

August 2, 2021

Ms. Jane Fisher Carlson, Chair  
Weston Zoning Board of Appeals  
Weston Town Hall  
Weston, Massachusetts

Re: 510-518-540 South Avenue 40B Development Project, Land Use Analysis

Dear Ms. Carlson and Members of the Board,

In light of the Zoning Board of Appeals' upcoming discussions on August 3, 2021 regarding the architecture and landscaping of the proposed 40B development of 200 units at 510-518-540 South Avenue, I would like to offer some detailed analysis of the proposed size, scope and density of the development to help put it in the proper context.

By way of background, my analysis of this matter is based on a nearly 40-year professional career as a practicing municipal land use planner and consultant specializing in transportation, land use, zoning, and housing issues. During this time, I have served directly in several diverse communities and most recently in the City of Newton as a Senior Land Use and Transportation Planner. I have held positions with titles such as Town Planner, Community Development Coordinator, Senior Transportation Planner, and Fair Housing Officer. I have drafted hundreds of development review memos for all types of land use projects including several complex Comprehensive Permit applications under G.L. c. 40B. With respect to Chapter 40B and other multi-family developments, I have often advocated for specific affordable housing projects through the land use review process, ultimately drafting memos of support for such projects to elected officials. On numerous occasions it has been my pleasure to work side by side with developers and neighbors to achieve desirable projects with widespread community support. I have seen the rewards of lots of hard work, careful planning, and the proper addressing of legitimate concerns. I have spent my entire professional planning career advocating for development that adheres to sound land use practices in the communities I've served.

#### **Existing Conditions**

The following description summarizes many of the key attributes about the current conditions at 510-518-540 South Avenue and the neighboring area (lot sizes are from the Final Fiscal Year 2021 Property Valuations found on the Town of Weston website):

- 510 South Avenue is an approximately 225,600 square foot, vacant parcel (5.18 acres) that is generally wetland and mostly not developable. The residential properties at 500 South Avenue, 502 South Avenue, 526 South Avenue and 419 Wellesley Street are immediate abutters to 510 South Avenue.
- 518 South Avenue is an approximately 174,200 square foot (4.0 acres) parcel where a two-story single-family residential structure is presently located. A long, single-lane driveway, primarily located in the 100-foot wetland buffer zone, with a portion located in the Conservation

Commission's 25-ft No Disturb Zone, provides access to South Avenue. The properties at 526, 534, 540 and 546 South Avenue are immediate abutters to 518 South Avenue.

- 540 South Avenue is an approximately 40,800 square foot (.94 acre) parcel where a one-story single-family structure is presently located. The properties at 534 and 546 South Avenue are immediate abutters to 540 South Avenue.
- Combined, the three parcels (510, 518, and 540 South Avenue) contain approximately 440,600 square feet of land, or 10.1 acres total.
- All three parcels comprising the proposed project site are in the Single Residence A zoning district where 60,000 square feet is the minimum lot size. Therefore, three or possibly four single-family residences on these three parcels could be an allowed as a "by-right" use of the land depending on the lot configurations.
- The three parcels front on South Avenue (Route 30). The road consists of two single direction east-west travel lanes. The closest opposing intersection is at Highland Street and South Avenue, an unsignalized intersection with a stop sign at Highland Street entering South Avenue.
- The nearest signalized intersection is the 4-way crossing at South Avenue and Wellesley Street, approximately 0.3 miles from the site.
- There are no sidewalks on South Avenue in front of the site. A sidewalk does exist on the opposite or westbound side of South Avenue which connects to the Wellesley Street/South Avenue intersection.
- The Pope St. John Seminary abuts 518 South Avenue and is located at 558 South Avenue. There are approximately 60 seminarians housed on the 23.5-acre campus.
- The subject site is remote to most services and amenities that are usually found near proposed large-scale multi-family residential housing sites. To illustrate, the nearest land uses to the site are the following distances away:
  - Nearest grocery store: 2.6 miles
  - Nearest post office: 2.7 miles
  - Nearest service station: 2.7 miles
  - Nearest hospital: 4.4 miles
  - Nearest library: 1.8 miles
  - Weston Town Hall: 2.6 miles
  - Nearest community playground: 2.6 miles
  - Nearest bank: 2.6 miles
- There are no public transportation services on South Avenue near the site. Preferably, these services are accessible to residents of multi-family housing developments. From the subject site, the Riverside MBTA Green Line station is 4.2 miles away and the Wellesley Farms MBTA Commuter rail station (closest station) is 3.1 miles away.
- The closest access to the Massachusetts Turnpike is located at the Route 30/128 interchange in Weston and is approximately 2.5 miles east of the site. Access from the site by auto to the Turnpike entrance ranges from approximately 6 minutes during off-peak times to 15 minutes or longer during the peak morning commute hours in the eastbound direction, while similar conditions prevail on the westbound side of South Avenue during the evening peak hours.

