



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5398

December 11, 2015

Mr. Ronald I Rosen, Chair
Zoning Board of Appeals
100 Maple Avenue
Shrewsbury, MA 01545

Dear Mr. Rosen:

Reference is made to my letter to you dated December 8, 2015, the matter of the Chapter 40B application for the project entitled "The Pointe at Hills Farm" (Project).

Attached are a series of letters starting on July 10, 2014, and ending on April 15, 2015, from the Office of the Board of Selectmen to various offices that generally and specifically deal with this Project.

You will note that numerous concerns have been raised during the development of this project that still remain unresolved at this time.

The project is too dense, exacerbates traffic congestion in the immediate area, adversely impacts upon the immediate residential neighborhood and provides no mitigation to the community. This project demonstrates everything that is wrong with the Chapter 40B program.

I thought it appropriate to make these letters part of the record of this Project.

I expect to have additional comments during the review process.

Truly yours,

Daniel J. Morgado
Town Manager

**BOARD OF
SELECTMEN**



Richard D. Carney
Municipal Office Building
100 Maple Avenue
Voice: 508-841-8504
Fax: 508-842-0587
selectmen@th.ci.shrewsbury.ma.us

Town of Shrewsbury
MASSACHUSETTS 01545-5398

July 10, 2014

Senator Michael Moore
State House
Room 518
Boston, MA 02133

Representative Matthew A. Beaton
State House
Room 542
Boston, MA 02133

Re: Chapter 40B Projects

Dear Senator Moore & Representative Beaton:

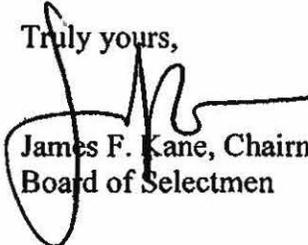
As you may have noted from recent media reports, the Town of Shrewsbury is now under attack by two Chapter 40B developers that are proposing a total of 475 units of housing. While the housing units themselves pose a major fiscal challenge, the major issue is that both projects are planned for non-residentially zoned parcels of property which compounds the negative fiscal impact.

In order to better control the inevitable, the Board has determined to issue a RFP to solicit proposals from all interested developers and then choose the best project for the community.

We will be calling upon each of your offices in the upcoming weeks to assist us in dealing with the involved agencies of the Commonwealth who we hope will be supportive of our efforts.

Thank you for your kind assistance in this matter.

Truly yours,



James F. Kane, Chairman
Board of Selectmen



TOWN OF SHREWSBURY
100 MAPLE AVENUE
SHREWSBURY, MASSACHUSETTS 01545-5398

July 10, 2014

Gregory Watson
Manager of Comprehensive Permit Programs
Mass Housing
One Beacon Street
Boston, MA 02108-3110

Dear Mr. Watson:

On behalf of the Shrewsbury Board of Selectmen, we are writing to you as three potential 40B projects that have been presented to us over the past month. We understand that a proposal from the Capital Group Properties, Southborough, MA for the development of a 160 unit rental project at the intersection of Walnut Street and Route 9 in Shrewsbury will be coming before you in the next month to request Site Eligibility.

The Board is seeking to maximize the value of the M.G.L. Chapter 40B statute and our valid Housing Production Plan thru an RFP process that we believe will result in a Local Initiative Program (LIP) project. The Board will be seeking Expressions of Interest from qualified developers to create a residential or mixed-use development that will assist the Town of Shrewsbury in making progress towards the 10% statutory minimum under M.G.L. Chapter 40B, Sections 21-23.

Based upon the presentation given to the Board by the Capital Group Properties and materials submitted in advance, we have the following concerns that we would like to make Mass Housing aware of regarding the proposed project:

Grading and slopes

The plan that was provided and the Town GIS topography shows substantial slopes on the subject property.

Access and Traffic

The entrance and exit to the project is proposed to be off Walnut Street. Walnut Street is accessed off Boston Turnpike (Route 9) through a right turn in, right turn out movement. Walnut Street also heads in a northerly direction towards Main Circle and Main Street.

