parking and access drives 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 volume².

The submitted plans currently do not include information on stormwater calculations or management, nor do they address Wellhead Protection measures. In general, given the dense site configuration, there is limited availability for subsurface retention in the small "open space" area directly abutting the rear of the property at 144 Weston Road.

The Town is also concerned about the activities and materials detrimental to drinking water and surface water that will be generated by 55 households and general property maintenance within a Wellhead Protection Zone. These materials include pet waste; oil and other automobile fluids; herbicides, pesticides, fertilizers; ice melt products; cleaning and other household maintenance materials. While the Town would endeavor to educate the residents and property management on how to properly manage such materials, responsible management is by no means assured. In the near term, the Town is concerned that the extensive construction activities could also result in the deposition of materials in the Wellhead Protection Zone including oil and other vehicle and equipment maintenance materials; volatile organic compounds in paints, stains, and paint thinners; concrete curing compounds; asphalt products; wood preservatives; roofing tar; adhesives and septic wastes.

Fire Access

The proposed access and egress to the site for the Fire Department proposes to include essentially a backout/turn movement using "open space" areas on the site that likely would be reinforced. There is no access from the north or west sides of the parcel from Town land which is tree covered. When responding to any EMS call in Wellesley, a fire truck, ambulance, and police car respond. The fire access lane will need to remain clear to allow a fire truck to exit the site from these various calls. That will include maintaining clearance 365 days a year and will require plowing and limited plantings. The narrow access passage between the driveway and the property at 144 Weston Road will be challenging with snow plowing/clearing as well as when vehicles are parked in the surface lots.

Affordability

The proposed project is seeking to only have 11 units or 20% of the project classified as affordable. In doing so, rent for the affordable units is based on 50% of the median income. The project is within close proximity to twelve (12) Wellesley Housing Authority units at Waldo Court (50 Linden Street) which are low-income family housing (renovated with Town and HUD funding in 2009), and 1900 feet from the

¹ See Massachusetts Stormwater Management Standards 6 and 7.

² See Massachusetts Stormwater Management Standard 4.

proposed Wellesley Crossing project at Delanson Circle approved by Massachusetts Housing Partnership for 90 units with the affordable component at 50% of the median income. The Town would prefer to increase the affordability threshold to 25% of the project at 80% of the median income to diversify the housing stock in the area, and to decrease the affordability gap between the market and affordable units, which as proposed escalates from 200% to 300% with the number of bedrooms per unit.

Traffic

Potential traffic associated with the project is a significant concern given longstanding issues with traffic volume and delays along Weston Road. At the site visit, Masshousing suggested that the Town could identify mitigation measures. The following outlines the Town's concerns, and explains why mitigation measures are essentially non-existent.

Heavy Traffic Volume: On average, Weston Road experiences traffic volumes of approximately 15,500 cars daily. The Town has conducted numerous studies on Weston Road in an attempt to mitigate existing traffic, with limited success. The Town is currently studying the pedestrian light at Weston Road and Linden Street to improve pedestrian safety given a significant number of complaints and continual police enforcement at the high crash intersection. Weston Road is one of the few north/south corridors running through the Town and is heavily used by both residents and commuters alike. In particular, Weston Road is a primary connector between Route 9 to the north and Wellesley Square, and carries all of the vehicular school traffic for one of the Town's elementary schools and a substantial portion of traffic to Wellesley College.

Extensive Queuing Resulting in Cut-throughs: The intersection of Weston Road at Central Street operates very poorly (Level of Service F)³ during the commuting peak periods due to the high traffic demand. The resulting southbound queues on Weston Road typically extend beyond 1,000 feet from Central Street. At times, the southbound queues extend as far back as Turner Road (approximately 2500 feet). These queues extend through the Linden Street intersection blocking vehicles from entering Weston Road. Due to the traffic congestion and long queue on Weston Road, Curve Street and Howe Street, which have no sidewalks, are increasingly used as cut-through streets to get to Linden Street. These two streets have steep slopes and curvy or hard-angle turns making excessive speed dangerous for neighborhood residents and other motorists. Heavy volumes at the Route 9 and Weston Road Interchange also generate traffic congestion. Vehicles entering and exiting the Route 9 ramps experience significant delays (Level of Service F) due to the heavy volumes on Weston Road. In the northbound direction, queues generated by school activity and the Route 9 ramps were found to extend back to Turner Road (approximately 1,700 feet) in the morning peak hour.

Recent Traffic Studies: The Town most recently studied Weston Road as part of the purchase of the North 40 in 2014 and in review of a school project (Hardy, Hunnewell, and Upham) in 2017.⁴ Due to the limited right of way width of 40 feet, the existing volumes, and existing impediments including the MBTA rail line bridge, the mitigation options are very limited, if not impossible. While improvement might result from the expansion of the bridge width, this would require a taking of property, and would cost up to \$5.5 million, depending on scenarios. This option would also require the agreement of MassDOT and MBTA. Further, we note that this bridge was fully rebuilt at substantial cost to the Town in 1997.

