

**Housing Needham (HONE) Advisory Group**

**Thursday, February 15, 2024**

**7:00 p.m.**

**Charles River Room**

**Public Services Administration Building, 500 Dedham Avenue**

**AND**

**Virtual Meeting using Zoom**

Meeting ID:

**834 7583 6726**

(Instructions for accessing below)

To view and participate in this virtual meeting on your phone, download the “Zoom Cloud Meetings” app in any app store or at [www.zoom.us](http://www.zoom.us). At the above date and time, click on “Join a Meeting” and enter the following Meeting ID: **834 7583 6726**

To view and participate in this virtual meeting on your computer, at the above date and time, go to [www.zoom.us](http://www.zoom.us) click “Join a Meeting” and enter the following ID: **834 7583 6726**

Or to Listen by Telephone: Dial (for higher quality, dial a number based on your current location):  
US: +1 312 626 6799 or +1 646 558 8656 or +1 301 715 8592 or +1 346 248 7799 or +1 669 900 9128 or +1 253 215 8782 Then enter ID: **834 7583 6726**

Direct Link to meeting: <https://us02web.zoom.us/j/83475836726>

- I. Welcome and Meeting Goals, *Heidi Frail and Natasha Espada, Co-Chairs*
- II. Approval of Minutes from HONE Meeting of December 20, 2024
- III. Presentation and approval of final base scenario, *Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates*
- IV. Selection of final add-on scenario for MBTA Communities Compliance, *Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates*
- V. Finalize Inclusionary Zoning percentage recommendation. *Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates*
- VI. Finalize parking requirement recommendation. *Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates*
- VII. Next Steps

**Housing Needham (HONE) Advisory Group**

|                 |                           |
|-----------------|---------------------------|
| Heidi Frail     | Select Board (co-chair)   |
| Natasha Espada  | Planning Board (co-chair) |
| Kevin Keane     | Select Board              |
| Jeanne McKnight | Planning Board            |
| Joshua Levy     | Finance Committee         |
| Ronald Ruth     | Land Use Attorney         |
| William Lovett  | Real Estate Developer     |
| Liz Kaponya     | Renter                    |
| Michael Diener  | Citizen at Large          |

Town of Needham, Massachusetts  
**Housing Needham Advisory Group (HONE)**  
Meeting Minutes  
December 20, 2023

**Place:** Charles River Room, 500 Dedham Ave, Needham and Virtual Meeting via Zoom  
**Present:** Co-Chair, Heidi Frail; Co-Chair, Natasha Espada; Liz Kaponya, Kevin Keane, Joshua Levy, William Lovett, Jeanne McKnight, Ronald Ruth  
**Remote:** Michael Diener  
**Absent:** None  
**Staff:** Katie King, Deputy Town Manager; Lee Newman, Director of Planning & Community Development; Alexandra Clee, Assistant Town Planner  
**Guest:** Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates

At 7:00 pm, H. Frail called the meeting to order. The meeting is being video recorded.

**I. Welcome and Meeting Goals, Heidi Frail and Natasha Espada, Co-Chairs**

Co-Chair Frail stated that the HONE Advisory Group will not recommend the Hersey Station area for modeling by the Consultants for the following reasons:

1. There is not enough usable land within the Neighborhood Business District at Hersey Station to make a district an MBTA compliant district with the MBTA Communities Act of 5 contiguous acres.
2. The 1.5-acre MBTA parking lot can't be counted for MBTA Compliance as the land is publicly owned.
3. HONE Group has decided not to recommend rezoning 4.5 acres of single-family residences to make Hersey Station an MBTA Communities compliant district.

The HONE mission is to create a compliant MBTA Communities District to pass at Town Meeting. HONE will recommend to the Planning Board the Hersey Station area business parcels be rezoned outside of the MBTA Communities process. Ms. McKnight noted that Panellas market on Central Avenue recently had an overlay to allow for multi-family in a mixed-use setting and this overlay could serve as a model for the Planning Board.

**II. Approval of Minutes from HONE Meetings of September 7, 2023, October 5, 2023, October 18, 2023, November 9, 2023, and November 15, 2023.**

**MOTION:** J. Levy moved to approve HONE Meeting Minutes of 9/7/23, 10/5/23, 11/9/23 and 11/15/23.

**SECONDED:** N. Espada

**ROLL-CALL VOTE:** M. Diener, aye; N. Espada, aye; H. Frail, aye; L. Kaponya, aye; K. Keane, aye; J. Levy, aye; J. McKnight, aye; R. Ruth, aye. Unanimous.

