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PLANNING DEPARTMENT

M E M O R A N D U M

TO: Board of Selectmen
Planning Board
Affordable Housing Trust

FROM: Joseph Laydon, Town Planner

DATE: July 8, 2016

SUBJECT: Comments on 21 Wheeler Road – Elmrock Estates – Site Eligibility Application

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This memorandum documents the 40B Site Eligibility process associated with Elmrock Estates at 21 Wheeler Road. This memorandum also summarizes the project and staff comments on the project that should be incorporated into a comment to be submitted to MassHousing for their consideration in granting a site eligibility letter.

Background

On May 19, 2016 Fieldstone Farms, LLC provide the Town of Grafton with a document entitled "Notice of Application for Chapter 40B Site Eligibility Letter – MassHousing New England Fund Project: "Fieldstone Farms" Wheeler Road and Brigham Hill Road, Grafton MA. The submission of the site eligibility application to MassHousing triggers a 30-day comment period for the Town of Grafton.

On June 2, 2016, Ann Morgan and I attended a site walk at 21 Wheeler Road conducted by Michael Busby from MassHousing. Also in attendance were the project proponent and his development team and Dan Crossin, chair of the Affordable Housing Trust. During the site walk it was noted the property is surrounded by designated open space, that the road was in excess of maximum length requirements, and that the proposed development plan did not contain any open space or provide any trail connections to adjacent trail networks. At the site walk, staff inquired with Mr. Busby about granting an extension for the public comment period to allow for the Town to coordinate its review of the proposed project. Mr. Busby granted the request to extend the comment deadline to July 15, 2016.

Development Proposal Summary

Elmrock Estates (initially named Fieldstone Estates)
Parcel Size: about 18 acres

Housing Units: 36 single family dwelling, 27 market rate units and 9 affordable units.
By-right Plan: Proponent States 18 single family homes possible
Street Length: 1,550 feet
Street Width: Proposed at 24 feet
Home Sizes: Range from 2,020 to 2,417
Bedrooms: All have 4 Bedrooms
Zoning: Residence 40 (minimum 40,000 square foot lot requirements
Utilities: Water/Sewer Available, Gas can be extended from 19 Wheeler.
Lot Coverage: Buildings (10%), Parking/Paving (15%), Usable Open Space (68%)

Staff Comments

On June 16, 2016 the Project Proponent and his development team met with various staff from town departments. Attached to this memorandum as Attachment A are meeting notes from that meeting. The following is a summary of issues raised by town staff.

1. Road Length: As of right plan and development exceed maximum permitted by subdivision rules and regulations. Proposed length (1,550 feet) exceeds permitted dead end length of 500 feet.
2. Separation of Roads: Subdivision Regulations require 600 foot separation of subdivision roads, 120 feet is proposed.
3. Emergency Access: No second means of access, concern for length of road, no mid-block turnaround, road width should be increased to 26 or 28 feet, and there are no details on the plan to evaluate adequacy of common driveways.
4. Common Drives: Zoning Bylaw limits the number of lots served by common driveway to no more than 3. The development plan indicates two locations where 4 lots are accessed by common driveways. The development plan does not indicate the location or dimensions of the common driveway serving homes at the northwest corner of the property.
5. Stormwater Design should incorporate Low Impact Development Techniques.
6. Proponent should consider alternative housing design sceneries that permit preservation of open space and connection to adjacent trail systems.

Review of MassHousing Application Materials

<u>As-of-right Plan</u>: The Application includes an as-of-right development plan that indicates that 18 single family homes could be built on the property. The plan however, would rely on waivers being granted by the Planning Board. The Town of Grafton Subdivision Rules and Regulations require a maximum length of dead-end street be no longer than 500 feet. The proposed 1,550 foot subdivision road would require a significant waiver from the Board. Therefore, I estimate that a conforming subdivision road not exceeding 500 feet would result in a subdivision between 6 and 8 homes, not the 18 being proposed.

In addition to the maximum length of street permitted under the Subdivision Rules and Regulations, the Planning Board also requires that adjacent street be no closer than 600 feet. The proposed roadway is 120 feet from the Meadow Lane, therefore requiring another wavier from

the regulations. Due to these two provisions, the density under the as-of-right plan should be reduced from 18 to 8 units.