Letter to Mass Housing

July 10, 2014

Page 2 of 2

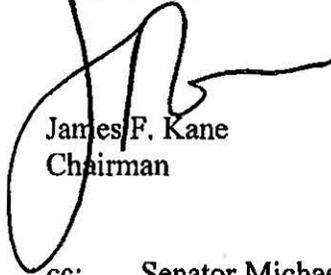
Sewer

There is a 6" PVC sewer force main on Walnut Street along the frontage of the proposed project. In speaking with the Water and Sewer Superintendent, the project would not be able to tie into the sewer for two reasons. First, a connection of this size would not be allowed to tie into a force main. Secondly, a sewer extension for residential purposes is not permitted per the Sewer Regulations and the commitments that were made during the SRF funding of the Westborough Wastewater Treatment Plant.

Although the project does not have direct access onto Boston Turnpike, a Mass DOT Indirect Access permit will be required as the project abuts a State highway layout.

Based upon what we know now about the project and the information we have provided you, we ask that you hold on any action related to the Capital Group Properties until the RFP is issued.

Yours truly,



James F. Kane
Chairman

cc: Senator Michael O. Moore, via email
Representative Matthew Beaton, via email
Shrewsbury Board of Selectmen
Kristen D. Las, AICP, Shrewsbury Planning and Economic Development



TOWN OF SHREWSBURY
100 MAPLE AVENUE
SHREWSBURY, MASSACHUSETTS 01545-5398

October 2, 2014

Gregory Watson
Manager of Comprehensive Permit Programs
Mass Housing
One Beacon Street
Boston, MA 02108-3110

Dear Mr. Watson:

To follow up on a letter that we sent to you in July, the Shrewsbury Board of Selectmen is writing to update you on the RFP process we are undertaking to maximize the value of the M.G.L. Chapter 40B statute and our valid Housing Production Plan.

Proposals were due on September 30, 2014 to the Town Manager's office and three proposals were received. They are summarized below.

- 440 Hartford Tpke, Park Place West, St. Pierre Group, 192 rental units (5.4 acre parcel at 550 Hartford Tpke to be dedicated for Commercial Development)
- 526 Hartford Tpke, Park Place East, St. Pierre Group, 128 rental units (5.4 acre parcel at 550 Hartford Tpke to be dedicated for Commercial Development)
- 258 & 274 Walnut Street, Mixed Use Development, Capital Group Properties, 150 senior 45+ residential rental units and 20,000 sf commercial/retail building

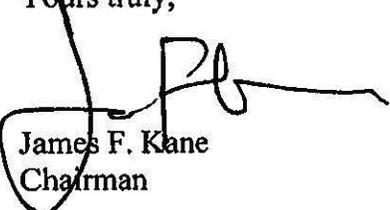
In July, we wrote to you about the Capital Group Properties submittal off Walnut Street as we understood they would be submitting their Site Eligibility Request to Mass Housing and ignoring the Town. We are pleased that they submitted a mixed use development project to the Town of Shrewsbury on land that is zoned both Commercial Business and Residence B-1.

Over the next several months, the Board of Selectmen, Town Staff and Board members will be reviewing the three proposals for 40B projects to determine if any of them should move forward under a LIP project.

We plan to keep you updated as the process moves forward.

Letter to Mass Housing
October 2, 2014
Page 2 of 2

Yours truly,



James F. Kane
Chairman

cc: Senator Michael O. Moore, via email
Representative Matthew Beaton, via email
Shrewsbury Board of Selectmen
Kristen D. Las, AICP, Shrewsbury Planning and Economic Development



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5398

October 29, 2014

Gregory Watson
Manager of Comprehensive Permit Programs
Mass Housing
One Beacon Street
Boston, MA 02108-3110

Dear Mr. Watson:

To follow up on a letter that we sent to you in early October, the Shrewsbury Board of Selectmen is writing to update you on the RFP process we are undertaking to maximize the value of the M.G.L. Chapter 40B statute and our valid Housing Production Plan.

Proposals were due on September 30, 2014 to the Town Manager's office and three proposals were received. They are summarized below.

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The Board of Selectmen held a public hearing, last evening, October 28, 2014 for the proposals. At that time, we learned that the 440 Hartford Turnpike and 526 Hartford Turnpike proposals were going to be combined into one project of 300 units. We also learned that the 528 & 274 Walnut Proposal was going to be an over 55 age restricted project with 80% of the units for 55+ and 20% of the units un-age restricted, with the commercial development as noted above.

