

TOWN OF SOUTHBOROUGH

Planning Board

17 Common Street Southborough, MA 01772

September 20, 2007

Nancy Anderson
Manager, Rental Programs and Development
Massachusetts Housing Financing Agency
One Beacon St.
Boston, MA 02108

Re: Avalon Southborough, MH # SA-07-006

Dear Ms. Anderson,

Thank you for the opportunity to comment on this project. The Planning Board has reviewed this proposed comprehensive permit project and submits the following comments for your consideration.

1. The current zoning in Southborough is an equation that represents a balance between land uses. This site is zoned Industrial Park for obvious reasons: its close proximity to both Route 9 and I-495 make it ideal for commercial uses. This zoning anticipates a particular use and, by extension, services and tax base. By locating residential development on industrial land, there is an overall imbalance of land uses in the town: limited industrial land is converted to a residential use thus resulting in a net loss for the town: loss of commercial land coupled with increased costs due to residential development. While we understand that comprehensive permit projects may be proposed on industrial land, land in Southborough zoned for such purposes, and in such close proximity to Route 9 and I-495 is minimal, and it is of concern that a valuable commercial site, of such significant acreage, is now proposed for residential purposes. We note, however, that this project proposes to utilize all available site acreage, thus not segmenting the parcel.
2. Related to this issue is that there is an absence of materials indicating how the proposed residents will be connected to the community. This site is on the outskirts of Southborough and is surrounded by commercial and industrial development. While this does not promote a connection to the rest of town, it also does not overburden narrow local roadways with numerous unanticipated vehicle trips, an obvious trade-off. This site is fully served by Route 9 and Crystal Pond Road; the challenge for the proponent is to establish a clear relationship between these new Southborough residents and the existing community.

3. The access driveway for this site that will now be a connector between Route 9 and Crystal Pond Road is of great interest to the Planning Board. As you may be aware, EMC, Corporation is in the permitting process to expand their campus to 2.2 million square feet of research and development and office space on 445 acres of land in Southborough and Westborough. The proposed access driveway, also known as the “jughandle”, is part of the required EMC roadway improvement plan. We are extremely interested in knowing how this residential development will work within that large-scale industrial development proposal, particularly as the EMC traffic analysis indicates that as many as 15,000 additional daily vehicle trips are projected from their development. A detailed traffic analysis, trip generation model, and intersection Level of Service study with associated mitigation measures must be submitted in order to determine how the Avalon proposal fits into the overall development process at this area of Route 9. This is particularly important both for planning purposes for the town, but also for the reasons mentioned above given the proposed EMC proposal and its associated mitigation requirements. While we understand that these are two separate projects on different development schedules, there is no question that they must coordinate to the greatest degree possible to ensure a comprehensive mitigation plan for the area. Certainly the EMC proposal did not envision a residential development on this parcel, and thus the roadway network and proposed changes must accommodate this change in use and traffic pattern.
4. In addition to the EMC campus proposal, there have been recent filings with MEPA related to large projects further west on Route 9 in Westborough (specifically EOEA #3143 and EOEA #4396), which total nearly 700,000 SF of additional Office/R&D space and an increase of over 4,000 vehicle trips per day. The Town has serious concerns about the viability of the I-495/Route 9 interchange given this amount of projected growth, particularly as EMC has identified that a majority of the vehicle trips generated by the project will be to and from this interchange. The functioning level of service of the Rt. 9/I-495 interchange and possibly the I-90/I-495 Interchange will be determined by the chosen mitigation for this project in combination with the other known projects in the pipeline. We are also concerned about the viability of the signalized intersection at Route 9/Crystal Pond Road with this new development. While the connection to Crystal Pond Road is an asset to the overall project, the traffic analysis must assess the functionality of the intersection given the commuting patterns of a residential development, which are far different from the vehicle trips currently entering and exiting the Crystal Pond Road industrial area. The cross pattern of more vehicles exiting Crystal Pond Road to access the light for a westbound movement will directly affect the Route 9 through-traffic. Clearly, direct coordination with MassHighway is necessary.
5. The application states that the owner of the property is the Flatley Company, yet the submitted Purchase and Sale Agreement is between AvalonBay and Moss Development, Inc. This does not address the issue of required site control. Without evidence of Moss Development, Inc. having control of the site, we cannot establish their ability to enter into a Purchase and Sale Agreement with AvalonBay. This information is a requirement for filing a comprehensive permit application and must be submitted prior to further action on the application.

