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October 17, 2017

Katharine Lacy
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110

RE: 1-8 Delanson Circle, Wellesley, MA Site Eligibility Response to Revised Plans

Dear Ms. Lacy:

On behalf of the Town of Wellesley Board of Selectmen and Planning Board, please find the following comments with respect to the Revised Comprehensive Permit Site Approval Application recently revised by Delanson Realty Partners, LLC for the reduction in the proposed development from a 95-unit to a 90-Unit residential housing development at 1-8 Delanson Circle within the Town of Wellesley.

The Town remains steadfast in its view that the project as proposed is much too intense for a site less than 1.5 acres in size. The revised plans include the developer's unproductive revision, purporting, yet failing, to address Massachusetts Housing Partnership's (MHP's) peer review concerns. The revision minimally decreases the number of units from 95 to 90, and the Town's initial comments are **all** still relevant. Based upon email communication between MHP and the developer, the Town is aware that MHP's peer reviewer, Steven A. Heikin, of Icon Architecture, agreed with much of the Town's concerns (Attachment A) including the following specific concerns detailed below. The proposed development has **not** been responsive in modifying the plans to address these concerns. Icon's recommendation was to reduce the number of units to 66. The minimally revised proposal of 90 units, **still nearly 50% greater** than Icon's recommendation, continues to be unacceptable concerning the level of density, site grading and design, pedestrian circulation, parking, access, stormwater design, building design, and transition to abutters.

Vehicular Access and Parking

The parking ratio continues to be low for the project at 1.11 with a significant portion of the parking being usable only with 46 stacker parking spaces that are also tandem parking spaces. The required level of parking management to verify continuously successful operation is extraordinary and the **parking configuration continues to raise significant concerns that it is unworkable**. To further limit the parking, the developer proposes to work with Zipcar, which could only be accommodated within the parking area further reducing tenant parking spaces to an unknown level. The concept of Zipcar seems favorable, however, Zipcar is accessible to the greater public generally and is not limited to tenants. To meet the parking demand on site, the unit count must be decreased. At present, there is also no traffic data or turning radius analysis to assess the impact the additional vehicle trips, including additional EMS calls, from the project would have on Hollis Street or Linden Street. The Town's original comments concerning traffic, parking, and access all continue to be of significant concern.

The Town would like to reiterate a critical point of clarification in the plans submitted. Hollis Street is a **PRIVATE** way. The plans submitted to MHP list Hollis Street **incorrectly** as a Public Way. The right of way has never been accepted by the Town of Wellesley Town Meeting, and therefore is under the control and ownership of the abutters with frontage along Hollis Street. The Town does not have jurisdiction over the way with regards to widening the exceptionally narrow road. The developer may be able to widen the right of way by granting a portion of their property to the right of way layout, but concerns over access and impingement on private property remains high with abutters given the narrow nature of the existing right of way and paved area.

Pedestrian Site Circulation

The Town disagrees with the assessment from Icon Architecture that the pedestrian circulation is “well thought out”. The pedestrian access around the building on Hollis Street is lacking on a well-traveled pedestrian route to the Sprague School. The minimal 30-foot right of way (13-18 foot paved area), scale of the building and increase in vehicular volume precludes the ability to construct safe, buffered pedestrian access in spring, summer, and fall conditions. Pedestrian concerns will escalate during winter conditions as snowbanks further decrease the width of the travel way and force pedestrians into the road, as there are no sidewalks. The Town’s initial comments on sidewalk construction and pedestrian activity remain.

Stormwater Management

Icon Architecture noted **“the proponent should provide at least basic information on the proposed stormwater management system for the project, which should be subject to independent peer review”**. There has been no additional information provided on stormwater for a project where the site is predominantly ledge and the usable area has been decreased to comply with concerns over the construction of a 30-foot retaining wall. With the removal of the 30-foot retaining wall, the amount of usable open space declines as well as the opportunity for any subsurface infiltration chambers. A reduction in density may allow for a better site design.

The Town’s Municipal Stormwater Drainage System Rules and Regulations require that “[o]n-site stormwater management BMP’s shall be used to infiltrate, disperse, and retain stormwater runoff onsite to the maximum extent practicable.” These rules and regulations further require the applicants to “submit runoff calculations substantiating the anticipated volume of discharge” and “[i]n the case of development or redevelopment projects, discharge quantity shall be limited to preconstruction amounts.” The project has not yet provided any information as to how it intends to address these requirements.