Sustainable Development Criteria Score Card: The MassHousing application encourages housing projects to be consistent with sustainable development designs and green building principles. The "Developer Self-Assessment" provides for two methods to demonstrate compliance with the sustainable design criteria. The following criteria appear not to have been satisfied in the Applicants Self-Assessment:

- Criteria 1 - Concentrate Development and Mix Uses: The Self-Assessment states this criterion has been met. One element that I disagree with is the statement that the development is "compact and/or clustered so as to preserve undeveloped land." The development plan utilizes a single subdivision road in excess of 1,550 feet and two common driveways to access additional lots within the development. Within both parcels, all open space is either in the back yard of homes or within wetland buffer areas. The Applicant has not clustered structures to retain open space or to provide connections for trails or for habitat to cross from adjacent conservation lands. See Attachment A for response to consider alternative designs in order to preserve open space.
- Criteria 3 – Protect land and Ecosystems: The Self-Assessment indicates that the project complies with the criteria to protect land and ecosystems. It is my opinion that the plan does not satisfy this criterion. In the explanation under this criterion, it is stated that "There is no common space … as each unit has very generous lot size..." It also states that the abundance of undeveloped land will be in "consistent and in context to the rural nature of the surrounding environment." The language under this criterion is relying on rear yard space to qualify as retained open space. There is no mention of establishing limits of clearing or using deed restrictions to control clearing on individual lots. Furthermore there is little opportunity for preserving tress between houses which would be consistent with the neighborhood. Use Natural Resources Wisely: The Self-Assessment states this criterion has been met and that low impact development techniques are being utilized and that energy efficient construction and fixtures will be utilized. I am of the opinion that this criterion has not been met as there is not adequate information to verify this criterion. In the Staff Meeting Notes, when asked about using LID techniques, the applicant's engineer stated they are open to consider LID techniques, thus supporting that the materials in the application do not demonstrate their utilization. In addition, the explanation does not state how the project will utilize energy saving techniques that are above Building Code Requirements such as building homes that are LED compliant.
- Criteria 9 – Plan Regionally: The Applicant states the project is in compliance with the town's local plan. While the 2013 Housing Production Plan does encourage working with developers on friendly 40B project, the plan does not specify properties for affordable housing projects. The project does conflict with the Town's Open Space and Recreation Plan. The property is identified within priority protection area to the west of Lake Ripple. The "Western Corridor" is one of five open space corridors that the plan identified as largely contiguous areas of open space and encouraged protection of undeveloped parcels within these areas. The two parcels proposed for development will sever existing open space and present an obstacle for wildlife. The Applicant should

consider a development scenario that clusters development closer to Wheeler Road and retains the rear parcel as open space.

Conclusion

For projects using MassHousing Financing or financing through the New England Fund, MassHousing requires "Site Approval" also known as a "project eligibility approval" prior to the submission of a comprehensive application to a municipality. According to MassHousing's website, they visit a site and solicit comments from the municipality as follows:

> *"MassHousing will consider any relevant concerns that the municipality might have about the proposed project or the developer. The applicant is encouraged, therefore, to make contact with the municipality prior to submitting the Site Approval application in order to ensure that the applicant understands any concerns that the municipality may be likely to raise regarding the proposed development"*

Therefore the comments submitted from the Town of Grafton as part of the project eligibility approval process typically will result in developers revising their plans to address comments received.

It is my recommendation that comments identified in this memorandum be included in a consolidated document to be sent out from the Town of Grafton. It is important to state how the Town is actively engaged in the creation of affordable housing units and has an Affordable Housing Trust that is committed to increasing Grafton's affordable housing stock.

I recommend the following comments be submitted to MassHousing:

1. As-of-Right Plan: The as of right plan is not accurate and should be reduced from 18 lots to 8 lots.
2. Significant Emergency Access Concerns: Maximum length of road is a concern for emergency responders. Also there are no details associated with the design of the common driveways to evaluate adequacy for emergency vehicles.
3. Utilization of Low Impact Development Techniques: The development should utilize low impact development techniques to minimize stormwater structures. Three detention basins are proposed adjacent to open space areas, potentially impacting trails and wildlife movement on these parcels.
4. Consider redesigning the development to concentrate development on the Wheeler Road parcel, leaving the rear parcel as open space. This is important to minimize impacts to existing trails and wildlife. Furthermore it will meet a goal of the Open Space and Recreation Plan to permanently protect parcels adjacent to contiguous open spaces.
5. A Traffic Study will be required and the intersection of Wheeler and Worcester Street will need to be examined closely.

Thank you for your consideration of these comments.

