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By Email to [MMorelli@brooklinema.gov](mailto:MMorelli@brooklinema.gov)

Mark Zuroff, Chair  
Zoning Board of Appeals  
Town of Brookline  
333 Washington Street  
Brookline, MA 02445

Re: Center Communities of Brookline, Inc.(CCB)  
Comprehensive Permit  
Case No. 2781 (C-W Associates)

**NOTICE OF PROJECT CHANGE:**  
**REQUEST FOR ADMINISTRATIVE APPROVAL**  
**MODIFICATION TO ADD TWO HANDICAP PARKING SPACES**

Dear Chairman Zuroff:

Reference is made to the Comprehensive Permit issued for the property at 100 Centre Street dated June 26, 1986, ZBA Case #2781<sup>1</sup> (the "1986 Comprehensive Permit") which is currently owned by CCB. Since the Zoning Board of Appeals ("ZBA") approved the 1986 Comprehensive Permit and associated plans Hebrew SeniorLife, Inc.(HSL) the Managing Agent for CCB has filed an application for a comprehensive permit to build 54 units of affordable housing for seniors at its

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<sup>1</sup> The permit to construct 100 Centre Street was approved by the Board on June 11, 1970, Case #1636. The Board, in 1970 issued the necessary variances and special permits for the original 214 unit project to proceed. There are no changes sought to the 1970 permit. Condition 4 of the 1970 permit pertained to parking and provided, in relevant part, "Total number of parking spaces is to be 39, 14 of which may be under Building B." Building B as referenced is now 112 Centre Street which has an underground parking garage. 100 Centre Street will still have 26 surface spaces and 13 spaces available in the 112 parking garage in order to meet this original condition. In 1986, a Comprehensive Permit under M.G.L. Chapter 40B was issued for 100 Centre Street. The 1986 permit added 3 units, a tenth floor with community space, kitchen facilities, dining facilities and other amenities. The 1986 permit also converted the use to a congregate care facility to allow for services for seniors such as medical care, dining facilities, shopping and housekeeping services. By converting the use and seeking relief via Chapter 40B it also guaranteed the continued affordability restrictions for these senior living units. Both ZBA decisions are attached for the Board's convenience.

adjacent site at 108 Centre Street (the "108 Project"). During the recent Transportation Board hearing relative to the 108 Project the Transportation Board recommended that HSL include handicap parking for residents at the proposed 108 Project. The ZBA agreed with this recommendation. Therefore, HSL seeks to modify the 100 Centre Street Comprehensive Permit to include 2 handicap parking spaces (shown in pink on the attached plan) on the 100 Centre Street lot which would be dedicated to residents at the adjacent 108 Project. No other changes to the existing parking or program at 100 Centre Street are requested.

760 CMR 56.07(4) (b) provides guidance to a Zoning Boards of Appeal as to what constitutes a substantial or insubstantial change to a comprehensive permit. Following are some examples of what circumstances ordinarily will and will not constitute a substantial change, as described in 760 CMR 56.07(4)(a).

"(c) The following matters generally will be substantial changes:

1. An increase of more than 10% in the height of the building(s);
2. An increase of more than 10% in the number of housing units proposed;
3. A reduction in the size of the site of more than 10% in excess of any decrease in the number of housing units proposed.
4. A change in building type (e.g., garden apartments, townhouses, high-rises); or
5. A change from one form of housing tenure to another.

(d) The following matters generally will not be substantial changes:

1. A reduction in the number of housing units proposed;
2. A decrease of less than 10% in the floor area of individual units;
3. A change in the number of bedrooms within individual units, if such changes do not alter the overall bedroom count of the proposed housing by more than 10%;
4. A change in the color or style of materials used; or
5. A change in the financing program under which the Applicant plans to receive a Subsidy, if the change affects no other aspect of the proposal."

As is consistent with the aforementioned language, HSL respectfully submits that the change to the 1986 Comprehensive Permit for 100 Centre Street to provide two handicap spaces on the 100 Centre Street lot dedicated to the 108 Project is insubstantial under the applicable regulations. Since the original parking plan for 100 Centre Street will not substantially change, we also ask that the Board find that the 1970 special permit does not need to be modified at this time. This notice is being provided pursuant to 760 CMR 56.05(11)(a). Pursuant to these regulations, the Board shall determine within twenty (20) days whether this request is a substantial or insubstantial change in accordance with 760 CMR 56.05(11)(c) and (d). If it is determined that they are insubstantial changes, or if notice is not provided to the

applicant to the contrary within such twenty (20) day period, the Comprehensive Permit shall be deemed changed, as requested. The above process does not require a public hearing. A public hearing would be required only if you determine that the requested changes are substantial changes, and if so, and pursuant to the aforesaid regulations, a public hearing is to be held within thirty (30) days.

We look forward to addressing this matter at the meeting on December 13, 2021. Thank you.

Very truly yours,



Jennifer Dopazo Gilbert

Encs.

Copies Via Email to:

Kara Brewton, Director of Planning and Community Development

Maria Morelli, Senior Planner

Dan Bennett, Building Commissioner

Virginia Bullock, Housing Project Planner