In addition, the Town continues to analyze the potential impact on the Town’s stormwater system in this area. Three potential 40B (Wellesley Crossing, 16 Stearns Road, and 680 Worcester Street) projects could potentially direct overflow discharge to the McCracken Brook Culvert which runs from Route 9 through Sprague Fields, across Linden Street by 151 Linden Street, under the railroad tracks to daylight at Town Hall. This complex system was near capacity with the Linden Square redevelopment in 2006. Alternatives to directing stormwater from the Delanson site include directing the overflow towards Crest Road. In discussions with the DPW, this alternative system discharges onto MBTA land and currently experiences flooding with the existing stormwater discharges. The project has not indicated **ANY** plans for stormwater management, and the Town continues to raise serious concern over disturbing over an acre of land with no current plans for stormwater retention or management.

Building Design

The reduction in scale by five units **does not** decrease the significant impact the size, scale, and mass of the structure continues to have on the surrounding neighborhood which is described by Icon Architecture as “modestly-scaled single and two-family dwellings”. Icon further agrees that abutting housing, **“Those that remain, to the north and west, and across Hollis Street, will be significantly impacted by a development of this scale”**. Icon additionally reiterates the Town’s concerns that the project **“does not...achieve a comfortable or sensitive transition to its immediate abutters.”** Icon further agrees with the Town’s findings with its comments that the **“overall height and bulk of the building, and the near-leveling of the site...represent an uncomfortable and excessive intrusion on the adjacent properties.”**

Icon Architecture concluded that the major issues with the proposed project are the scale and height of the building, and the approach to site design. The Town agrees. A reduction in height, footprint, and density would assist with mitigating the significant impacts the currently project proposes.

Affordability

The project continues to raise concerns with the use of 50% of the median income, thus requiring only 20% of the units to be affordable in a project in a high-end market. If the goal of 40B is to increase affordable housing, particularly in a project that is aggressively increasing density incongruous to the neighborhood, the Town requests that MHP require 25% of the units be affordable at 80% of the median income. This would not preclude tenants making less than 80% from qualifying, and would decrease the gap between the market rate and affordable pricing.

The Town urges MHP to consider current and previous concerns (Attachment B) raised for this site and to consider the goals of the project relative to the intent of the 40B statute and MHP's mission. MHP's mission is to "to significantly expand the supply of affordable housing throughout the Commonwealth". The current proposal creates 18 affordable units, while allowing a developer to construct 72 units at market rate, at a considerable cost to the Town and direct abutters. A far less dense project at 25% affordability would far better serve those in need of affordable housing, and the Town of Wellesley.

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 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 as noted above.

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

1. 680 Worcester Street (20 Units)- ~.05 miles from proposed project
2. 16 Stearns Road (36 Units) ~2100 feet from proposed project
3. 148 Weston Road (55 Units) ~ 1500 feet from proposed project
4. 135 Great Plain Avenue (44 Units) ~ 1.3 miles from proposed project

Other 40B projects being considered in Wellesley

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

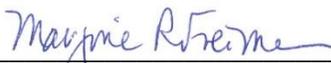
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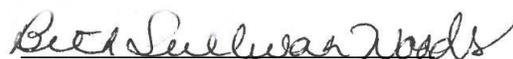
Ellen F. Gibbs, Chair



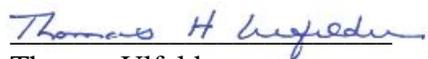
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ATTACHMENT A

Laura F. Shufelt
Community Assistance Manager
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110

August 3, 2017

**RE: Design Review/Proposed 40B Project Eligibility Application
Wellesley Square Residences, 8 Delanson Circle, Wellesley, MA**

Dear Ms. Shufelt,

In accordance with our agreement to provide third-party professional design review assistance, this letter constitutes our review of the conceptual design of a proposed 40B project in Wellesley, MA, and our findings as to its appropriateness for the site on which it is proposed to be located.

The proponent, Delanson Realty Partners LLC, provided review materials including a Project Eligibility Letter (PEL) application and several attachments: a project narrative, and various locus maps. An updated Design Concept Package, dated June 22, 2017, was provided by EMBARC Architecture and Design; an Existing Conditions Plan, dated January 12, 2017, was provided by McKenzie Engineering Group. Additional updates, with revised site area and open space calculations, were provided on July 26 and August 2.

Our design review process included a site visit on Tuesday, June 20, which was attended by representatives of MHP, the development team, and the Town of Wellesley, including members of the Planning Board and Board of Selectmen, and several abutters. The development team was represented by Victor Sheen of Delanson Realty Partners, LLC, Geoff Engler of SEB LLC, and Dartagnan Brown of EMBARC.