- There are currently no bicycle lanes or designated facilities for bicycles along any portion of South Avenue in Weston, although the proposed Route 30 reconstruction project (which is still in the early design stages) necessarily envisions a shared use path along the southerly (development side) of the street.
- In front of the proposed site, eastbound morning peak hour traffic often stops or slows to a crawl approaching the signal at Wellesley Street and South Avenue. These eastbound delays can extend beyond Highland Street and Winter Street, and on occasion extend from Brown Street all the way to the signalized intersection.
- The closest schools to the site are the Regis College Campus, which is .7 miles away or an approximately 12-minute walk, and Weston High School which is approximately .5 miles from 518 South Avenue. The elementary schools in Weston are approximately 2.5 miles from the site.

**Comparisons with Neighboring Residential and Institutional Land uses, Other Weston 40B projects, Similar High-Density Residential Developments Outside of Weston and Lot Coverage Calculations**

From Chapter 40B’s implementing regulations, 760 CMR 56.07(3)(e) Site and Building Design, the framework by which design elements of this proposed project and similar developments are reviewed and local concerns addressed, include the following areas:

1. Height, bulk, and placement of the proposed Project;
2. Physical characteristics of the proposed Project;
3. Height, bulk, and placement of surrounding structures and improvements;
4. Physical characteristics of the surrounding land;
5. Adequacy of parking arrangements;
6. Adequacy of open areas, including outdoor recreational areas, proposed within the project site.

With this perspective in mind, I will analyze:

- 1) the surrounding single-family land use development patterns;
- 2) the development of the institutional uses in the area and their size and scale;
- 3) the comparison with other approved and pending 40B developments in Weston; and
- 4) the land use features present in other similar sizes large scale high-density residential developments in other similar communities.

**1. Single Family Residential Density Analysis in Project Area**

Using 2021 Board of Assessors data delineated on the Town of Weston website, 31 nearby and abutting single residence properties in the Single Residence A Zoning District were analyzed to determine the lot area per dwelling unit and the average gross square footage per residence compared to the lot size, otherwise known as a FAR (Floor Area Ratio or building massing) calculation. These properties are located on South Avenue, DiBenedetto Drive, Highland Street, Brown Street, Wellesley Street and Winter Street. The results as shown in Appendix “A” attached hereto revealed:

- The 31 single family residences are located on 2,617,044 square feet of land, or 60.1 acres. This equates to 1.62 acres (84,421 square feet) per dwelling unit.
- The 31 residences have a total gross floor area of 103,332 square feet, or an average of 3,333 square feet per dwelling unit.
- Therefore, the FAR (ratio of floor area to lot size) average is **.04** in the project area.

**By comparison, the proposed 200-unit development at 510-518-540 South Avenue creates 257,728 square feet of interior floor space on the combined 440,600 square feet of lot area, thus yielding a FAR of .58, which is 14.5 times higher than the project area surrounding the site.** This proposed development calculation doesn't include the 5-story parking garage, which would add at least 200,000 square feet of building space to the project site. Nor does it take into consideration the nearly 5 acres of unbuildable wetlands on the 510 South Avenue parcel.

A detailed parcel-by-parcel breakdown (with an area map) is included as Appendix "A" to this letter.