ATTACHMENT A

21 Wheeler Road Meeting
Development Team Meeting
June 16, 2016

A Development Team meeting was held on June 16, 2016 in Conference Room B at the Grafton Municipal Center, 30 Providence Road, Grafton, MA. Present for the meeting were Town Planner Joseph Laydon, Conservation Agent Maria Mast, Assistant Town Administrator Doug Willardson, Department of Public Works Dave Crouse, Grafton Fire Department Stephen Charest, Peter Adams of Fieldstone Realty, LLC, Stephen O'Connell of Andrews Survey & Eng., Geoff Engler and Moira Cronin with SEB LLC, and Planning Department Office Manager Nicole Larson.

Mr. Laydon began the meeting at 2:40 p.m.

Mr. Laydon reviewed the timeline and next steps for the proposed project. Mr. Engler noted that he is looking forward to gathering municipal feedback into this project. Mr. O'Connell noted the following development details:

- 36 units proposed, 9 units proposed as affordable housing.
- "As of right" plan would have produced 18 single family lots.
- House lots are approximately 2,220 square feet.
- Single family with lot sizes that utilize surrounding background.
- Water, cable, gas and electrical are all accessible from the property. Sewer will need to be brought up Wheeler Road to the project. Gas would need to also be extended up from Meadow Lane.
- Plan is for single road down center with houses and lots to each side.
- Houses on the east side will have walk-out basements.
- Houses on west will be up on hill with inclined driveway.
- Work within the wetland buffer would require Conservation Commission's approval however 40B projects and not subject to local wetlands & stormwater and state requirements apply.
- Pavement width would be 24 feet with bituminous berm and rounding at end of road.
- Proposed roadway is 1500 feet long with some properties accessed through common driveways off the subdivision road.
- Pavement radius of cul-de-sac is 100 feet.
- There will be hydro-flow testing done to verify the development will have suitable water pressure.
- Property currently has 416 feet of frontage.
- The plan follows the general topography of the land.

Mr. Laydon would like to give more separation than 120 feet between entrance and nearby roadway (Meadow Lane). Traffic study will .need to be done as development is over 20 units. Mr. O'Connell noted scope of the traffic study would include site distance, speed analysis and level of service.

The group discussed road width. Mr. Charest suggested a 26-28 foot road width for easy access for larger vehicles. Mr. Laydon asked if there could be a midway block put in to cut down on the impervious surface for stormwater and drainage coverage. Ms. Mast asked if an impervious shoulder could be possible. Mr. O'Connell suggested swales and noted driveway culverts that will be present and noted that LID techniques can be difficult, and often times leaves stormwater untreated, but they will be open to consider LID techniques that may work for this property.

The group also noted that the roadway was in excess of the length permitted by the Planning Board's Subdivision Rules and Regulations. Mr. Laydon also noted the as of right subdivision plan exceeded the maximum length and could only be permitted through granting of waivers by the Planning Board.

Mr. Laydon noted that there are a number of lots that are served by common driveways. The Plans did not indicate the location or design of the common driveway serving the cluster of homes on the western side of the second parcel. He noted the longest driveways will be nearly 300 feet in length and will need a hammerhead turnaround. Mr. Charest also noted the steep topography, which will need to be considered when designing the turn around. Mr. Laydon noted that there are 4 lots served by a common driveway at the end of the subdivision road. Since the zoning bylaw restricts common driveways to serving no more than 3 lots, a waiver would be required to be submitted with the comprehensive permit application.

Mr. O'Connell stated the roadway curbing will consider of bituminous berm on the lower side with granite curbing on the upper side. The group discussed the possibility of a boulevard entrance, but that concept was found to be insufficient in addressing the Fire Department's concern for fire access.

Mr. Laydon inquired whether alternative housing types or a mixture of housing types was considered. Mr. Engler said the location has potential for a unique design, but he defers to the preferences of applicant he represents. Mr. Adams stated that he believes many people want their own homes, and he himself is an advocate of single family homes. He also noted that he is used to building these types of homes. Mr. Laydon noted there are beautiful areas that would be great to maintain, such as the existing field adjacent to Wheeler Road. He also said that there is no integration of connections to the trail systems on the surrounding Grafton Land Trust land. Currently the property to the east side of 21 Wheeler Street is owned by Grafton Land Trust. Mr. O'Connell noted that there are stone walls in rear of some properties that will be preserved and not disturbed, though parts of the wall through the proposed roadway will need to be relocated where possible. He also responded to Ms. Mast's inquiry about preserving as much vegetation as possible with small, walk out yards that would not be fully cleared. Trail heads would be possible and located at the rear of lots at the end of the proposed cul-de-sac.

Mr. Laydon stated that he would be using the notes from this meeting to coordinate comments to MassHousing from the Town.