Existing Conditions

The site is a rectangular 61,774 SF (1.42 ac) parcel fronting on Linden Street directly across from the Wellesley Square MBTA Commuter Rail Station, with additional frontage on Hollis Street to the east. The Linden Square shopping area is several

blocks to the east on Linden Street, and the shopping area of Wellesley Square is a short distance away via Linden Street and Crest Road across the MBTA commuter rail line.

The property is currently occupied by five one- and two-family residential structures on a private central cul-de-sac, Delanson Circle, entered from Linden Street. A number of large trees are set among the existing homes; others line the perimeter of the site along the north and west property lines.

Aside from the existing structures and mature trees, the most significant feature of the property is its significant grade change. It rises from east to west, diagonally across the site, from an elevation of 157 at the southeast corner, at the intersection of Linden and Hollis, to an elevation of approximately 200 at the northwest corner – a grade change of 43 feet. (The proponent’s narrative incorrectly describes this grade change as approximately 30 feet.)

The site is bounded on its north and west sides by residential properties which will be significantly impacted by a development of this scale, particularly due to the extensive excavation proposed. Three of the abutting residences to the north and west of the site are 20 feet or less from the property line.

The Proposed Project -- Overview

The proposed development – Wellesley Square Residences – consists of 95 units in a six-story building comprised of 5 residential floors above an at-grade parking level which also includes the residential lobby and leasing offices. The construction is a podium-type building, with five wood-framed floors above a concrete base with a three-hour fire separation above the parking garage and lobby. The parking level and residential entry are set at elevation 160 – the existing grade at the midpoint of the site’s frontage along Linden Street. The parking is entered, however, from Hollis Street, with a short ramp down from elevation 163 at the entry point.

The upper floors of the building form a U-shaped enclosure around a central courtyard, which is set at one level above the garage and Linden Street, at el. 171. A portion of the Linden Street wing of the building, starting at elevation 171, extends beyond the garage and lobby area, as the existing grade of the site begins to rise in this area. An upper lobby and building amenity spaces, including a fitness room and community room, open onto the courtyard at this level, as do a number of residential units on this floor. The courtyard may be reached directly from Linden Street by a monumental set of open stairs, which are accessed under a two-story arched opening. Barrier-free access to the courtyard is available by an elevator

connecting the two lobby levels. The courtyard is also accessible from Hollis Street via a fire lane along the northern edge of the site; the elevation of the courtyard, at el. 171, is the same as the existing elevation along Hollis Street at the northeast corner of the site.

The project’s unit mix and average unit areas are as follows:

1 BR:	34 units (36%)	875 SF
2 BR:	44 units (46%)	1100 SF
3 BR:	17 units (18%)	1300 SF
Totals:	95 units (100%)	

The project thus exceeds the required 10% for three-bedroom units.

Site Development

Site Grading: This development is founded upon an extensive excavation of the sloping site, setting a base garage and entry level at the grade of Linden Street at elevation 160. This garage level occupies approximately 2/3 of the site. At the northwest corner of the garage, the existing grade is approximately 185, requiring the removal of approximately 20 feet or more of existing fill to get to the depth required for the structure’s footings.

The project’s central courtyard, which sits atop the garage slab at elevation 171, is created by additional excavation of the northwest and western portions of the property, with a series of five stepped retaining walls used to achieve the transition to the existing grade at the property line, as can be seen in the site plans and section. At the northwest corner of the site, its highest point, the existing grade is a bit more than el. 200 – nearly 30 feet above the proposed courtyard elevation.

Vehicular Access and Parking: The project proposes a single level of garage parking, entered from Hollis Street via a slight down-ramp. Although the survey indicates that Hollis Street, a public way, has a right-of-way dimension of 33 feet, the paved portion of the street appears to be only about 18-19 feet wide. There are no sidewalks at present on Hollis Street. The building is set back 15 feet from the property line, with approximately another 7-8 feet shown as sidewalk within the right-of-way on the site plan. This should provide for adequate visibility and allow for an adequate turning radius at the curb cut to facilitate access for cars entering and leaving the garage. However, a traffic study should confirm the viability of access from Hollis Street, as well as any issues related to cars turning from Hollis Street into the much busier Linden Street.