## 2. Size and Density Comparison of Institution Uses in the Project Area

The project area includes as many as 5 nearby institutional uses and the following data summarizes these uses and their development envelope.

Institutional Uses Surrounding Project Area							
Source: Town of Weston Assessor's FY 2021 Final Property Valuation							
#	STREET		AC	SQ FT LOT	GLA	STORIES	FAR
412	HIGHLAND ST	Beechwood Stables	10.5	457,380	2,502	2	0.005
558	SOUTH AV	Pope St. John Seminary	23.54	1,025,402	62,100	3	0.06
57	BROWN ST	St. Demetrios Greek Church	5.76	250,906	33,907	2	0.14
100	BROWN ST	Wightman Tennis	15.13	659,063	37,600	2	0.06
150	BROWN ST	Mormon Church	4.5	196,020	22,543	2	0.12
<b>TOTALS</b>				<b>2,588,771</b>	<b>158,652</b>		<b>0.06</b>
AVG GLA			31,730				
AVG SQ FT LOT			517,754				
AVG FAR Institutional			0.06				
FAR (Floor Area Ratio) = Gross floor area (GLA) / Lot area (SQ FT LOT)							

Data is from the Final Fiscal Year 2021 Property Valuations found on the Town of Weston website

The average FAR of these 5 institutional uses is .06, only slightly higher than the single residential average of .04. **It is also noteworthy that none of these uses exceed 3 stories, whereas the proposed development provides for up to 5 stories of development – which is nearly double the building height of the tallest existing institutional uses.**

## 3. Density Comparison of Existing 40B Projects in Weston with Proposed Development

The following table details the units per acre for approved affordable housing projects in Weston:

## Weston Affordable Housing Projects – Total Units Per Acre Analysis

Name	Type	Total Units	Acres (Town information)	Units per Acre
Brook School Apartments	Rental	75	16.30	4.60
Dickson Meadow	Ownership	18	9.70	1.86
Winter Gardens	Ownership	24	8.40	2.86
Merriam Village	Rental	62	15.51	4.00
Jones Rd	Rental	1	0.28	3.57
Post Road Green	Ownership	8	3.05	2.62
680 South Ave	Ownership	16	2.74	5.84
45 Church St	Rental	1	1.07	0.93
Highland Meadows	Ownership	71	40.72	1.74
23 Pine St	Rental	2	1.84	1.09
Warren Ave	Rental	7	8.01	0.87
Viles St	Rental	2	0.23	8.70
751-761 Boston Post Road	Rental	180	61.79	2.91
	<b>TOTALS</b>	<b>467</b>	<b>169.64</b>	
	<b>Average Units Per Acre</b>		<b>2.75</b>	
<b>510-518-540 South Ave</b>	<b>Rental</b>	<b>200</b>	<b>10.10</b>	<b>19.80</b>

Data compiled from information found on the Town of Weston website.

This analysis reveals that the Town’s existing Chapter 40B developments are consistent with the *Town of Weston Policies and Preferences for Affordable Housing* published on the Town website (page 3), which states that “...the average or gross density will not exceed four (4) dwelling units per acre” for affordable housing.

**At a density of 19.8 units per acre, the proposed density for the 510-518-540 South Avenue project is nearly 5 times higher than the stated guideline.** Thus, the proposed South Avenue project would create a density more than **7 times** the average units per acre for other affordable housing projects in Weston and would be **over 9 times** the density of the largest comparable project at 751 Boston Post Road.