As part of the 2014 study, Beta Engineering, the Town's traffic consultant, made the following findings:

- The intersection of Weston Road at Central Street (Route 135) has a volume capacity of 1,800 vehicles during the morning and afternoon peak hours.

³ Beta Engineering, Preliminary Traffic Study of the North 40 Area dated September 30, 2014 prepared by Kien Ho.

⁴ Beta Engineering, Wellesley "High Level" Traffic Evaluation of Elementary School Consolidation/Redistricting February 14, 2017

- Traffic data indicates approximately 2,300 cars are traveling through the intersection during these peak hours, exceeding the volume capacity by approximately 500 cars.
- For this intersection, the morning peak hour is between 7:30 am to 8:30 am, and the afternoon peak hour is between 4:30 pm - 5:30 pm.
- As noted above, queues for the Weston Road/Central Street intersection can extend during these times approximately 1,000 to 1,700 feet back from the intersection along Weston Road.

The traffic volumes and queues on Weston Road are existing conditions. The addition of 55 units at this location will further degrade the level of service at the Weston Road/Linden Intersection and Weston Road/ Washington Street (Route 135) intersections. Increased volume generated to/from the proposed site will exacerbate these existing safety and traffic operational concerns outlined above.

New 40B Impacts: On November 8, 2017, Massachusetts Housing Partnership notified the Town that site eligibility has been granted for a 90-unit project located at Delanson Circle (aka Wellesley Crossing) at the corner of Hollis Street and Linden Street. Linden Street provides critical east/west access to Weston Road, the north/south access of Wellesley. Traffic in the immediate area of the projects will be further exacerbated from the Delanson Road project. Adjoining streets in the area will be further impacted by cut through traffic due to increased congestion and wait times at the Weston Road/Linden Street intersection, Linden St/Crest Road intersection, and Weston Road/Central Street intersection. Addition of these 55 units will result in 145-unit residents vying for through-traffic corridors to two of the most heavily-sought destination areas in Town: Central Street the head of downtown and the shopping center at Linden Square which houses the largest grocery store in Town. Traffic will be impacted greatly by new residents seeking routes to these two locations.

Abutting Properties

The setbacks of the proposed project are inadequate and juxtapose a 62-foot-tall building, 25 feet from the property line of a single residence home located at 144 Weston Road. This proposal has situated the proposed structure 5 feet from Town land. The design is totally out of character with the neighborhood, which as noted includes low-impact, two-story multi-family housing on Linden Street. On Weston Road, the neighborhood is comprised of low 1 ½-story Cape Style, Farmhouse style Colonials, and Dutch-style Colonials, many of which were built in the 1800s or early 1900s. Newer homes constructed along Weston Road have followed historic patterns and are low-profile in nature. The proposed monolithic structure will significantly rise above the area, and likely will be seen from the entire surrounding neighborhood (known as College Heights) and even from Wellesley College given the height, glass architectural design, and impacts from lighting.

The minimal setbacks surrounding the property leave no room for an adequate buffer. The grades of the property decline to the rear of the site, which is a concern for the Town on stormwater run-off, but in addition provide for no landscape buffer or screening. The minimal attempt at open space on the site, based on the fire access plan, would preclude plantings other than grass immediately abutting residential properties. The top floor balconies will further encroach on the privacy of the immediate abutters located at 144, 140, and 138 Weston Road. The properties located at 140 and 138 Weston Road have indicated they already experience wetter back yards from stormwater run-off from the cleared 148 Weston Road property. They have voiced significant concerns that stormwater run-off will further degrade their properties, as well as the Wellesley Municipal Light Plant Substation property located downhill at 134 Weston Road.

To the north and west of the property, the abutting land is owned by the Town and is commonly referred to as the North 40. The rear parcel line touches the Cochituate Aqueduct, an historic resource listed on the National Register of Historic Places. The Cochituate Aqueduct is owned by the Town and is used for trail walking, but also has utilities including water and sewer. The site design has not taken advantage of this asset, which may be the only safe pedestrian access point to a safe crosswalk at Linden Street. The Town

also has previously committed to having buffer and screening between any buildings constructed next to the Cochituate Aqueduct. This project design would preclude any screening to the Cochituate Aqueduct.

Proposed Parking

The parking for the site includes 60 parking spaces or 1.09 spaces per unit. The proposal does include 6 visitor parking spaces and a small area for deliveries which is critical since **on-street parking along Weston Road is prohibited**. The Town continues to remain concerned that the parking is insufficient to house residents in two and three bedroom units, almost none of which would likely have only one car in a suburban environment, regardless of the proximity to the MBTA station. (We note that the nearest large grocery store is $\frac{3}{4}$ of a mile from the proposed project and is therefore not easily walkable with a load of groceries.) Although parking has been provided for deliveries, the turning radius, should cars be parked in the visitor spaces appears to be limited. The Town notes trash is not part of the plan, but likely will be required to be located at grade and will deplete the surface parking areas.