The updated plans indicate two parking options. The base plan provides 82 parking spaces, 15 of which are tandem. This provides an overall ratio of 0.86 spaces per unit. However, if the tandem spaces are intended to serve residents with two cars, then only 67 of the 95 units would have access to a parking space, a parking ratio of 0.7 spaces per unit.

An alternate parking plan provides for a total of 100 spaces, replacing the tandem parking spaces with a two-deep stacker system, which can be operated by the residents themselves to retrieve cars in the back row as well as the upper level. This makes any space available to a resident, with slightly more than 1 space per unit overall. How the parking is managed, and whether spaces are available to residents of the affordable units, and under what terms, should be evaluated further if the project proceeds.

Parking space and garage aisle dimensions, at 8.5x18 feet and 24 feet respectively, meet Wellesley's standards for the design of parking facilities. The garage plans also indicate storage space for what appears to be approximately 40 bicycles, although the space is labelled as holding 22.

The maximum parking ratio provided under the alternate plan, at 1.05 spaces/unit, is well below Wellesley's typical standard of 2.5 spaces per unit, or 2 spaces per unit in a Residential Incentive Overlay District. The site, however, is well-located as a transit-oriented development, across the street from the Wellesley Square commuter rail station, and within walking distance of two major shopping areas. The project narrative indicates that the site is a 4-minute walk from the #8 MWRTA bus on Central Street, which runs between Natick and the Woodland T Station on the Riverside Line. The proponent also proposes to work with Zipcar to provide on-site car-share service.

Notwithstanding these opportunities for a reduced parking ratio, this is still a 75% market-rate development in a middle-to upper-income suburban community with an excellent school system. The program includes a significant number of 2- and 3-bedroom units; it is likely that a fair number of units will be occupied by families with children. A parking ratio of 0.7 spaces per unit (assuming tandem spaces would be taken by families with two cars) or even 1 space per unit, if the stacker option is implemented, may not be enough to serve the residents of this development, suggesting that either a way of providing additional parking, or reducing the number of units be considered.

Site Circulation – Pedestrian: Pedestrian circulation around and within the site is well thought out. As noted above, the project plan shows a new sidewalk being

provided along Hollis Street. The building's main pedestrian entry is accessed from Linden Street, which leads to the lower level of a two-story lobby space, and which also provides direct access to the garage level. The upper level lobby, which opens onto the internal courtyard, provides for both internal and outside access to the adjacent fitness center and community room. A monumental covered staircase also connects the Linden Street entry to the courtyard. Yet another pedestrian route to the courtyard is available via the fire access lane along the northern edge of the site; this is a nearly level path, linking the courtyard, at el. 171, to Hollis Street at virtually the same elevation.

Storm Water Management: No information has been provided on storm water management. The portions of the site that are outside the perimeter of the garage, including the western portion of the courtyard and the fire access lane on the north side of the site, could provide locations for subsurface infiltration systems. Any such system would then presumably be connected to the Town's storm sewer system for overflow. The proponent should provide at least basic information on the proposed storm water management system for the project, which should be subject to independent peer review.

Landscape Design: The site plan provides only a preliminary concept for the landscape design of the site, including the central courtyard, which comprises the project's usable open space. An Open Space Diagram, dated July 26, 2017, indicates that the project's usable open space, including both green areas and paved walkways, totals 16,612 SF (0.38 ac), or 26.9% of the site area. This does not include the project's landscaped site frontage areas, the fire access lane, private terraces, or the stepped retaining wall area.

The project narrative suggests that the front, side, and rear yard setbacks will all be 25 feet. These areas will be at least partially landscaped; the site plan shows both street frontages lined with trees. However, the Hollis and Linden Street setbacks are both less than 25 feet. The setback on Hollis Street is 15 feet, with a proposed new sidewalk in the public right-of-way; the setback on Linden street ranges from about 18 to 20 feet, with an existing sidewalk in the public right-of-way.

The usable open space at the courtyard level includes a central circular path, partially shaded by trellises, with several benches around its perimeter. This area of the courtyard is bounded largely by common spaces, including the upper lobby, fitness center and community room. However, three units also face this area, with their own private terraces, which could create some privacy conflict with users of the common courtyard area.

The western portion of the courtyard contains several more public spaces, including a barbecue area and a private function area. These are more separated from nearby units. While the project narrative suggests that the courtyard “can accommodate public access as well as private space for resident use,” it is unlikely that this courtyard, while theoretically accessible to the public, would actually serve as a public space for non-residents unless it were specifically programmed as such from time to time.

