



TOWN OF MEDFIELD
Office of
BOARD OF SELECTMEN

MICHAEL J. SULLIVAN
Town Administrator

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MEDFIELD, MASSACHUSETTS 02052-0315

(508) 359-8505

November 27, 2018

Catherine Racer, Associate Director
Division of Housing and Development
Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, Massachusetts 02114

RE: Chapter 40B Comprehensive Permit

Project Name:	The Rosebay at Medfield
Location:	30 Pound Street, Medfield, MA, 02502
Number of Units:	45 Units (45 affordable)
Subsidizing Agency:	DHCD
Applicant:	Newgate Housing LLC

Dear Ms. Racer,

Thank you for the opportunity to comment on the Project Eligibility Application under the Chapter 40B program for a proposed Low Income Housing Tax Credit (“LIHTC”) development. The Rosebay at Medfield, a 45-unit senior housing rental development proposed by Newgate Housing LLC contains 37 one-bedroom units and 8 two-bedroom units as well as programming space for elder services. The project site is currently in partial use as a Medfield Housing Authority senior housing property (“Tilden Village”). Tilden Village includes 60 units within six two-story buildings and is served by existing municipal infrastructure. As Tilden Village is not served by elevators and none of the upper-story units are accessible, and as the proposed development includes programming space for elder services, it is logical to locate new senior housing on the undeveloped two-acre portion of the site. There is very limited available land in Medfield that is served by public water and sewer – including most undeveloped Town-owned land and the former Medfield State Hospital Site. This presents significant challenges to the provision of affordable housing on other Town-owned sites. In order to increase the supply of handicap accessible affordable senior rental housing which would provide a modest number of two-bedroom units to accommodate households with authorized home care workers the site at 30 Pound Street is ideal given its proximate location to the Town Center, existing senior housing, and local services.

The Medfield Board of Selectmen has reviewed the application and is in support of the concept to construct affordable senior housing on this site but has some reservations about the design and potential traffic impacts of the proposed building. Having recently completed a Housing Production Plan which underscored the need for more diverse housing units in terms of unit size, tenure, and cost, the Plan specifically identified both Tilden Village and the Town Center as a target area for affordable housing. The Town-

led effort to allow further development at Tilden Village has been a partnership between the Board of the Selectmen, the Medfield Affordable Housing Trust, and the Medfield Housing Authority to develop and issue an RFP for this site, and then to select the most responsible proposer [Newgate LLC]. The applicant has worked with the Town to develop a development program to create additional senior housing.

The building, which has not yet undergone local permitting, has generated concern from neighboring residents and within the Town government. Although the applicant states that much of the design issues could be worked out during the Zoning Board of Appeals (“ZBA”) process, the Town would prefer the applicant to revise their design program prior to appearing before the ZBA as incomplete applications could potentially undermine concerted efforts on the Town’s part to make the plan review process as transparent as possible. The applicant’s permitting strategy to wait until after the commencement of a hearing at the ZBA could damage newly formed public trust and lead to confusion and the spread of misinformation, which could be detrimental to an already sensitive proposal for much needed housing and add considerable time and acrimony to the process.

Due to these factors, the Board of Selectmen may opt not to support this project unless the applicant changes approach and becomes more responsive to community concerns regarding design and traffic impacts, and consequently, they may recommend that the Zoning Board of Appeals deny this project, as is their right due to the Town’s position in Safe Harbor.

In addition to the Town’s efforts to improve public perception regarding affordable housing, the Town has made significant strides to increase the actual production of affordable housing opportunities within the Town. Since the completion of the Housing Production Plan, the Town has authorized the formation of an Affordable Housing Trust (“Trust”), passed a \$1m bond to capitalize the Trust, and adopted an aggressive Inclusionary Zoning Bylaw at Annual Town Meeting in 2017. The Town has been involved in further planning efforts including the Trust’s completion of a Five-Year Action Plan and Strategy and a Master Plan for the State Hospital site, which features provisions for affordable housing opportunities. Since the adoption of the Housing Production Plan, the Town has met their targets to reach Safe Harbor by approving the following developments: Cushman House at 67 North Street (rental, 8 units, 2 affordable), 71 North Street (rental, 8 apartments, 2 affordable), Chapel Hill Landing (ownership, 49 units, 13 affordable), Hillside Village (rental, 16 apartments, 4 affordable), and is currently reviewing Medfield Green at 41 Dale Street (mixed tenure, 36 units, 27 SHI eligible units).

The Medfield Planning Board took the opportunity to comment on the proposal early in concept at their August 28, 2017 meeting and again at their September 17, 2018 meeting. The Planning Board is concerned about the design of the building; in particular with respect to the roofline and the massing. Although the school complex is a large institutional building, Tilden Village consists of modest two-story structures and the surrounding neighborhood contains single family homes. The Planning Board is concerned that the proposed building is not in keeping with the architectural vernacular of the area and would like to see more effort to appropriately mass the building so as to

minimize impacts on neighboring properties. Medfield's local design standards discourage long unbroken facades, and they should be avoided and broken up with recesses and projections, changes in materials, and complimentary landscaping; although these standards are not applicable to a development pursuant to Chapter 40B, they do offer insight as to what the Town might consider appropriate design. The Planning Board also requested a traffic report and recommended the Zoning Board of Appeals consider obtaining technical assistance for the design review of the proposed building.