Site access

The proposal includes direct ingress and egress from Weston Road. As noted above, Weston Road has existing capacity issues and often times forms long queues from Central Street back to almost Route 9. The access to the site heading northbound on Weston Road does not have suitable width to create a left hand turning lane. Access to the site heading north will create backups that will further impact the Linden Street and Central Street intersections. The Town is also confident that significant stacking and queuing on-site will occur during the morning peak due to the existing volumes on Weston Road. The short driveway area and garage likely will not be able to handle the potential stacking on site.

The location of the driveway is also troubling. The project location has a minimal frontage on Weston Road. The developer is proposing to keep the existing driveway in its location, which directly abuts the residential driveway of 144 Weston Road. The lights of turning vehicles will significantly disrupt the livability within this house. Turning into the site, a driver feels like they are turning into 144 Weston Road's driveway. The developer proposes a small "amenities" building, which should be removed. The driveway should be altered to create some buffer for the residential abutter. In doing this, the only way to then make parking and access work is to decrease the size of the building.

Pedestrian access

The project location has no pedestrian amenities on the west side of Weston Road. Residents would be required to cross Weston Road to the existing sidewalk. Safe passage across Weston Road during the peak times would be encouraged at the Municipal Light Substation located at the intersection with Linden Street. The proposed plan has no pedestrian access proposal to safely move its residents to points of interest or the commuter station. The interior configuration of pedestrian access is located directly against the residential property located at 144 Weston Road, with no screening or buffering proposed. With snow conditions and the limited ingress and egress into the site, pedestrian access will be limited to the travel way in the site.

Public Transportation

The Applicant characterizes the proposed project as "transit-oriented." Wellesley is extremely fortunate that the commuter rail serves our town. However, it should be noted that only 28% of employed Wellesley residents work in communities serviced by the commuter rail line (i.e., Boston, Newton and Framingham)⁵. Only 9% of Wellesley residents use public transportation to get to work while 68% drive to work. The nearest train station to the proposed project is 0.4 miles away. The MetroWest Regional Transit Authority has the Route 8 commuter bus which travels along Weston Road and to several stops within Wellesley, Natick and western Newton. It should be noted that Route 8 runs on a very limited schedule Monday

⁵ See "Wellesley at a Glance," wellesleyunifiedplan.com.

through Friday. In summary, while there are limited public transit options in the vicinity of the proposed project, it is an overstatement to characterize the proposed project as “transit-oriented.”

Construction Concerns

The Town has significant concerns with respect to the practicality of constructing this project on this site. 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 will be extremely limited and therefore will significantly affect the adjacent property and neighborhoods, as parking is not allowed on Weston Road or Linden Street. Adjacent neighborhoods along Howe Street, Turner Road, Curve Street, or Avon Road must not be impacted. These neighborhoods already experience significant cut-through traffic due to the traffic volumes and delays along Weston Road. The narrow nature of roads such as Howe, Curve, and Avon, combined with the existing hilly topography, will make travel dangerous should construction workers park in the area. The developer will be required to have parking off-site and to shuttle workers to the site. Deliveries will need to be expertly coordinated. Parking, even of a temporary nature on Weston Road, represents a significant safety concern to the Town and has the potential to significantly impede safety in a high crash and heavily congested area. The developer has not stated in the site application how construction would be staged and coordinated.

Landscape

The site is surrounded by dense forests, including significant tree stands located within the North 40. Without ever coming to the Town to discuss potential by-right development, the property owner cleared the site of 95% of the preexisting trees. The project proposes to situate the structure to the rear of the *pork chop*-shaped lot, but does not address any landscaping or screening of the site. The dense site design further limits the ability to screen with the placement of sidewalks against existing property lines, and fire access drives over the minimal open space area. The site is too dense to accommodate the design, and the neighbors will have no relief from the monolithic structure.

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. 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 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
- November 2017: 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.

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

1. Delanson Circle (90 Units) ~ 1900 feet from proposed project (MHP-granted)
2. 135 Great Plain Avenue (44 Units) ~ 2 miles from the proposed project (MassHousing)

Other 40B projects being considered in Wellesley:

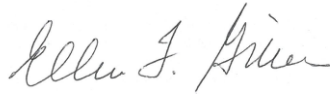
1. 136 Worcester Street (44 Units) ~3 miles from proposed project

Recent projects denied site eligibility, but likely to return as 40B projects are:

1. 680 Worcester Street
2. 16 Stearns Road

Based on all of the reasons articulated above, the proposed development is poorly designed and too intense for a site that is less than 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 traffic and safety concern, poses potential risks to the local groundwater supply, and must be denied at this level of density.

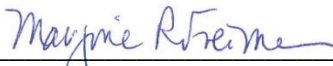
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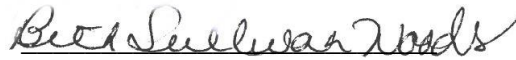
Ellen F. Gibbs, Chair



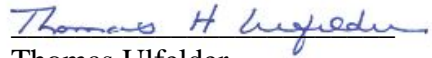
Jack Morgan, Vice Chair



Marjorie R. Freiman



Beth Sullivan Woods



Thomas Ulfelder