The dominant feature of the courtyard is the 30-foot high set of retaining walls, which achieve the transition in grade from the courtyard elevation at 171 to the northwest corner of the site at 200. More detailed landscape plans and elevations, including a delineation of facing materials proposed for the wall itself, as well as plantings for the various terraces and an indication of how the plantings will be maintained, should be provided.

Building Design

The overall building design presents a very urban character – and a well-designed one – on a transitional, transit-oriented suburban site. Linden Street is a major commercial corridor, with several three- and four-story commercial office structures within one block of the site, and the Linden Square mixed-use development just a few blocks to the east. However, this site is nestled into a neighborhood of modestly-scaled single- and two-family dwellings – such as those currently on the site itself. Those that remain, to the north and west, and across Hollis Street, will be significantly impacted by a development of this scale.

What this project does well is to articulate its very significant bulk into well-composed and lively elevations. The building’s 6-story height is organized with a clear 1-story base, 3-story middle, and 2-story top, identified by changes in materials. The top is further articulated by a penthouse level that is set back from the main façade by 6 feet. A series of projecting bays in the middle section, topped by balconies at the fifth floor, and recessed bays at the Linden and Hollis Street entries, provide additional articulation and logical opportunities to vary materials.

Windows are large, with an industrial character to their muntin pattern, but varied in size, and supplemented by similarly muntined doors that open to Juliet balconies at most units, maintaining a residential character.

Typical materials are not fully defined in the project narrative, nor are they called out on the elevations, but the narrative does indicate that the base garage level will be clad in light-toned masonry, while upper floors will use “varying cladding

textures” with a “complimentary (sic) color palette.” The color palette in the renderings looks attractive, but the materials should be better defined.

What this project does not do well is achieve a comfortable or sensitive transition to its immediate abutters. While it “solves” the problem of its sloping site in an efficient manner, concealing all parking below a landscaped deck, and providing decent setbacks from the adjacent streets, in other respects it is too aggressive in its reach for urban density. The overall height and bulk of the building, and the near-leveling of the site, creating a stepped 30 foot retaining wall at the rear property line, represent an uncomfortable and excessive intrusion on the adjacent properties. Suggestions to mitigate this are provided in the recommendations below.

At a finer grain, the building plans indicate storage areas (for residents?) at the inside corners, which is a good use of that space, since there is no additional tenant storage provided on the garage level, other than for bicycles. However, the plans do not indicate how trash and recycling are to be handled.

Unit Design

Typical units are relatively spacious in overall area, with typical unit sizes listed in the narrative as follows: 1BR – 875 SF; 2BR – 1100 SF; 3 BR – 1300 SF. The project narrative indicates that affordable and market units will be the same size. However, the floor plans show that many 1 BR units are actually significantly less than 875 SF, including one at 781 SF, and a number at 845. The larger average is apparently due to a number of 1 BR+ units, which presumably include an office or den.

The typical unit plans provided reveal a number of concerns relative to the efficient use of space:

- The typical 1 BR unit illustrated includes an office, which is a windowless interior space, and has a floor area of approximately 1000 SF. This does not appear to be “typical” and illustrates a problem with the other “typical” unit plans.
- The “typical” 2 BR unit has an area of approximately 1134 SF; while this is spacious in the abstract and close to the average unit size, this unit has rather small bedrooms and a large interior space at the entry that provides little functional value or amenity.
- The “typical” 3 BR unit illustrated has an area of almost 1800 SF – 500 SF larger than the “average” 3BR unit, and it still has small bedrooms, no linen closet, and

windowless interior office. In addition, the master bedroom opens directly into the living room.

These “typical” unit plans, in fact, do not appear to be fully representative of the current project, as each of them has features not found in the building plans, such as a recessed balcony in the 1 BR unit, and overall configurations in the 2- and 3 BR units that do not match anything in the building plans.

Recommendations

A number of issues with the site development approach and scale of the project and the “typical” unit design are identified above and in the attached checklists. These issues and recommendations for mitigation or further design effort are summarized here.

Overview and Key Findings

This is an appropriate site for multifamily development. It is on a busy main street, close to various forms of public transportation and shopping. The building is generally well designed. But while it is an attractive design solution for a difficult site, it is a solution that lacks respect for its context.

Program, Parking, and Site Design

This project would benefit functionally and contextually from a reduction in scale: either height, footprint, or both.

