



TOWN OF NEEDHAM

TOWN HALL

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Office of the
TOWN MANAGER

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March 28, 2014

Richard Sullivan, Jr.
Secretary of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Environmental Notification Form (ENF)
Greendale Mews, Needham, MA 02492

Dear Mr. Sullivan:

The Town received a copy of the ENF for the Greendale Mews project on February 27, 2014. We noticed a few discrepancies on the form sent to you with a letter from Goulston & Storrs dated February 21, 2014.

On page 2 of the ENF form, the applicant indicates that the Wastewater generation for the project is proposed to be 45,000 gallons per day. During the Town's review of the project it was noted that the applicant was proposing a combination of 474 bedrooms and dens in the project. The applicant is also proposing 62 lofts, however the lofts were not enclosed and did not meet the definition of a bedroom and therefore were not included in the Town's calculation. The anticipated sewage generation based on the total number of bedrooms and dens is 52,140 gallons per day. The applicant is also proposing a swimming pool for the development which meets the definition of a semi-public pool. Sewage generated from the showers/locker room areas and backwash from the filters have not been included in the amount of sewage generated. A DEP Sewer Connection Permit is required to support the 268 apartment unit development. The estimate for water usage indicated on the form needs to be corrected. The section regarding which state permits are required also needs to be corrected.

The ENF application indicates that all stormwater generated from the proposed development will be infiltrated onsite, i.e. "zero discharge" for all of the design storm events. Plans and calculations submitted with the proposed development, however indicate that two discharge pipes are proposed which drain to Route 128 without the benefit of an easement. Storms exceeding the design storms analyzed either in rainfall depth, intensity or duration will discharge into the Route 128 right-of-way. The recent rain events from September 2013 are a very good example of rain discharge.

On page 3 of the ENF form the project description is provided. The Town further notes that the project is proposed to be built within 150 feet of Route 128 with a swimming pool facing the highway within 200 feet of the roadway. Route 128 is an extremely busy multi-lane interstate highway carrying thousands of vehicles per day. The highway is in the process of being expanded from three to four lanes in each direction.

Recent credible studies have established that air pollution within 300 meters of a major highway leads to increased incidents of asthma, lung disease, cancer, heart disease and other health risks. The following conditions have been placed on the project based on health and safety concerns to address the abatement of air and noise pollution. The Board of Appeals required windows directly facing the highway and not separated by

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a building to be fixed and sealed. The pool was also to be relocated to a location in which it is blocked by a building or is located more than 300 feet from the highway. A forced central air filtration system was required to remove particulate matter from the residences. Finally, compliance with HUD noise guidelines as set forth in 24 CFR 51 was required. A noise study was further required before occupancy confirming that implemented noise abatement measures have reduced the interior residence noise level to 45 db or less within each apartment and that the noise level at the pool does not exceed 65 db.

The subject project, at a density of 44 units per acre and its location in a single residence district, is inconsistent with the Town's established policy objectives as stated in both the "Needham Affordable Housing Plan" and Town's Chapter 40B Guidelines and with the observed density range norm for apartment development in the Boston suburban market. On page 8 of the ENF form under the land section designation entitled "Consistency", the ENF identifies the "Needham Community Development Plan", dated June 2004 as the most recent comprehensive land use plan document as relates affordable housing. In fact the housing component of the 2004 plan was updated and reissued under the title "Needham Affordable Housing Plan" in June of 2007 (copy enclosed). Furthermore, in October 2012, the Town issued Chapter 40B Guidelines (copy enclosed) to communicate the Town's preferences for housing developed under Chapter 40B. Both of the above-named documents were adopted as Town policy by the Board of Selectmen and Planning Board.

Towards these ends, Town policy encourages the placement of larger scale affordable housing development in the Town's commercial areas comprising the New England Business Center, Highland Commercial 128, Mixed-Use 128, and the Industrial District, located in the area north of Kendrick Street. Additionally, the commercial areas around Avery Square (specifically the Hillside Avenue Business District, Avery Square Business District and the adjacent Industrial District), the Center Business District and Chestnut Street Business District are designated as appropriate areas under the policy for higher density housing development. Within the noted commercial areas, higher densities (up to twenty-four units per acre on apartment zoned parcels and sixteen units per acre on commercially zoned parcels) are identified as appropriate for 40B consideration. Densities exceeding twenty-four units per acre are considered on an individual case basis in the New England Business Center, Highland Commercial 128, and Mixed -Use District. Locating higher density housing in Needham's commercial areas, Town Center and villages embraces the principles of "Smart Growth" by providing distinctive, compact developments in existing walkable locations near public transportation and retail services. In the single residence districts, where the subject property is located, Town policy encourages small-scale affordable housing development in the density range of eight to ten units per acre. This lower density threshold was selected to assure development scale and character appropriate to the neighborhood context in which the housing would be developed.

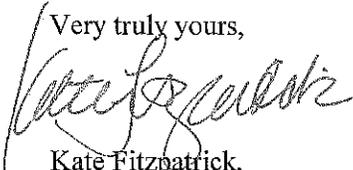
Finally, a regional comparison analysis of gross density and open space and recreational amenities for apartment development in the Boston area was prepared by RKG Associates, Inc. for the Needham Board of Appeals in November 2013 (copy enclosed). The Board wanted to know if the density of the subject development was comparable to other recently built mixed-income apartment developments in the Boston area and whether the project offered similar outdoor recreational facilities. In addition, the Board requested information about the zoning designation for sites developed under a comprehensive permit. Density data for a sample of twenty-three suburban apartment communities was obtained. The average density in the sample, not including the highest (Charles River Landing) and lowest (Residences at Steven Pond) in the range, is 14.3 units per acre. The sample midpoint is 11 units per acre. Given the disparity between the Town's policy objectives as relates density for the subject property and the developer's proposal, an alternatives analysis to consider the impacts of a reduced density at the subject site is recommended.

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We urge you to consider requiring the applicant to prepare and submit an Environmental Impact Report (EIR) so as to evaluate how the noted impacts will be addressed.

Should you have any questions regarding the above, please contact our office at 781-455-7500.

Very truly yours,



Kate Fitzpatrick,
Town Manager

cc: Lee Newman, Director of Planning and Community Development
Richard Merson, Director of Public Works
Board of Selectmen
Board of Appeals
Jay Talerman, Blatman, Bobrowski & Mead, LLC
Representative Denise C. Garlick
Senator Michael F. Rush

Attachments: Report entitled "Needham Mews" prepared by RKG Associates, dated November 18, 2013.
Report entitled, "Town of Needham, Chapter 40B Guidelines", dated October 2012.
Report entitled, "Needham Affordable Housing Plan", dated June 2007.
Letters to the Board of Appeals from Anthony DelGaizo, Needham Town Engineer, dated December 12, 2013, November 21, 2013, October 11, 2013, August 15, 2013, and May 16, 2013.