**MOTION CARRIES: 8-0**

**MOTION:** R. Ruth moved to approve HONE Meeting Minutes of 10/18/23.

**SECONDED:** J. McKnight

**ABSTAINED:** J. Levy was not present on 10/18/23.

**ROLL-CALL VOTE:** M. Diener, aye; N. Españada, aye; H. Frail, aye; L. Kaponya, aye; K. Keane, aye; J. McKnight, aye; R. Ruth, aye.

**MOTION CARRIES: 7-0-1**

**III. Review of Executive Office of Housing and Livable Communities (EOHLC) Compliance Modeling Results for Studied Scenarios, Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates**

E. Halvorsen explained 6 scenarios from the presentation, *Housing Needham (HONE), Town Visioning for Multi-Family Housing.ppt*. The presentation is available in the Meeting Packet at <https://www.needhamma.gov/Archive.aspx>

HONE members discussed the 6 Scenarios presented in the light of height and density, areas with or without General Residence that do or do not meet MBTA Communities compliance, and areas that could be made compliant as MBTA Communities Districts.

Members discussed contiguity in Scenario 3 versus Scenario 2. Scenario 3 has lower density but more units. Downtown buildings lack vibrancy. Scenario 3 would encourage vibrancy.

Members discussed whether or not to incentivize mixed use in other Scenarios. Consultants specified a 51% approval vote is required if seeking zoning for a housing use overlay. A two-thirds majority vote is required for mixed use other than housing only.

Consultants suggest separating in the Housing Plan what to accomplish with MBTA Communities zoning versus other zoning. MBTA will not work for everything.

Members discussed 3 Scenarios: minimum, middle, and maximum ground concepts ~~Scenarios~~. Consultants modeled unit density per parcel in the General Residence District. Members discussed proposing targeted units per acre rather than height specific. Create a control for the number of units per lot versus per acre and where to add density in each District.

Once the prime Scenario is approved, Town Staff will talk with Police, Fire, DPW, and schools regarding building infrastructure, capacity, and school enrollment in the Due Diligence process.

Members discussed Districts for consultants to model for compliance with MBTA Communities Law.

J. McKnight, a Rosemary Ridge condominium homeowner and HONE Board member, will refrain from discussion of upzoning the Apartment A-1 districts and/or rezoning the Industrial District along Hillside Avenue to allow multi-family housing as an additional use.

Members will keep boundary Districts the same on Chestnut St. Center Business District and Avery Square and add density to get the maximum Scenario then get public feedback.

Members discussed modeling a 5 story height cap for Chestnut St. Center and Avery Square while keeping all General Residential.

HONE Members expressed interest in having the Consultants model the 3 Scenarios as presented, two Scenarios as is: Scenario 1 for minimum ground, Scenario 3 for middle ground, and Scenario 6 as maximum ground to have density created to comply with MBTA Communities.

~~**MOTION:** H. Frail moved to have Consultants model the 3 Scenarios as presented, two Scenarios as is: Scenario 1 for minimum ground, Scenario 3 for middle ground, and Scenario 6 as maximum ground to have density created to comply with MBTA Communities.~~

~~**SECONDED:** K. Keane~~

~~**ROLL CALL VOTE:** M. Diener, aye; N. Espanada, aye; H. Frail, aye; L. Kaponya, aye; K. Keane, aye; J. Levy, aye; W. Lovett, aye; J. McKnight, aye; R. Ruth, aye. Unanimous.~~

~~**MOTION CARRIES: 9-0**~~

#### **IV. Review of Alternative Affordability Percentage Thresholds Analysis, Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates**

Consultants presented the Economic Feasibility Analysis (EFA) available in the Meeting Packet at <https://www.needhamma.gov/Archive.aspx>

MBTA Communities Act guidelines require an EFA be completed for any community that wants inclusionary zoning (a set-aside for affordable units within a residential development over a certain number of units) higher than 10%.

For example, if a parcel ~~will contain~~contains over a certain number of units, 12.5% of units must be set aside as deed-restricted affordable for people earning less than 80% of the area median income.

MBTA guidelines limit inclusionary zoning thresholds to 10% of total units at or below 80% of AMI for income restricted units. The EFA is can support an exception that allows higher limits. The model tests Scenarios to determine feasibility if inclusionary zoning is increased.

Consultants worked with EOHLC to develop EFA guidelines. They built a model for other communities. It is a point in time analysis. Assumptions and Return on Costs were discussed.

Consultants will clarify for the public that MBTA Communities Act will not create more than a set percentage of affordable housing.