- Reducing the number of units while maintaining the current parking strategy would increase the parking ratio.
- Eliminating one typical story would reduce the unit count by 21.
- Reducing the wing of the building that parallels the north property line -- say by eliminating the two end units -- would reduce the unit count by 10 (or by eight if an entire floor were also eliminated).
- Making both of these changes would reduce the unit count by 29, to 66.
- With 66 units, the parking ratio without stackers would be approximately 1 per unit. With stackers, the ratio would be 1.5 per unit.

Reducing the length of the north wing, as well as reducing the height of the building by one story, would mitigate the impact on the abutter to the north. It would also allow a re-thinking of the design of the open space deck, ideally providing for a more gradual and attractive transition between the grade of the deck and the grade at the property line.

Site Development -- Storm Water Management, Snow and Trash Handling

More information on all of these topics is needed.

Unit Design

The “typical” unit plans presented do not appear to have come from the present building design. They are not “typical” of the average unit areas listed in the project narrative, and do not make efficient use of space. Bedrooms are small, and windowless interior “offices” do not provide much amenity.

Conclusion

Following this letter are the two checklists, for Initial Project Review/Design Elements and Detailed Project Review.

As can be seen from the comments above and the summarized comments in the attached checklists, the major issues with this proposed project are the scale and height of the building, and the approach to the site design, particularly the carving out of the existing topography to create a level platform, while creating a three-story high retaining wall.

A reduction in height and/or footprint, ideally to a project size of about 66 units, would mitigate many of the impacts the project would generate in its current form, and improve the parking ratio per unit to a level that still recognizes access to transit, but is more commensurate with the project’s suburban location.

Please call if you have any questions or comments.

Sincerely,

ICON Architecture, Inc.



Steven A. Heikin FAIA
Senior Principal

Wellesley Square Residences, 8 Delanson Circle, Wellesley, MA
Initial Project Review: Design Elements Checklist
August 3, 2017

Factor

Findings

	40B Design Regulations	Integration with adjoining properties
Proposed Use	Acceptable	The site is in a transitional location, with the mixed-use commercial development along Linden Street to the east, and single family uses to the north and west. It is across the street from the MBTA Wellesley Square commuter rail station. Development under 40B is an appropriate use of the site.
Conceptual Site Plan	Acceptable in concept but too dense	The site plan is acceptable in its basic concept, with the structure set back 15-20 feet from the property lines along its street frontage, and parking concealed within the site under the building and an open central plaza. However, the overall scale of the building, including its height, the wing which parallels the northern property line, and the amount of excavation required to develop the garage at the grade of Linden Street, contribute to an overly dense intrusion into its surrounding context.
Building Massing	Acceptable but too dense	The building is fairly well articulated both in overall massing and vertically, with some thought to establishing a base, middle, and top. Some reduction in height and/or footprint should be considered to achieve a better fit on the site.
Environmental Resources	Not Acceptable	No information on storm water management, or handling of trash and recycling is provided.
Topography	Not Acceptable	The proposed site development requires extensive excavation, to a depth of 20 feet or more over much of the site, which is largely ledge. The creation of a 30 foot high retaining wall along much of the site's northern and western boundaries – even though it is stepped – is an inappropriate way of addressing the natural topography of the site.

Wellesley Square Residences, 8 Delanson Circle, Wellesley, MA
Detailed Project Review: Design Review Checklist
August 3, 2017

Factor	Finding: Integration with adjoining properties
Relation to Surrounding Structures and Public Spaces	Not Acceptable: Creation of a 30-foot retaining wall at the adjacent residential property lines is an inappropriate response to the site's topography.
Architectural and Site Details	Architectural Details: Acceptable. Site Details: Acceptable in general concept but a reduced footprint that allows for a more naturalistic treatment of the site's topography should be considered. A landscape plan should be provided.
Scale	Not Acceptable: The building should be reduced in height by one story and/or reduced in footprint, both to mitigate its impact on the surrounding context, and also to reduce the program to achieve a better parking ratio.
Building Height and Stepbacks/ Façade Design/Length and Articulation	Acceptable: Projecting and recessed bays, Juliet balconies and decks, the stepback at the penthouse level, and varied window sizes all provide articulation within the street facades, which are otherwise quite lengthy at around 190 feet each. Articulation of base, middle, and top is achieved through changes in materials.
Proportion	Acceptable.
Shape or Form	Acceptable: but the building's relation to the site and context would be improved if the northern wing were reduced or eliminated, which would reduce the impact on the northern abutters and permit a more naturalistic treatment of the central open space and grade transition to the property lines.
Streetscape and Landscape	Not Acceptable: A narrative describes proposed site amenities but these are only conceptually portrayed on the site plan. Achieving a better transition to the higher grades surrounding the site is a major concern. The 30-foot stepped retaining wall is not acceptable.
Design Treatments of the Edge	Not Acceptable: In addition to issues with the retaining wall, the proposed treatment of the Linden and Hollis Street frontages is unclear. Site plans appear to show the creation of a sidewalk along Hollis, which would be necessary with this development, but there is no clear indication that it is part of the project

