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November 16, 2015

Board of Selectmen
Town of Stoneham
Town Hall
35 Central Street, 2nd Floor
Stoneham, MA 02180

**Subject: Alternatives Discussion
The Commons at Weiss Farm
Stoneham, Massachusetts**

Dear Project Reviewer,

On behalf of Weiss Farm Apartments LLC, AECOM has submitted to the Secretary of Energy and Environmental Affairs (Secretary) the enclosed Alternatives Discussion as a supplement to the Environmental Notification Form (ENF) submittal in accordance with 301 CMR 11.00 for The Commons at Weiss Farm.

Notice of the ENF will be published in the Environmental Monitor on November 23, 2015 and the Secretary will receive public comments on the project until December 14. The public notice will be published in the November 18, 2015 issue of The Stoneham Independent.

Yours sincerely,

Dennis J. Lowry
Senior Wetland Scientist

Enclosures

cc: Peter Mahoney, John M. Corcoran & Co. LLC
File 60331761



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November 12, 2015

Secretary Matthew A. Beaton
Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

**Subject: Alternatives Discussion
The Commons at Weiss Farm
Stoneham, Massachusetts**

Dear Secretary Beaton,

In their preliminary review of the recently-filed Environmental Notification Form (ENF) for The Commons at Weiss Farm, the Massachusetts Environmental Policy Act (MEPA) Office has asked for additional information concerning alternatives to the proposed Project. As indicated briefly in the ENF, the developer recognizes the need for affordable housing in suburban towns in the Commonwealth, and the town of Stoneham has not met the state's minimum threshold for affordable housing. The proposed development qualifies as assisted "low or moderate income housing" within the meaning of Massachusetts General Laws Chapter 40B, Section 20 and will provide approximately 66 units (25 percent of the total units) that will serve households earning at or below 80 percent of area median income and thus will meet the definition of low and moderate income under the statute. Accordingly, a primary objective of the Project is to contribute to meeting that need for affordable housing in Stoneham. Meeting this purpose and need is therefore a vital consideration that forms the foundation of the alternatives evaluation. Further, while current zoning of the Project site would allow for single family residences, the developer's experience mainly consists of multifamily developments, which is the only viable form of development that could substantially contribute to meeting the affordable housing objectives.

More specifically, the following paragraphs provide an assessment of three alternatives to the proposed Project:

No-Build Alternative – For the Weiss Farm site, the no-build alternative would involve the sale of the property to a qualified buyer other than the Proponent, since the current owners have decided to sell the land. In this case, uses cannot be known, but almost certainly would result in some use being made of the property. Thus, the No-Build alternative could have substantial negative environmental effects. It is not likely that a true No-Build, leaving the property as is, would come to be. No estimates of environmental effect can be made for the No-Build Alternative, since the use of and program for the site cannot be determined.

On-Site Single-Family Alternative –The Proponent has studied and prepared a Preliminary Subdivision Plan (See Figure 1) to determine the number of single-family dwelling units that could be constructed on the developable portion of the site. This area is essentially identical to the area occupied by The Commons at Weiss Farm, but only 25 single-family homes (none affordable) could be built.

Off-Site Single-Family Alternative – For comparative purposes, an alternative providing the same number of residences (approximately 265) as The Commons is envisioned. Such an alternative would be located on one or more sites in Stoneham, and it is assumed that this site or these sites would be subdivided approximately as is the On-Site Single Family Alternative. This assumption allows the estimation of Total Site Acreage and other relevant metrics presented in the Summary of Project Size & Environmental Impacts in the Environmental Notification Form for The Commons.

Comparison of Environmental Effects – Table 1 shows the relevant project measures and measures of environmental effect associated with The Commons at Weiss Farm, the On-Site Single Family Alternative, and the comparative Off-Site Single Family Alternative. The footnotes to Table 1 provide information on the design assumptions and estimating techniques that were used to develop the Comparison.