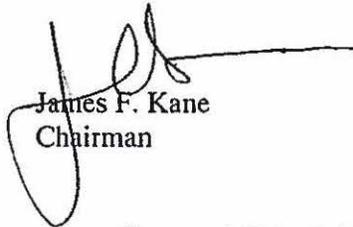
Letter to Mass Housing
October 29, 2014
Page 2 of 2

The Board of Selectmen will meet next on Wednesday, November 12, 2014 to discuss the proposals and the public hearing. At that time, the Board will decide if they want to move forward in the LIP process with one or both of the developers, if they need more information or if they do not move forward with any of the proposals.

We ask that if Mass Housing receives a 40B proposal that they do not act until the Town RFP process is complete.

We plan to keep you updated as the process moves forward.

Yours truly,



James F. Kane
Chairman

cc: Senator Michael O. Moore, via email
Representative Matthew Beaton, via email
Shrewsbury Board of Selectmen
Kristen D. Las, AICP, Shrewsbury Planning and Economic Development



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5398

October 29, 2014

Greg Bialecki, Secretary
Aaron Gornstein, Undersecretary
Executive Office of Housing and Economic Development
One Ashburton Place, Room 2101
Boston, MA 02108

Dear Secretary Bialecki and Undersecretary Gornstein:

On behalf of the Shrewsbury Board of Selectmen, we are writing to follow up on our letter of August 12, 2014 to you as three potential 40B projects that have been presented to us over the past six months.

We are attaching a letter sent to Mass Housing on October 2, 2014 that outlined the Boards RFP process moving forward to select a 40B Developer to partner with in the LIP process.

The Board of Selectmen held a public hearing, last evening, October 28, 2014 for the proposals. At that time, we learned that the 440 Hartford Turnpike and 526 Hartford Turnpike proposals were going to be combined into one project of 300 units. We also learned that the 528 & 274 Walnut Proposal was going to be an over 55 age restricted project with 80% of the units for 55+ and 20% of the units un-age restricted, with the commercial development as noted above.

The Board of Selectmen will meet next on Wednesday, November 12, 2014 to discuss the proposals and the public hearing. At that time, the Board will decide if they want to move forward in the LIP process with one or both of the developers, if they need more information or if they do not move forward with any of the proposals.

We ask that if DHCD receives a 40B proposal that they do not act until the Town RFP process is complete.

We plan to keep you updated as the process moves forward.

Yours truly,



James F. Kane
Chairman

Letter to Mass Office of Housing and Economic Development
October 29, 2014
Page 2 of 2

Enclosure: Letter to Mass Housing, dated October 2, 2014

cc: Senator Michael O. Moore, via email
Representative Matthew Beaton, via email
Gregory Watson, Mass Housing, via email
Shrewsbury Board of Selectmen
Kristen D. Las, AICP, Shrewsbury Planning and Economic Development



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5398

November 13, 2014

Mr. Gregory Watson
Manager of Comprehensive Permit Programs
Mass Housing
One Beacon Street
Boston, MA 02108-3110

Dear Mr. Watson:

Reference is made to my letter to you of October 29, 2014.

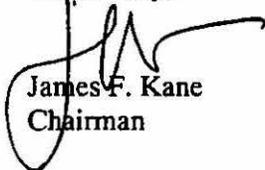
At our meeting on November 12, 2014, the Board voted to continue discussions with Capital Group Properties, LLC relative to their mixed use development of 150 senior 55+ residential rental units and 20,000 sf commercial/retail space to be located at 258 & 274 Walnut Street.

The project proposed by the Roderick St. Pierre for 440 and 526 Hartford Turnpike for a total of 300 residential rental units was dropped from further consideration at this time.

We ask that if Mass Housing receives a 40B proposal that they do not act until the Town's RFP process is complete.

We plan to keep you updated as the process moves forward.

Yours truly,



James F. Kane
Chairman

cc: Senator Michael O. Moore, via email
Representative Matthew Beaton, via email
Shrewsbury Board of Selectmen
Kristen D. Las, AICP, Shrewsbury Planning and Economic Development



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5398

December 10, 2014

Ms. Catherine Racer, Associate Director
Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114

Re: "The Pointe at Hills Farm" – 440 & 526 Hartford Turnpike, Shrewsbury, Massachusetts

Dear Ms. Racer:

The Board of Selectmen is in receipt of the Project Eligibility Application for a project now being called "The Pointe at Hills Farm".

