



# Town of Brookline

## *Massachusetts*

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March 8, 2016

Katherine Lacy, AICP  
Comprehensive Permit Program  
Massachusetts Housing Finance Agency  
One Beacon Street  
Boston, MA 02108

RE: 40 Centre Street, Brookline (MH #810)  
Brookline Response to Notice of Application for C. 40B Site Eligibility Letter

Dear Ms. Lacy:

Thank you for the opportunity to provide comments on the application for Site Approval submitted by 40 Centre Street, LLC to develop a residential project under GL Chapter 40B at 40 Centre Street, Brookline. The applicant is proposing to demolish a two-story brick building containing two medical offices on the ground floor and one apartment on the second floor and replace it with a six-story building consisting of 45 residential units, nine of which will be affordable. The residential units will be on floors two through six while seventeen parking spaces will be provided on the ground floor of the building.

The Board of Selectmen has requested comments from municipal departments, boards and commissions and held a public hearing on March 1st to solicit input from interested parties in the town. Since there was insufficient time for a comprehensive review and additional information is still needed before the review can be completed, a more intensive

evaluation will be conducted during the Comprehensive Permit process if a Project Eligibility Letter (PEL) is issued and the applicant submits a Comprehensive Permit application.

While the Board fully anticipates that municipal departments, boards and commissions may identify other issues following a detailed review of the additional information, and the Board of Appeals may seek peer review on some of these issues, the Board of Selectmen is submitting the following preliminary comments on the proposal:

- The Town of Brookline supports the provision of affordable housing and has focused significant resources to expand housing opportunities for vulnerable populations. Attached is a summary of recent efforts by the Town to retain, improve and expand the availability of affordable housing. Also attached is a memorandum from Brookline's Housing Advisory Board.
- The location of this project in the heart of Coolidge Corner meets most of the tenets of SMART growth. The site is proximate to rapid transit on Beacon Street and bus service on Harvard Street and is on the cusp of the largest commercial area in Brookline. However, the required demolition of an attractive *circa* 1921 Georgian-Federal Revival style brick building (including the elimination of an existing apartment) is antithetical to the overriding sustainable development principle of "concentrate[ing] development and mixed uses" by "encourag[ing] remediation and reuse of existing sites, structures, and infrastructure..."
- While supporting the expansion of housing opportunities for vulnerable populations (as evidenced by its past and ongoing commitment of Town resources to create and maintain affordable housing), the Board of Selectmen laments the growing tendency in essentially fully developed communities like Brookline to replace existing structures including residential buildings with new buildings under the auspices of 40B. (Please note that this is more than a "tendency" in Brookline—five of the six projects currently in various stages of the 40B process involve demolition.) The proposed demolition of this property is an egregious violation of the Sustainable Development Principles that seek to protect and conserve existing resources rather than eliminate them to promote new construction.
- Despite the availability of a strong public transportation network, the proposed number of parking spaces is seriously deficient. Seventeen spaces for 65 bedrooms plus 5 studios, combined with the fact that the project is not providing parking for service vehicles or visitors will significantly exacerbate existing parking issues within the area. On-street parking during the day is particularly limited in this residential area that immediately abuts a very busy commercial area; and the Town of Brookline prohibits overnight parking anywhere in town. Seventeen spaces (including only one for handicapped parking) for 45 units with a ratio of 0.37 spaces per unit is grossly inadequate. The number of parking spaces needs to be increased dramatically and/or the number and size of the units need to be reduced substantially. Other approaches could include reducing the footprint of the building to allow for open air parking to the rear of the proposed building.
- The proposed project will overshadow the three-story brick row house to the immediate left of the property. The applicant needs to identify ways to minimize the massing and

height of the proposed building to relate better to this abutting row house as well as the area as a whole. Reducing the size of the building—including both the height and footprint—would help mitigate the impact to the abutting property to the south at 30 Centre Street, create a better transition from the high rise to its rear and the nearby lower scale residential buildings on Centre Street, provide greater setbacks on all four sides (the setback to the street lot line is only 2' and 5' to 6' on the other three sides), allow for more landscaping around the building and increase the parking space-to-unit ratio. The proposed two foot front yard setback is not appropriate because it is inconsistent with the existing streetscape and setback of the properties on this block. In addition, the shallow setback will not sufficiently accommodate landscaping that would effectively buffer the visual impact of this more intensive land use.

- The Board also recommends that the applicant explore the possibility of restricting the tenant pool to people of at least 55 years old. While the Selectmen recognize and support the need for family housing, there is also a compelling need for senior housing in Brookline and the region. Coolidge Corner has historically been—and continues to be—an ideal location for seniors given the range and abundance of services that are provided, including a municipal senior center down Centre Street. Age-restricted housing will meet a significant (and growing) need, while at the same time providing opportunities to reduce the massing of the building and minimize the parking requirement from the perspective of both the neighborhood and the market.
- As currently proposed, the project does not provide for any usable open space for residents. At a minimum, a rooftop landscaped courtyard should be considered. A preferable approach from the perspective of the Board of Selectmen (and probably the tenants) is to reduce the size of the building footprint to allow for at-grade open space.

The Board of Selectmen strongly recommends that, in order to facilitate and expedite the Town's review of a Comprehensive Permit application, the applicant address the above issues and submit the following information prior to or as part of an application to the Town's Board of Appeals:

- a 3D model showing the proposed and abutting buildings
- a site plan showing abutting buildings with setbacks of the proposed building to its property lines and to abutting buildings
- a traffic and parking circulation study, including the impact that this project will have on the availability of existing on-street parking in the immediate area. The study should also expressly address the potential safety concerns associated with the proximity of the garage entrance and exit to the Centre Street sidewalk.
- a staking on the lot of the building's footprint to illustrate its size and setbacks
- a shadow study
- a storm water and drainage report
- a waiver list in tabular form

The Board also recommends that the applicant meet with the Fire Chief as soon as possible in order to identify and address any fire safety issues.

Finally, the Board of Selectmen respectfully requests that MassHousing encourage the developer to work with the Town to achieve an improved project – one that has a much higher

ratio of parking to number of bedrooms and one that does not overwhelm the adjacent lower building to its left. Hopefully, MassHousing will condition site eligibility approval, if any, on the applicant's cooperative engagement with the Town. If a PEL is issued, the Town looks forward to working with the developer and its architectural team to refine the proposal during the review. Town staff is available to meet with the applicant prior to any formal process in order to answer any questions or expand on the comments above.

Thank you for your consideration.

Sincerely,

Neil A. Wishinsky  
Chairman

Attachment: Affordable Housing in Brookline  
Memorandum from Housing Advisory Board

cc: Melvin Kleckner, Town Administrator  
Alison Steinfeld, Planning Director