6. The application includes a Smart Growth Criteria Scorecard. We offer the following comments on the submittal: 1) the scorecard indicates that no efforts to utilize Lower Impact Development principles during site development will be taken, despite the fact that Southborough has a Lower Impact Development Bylaw. Given the existing wetlands system on this property, and the extensive amount of surface parking proposed, it seems obvious that such development principles would be used. Innovative techniques in stormwater treatment and retention should be used rather than the conventional large detention basin system proposed; 2) in a meeting with the town's affordable housing committee, AvalonBay indicated their willingness to offer units at a range of affordability, and not simply the maximum 80% of AMI. We trust that they will support such an effort and will make units available to a broader range of income levels; 3) the application makes no mention of transportation options available in Southborough. The site is a few miles from the Southborough commuter rail station, a heavily-used transit connection to Boston and Worcester; use of the train should be encouraged to residents. The scorecard indicates that the site is not walkable to public transit; however, The Local Connection (TLC), a demand-response transit service operated by the Worcester Regional Transit Authority in Southborough and Marlborough would be available directly at this site. The TLC is also not mentioned in the General Development Information application. As a model suburban transit service provided hundreds of trips each week, we are surprised that the applicant did not capitalize on it and make it part of the application package. Provisions must be made to accommodate and encourage transit use, particularly in such an isolated location. Also, with the new MetroWest Regional Transit Authority now in operation in the region, we believe there to be a clear opportunity to provide accessible transit service to the residents of the development and expect the applicant to participate in this effort.
7. The Planning Board has enacted regulations regarding both landscaping and outdoor lighting to ensure that invasive species are not planted and to ensure adherence to Dark Sky standards. Recognizing that local regulations are eligible for waivers in the Comprehensive Permit process, it will only benefit the project and its residents to have the site fully comply with these regulations.
8. Virtually all residential developments in Southborough, regardless of size, contribute to the town's inventory of recreation land and/or open space, as a way of offsetting the impacts of additional residents and development to the town. Although this is one of the largest residential developments proposed in Southborough, this proposal does not include such a component.
9. The application notes that sanitary sewer service to the site will be provided by an on-site wastewater treatment facility, yet this facility is not shown on the site plan. Further, it is not clear whether or not this facility will include a groundwater or surface water discharge component. Given the proximity of wetlands resources to the site, this information is important to the viability of the project.

10. A complete list of all waivers requested was not submitted with this application, which would have assisted the Town in preparing its comments to your agency.
11. We also note another large Chapter 40B project in close proximity to this site, also on Industrial Park-zoned land. It is proposed for 200 units of rental housing by Trammell Crow Development (Alexan). As with the AvalonBay proposal, the Alexan proposal would achieve the Town's 10% subsidized housing requirement. Thus, the Town finds itself in a unique position to evaluate the benefits and the impacts of both proposals simultaneously. Given this situation, we intend to weigh these projects on their merits to ensure that the approved project meets the goals and objectives of the town.

This project represents one of the largest residential developments ever proposed in Southborough, and is located very nearby to an extremely over-taxed highway interchange in a somewhat isolated location on land zoned Industrial Park. Thus, the Planning Board is paying particular attention to the proposal to ensure that the vision and goals expressed in our current Master Plan process are respected.

The Town of Southborough has made significant strides over the last few years in creating affordable housing, both in approving a 29-unit comprehensive permit which is currently under construction and creating two single-family dwelling units (one rental unit and one ownership unit) through the Local Initiative Program. These kinds of developments, that are more in keeping with the town's existing development pattern and that are scattered throughout the community reflect the objectives stated in the town's certified Affordable Housing Strategy. We see our prior efforts as a positive trend toward achieving diversity in our housing stock. The Town is committed to affordable housing, and recognizes that the best way to integrate diverse housing into the fabric of its neighborhoods comes from community involvement and exceptional architectural design and site development.

Our concerns about the size and location of the project notwithstanding, we intend to work cooperatively with the applicant through this permitting process.

We appreciate the opportunity to comment on this proposal.

Respectfully submitted,

Vera Kolia, AICP
Town Planner

Cc: Board of Selectmen
Karen Galligan, Superintendent of Public Works
Fire Chief John Mauro
Police Chief William Webber
Conservation Commission

Peter Johnson, Building Inspector
Aldo Cipriano, Town Counsel
Board of Health
SHOPC