A site visit with DHCD was conducted on November 6, 2018. During the site visit, the following issues were discussed:

- Identification of project in Housing Production Plan
- Services and amenities offered and available in the community near the project site
- Amount of affordable family housing available in Medfield
- Level of support from the Town and residents
- Comments related to the school, such as retention of an existing path
- Minimum age restriction (55 versus 62)
- Bedroom counts; necessity for two-bedroom units
- Height, bulk, massing and architectural context
- Lockbox gate in rear
- Absence of wetlands or natural heritage areas

Following the site visit, Town Officials have submitted the following comments:

TOWN ADMINISTRATOR

The Town Administrator is not supportive of this proposal. The Town Administrator believes that the proposed neighborhood has faced a lot of recent development, including the 2005 renovation of the Middle and High Schools (originally constructed in 1961), a recent multifamily conversion resulting in the preservation of the historic Cushman House and resulting in 8 units including two affordable handicap accessible units, and a proposed adjacent multifamily project, also resulting in an increase of 8 units including two affordable units for a total of 16 units within a half mile radius of the project site. Further, Pound Street is currently used as a commuter cut through which would be impacted by this project. The Town Administrator would prefer to focus development at the former State Hospital Site.

BOARD OF HEALTH

Due to the project site's location within the Aquifer Protection Zone [which covers much of the Town], the applicant is requested to infiltrate, at a minimum, the first one-inch of run-off from the entire site, and that run off from impervious surfaces be treated to the highest regulatory standard prior to infiltration. The Board of Health believes this will help ensure that the Town can maintain a clean and adequate supply of drinking water to its citizens, including those who reside and/or work at this project site.

DEPARTMENT OF PUBLIC WORKS

Although the Department of Public Works (DPW) anticipates that all drainage, water, and sewer utilities will be shown on future plans as the project progresses, there are still some concerns about other missing elements. The current plans do not address snow removal for the planned development. It is unclear if there will be snow storage areas dedicated for winter operations or if the snow be removed from the site. DPW notes that if the snow is planned to be removed from the site, accommodations for larger removal equipment such as, loaders, trailer dumps or large blowers should be considered. Parking vehicles within the right-of-way while snow removal in the development takes place should not be entertained as the town enforces parking bans throughout the winter months. In addition, the applicant shows a driving lane and two parking spaces located within a 20' wide drainage easement held by DPW. Further discussion between the applicant and DPW will be required regarding the easement. In addition, details for handicap accessibility should be shown for each of the sidewalk approaches to the main entrance driveway on Pound Street. Lastly, DPW notes that all permits should be obtained before any work has commenced for street opening, trenching, and water and sewer connections; and believes the applicant should satisfy concerns related to increased traffic.

COUNCIL ON AGING

The Council on Aging is supportive of this proposal but has some concerns about the appearance of the building, as well as the size and height.

MEDFIELD PUBLIC SCHOOLS

The Medfield School Department is concerned by how close the building and parking is to adjacent Middle and High School complex. Many students at both the middle school and high school walk to school, and use an existing path that runs through the site to access the school. Maintaining the safe pedestrian access through the site for students should be a priority. There is also concern that the current road on the school side will be used as an emergency egress into the property. The school property has consistent traffic from 7am -11 pm from Sunday-Saturday for the period of September – June, and could be impacted by this project. Finally, the School Department notes that part of the Housing Authority property is currently in use as a playground for the School's daycare.

MEDFIELD POLICE DEPARTMENT

The Medfield Police Department is supportive of this proposal, but would like to see more details related to site illumination and traffic impacts.

MEDFIELD FIRE DEPARTMENT

The Medfield Fire Department would prefer the applicant use a lockbox at the gate for emergency egress in lieu of Opticon, a barcode scanning system.

RESIDENT COMMENTS

In addition to those comments by Town Officials, a number of neighbors and residents have also submitted comments on the proposed project. Most comments related to concerns related to the Aquifer Protection District, the appropriateness of the building, the design of the building, and traffic impacts; however, not all letters spoke in opposition and several residents did issue letters of support.

GENERAL COMMENTS

Finally, the Town has reviewed the development budget and operating pro forma for the proposed project. The Town recognizes that there are real challenges with respect to finding income eligible tenants who can afford LIHTC rents without a rental subsidy but notes that the proposal calls for 8 apartments to be "Low Income, Rental Assisted" units. The Town would like to better understand the anticipated source, amount, and duration of this partial rental subsidy as part of its assessment of project viability. While it is premature to expect the development team to stipulate a recapitalization plan for the end of the tax credit period at this very early point in the process, the Town seeks reasonable assurances regarding the long-term feasibility of the development including potentially following a transfer of control to the Housing Authority or another party if the original partnership is dissolved after the initial LIHTC compliance period ends after 15 years. Understanding the availability and likelihood of rental assistance for some of the project's units, both during and after the LIHTC compliance period, is important in this respect.

The Town also notes that the fair market rents for 2019 have been issued and should be used in Newgate LLC's pro forma calculations. Due to long-term funding challenges, the Town also recognizes that the affordable units in this development are smaller than those required by DHCD but believes this will assist with future affordability. As the project consists of three fully handicap accessible units and two hearing impaired accessible units, and the building is served by an elevator, the Town is satisfied that the units will provide significant housing opportunities for lower income senior households. Although DHCD has advised against the inclusion of two-bedroom units, the Town would like to see the two-bedroom units to remain so as to allow for the occupancy of an authorized home care worker and believes such units would provide a significant benefit to the Town.

In consideration of the above comments, and those enclosed, it is our expectation that you will agree that the Rosebay at Medfield is eligible for funding by DHCD so they may proceed with applying for LIHTC credits.

Please do not hesitate to contact us with any questions that you may have.

Sincerely,



Michael Marcucci, Chairman
Medfield Board of Selectmen