TOWN OF WELLESLEY



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July 19, 2017

Katharine Lacy
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110

RE: 1-8 Delanson Circle, Wellesley, MA Site Eligibility Response

Dear Ms. Lacy:

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 Delanson Realty Partners, LLC for the construction of a 95-unit residential housing development at 1-8 Delanson Circle within the Town of Wellesley. While the Town finds the location of the proposed project to be a suitable site, the Town finds that the project's density and scale is incongruous to the neighborhood and will have a detrimental impact on abutters due to mass, scale, and traffic. We request that your office and the applicant consider our following concerns:

Site Constraints

The site has an area of 61,774 square feet. The proposed development has a gross floor area of approximately 125,000 square feet based upon the response that the proposed Floor Area Ratio is 2.0, and height greater than 66 feet. The application states the height is 50/60 feet. This may be based on average finished grade, but the maximum height is 66 feet. It is unclear how much open space will remain as the application does not indicate the proposed percentage. The site contains a steep grade with a difference in elevation of over 50 feet from Linden Street at the corner of Hollis street to the rear of the property. The entire site sits on ledge.

Proposed stormwater management concerns

Given the dense development of the site, stormwater management is a concern to the Town. The underground garage and dense site configuration will limit the available locations for subsurface infiltration. On site mitigation must be considered, however, the Town will be opposed to the location of subsurface infiltration within the foundation of the proposed

building. The rear of the site is proposed to consist of a series of retaining walls, which will impede available space for stormwater management. Properties on Linden Street, in particular the 151 Linden Street building, have experienced flooding in years past due to poor stormwater management. The Linden Square Development corrected the issue, although the correction was based on the stormwater generated from their development. Unmanaged stormwater will exacerbate the problems associated with the McCracken Brook culvert.

Proposed setbacks will cause unacceptable impacts to abutting properties

The setbacks of the proposed project are inadequate and juxtapose a 66-foot-tall building 25 feet from the property line of a single residence home located at 7 Oakencroft Road to the north (total separation of buildings is approximately 47 feet) and to the two-family property located at 12-14 Hollis Street (total separation of buildings is approximately 38 feet). The proposed structure will be placed into the existing slope, so height will be somewhat mitigated, however the property at 12-14 Hollis at approximately 30 feet in height will have a 55 foot structure 38 feet away. The minimal setbacks leave no room for an adequate buffer; particularly given the fire access road will be located within the rear 25 foot setback along Hollis Street. In addition, the proposal creates exterior balconies for the top floor that will overlook the abutting properties with minimal visual or sound mitigation.

Parking Garage is poorly designed and will not function as proposed

The parking for the site includes 84 parking spaces, not the 95 identified in the application, for .88 spaces per unit. Tandem parking has been used in the site for 30 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 Hollis Street, **which is a private way with a limited right of way of 33 feet. The application is also incorrect in establishing Hollis Street as a public way.** The applicant has provided no visitor parking. Their proposal may rely on public parking across the street at the Tailby Municipal Lot. This lot is filled with commuter parking throughout the day, and does not allow overnight parking. The Town's fear is cars will park illegally on Hollis Street or along the proposed fire access way, significantly impeding traffic along a narrow road with poor sight lines. The proposal does not indicate areas for parking of delivery trucks or workers to the facility. Parking for deliveries is limited and appropriate turning radii for delivery trucks has not been accounted for in the design. Trash is unaccounted for either on the exterior or interior of the building, and access to trash hauling will be difficult if located within the underground parking garage. It is important to note that Wellesley does not have municipal trash removal, but relies on residents or private trash hauler, as licensed by the Board of Health.

During the site walk, the proponents indicated that stacked parking might be considered to alleviate the tandem parking issues. The Town's concern would be on the efficiency and operation of the hydraulic lifts by all operators, as well as concern for potentially increasing the height of the structure to accommodate the lifts, or increasing potential water table and stormwater issues by pushing the parking structure further underground. Additional concerns raised by the Planning Board on the lifts include residents' access to vehicles in emergency situations.