If the Town wants inclusionary zoning, it must comply with the State and ~~and~~ the EFA must be part of this package unless HONE members decide on inclusionary zoning between 0% and 10%. Because we are already at 12 1/2% in some zoning districts~~areas~~, HONE should make a recommendation as part of its submission ~~this recommendation~~ to the State by April.



## **V. Review of Fiscal Impact Model & Analysis Results, Eric Halvorsen, RKG Associates**

Consultants presented the *Housing Needham (HONE), Fiscal Impact Model & Analysis Results* presentation available in the Meeting Packet at <https://www.needhamma.gov/Archive.aspx>

The [Fiscal Impact Analysis \(FIA\)](#) measures the impact of a hypothetical development scenario by comparing gross property taxes with municipal and school costs with positive impact if revenue outweighs costs. At the time, Consultants had not met with departments, but had received some data from the town, including department staffing and budget information from the finance director.

The mixed-use scenario was not modeled at this time, but Consultants have a commercial module. The model separately analyzes police, fire, DPW, schools, and general government (everything else).

The modeling approach is different for schools versus other departments as it estimates the number of new students. Modeling for the schools included actual data from the school department about the types of housing units where students live. It was noted that the number of students in prior developments was less than what the town's demographer had projected. For units with three bedrooms, estimated numbers were increased from Needham's actual experience to project costs more conservatively (i.e., higher). Consultant noted that the total per student cost from the model was likely high, but a conservative estimate.

Consultants shared model assumptions used. Consultants will meet with departments and schools in January to go over analysis results. The FIA [is focuses on](#) operating costs, not capital expenses. One purpose of the meetings with departments will be to review potential capital costs.

The analysis calculated an estimated net fiscal impact for each District under each Scenario. The preliminary analysis showed a positive fiscal impact to the levy, with additional revenue from CPA and vehicle excise taxes.

## **V.VI. Review Strategy for January 18 Community Meeting, Eric Halvorsen, RKG Associates; Emily Innes, Innes Associates**

The public meeting will be offered in-person with a hybrid option. Consultants will present the 3 Scenarios. A public feedback survey will be ready in the room and on-line to answer specific questions. The survey will remain open for two weeks so people can watch the video recording of the public meeting. HONE members will hear public comments. Members will answer clarifying questions. Complex answers will be provided after the public provide survey responses.

## **V.VII. Next Steps**

Town Staff will produce a timeline of decisions that need to be made.  
Consultants will finalize Scenarios.

Consultants will create visual maps showing height and density for the January 18 public meeting.  
Consultants will prepare draft survey questions for the public meeting.  
The second HONE postcard will be mailed to residents for outreach before January 5.  
Town Staff will meet to discuss consultants fiscal impact analysis.

**Informational** - The Meeting Packet is available at <https://www.needhamma.gov/Archive.aspx>

**MOTION:** R. Ruth moved to adjourn the meeting at 10:13 pm.

**SECONDED:** N. Espanada

**ROLL-CALL VOTE:** M. Diener, aye; N. Espanada, aye; H. Frail, aye; L. Kaponya, aye; K. Keane, aye; J. Levy, aye; W. Lovett, aye; J. McKnight, aye; R. Ruth, aye. Unanimous.

**MOTION CARRIES: 9-0**

Respectfully submitted,

Dale Michaud  
Recording Secretary

# Housing Needham (HONE) Advisory Group Meeting

Town of Needham, Massachusetts

February 15, 2024

## INFORMATION PACKET



**HOUSING NEEDHAM (HONE)**

**TOWN VISIONING FOR MULTI-FAMILY HOUSING**

This packet contains the background information on the existing zoning, overlay district zoning, and Scenarios A, B, and C you will need to answer the questions posed for our next HONE meeting. The information in this packet will provide you with the key zoning parameters that the MBTA Compliance Model utilizes and a map (where applicable) to better understand the extents of each zoning district. For existing zoning and overlays, please refer to the Town's zoning map which can be found here:

<https://needhamma.gov/DocumentCenter/View/1388/Zoning-Map-2022?bidId=>

You can also find parcel specific information using the Town's online parcel mapping software found here:

<https://needham.maps.arcgis.com/apps/webappviewer/index.html?id=c2126e2d5a8947b0a5c9489282ae4b6e>

