

# Weston Affordable Housing Trust

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June 18, 2019

**To:** **Weston Zoning Board of Appeals (ZBA)**  
Valerie Geary, ZBA Staff Assistant ([geary.v@westonmass.org](mailto:geary.v@westonmass.org))  
John Field, Land Use Coordinator ([field.j@westonmass.org](mailto:field.j@westonmass.org))

**Cc:** Leon Gaumond, Weston Town Manager ([gaumond.l@westonmass.org](mailto:gaumond.l@westonmass.org))  
Mark Romanowicz ([mark.romanowicz@gmail.com](mailto:mark.romanowicz@gmail.com))  
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**Re:** Modera Weston, 751-761 Boston Post Road

The Weston Affordable Housing Trust (“Trust” or “HT”) submits this letter to the ZBA to provide input and recommendations regarding the Comprehensive Permit application for the multi-family rental housing development being proposed at 751-761 Boston Post Road (“the project”). The Trust has reviewed the project on two occasions and has previously submitted letters of support to the Board of Selectman (BOS) on October 15, 2018 and May 26, 2019. The support letters focused their comments and recommendations to an analysis of issues and preferences that the Town has identified in the “Town of Weston Policies and Preferences for Affordable Housing” document. The Trust continues to support the project for the reasons stated in these letters.

The Trust urges the ZBA to maintain the current proposed mix of 1, 2 and 3 bedroom units, ensuring that family-sized and elder-friendly (2 bedroom or greater) units are provided to the greatest extent possible. Thus, fulfilling the needs identified in the HPP for family friendly rental housing (due to the current market “pricing-out” young families) and for down-sizing seniors (where there is the greatest documented need among current Weston residents for rental housing).

The Trust urges the ZBA to stipulate the following conditions as part of the issuance of the Comprehensive Permit regarding the affordable housing component to the proposed project:

1. All of the units in the Project Shall be eligible for inclusion in the SHI as set forth in Section II.A.2.b.1 of "Guidelines G.L. C.40B Comprehensive Permit Projects Subsidized Housing Inventory," MA Department of Housing and Community Development ("Guidelines") in perpetuity.
2. Building permits shall not be issued without the project submitting Final Approval confirmation from MassHousing.
3. All affordable units, of each type (i.e. 1 br, 2br, 2br townhouse, 3br and 3 br townhouse), in the development shall be evenly disbursed throughout the project and be indistinguishable from market units in external appearance and interior finishes, fixtures, and appliances. Further, the average square footage of the affordable units

shall be equal to the average square footage of the market units for each type of unit. Unless otherwise required by the Subsidizing Agency, the Affordable Units shall have the same unit distribution as the other units in the Project in terms of number of bedrooms and type of units. For this project, 13 one-bedroom units would be affordable (25% of the 51 one-bedroom units); 20 affordable two-bedroom units (25% of the 79 two-bedroom units); 8 affordable two-bedroom townhouse units (25% of the 32 two-bedroom townhouse units); 1 affordable three-bedroom unit (25% of the 2 three-bedroom units); and 4 affordable three-bedroom townhouse units (25% of 16 three-bedroom townhouse units. Final unit mix, unit location, and unit specifications (of interior finishes, fixtures, and appliances) shall be submitted by the applicant for approval by the Town, with review and recommendations by the Affordable Housing Trust, prior to the submission to the Subsidizing Agency for final approval.

4. If the project is to be delivered in phases, 25% of the units in each phase must be affordable, and match unit type/size distribution to greatest extent possible. No occupancy permits should be issued prior to verification of the market to affordable ratio of units to be included in the issuance of the occupancy permits.
5. In accordance with the Guidelines, and to the extent allowed by law, at initial lease-up preference for renting up to fifty percent (50%) of the Affordable Units shall be given to residents of the Town, which for this purpose is defined as anyone currently living in the Town (at the time of application to rent a unit), employees of the Town, businesses located in the Town, or holders of bona fide offers of employment with the same, or households with children attending school in the Weston School District.
6. Affirmative Marketing Plan, including the name and qualifications of both the lottery agent and ongoing property manager, shall be submitted by the applicant for approval by the Town, with review and recommendations by the Affordable Housing Trust prior to the submission to the Subsidizing Agency for final approval. The Town will work with the applicant to market the affordable units, specifically identifying appropriate local outreach venues.
7. The Owner shall submit to the Town annually all monitoring reports including annual rent increases and information verifying income eligibility for the affordable units.
8. All leases for the units in the Project shall include language stating that tenants may not use any rooms other than bedrooms for sleeping purposes. Living rooms, dens, or dining rooms for example, may not be used as bedrooms.