The purpose of this letter is to provide you with the Town's initial response reserving our rights to make a more detailed and formal response over the coming weeks.

In our cursory review of the application, we came across Mr. Geoffrey Engler's letter to you dated December 9, 2014, that is contained in tab 21 of the application. This letter greatly distorts the interactions between the Town and the project principles and incorrectly reports on basic facts of the record to date.

By example, there was no public hearing on August 26, 2014.

A review of the video from a public hearing on October 28, 2014, a copy of which will be provided to you in a subsequent filing by the office, will show project representatives totally unprepared to answer basic questions and more disturbing, you will be able to witness for yourself the metamorphosis of the project taking place during the presentation.

I have enclosed a series of communications dated July 10, 2014, August 12, 2014, October 2, 2014, October 29, 2014, November 13, 2014, December 9, 2014 between the Town and Secretary Bialecki, Undersecretary Gornstein and/or Mr. Watson updating them on the process being employed by the Town to prepare a Local Initiative Project (LIP) application.

Please advise this office as to when you would expect to receive the Town's formal response on this application filing.

Thank you for your kind assistance.

Truly yours,



James F. Kane, Chairman
Board of Selectmen

Cc: Charles D. Baker, Jr., Governor-elect
Karyn E. Polito, Lt. Governor-elect
Jay Ash, Secretary Designee, EOHEd
Secretary Greg Bialecki, EOHEd
Undersecretary Aaron Gornstein, EOHEd
Gregory Watson, Mass Housing, via email
Senator Michael O. Moore, via email
Representative Matthew A. Beaton, via email
Kristen D. Las, AICP, Shrewsbury Planning and Economic Development



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5398

December 17, 2014

Mr. Gregory Watson
Manager of Comprehensive Permit Programs
Mass Housing
One Beacon Street
Boston, MA 02108-3110

Re: The Pointe at Hills Farm Project Eligibility Application
Initial Planning Department Comments

Dear Mr. Watson,

The Town of Shrewsbury received a copy of the Project Eligibility Application submitted to Mass Housing by Smart Growth Design, LLC on December 9, 2014. Following are initial comments on said application after preliminary review by the Planning Department. We reserve the right to make additional comments before the end of the thirty (30) day review period.

Zoning & Planning Concerns

- The project has been proposed on two Limited Industrial zoned pieces of property. The Town has very little Limited Industrial land available for development that also has access to the sewer. The Town is currently undergoing a Master Plan Update and has already gone through an Economic Development Self-Assessment Took Kit Study and a Housing Production Plan that was approved by DHCD. This property is not appropriate for housing based upon the zoning, the location and the studies that have been prepared.
- Many waivers have been requested from the Zoning Bylaw for the proposed project.
- There appears to be a large massing of 120 units in one proposed building of 5 stories, 58 feet high (Phase II). The Town currently does not have any 5 story housing developments and such building heights are not even allowed in the Limited Industrial Zoning District. The Limited Industrial Zoning District allows for 4 stories and 50 feet of height.
- Upgrades will likely need to occur to the existing sewer utilities along Hartford Tpke and Stoney Hill Rd and various pump stations, which could potentially drive up development costs.
- The project will likely be subject to MEPA review due to the number of Parking Spaces created and an Access Permit being required by MassDOT.

- The Grafton MBTA commuter rail station is greater than 1.6 miles from the project site and additionally is accessible only by car as there is no sidewalk on Rt. 20.
- Under Tab 14, the claims that the project offers transportation choice, that the WRTA bus could be extended to the site, and that the project is proximate to basic needs are not supported by documentation in the application. We do not feel that this is an accurate statement based upon the existing condition or the projected conditions over the next five or more years. Additionally, on page 6 of the MassHousing application, the applicant has selected "NO" to all public transportation options.