# Existing Zoning Parameters

|                                 | Apartment A-1 | Business    | Avery Square Business | Chestnut Street District | Center Business       | Hillside Avenue Business | General Residence | Industrial  |
|---------------------------------|---------------|-------------|-----------------------|--------------------------|-----------------------|--------------------------|-------------------|-------------|
| Max Units per Lot               | N/A           | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | N/A               | N/A         |
| Minimum Lot Size                | 20000         | 10000       | 10000                 | 10000                    | 10000                 | 10000                    | 10000             | 10000       |
| Height (Stories)                | 3 (40 feet)   | 3 (40 feet) | 2.5 (35 feet)         | 2.5 (35 Feet)            | 2.5 (35 feet)         | 2.5 (35 feet)            | 2.5 (35 feet)     | 3 (40 feet) |
| FAR                             | 0.5           | N/A         | 0.7                   | 0.7                      | 1.0                   | 0.7                      | N/A               | N/A         |
| Max Blg Coverage                | N/A           | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | N/A               | N/A         |
| Max Lot Coverage                | N/A           | 25%         | N/A                   | N/A                      | N/A                   | N/A                      | 30% - 35%         | 60%         |
| Minimum Open Space (%)          | N/A           | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | N/A               | N/A         |
| Open Space per Dwelling Unit    | N/A           | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | N/A               | N/A         |
| Front Setback                   | 25            | 10 or 20    | 10 to 15              | 10 or 20                 | 3 or Avg. of Setbacks | 20                       | 20                | 10 or 20    |
| Rear Setback                    | 20            | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | 20                | N/A         |
| Side Setbacks                   | 20            | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | 14                | N/A         |
| ResidentialParking per Unit     | 1.5           | 1.5         | 1.5                   | 1.5                      | 1.5                   | 1.5                      | 1.5               | 1.5         |
| Lot Area per Dwelling Unit      | N/A           | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | N/A               | N/A         |
| Maximum Dwelling Units per Acre | 18            | N/A         | 18                    | 18                       | 18                    | 18                       | 8                 | N/A         |
| Maximum Dwelling Units per Lot  | N/A           | N/A         | N/A                   | N/A                      | N/A                   | N/A                      | N/A               | N/A         |

**\*Note that multifamily housing is not permitted in the Business and Industrial Districts under existing zoning.**

# Existing Zoning Modeled Capacity

The Consultant Team was asked to model the zoning capacity of the existing zoning districts that align with the boundaries in Scenario A to better understand the number of units that the zoning could support today.

To do this, the Consultant Team (in consultation with Town Staff) made the following assumptions in the MBTA Compliance Model:

- Models the base zoning parameters for Avery Square, Apartment A-1, and Hillside Avenue.
- Models the overlay zoning parameters for Chestnut Hill Business Overlay.
- Does not model Business or Industrial as they do not currently allow multifamily housing at all.
- Uses a parking ratio of 1.5 as this is what the existing zoning requires.

