

Glenn C. Gibbs, Municipal Planner

4 Cameron Avenue
Ipswich, MA 01938

February 18, 2014

Katherine Lacy, Permitting and Monitoring Specialist
MassHousing
One Beacon Street
Boston, MA 02108

Re: Project# SA-13-007 – The Commons at Weiss Farm in Stoneham

Dear Ms. Lacy:

Last fall, at the request of Attorney William Solomon, Stoneham Town Counsel, I reviewed the above-referenced application from John M. Corcoran and Company, and offered my comments to the Stoneham Board of Selectmen and Town residents at a public hearing held on November 12, 2013. My reaction to the initial plan, which was shared by many at the hearing, was that the proposed project was overly dense and had no sense of human scale, excessive impervious surface, insufficient green space, and inadequate accommodation for pedestrians. I also noted that it was obvious the developer had not reached out to Stoneham officials and residents in a meaningful manner.

On January 13, 2014, Corcoran's president, Richard J. High, sent a letter to Gregory Watson at MassHousing in which he describes changes made to their initial submission that are responsive, he argues, to the concerns expressed by the Town and by speakers at the public hearing. At the request of Town Counsel, I have reviewed the letter, as well as the modified plan. I am writing to give you my thoughts and comments.

Before doing so, however, let me give you some background on my planning and affordable housing experience. As the Director of Planning & Development for the Town of Ipswich for the past twenty years, I have had significant experience with affordable housing, including reviewing and commenting upon 13 separate 40B development proposals. I have interacted with MassHousing on a variety of housing issues and initiatives, and I've prepared numerous draft comment letters for the Ipswich Selectmen pursuant to your 40B eligibility process.

I am a strong advocate of affordable housing. Over the past 15 years, under my leadership, Ipswich has aggressively pursued affordable housing opportunities in a variety of ways, including: requiring developers to provide affordable housing units in multi-family developments; establishing an affordable housing trust fund into which we deposit "payments-in-lieu" from housing developers; administering first time homebuyer down-payment assistance, rent buy-downs, and home rehab programs; offering density bonuses to developers in exchange for increasing affordability; and creating zoning regulations that allow for the development of units that can be afforded by households of low and moderate income. We also used the 40B mechanism in three separate instances to create affordable housing on property owned by the Town, applying our annual HOME funds as well as obtaining more than a million dollars from state and federal housing grant programs to fund their development.

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In its January 13th letter Corcoran lists the benefits of the plan modifications for the Weiss Farm proposal, which include introducing a few smaller townhouse buildings, reorienting the larger buildings and decreasing their length, and reducing impervious areas. I agree with the developer that the revised plan is better than the first. Unfortunately, the magnitude of the changes is so modest that they provide only marginal benefit. For example, the introduction of five tri-plexes is a good step, but 15 units represent scarcely more than five percent of the total units in the project. As well, none of the changes offered by Corcoran address the excessive density of the proposed development.

What is most disappointing about the modified plan, however, is that Corcoran did not, as recommended by many at the hearing, including myself, work with Town officials or other members of the community on the modification of the development plan. I also encouraged the Town and residents to do likewise by engaging seriously with the developer, and they indicated a continued willingness to do so. Had Corcoran chosen to work with the Town, they would have understood the community's needs and objectives, so that common goals could be identified, making it a better project for all concerned. (In my Ipswich experience, the two or three instances in which the Town of Ipswich was unwilling to support a 40B project had a common denominator – the project developer refused to work with the Town.) Instead, the developer followed the same course as before – unilaterally making changes without seeking any Town input. I suspect they did so in part because they were unwilling to consider eliminating even one unit from the overly dense 264-unit proposal for the property.

One additional point relative to your consideration of this project's eligibility for formal local review: Several years ago, MassHousing revised its criteria by rightly giving priority to those projects that could demonstrate compatibility with the State's smart growth principles. Whatever the relative merits of this project may be, they do not include consistency with smart growth objectives. As noted in the letter of this date from the Chair of the Board of Selectmen, the site is not walkable, either to the town center or to public transportation, nor does the project contribute to the town center's revitalization. While the project's failure to meet these objectives is due to the location of the site selected by the developer, there are many other criteria that could be met if Corcoran is willing; these include concentrating the development within the site's buildable area so as to preserve usable open space, incorporating a commercial component that would meet the needs of the abutters, and reducing the density and magnitude of the residential buildings, all of which would make the project at least somewhat consistent with smart growth principles relative to the build-out of the property.

Thank you in advance for your thoughtful consideration of this letter.

Sincerely,

Glenn C. Gibbs, Municipal Planner