#### 4. Comparison with Other High-Density Residential Projects in the Suburban Boston Area

Several other comparable high-density projects in suburban Boston were examined with respect to zoning classification, proximity to major highways, and proximity to MBTA public transportation services. The chart below illustrates these findings:

High Density Residential Development Comparison					
Site	Address	# Units	Zoning	Distance to major highway	Public Transportation
Gables University Station	85 University Ave, Westwood	350	Industrial	0.5 mi to Rt 95/128	MBTA Commuter Rail - 0.3 mi AMTRAK - 0.3 mi MBTA Bus - 0.3 mi
Charles River Landing	300 Second Ave, Needham	262	Business	0.8 mi to Rt 95/128	MBTA Bus - 0.3 mi MBTA Commuter Rail - 1.7 mi
Woodland Station	1940 Washington St, Newton	180	Multi-Res	0.6 mi to Rt 95/128	MBTA Green Line - at site MBTA Shuttle - at site MBTA Bus - 0.2 mi
Hanover at Andover	30 Shattuck Rd, Andover	248	Industrial	0.7 mi to Rt 93	MBTA Commuter Rail - 4.0 mi
Gables Residential	204 Arsenal St., Watertown	296	Industrial	1.3 mi to Rt 90	MBTA Bus - at site
Avalon Bear Hill	1449 Main St, Waltham	324	Multi-Res	1.0 mi to Rt 95/128	MBTA Bus - 0.3 mi MBTA Commuter Rail - 0.8 mi
<b>518 South Ave</b>	<b>518 South Ave, Weston</b>	<b>275</b>	<b>Single Family Residential "A"</b>	<b>2.5 mi to Rt 90 2.8 mi to Rt 95/128</b>	<b>MBTA Commuter Rail - 3.1 mi MBTA Green Line - 4.2 mi</b>

*Data compiled from site web pages, zoning maps, MBTA website, and online maps (Google and Bing)*

**The South Avenue project is clearly inconsistent with the model for approved and developed high-density residential projects in the surrounding area. The lack of convenient and proximate public and private transportation options, combined with the complete mismatch of the single residence zoning classification, is clear and apparent.**

**Summary and Conclusion**

Developing quality, desirable, affordable housing in every community is a worthwhile and desirable goal. Ultimately, it is up to the developers of these projects to put forward their best efforts to achieving these goals in ways that are aligned with the character of the community, to meet community standards, to reduce impacts in the areas where they are located, and to work closely with those most impacted. From a land use perspective, it is safe to say that a massive 5-story, stand-alone building with 200 hundred rental units and a 343-space parking garage, on essentially 5 acres of buildable land, in a Single Residence zoned district does not even begin to resemble the character of Weston in any way.

As explained in this report, the project site is sorely lacking the key attributes typically found in high-density rental housing developments. The site is close to 100% auto dependent, basic and vital services and amenities are located miles away, public transportation is non-existent in the area, there is no sidewalk in front of the site, and public safety and site access considerations are not easily resolved.

The key points described in this report have identified the following areas of initial concern regarding the viability of a high-density, 200 rental unit proposal in this location:

1. At 200 units the proposed development’s FAR (building massing) is .58, while the FAR for the 31 single-family residential homes in the area around it is .04 – thus, the development as proposed is 14.5 times greater in building mass than the area around it. As noted above, this calculation

doesn't even factor in the parking garage (approximately 200,000 square feet) or the unbuildable land on the 510 South Avenue parcel (approximately 5 acres).

2. The FAR among the 5 institutional uses in the area is .06, and none of these existing uses exceed 3 stories; the proposed development would have an FAR of .58, including a 5-story structure. Both the FAR and building height are excessively out of line with the institutional uses around the proposed project site.
3. At 19.8 units per acre, the development has a proposed density nearly 3 times higher than any approved 40B project in Weston and would be **over 9 times** the density of the next largest project at 751 Boston Post Road.
4. The development proposal is totally inconsistent with the typical land use characteristics of 6 other high-density residential developments in area communities, most notably due to the lack of convenient and proximate public and private transportation options. This missing transportation element, together with the driving distances to basic community amenities and services, render this site extremely problematic for a rental proposal of this scale. Massive developments such as what is proposed here are found in urban settings, near public transit and other amenities, or in existing industrial office parks.
5. The 200-unit proposal is entirely mismatched with the uses that exist in the surrounding Single Residence zoning classification, as evidenced by the wholesale exceptions and waivers to the zoning requirements that are being sought. Typically, these types of large-scale developments (as noted in the table above) are located in Industrial or Multi-Family zoning districts, which is appropriate.
6. The plan for 200 units is significantly at odds with the Town's own stated guideline of density "not to exceed 4 units per acre", published in the *Town of Weston Policies and Preferences for Affordable Housing* from 2010 (page 3).