Table 1 – Alternatives Comparison

Summary of Project Size & Environmental Impact	The Commons at Weiss Farm	On-Site Single Family Alternative	Off-Site Single Family Alternative
LAND			
Total Site Acreage	25.9	25.9	106 ¹
New Acres of Land Altered	10.2	10.2	84.8 ²
Acres of Impervious Surface	5.9	3.7	42.4 ³
STRUCTURES			
Gross Square Footage	323,919	75,000 ⁴	795,000 ⁴
Number of Housing Units	265	25	265
Maximum Height (Feet)	±66 feet	±30 feet	±30 feet
TRANSPORTATION			
Vehicle Trips Per Day	1,774	290 ⁵	2,550 ⁵
Parking Spaces	438	75 ⁶	795 ⁶
WASTEWATER			
Water Use (Gallons Per Day)	51,154	12,100 ⁷	128,260 ⁷
Wastewater Generation (GPD)	46,504	11,000 ⁸	116,600 ⁸

1. Estimated at 0.4 acres per dwelling unit, including lot and roadways.
2. Estimated at 80% of total area.
3. Estimated at 40% of total area.
4. Estimated at 3,000 square feet per single-family home.
5. ITE Land Use Code 210 (Single-Family Detached Housing).
6. Estimated at 3 parking spaces per single-family home.
7. Estimated at 110% of wastewater generation.
8. Estimated by Title 5 (110 gpd/bedroom) and 4 bedrooms per single-family home.

As can be seen on Table 1, the On-Site Single Family Alternative occupies and alters the same amount of land as does The Commons. The On-Site Single Family Alternative creates some-

what less impervious surface (3.7 acres vs. 5.9 acres) and does have smaller gross square footage, vehicle trips, parking spaces, water use, and sewage generation. These effects, however, represent only 25 dwelling units, none of which would be affordable. The Commons, on the other hand, will provide approximately 265 dwelling units (approximately 66 affordable), with far less negative effect per dwelling unit.

To make an “apples to apples” comparison of effects, the Off-Site Single Family Alternative was developed and analyzed to show the effects of “green field” development of 265 dwelling units. As can be seen in the final column of Table 1, such an Alternative, were it feasible, would require a site or sites more than 4 times the size of the site for The Commons, would alter over 8 times the amount of land, and would create over 7 times the amount of impervious surface. Total traffic would be increased, as would water use and sewage generation, and such an alternative would not create any affordable housing. It is for this reason that the Metropolitan Area Planning Council and other regional planning agencies favor the redevelopment of already disturbed sites with significant density. In this fashion, open land is preserved and housing is provided with less negative environmental effect than single-family, sprawl development.

Most importantly, as described above, the primary purpose of The Commons is to provide diversity and affordability of housing within Stoneham. Neither the On-Site nor the Off-Site Single-Family Alternative meets this aim. Each provides only relatively expensive single-family homes that are beyond the reach of many who wish to live in Stoneham.

For these reasons, the proposed Project is the only viable alternative for Weiss Farm Apartments LLC and the John M. Corcoran & Co. LLC. It provides much-needed affordable housing, occupies an already-disturbed part of the site, is of only slightly more negative effect than development of the site for single-family residences, and has significantly smaller negative effects than would the creation of 265 single family homes on a site or sites elsewhere in Stoneham.

This letter is copied to all who received the ENF. We would be happy to answer any questions that you or the MEPA staff may have on alternatives. If you have any questions regarding this Alternatives Discussion or the ENF, please do not hesitate to contact Mr. Peter Mahoney at (781) 849-7111 or pmahoney@corcoranmgmt.com.

Yours sincerely,



Dennis J. Lowry
Senior Program Manager/Wetland Ecologist

Enclosure: Figure 1 – Preliminary Subdivision Plan

cc: Peter Mahoney, John M. Corcoran & Co. LLC
ENF Distribution List (see Attachment A to the ENF)
File 60331761