The Trust recognizes that many of the above 1-8 recommendations will likely be addressed by the Subsidizing Agency and the Massachusetts Department of Housing and Community Development (DHCD) as part of the "Guidelines G.L. C.40B Comprehensive Permit Projects Subsidized Housing Inventory"; however, it is incumbent upon the Town to state these requirements clearly in the Comprehensive Permit to ensure the project meets or exceeds these requirements as may be beneficial to the Town.

The HT encourages the ZBA to request the project proponent accommodate, to the greatest extent possible, the following specific preferences in order to make for a safer and more livable community:

- A. Design buildings to align with the Policies and Preferences for Affordable Housing, specifically with regard to building mass and character. The HT urges the developer to continue to work with the Planning Board on modifying the building design.
- B. Construct all units following Universal Design principals to allow units to be adaptable and able to convert to accessible as may be required by the occupant.
- C. Design for walk-ability by providing sidewalks or informal pathways, or both. Ensure that the project contains pedestrian accessibility, including sidewalks on Boston Post Road to connect to future sidewalks. Consideration must also be made for school bus access.
- D. Design for sense of community. Consider building and site layouts that encourage communication and interaction among residents of the development (e.g. Common spaces within buildings, or common facilities, open space, or recreation areas.)
- E. Design common open space so that it will be accessible to all residents of the development.
- F. Protect historic resources by designing projects to avoid adverse impacts on structures with historic or architectural significance. The HT encourages the developer to continue to work with the Historical Commission on the re-use of existing buildings.
- G. Employ “green” development practices, considering both building and site.
- H. Address sustainability in the design, construction and operations/maintenance of the project.

Finally, the HT urges the ZBA to request the applicant to work with subsidizing agency to provide additional affordable units that would qualify as workforce housing with rents affordable to individuals and families with incomes of 81% to 120% of the Area Median Income (AMI). These units may qualify for subsidies through the MassHousing Workforce Housing Initiative.

Respectfully submitted,

Trustees of the Weston Affordable Housing Trust

(Approved unanimously by vote held at HT meeting June 17, 2019.)

## Weston Affordable Housing Trust

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October 15, 2018

To: Weston Board of Selectmen ([selectmen@westonmass.org](mailto:selectmen@westonmass.org))  
Leon Gaumont, Weston Town Manager ([gaumont.l@westonmass.org](mailto:gaumont.l@westonmass.org))  
Mark Romanowicz ([mark.romanowicz@gmail.com](mailto:mark.romanowicz@gmail.com))

Re: Proposed 40B Development – 751 Boston Post Road

The Weston Affordable Housing Trust is charged with performing housing-related review and making recommendations to the Board of Selectman for all c. 40B proposals in Weston. The Trust has met with and attended a site walk with the developer who intends to develop rental housing on the property located at 751 Boston Post Road. The Weston Affordable Housing Trust supports the proposed projects as a viable opportunity to bring needed affordable housing to Weston in the near term. As currently envisioned the multi-family development would provide approximately 160 units of rental housing with 25% or approximately 40 units affordable to households earning 80% or less than the area median income (AMI)\*\* (current 80% income limit for household of 4 is \$81,100).

As the Developer moves forward with the plans, the Trust will specifically be looking to ensure that units designated as affordable shall be interspersed throughout the community and shall match proportionately the overall unit type mix. The Trust encourages the developer to provide for a healthy mix of studio, 1, 2 and 3 bedroom units, to provide for as much housing diversity as possible. We also encourage developer to employ universal design principals and provide for all units to be adaptable to allow for accessible features, as may be needed by individual residents. These requirements will ensure that Weston's need for both family-friendly rental housing (due to the current market "pricing-out" young families) as well as elder-friendly housing (where we have the greatest documented need among current residents for additional rental housing) will be met. Additionally, in order to meet the needs of what we hope to be a diverse population, we will urge the developer to include park space/open space with seating, playground space, walking paths, bike stations, as well as common inside space for residents to gather.