Application Inconsistencies & Comments

- The number of 3 bedroom apartments in the unit mix on page 9 does not meet the 10% requirement. 19 units are supplied while 10% of 300 is 30 units.
- Page 15 of the Mass Housing application does not seem complete as the applicant did not provide a cost for the majority of the Construction Site Work Hard Costs.
- Page 16 of the application does not reflect accurately the Comprehensive Permit Filing Fees for the Town of Shrewsbury, per the ZBA's Comprehensive Permit Regulations, dated November 24, 2014.
- MassHousing, in reviewing the project, has to take into consideration municipal actions previously taken to meet affordable housing needs. The Town of Shrewsbury has taken the following steps to address these needs:
 - RFP for Mixed Use 40B, due September 30, 2014. The Town received three submittals, including the one from Smart Growth, LLC, and chose to partner with another mixed use 40B project proposed off Walnut Street and Route 9. Currently, the Town is still working with the chosen applicant in order to finalize the project prior to a LIP submittal
 - Multi-Family Zoning districts
 - Inclusionary Housing Bylaw
 - Approved Housing Production Plan
- The applicant does not describe the Existing Utilities and Infrastructure on page 6 of the MassHousing application or in Tab 8 under Existing Conditions.
- Outcropping shown on the "Phase II Grading, Drainage and Utilities Plan" while elsewhere in the document the applicant claims there is no ledge on the site.
- The current value of the land as taken from the assessor's data is \$1.4 million, not \$1.5 million as the applicant claims for the site acquisition. The applicant also states that the land was a family transfer and on page 12 does not give a purchase price for the parcels.
- Different numbers of units are given for both the affordable and market rate unit breakdown of number of units with 1, 2, or 3 bedrooms throughout the application.
- There was no public hearing on August 26, 2014 as the applicant stated in their application. A public meeting was held with the Board of Selectmen on that date. No public comment was taken.

- The September 10, 2014 meeting was not just for the applicants but was a pre-submittal informational meeting for the mixed use 40B RFP issued by the Board of Selectmen. The project before you was not discussed in detail at this meeting. The meeting was held for informational purposes only associated with the mixed use 40B RFP.
- The October 28, 2014 public hearing was attended by many abutters that raised numerous issues with the development. The applicant was not able to address a majority of the questions at that time and the project seemed to evolve throughout the public hearing. A DVD of this hearing is enclosed for your use.
- The Plans submitted as part of the Project Eligibility Application are different than what was in front of the Board of Selectmen and the review committee during the Mixed Use 40B RFP review process. Additionally, the plan submitted as part of the Project Eligibility Application does not reflect the Board of Selectmen's comments.
- There is limited mention of potential impacts to the town's services due to the development. For example, there is no mention of the potential financial impact resulting from the number of school children expected from the development. Also, it is not clear what school the children would attend.

Design Concerns

- The By Right exhibits under Tab 9 show that the parking spaces will be 9 feet by 20 feet. The Zoning Bylaw only requires 9 feet by 19 feet, therefore, the amount of impervious area will likely decrease in the by-right options.
- The proposed Phase I and Phase II show 9 feet by 20 feet parking spaces. Some impervious area can be reduced by creating parking spaces in accordance with the Zoning Bylaw of 9 feet by 19 feet.
- Neither Phase I nor Phase II provide parking spaces for visitors. It is anticipated that the two and three bedroom units may have 2 or more cars per unit plus visitors for all units.
- The Project almost qualifies as a Large Project, as defined in 760 CMR 56.03 as it is exactly 300 units.

Environmental Impacts

- The Shrewsbury Conservation Commission and MA DEP will likely have comments on the project due to the wetlands present on the project site.
- Phase I buildings are only 2 feet from wetlands while the Conservation Commission requires 30 feet. It does not seem that it is feasible to not disturb any wetlands with the building being so close.

Traffic Concerns

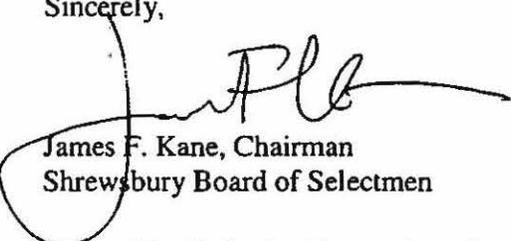
- The application to DHCD does not state the correspondence with MassDOT regarding the project of November 21, 2014, forwarded to the Town on November 24, 2014

Mr. Gregory Watson, Manager
Mass Housing
December 17, 2014
Page 4 of 4

- MassDOT has raised traffic concerns in past correspondence and meetings along Route 20 at the project site.

Please let me know if you need any additional information and explanations. As stated above, this letter reflects staff review which is ongoing.