By analyzing development review standards such as FAR and units per acre, it is clear that the proposed development is overwhelming in size, scale, massing, and density in its Weston setting. **The overall development proposal, including both interior building space and the 5-story parking garage, is likely close to or exceeding 500,000 square feet of total development space.** To assist the Board in its deliberations, we would respectfully request through the Zoning Board of Appeals that the developer provide the square footage detail of all interior building space as well as the parking garage, and provide both a lot coverage calculation (in square feet and as a percent of the lot area) and a usable open space calculation.

Sincerely,

Louis Mercuri  
502 South Avenue  
Weston, MA

CC: Valerie Geary, Zoning Board Staff Assistant [geary.v@westonma.gov](mailto:geary.v@westonma.gov)  
John Field, Land Use Coordinator/Building Inspector [field.j@westonma.gov](mailto:field.j@westonma.gov)

## Appendix A: Single Family Residential Survey in Project Area (With Area Map)

Single Family Residential Sample In Project Area					
Source: Town of Weston Assessor's FY 2021 Final Property Valuation					
#	STREET	AC	SQ FT LOT	GLA	FAR
500	SOUTH AV	1.54	66,970	5,664	0.08
502	SOUTH AV	1.40	60,871	2,214	0.04
505	SOUTH AV	1.90	82,651	2,716	0.03
518	SOUTH AV	4.00	174,127	3,153	0.02
526	SOUTH AV	1.38	60,000	1,656	0.03
531	SOUTH AV	0.92	40,200	2,790	0.07
534	SOUTH AV	0.97	42,400	1,926	0.05
540	SOUTH AV	0.94	40,800	1,192	0.03
546	SOUTH AV	0.93	40,500	3,682	0.09
3	WINTER ST	1.56	67,841	2,933	0.04
10	WINTER ST	1.20	52,096	2,452	0.05
15	WINTER ST	1.91	83,087	1,728	0.02
21	WINTER ST	1.39	60,436	2,736	0.05
27	WINTER ST	1.40	60,871	3,050	0.05
32	WINTER ST	1.40	60,871	5,748	0.09
33	WINTER ST	1.39	60,436	2,206	0.04
40	WINTER ST	1.65	71,761	2,673	0.04
41	WINTER ST	1.99	86,572	4,210	0.05
1	BROWN ST	1.94	84,394	4,650	0.06
3	BROWN ST	2.46	107,045	5,075	0.05
15	BROWN ST	2.93	127,518	6,644	0.05
65	BROWN ST	1.38	60,000	2,152	0.04
66	BROWN ST	1.88	81,780	3,026	0.04
73	BROWN ST	2.28	99,204	2,048	0.02
74	BROWN ST	1.74	75,682	2,994	0.04
82	BROWN ST	2.19	95,284	3,018	0.03
83	BROWN ST	1.40	60,871	2,084	0.03
419	WELLESLEY ST	5.00	217,687	5,372	0.02
405	HIGHLAND ST	1.31	56,854	3,206	0.06
5	DI BENEDETTO DR	1.45	63,049	6,215	0.10
10	DI BENEDETTO DR	6.32	275,186	4,119	0.01
<b>TOTAL</b>			<b>2,617,044</b>	<b>103,332</b>	<b>0.04</b>
AVG GLA (SQ FT) PER RESIDENCE		3,333			
AVG SQ FT LOT		84,421			
AVG FAR		0.04			
FAR (Floor Area Ratio) = Gross floor area (GLA) / Lot area (SQ FT LOT)					

Data is from the Final Fiscal Year 2019 Property Valuations found on the Town of Weston website