The Trust looks forward to continuing to review and provide feedback on the project in anticipation of a Local Initiative Project (LIP) application for the development of rental housing to the Department of Housing and Community Development (DHCD). While there have been no specific plans for the development presented, the Trust looks forward to working with the developer and the Town to support the development of affordable housing in Weston and to ensure that affordable housing units are created equitably.

\* Approved by a vote of the Weston Affordable Housing Trust at meeting held on *October 15, 2018*.

\*\* Area Median Income as determined annual by the Department of Housing and Urban Development (HUD) for the Boston-Cambridge-Quincy MA-NH HUD Metropolitan Area.

## Weston Affordable Housing Trust

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March 26, 2019

To: Weston Board of Selectmen  
selectmen@westonmass.org

Re: Proposed 40B Development – Modera Weston – 751 & 761 Boston Post Road

The Weston Affordable Housing Trust (“Trust” or “HT”) is charged with performing housing-related review and making recommendations to the Board of Selectman (BOS) for all c. 40B proposals in Weston. The Trust has reviewed the proposed Modera Weston development located at 751 & 761 Boston Post Road on two occasions and has prepared the following recommendations to the BOS, as the BOS prepares comments on the Site Approval application submitted by the developer to MassHousing.

The Trust supports the proposed project as a viable opportunity to bring needed affordable housing to Weston in the near term. The multi-family development would provide 45 units of rental housing affordable to households earning 80% or less than the area median income (AMI), which would be a significant contribution to our affordable housing needs in Town. We strongly recommend that the BOS issue a letter of general support to the project to MassHousing for the reasons we describe in this letter. The Trust also recommends that the Selectman encourage the developer to consider incorporating so-called “workforce housing” units in the project by taking advantage of funding available through MassHousing’s Workforce Housing Initiative. This program funds developments that provide rental housing to individuals and families with incomes of 61% to 120% AMI, creating a wider range of diverse affordable housing options in Weston.

Fulfilling a Need. The development would help fulfil the Town’s need for more diversity in housing types and affordability as identified in the “Town of Weston Housing Production Plan” (HPP), dated November 2015. Weston has a need for both family-friendly rental housing (due to the current market “pricing-out” young families) as well as elder-friendly housing (where we have a documented need among current residents for rental housing). The Trust would request the BOS to encourage the developer to include more 3 bedroom units than the minimum required under c. 40B regulations in order to provide family-sized units, fulfilling a need identified in the Housing Production Plan. Additionally, in order to address the need for more affordable and rental housing for elderly and aging residents, we request that the BOS also encourage the developer to incorporate more townhouse units with first-floor bedrooms, employ universal design, and provide for all units to be adaptable to allow for accessible features, as may be needed by individual residents. In order to meet the needs of what we hope to be a diverse

\* Approved by a vote of the Weston Affordable Housing Trust at meeting held on March 22, 2019.

population, we urge the developer to include park space/open space with seating and playground space, as well as common inside space for residents to gather.

This project aligns with many of the guidelines set out in the *Town of Weston Policies and Preferences for Affordable Housing (Housing Partnership, 2/25/10)*. Most notably, the property is accessed by a major road way, appears to minimize site disturbance and maximize open space, connects to existing trails and pathways, adheres to setback requirements, preserves and reuses historic buildings, and the density does not exceed 4 acres per unit. This is also evidenced by the relatively minimal scope of the zoning waivers anticipated to be required for the project. The Trust acknowledges that the plans continue to be in flux and perhaps subject to change over the course of the permitting, and therefore strongly urges the developer to continue to work cooperatively with the Weston Planning Board on the details of the design of the buildings and the site to insure that the final project aligns as much as possible with the *Policies and Preferences for Affordable Housing*, as well as the Planning Board's guidelines for residential development.

The Trust strongly supports this project. Not only does it meet the need for affordable rental housing but does so in manner that is sensitive to the town's preferences for development. The Trust appreciates the efforts of the developer to work with several town boards and affected residents to address specific areas of concern. The Trust looks forward to continuing to provide feedback to the developer as the project progresses and provide support for the project.

Respectfully Submitted,

Trustees of the Weston Affordable Housing Trust