Sincerely,



James F. Kane, Chairman
Shrewsbury Board of Selectmen

cc: Ms. Catherine Racer, Associate Director, DHCD, 100 Cambridge Street, Suite 300,
Boston, MA 02114

Enclosure



TOWN OF SHREWSBURY

Richard D. Carney Municipal Office Building
100 Maple Avenue
Shrewsbury, Massachusetts 01545-5338

April 15, 2015

Mr. Gregory Watson
Manager of Comprehensive Permit Programs
MassHousing
One Beacon Street
Boston, MA 02108-3110

Re: The Pointe at Hills Farm Project Eligibility Application
Supplemental Planning Department Comments

Dear Mr. Watson,

The Town of Shrewsbury received a copy of the Project Eligibility Application submitted to MassHousing by Smart Growth Design, LLC on December 9, 2014. The Board of Selectmen issued preliminary comments on December 17, 2014. The following are additional comments on said application after further review by the Board of Selectmen and the Planning Department.

We believe that our comments of December 17, 2014 regarding Zoning and Planning Concerns, Application Inconsistencies, Design Concerns, Environmental Impacts and Traffic Impacts alone are enough to warrant rejecting the proposed project. If MassHousing does choose to move forward and issue a letter of Site Eligibility, we ask that they do so in a way that is consistent with our current Housing Production Plan and only allow for the creation of 140 units. The creation of 140 units would provide the Town of Shrewsbury with the adequate amount of units created in one calendar year to satisfy the Certification of Municipal Compliance for a period of two years according to the DHCD Regulations.

Also, in accordance with our approved Housing Production Plan and the Shrewsbury Zoning Bylaw, the Town permitted a mixed use project, known as Lakeway Commons, in February 2015 for 100,000 square feet of retail, 250 apartment units and 13 townhouse units. 10% of all of the housing units will be affordable in accordance with the Lakeway Overlay District and the Inclusionary Housing provisions within the Shrewsbury Zoning Bylaw. Therefore, we anticipate 27 affordable units coming online in 2016 and counting towards the SHI.

This project is proposed on Limited Industrial property and is not a use allowed under the Shrewsbury Zoning Bylaw in this district. The Town has very little Limited Industrial land available for development that also has access to the sewer. The Town is currently undergoing a

Mr. Gregory Watson, Manager
Mass Housing
April 15, 2015
Page 2 of 5

Master Plan Update and has already gone through an Economic Development Self-Assessment Took Kit Study and a Housing Production Plan that was approved by DHCD. This property is not appropriate for housing based upon the zoning, the location and the studies that have been prepared. Many waivers have been requested from the Zoning Bylaw for the proposed project. There appears to be a large massing of 120 units in one proposed building of 5 stories, 68 feet high (Phase II, Site Plan Exhibit). The Town currently does not have any 5 story housing developments and such building heights are not even allowed in the Limited Industrial Zoning District. The Limited Industrial Zoning District allows for 4 stories and 50 feet of height.

In addition to the project being located in the Limited Industrial Zoning District, the development would be against Environmental Justice policy as the property would not allow for all residents of the project to have a right to be protected from environmental pollution, and to live in and enjoy a clean and healthful environment. As you may have noticed at the site visit, both properties abut and are located across the street from high industrial uses.

We are concerned about the number of school children that may be entering the Shrewsbury Public School system at one time if 300 units are approved and built. We need time for the school department to adjust and plan for such an influx.

After the site visit in January 2015 with MassHousing, we also have additional concerns about the vehicular access onto both parcels. We believe that on the east parcel, all access to the property shall be off Route 20, with an emergency access off Stoney Hill Road. Due to the slopes associated with the west parcel, we would like to see several alternatives for access studied in that location. The project is not proximate to public transportation as the only bus line through Shrewsbury is WRTA Route 15 that runs along Route 9 and through the center of town. Therefore, vehicle trips generated from such a project at all hours of the day is also a concern.

We understand that the developer of the proposed project has yet to well define the impacts on the Town's sewer system and if the system will even be able to accommodate the proposed connection.

Again, we would like to restate our concerns of December 2014 for your use.