Further, there is no allowance for parking of moving vans, whether a 10-14' self-move rental truck or a 30' van. With 95 units, there would be up to 190 moves the initial year, assuming 12-month leases at (100% occupancy). The site provides no ability for the trucks to unload except by parking on the street or the Fire access lane.

Water and Sewer service

The proponent has not indicated where they intend to access water or sewer from, whether Linden Street or Hollis Street. The sewer main through the Linden Street commercial area experiences heavy use and includes an inverted siphon beneath the MBTA railroad tracks which will need to be carefully analyzed given the added potential contribution of 15-20,000 gpd.

Site access exacerbates existing traffic and circulation problems

The proposal includes direct ingress and egress from Hollis Street, an unaccepted way with a right of way width of 33 feet and a variable paved width from 13-19 feet. Hollis Street is a heavily traveled pedestrian route for access to the Sprague School heading north, and access to the commuter rails station and Linden Street area heading south. Access to Hollis Street can be achieved from Linden Street or Westerly Street, which is also 33 feet in right of way width with variable pavement of 16-20 feet. The access from Westerly Street connects into a broader street network, but the connection to Hollis Street from Westerly is a 90 degree turn with limited visibility. Additional volume on a narrow road with significant pedestrian traffic, and no sidewalk is a concern given the current width and access. The Town will recommend prohibition of additional traffic from the site onto Hollis Street (currently two of the houses on the site – 1-3 Delanson and 5-7 Delanson – have driveways onto Hollis Street) without significant upgrades being made to the roadway.

The access from Linden Street is the Town's greatest concern. Hollis Street is located approximately 415 feet east from the signalized intersection of Crest Road and Linden Street, and 430 feet west from the signalized intersection of Linden Street and Everett Street. Traffic currently backs up from the light in front of the project site and nearly approaches Everett Street during multiple hours of the day including am and pm peak hours. Linden Street has a right of way width of 50 feet and has sidewalks on both sides. There is no space to allow a left turn lane to access Hollis Street, so turning vehicles will impede traffic flow, causing greater impacts at the intersection of Linden Street and Crest Road. The traffic impact would be substantially greater if the access was off Linden Street directly. Although the proximity to the Wellesley Square Station will alleviate some of the vehicle trips, the additional vehicle access will impede traffic flow during much of the day. The Town will recommend dedication of right of way from the site to allow for the installation of stacking and turning lanes.

Pedestrian access to and from the site is limited

It is unclear whether the applicant is proposing to improve the sidewalk along the Linden Street frontage, but given the location, it is essential. The Hollis Street access currently has no pedestrian amenities, but given the additional vehicle trips proposed on the unaccepted way, installation of a sidewalk is critical. To achieve the installation of an ADA sidewalk, it is proposed that the building be shifted to the west to accommodate a greater setback to

allow for an improved right of way width. Should the access remain off Hollis Street, a right of way width of 50 feet would accommodate a sidewalk and allow for greater sight lines exiting the structure.

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 makes it difficult to stage cranes or other construction equipment, or to stockpile materials on site for construction. Additionally, parking for all construction workers cannot be accommodated on site and therefore will significantly impact the adjacent neighborhoods or municipal lots as parking is not allowed on Linden Street. 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 Linden Street represents a significant safety concern to the Town and has the potential to significantly impede residents travel to adjoining neighborhoods. 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

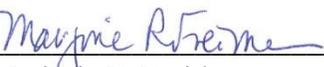
Ninety-five (95) residential units on a 61,774 square foot lot equates to a density of 67 units per acre. This project will be the densest project in Wellesley and the largest residential structure, if not largest structure in height. The density of the abutting residential neighborhood, not including the subject property, ranges from 2-8 units per acre. The single and two-family structures directly abutting the site will be significantly impacted due to the close proximity and potential shadow impacts from the development.

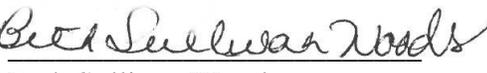
Based on the above, it is apparent that the proposed development is too intense for a site that is less than 1.5 acres in size. More affordable housing opportunities are necessary in the Town of Wellesley, and the proposed location may be suitable for reasonable affordable construction, but such opportunities should be more respectful of existing neighborhoods and land uses, as well as the eventual residents of the development. This proposal is far out of character with the community. The Town would be inclined to support development on the site, but at a density far less than proposed.

Sincerely,


Ellen F. Gibbs, Chair


Jack Morgan, Vice Chair


Marjorie F. Freidman


Beth Sullivan Woods


Thomas Ulfelder