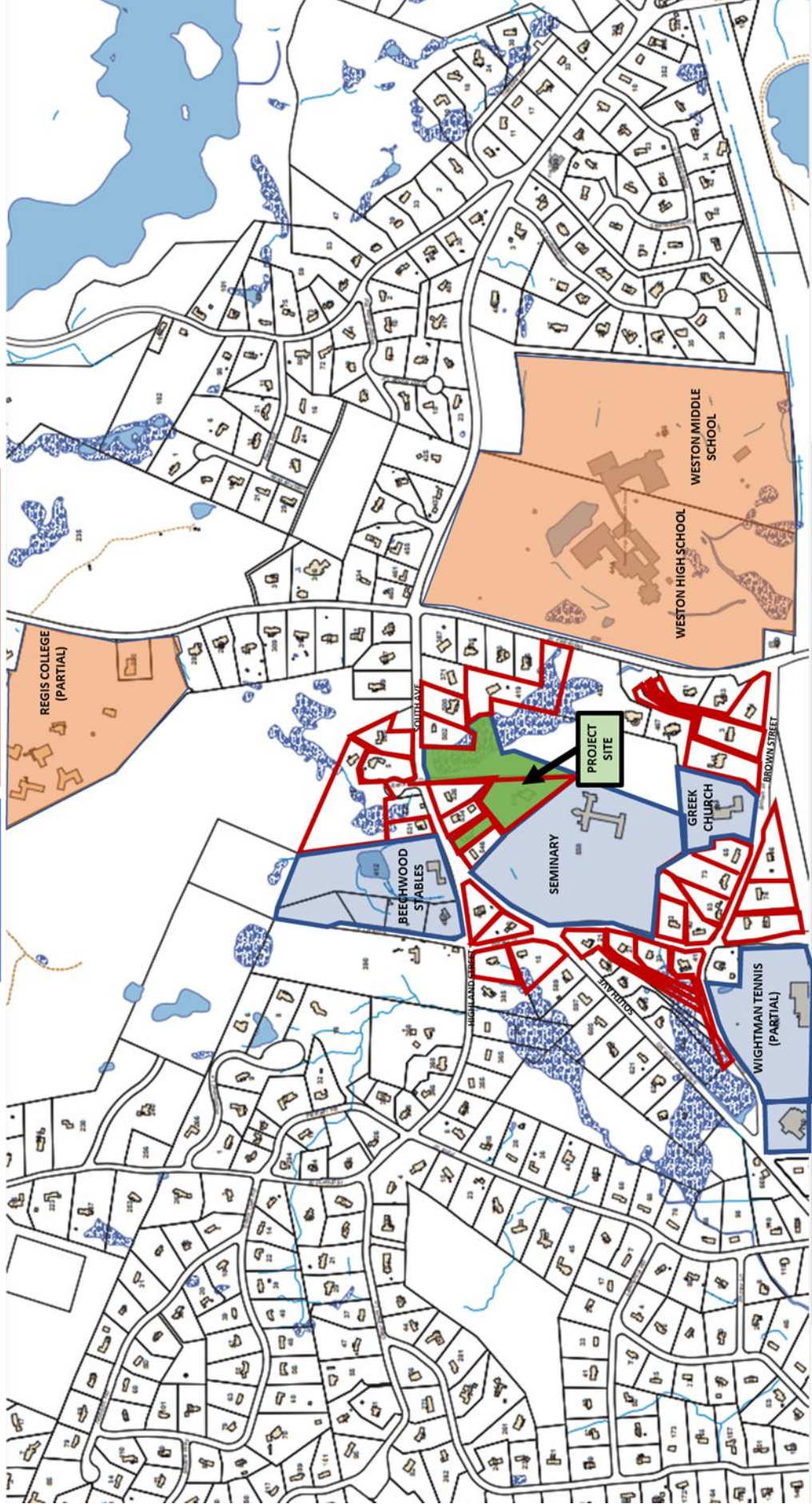
**PROJECT AREA SURROUNDING MAP**

**INSTITUTIONAL USES**

**SINGLE FAMILY RESIDENTIAL FAR SAMPLE**

**SINGLE FAMILY RESIDENTIAL PARCELS**

**PROJECT SITE**



MORMON CHURCH  
(PARTIAL)