Zoning & Planning Concerns

- The project has been proposed on two Limited Industrial zoned pieces of property. The Town has very little Limited Industrial land available for development that also has access to the sewer. The Town is currently undergoing a Master Plan Update and has already gone through an Economic Development Self-Assessment Took Kit Study and a Housing Production Plan that was approved by DHCD. This property is not appropriate for housing based upon the zoning, the location and the studies that have been prepared.
- Many waivers have been requested from the Zoning Bylaw for the proposed project.

- There appears to be a large massing of 120 units in one proposed building of 5 stories, 58 feet high (Phase II). The Town currently does not have any 5 story housing developments and such building heights are not even allowed in the Limited Industrial Zoning District. The Limited Industrial Zoning District allows for 4 stories and 50 feet of height.
- Upgrades will likely need to occur to the existing sewer utilities along Hartford Tpke and Stoney Hill Rd and various pump stations, which could potentially drive up development costs.
- The project will likely be subject to MEPA review due to the number of Parking Spaces created and an Access Permit being required by MassDOT.
- The Grafton MBTA commuter rail station is greater than 1.6 miles from the project site and additionally is accessible only by car as there is no sidewalk on Rt. 20.
- Under Tab 14, the claims that the project offers transportation choice, that the WRTA bus could be extended to the site, and that the project is proximate to basic needs are not supported by documentation in the application. We do not feel that this is an accurate statement based upon the existing condition or the projected conditions over the next five or more years. Additionally, on page 6 of the MassHousing application, the applicant has selected "NO" to all public transportation options.

Application Inconsistencies & Comments

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- There was no public hearing on August 26, 2014 as the applicant stated in their application. A public meeting was held with the Board of Selectmen on that date. No public comment was taken.
- The September 10, 2014 meeting was not just for the applicants but was a pre-submittal informational meeting for the mixed use 40B RFP issued by the Board of Selectmen. The project before you was not discussed in detail at this meeting. The meeting was held for informational purposes only associated with the mixed use 40B RFP.
- The October 28, 2014 public hearing was attended by many abutters that raised numerous issues with the development. The applicant was not able to address a majority of the questions at that time and the project seemed to evolve throughout the public hearing. A DVD of this hearing is enclosed for your use.
- The Plans submitted as part of the Project Eligibility Application are different than what was in front of the Board of Selectmen and the review committee during the Mixed Use 40B RFP review process. Additionally, the plan submitted as part of the Project Eligibility Application does not reflect the Board of Selectmen's comments.
- There is limited mention of potential impacts to the town's services due to the development. For example, there is no mention of the potential financial impact resulting from the number of school children expected from the development. Also, it is not clear what school the children would attend.

Design Concerns

- The By Right exhibits under Tab 9 show that the parking spaces will be 9 feet by 20 feet. The Zoning Bylaw only requires 9 feet by 19 feet, therefore, the amount of impervious area will likely decrease in the by-right options.
- The proposed Phase I and Phase II show 9 feet by 20 feet parking spaces. Some impervious area can be reduced by creating parking spaces in accordance with the Zoning Bylaw of 9 feet by 19 feet.
- Neither Phase I nor Phase II provide parking spaces for visitors. It is anticipated that the two and three bedroom units may have 2 or more cars per unit plus visitors for all units.
- The Project almost qualifies as a Large Project, as defined in 760 CMR 56.03 as it is exactly 300 units.

Mr. Gregory Watson, Manager
Mass Housing
April 15, 2015
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Environmental Impacts

- The Shrewsbury Conservation Commission and MA DEP will likely have comments on the project due to the wetlands present on the project site.
- Phase I buildings are only 2 feet from wetlands while the Conservation Commission requires 30 feet. It does not seem that it is feasible to not disturb any wetlands with the building being so close.

Traffic Concerns

- The application to DHCD does not state the correspondence with MassDOT regarding the project of November 21, 2014, forwarded to the Town on November 24, 2014
- MassDOT has raised traffic concerns in past correspondence and meetings along Route 20 at the project site.

Please let us know if you need any additional information and explanations.

Sincerely,



James F. Kane, Chairman
Shrewsbury Board of Selectmen

cc: Kristen D. Las, AICP, Principal Planner/Development Coordinator
Ms. Catherine Racer, Associate Director, DHCD, 100 Cambridge Street, Suite 300,
Boston, MA 02114
Secretary Jay Ash, Executive Office of Housing and Economic Development
Senator Michael Moore
State Representative Hannah Kane
Shrewsbury Board of Selectmen