Summary Table

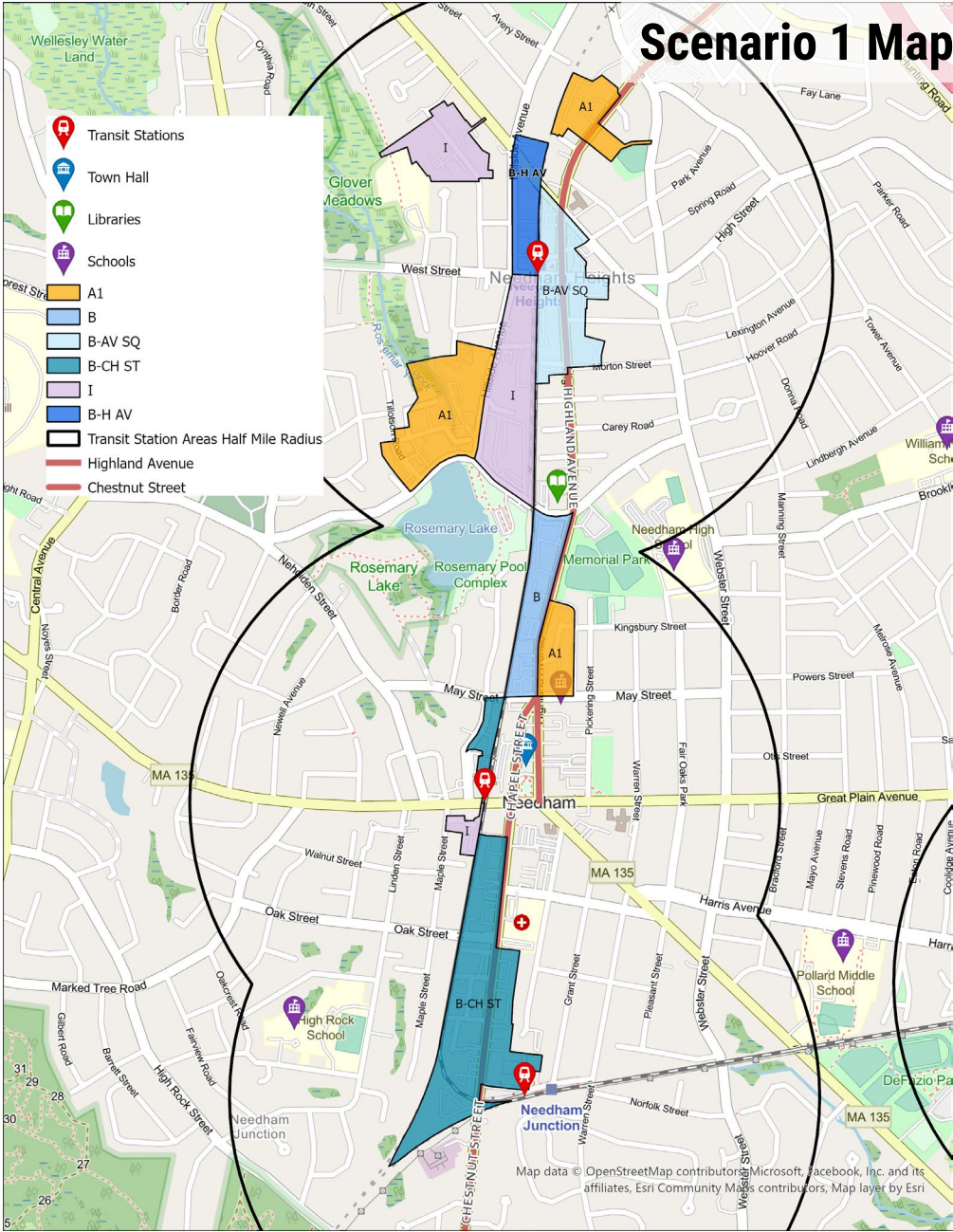
| Data Metric                                    | District 1 | District 2         | District 3 | District 4 | District 5 | Totals |
|------------------------------------------------|------------|--------------------|------------|------------|------------|--------|
| District Name                                  | A1         | A-1 Avery Hamilton | B-AV SQ    | B-CH ST    | B-H-AV     |        |
| District Acreage <i>(see note)</i>             | 23.1       | 6.6                | 4.3        | 34.3       | 7.1        | 75.3   |
| District Density Denominator <i>(see note)</i> | 20.8       | 6.6                | 4.3        | 34.3       | 7.1        | 73.0   |
| Final Unit Capacity per District               | 433        | 103                | 77         | 1,112      | 46         | 1,771  |
| DU/AC                                          | 20.8       | 15.6               | 17.9       | 32.5       | 6.5        | 24.3   |

# Overlay District Zoning Parameters

|                                 | Avery Square Overlay                                      | Lower Chestnut Street Overlay | Garden Street Overlay | Needham Center Overlay A             | Needham Center Overlay B             |
|---------------------------------|-----------------------------------------------------------|-------------------------------|-----------------------|--------------------------------------|--------------------------------------|
| Max Units per Lot               | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Minimum Lot Size                | 10000                                                     | 15000                         | 15000                 | 10000                                | 10000                                |
| Height (Stories)                | Up to 4 Stories by SP, limited to 35% of total roof area. | 3 or 3+1                      | 2+1 (37 feet)         | 3 or 3+1                             | 2+1 (37 feet)                        |
| FAR                             | 1.1                                                       | 1.5 or 2 by SP                | 1.0 to 1.2            | 2.0 or 3.0                           | 2.0 or 3.0                           |
| Max Blg Coverage                | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Max Lot Coverage                | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Minimum Open Space (%)          | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Open Space per Dwelling Unit    | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Front Setback                   | 10 to 15                                                  | 5                             | 10                    | 0                                    | 0                                    |
| Rear Setback                    | N/A                                                       | 25' if abutting MBTA ROW      | 10                    | 50' if abutting residential district | 50' if abutting residential district |
| Side Setbacks                   | N/A                                                       | 25' if abutting MBTA ROW      | 10                    | 50' if abutting residential district | 50' if abutting residential district |
| ResidentialParking per Unit     | 1.5                                                       | 1.5                           | 1.5                   | 1.5                                  | 1.5                                  |
| Lot Area per Dwelling Unit      | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Maximum Dwelling Units per Acre | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |
| Maximum Dwelling Units per Lot  | N/A                                                       | N/A                           | N/A                   | N/A                                  | N/A                                  |

# Scenario A Map

| Metric      | Number |
|-------------|--------|
| Gross Acres | 125.1  |
| DDD Acres   | 122.7  |
| Units       | 1,850  |
| DU/AC       | 15.1   |





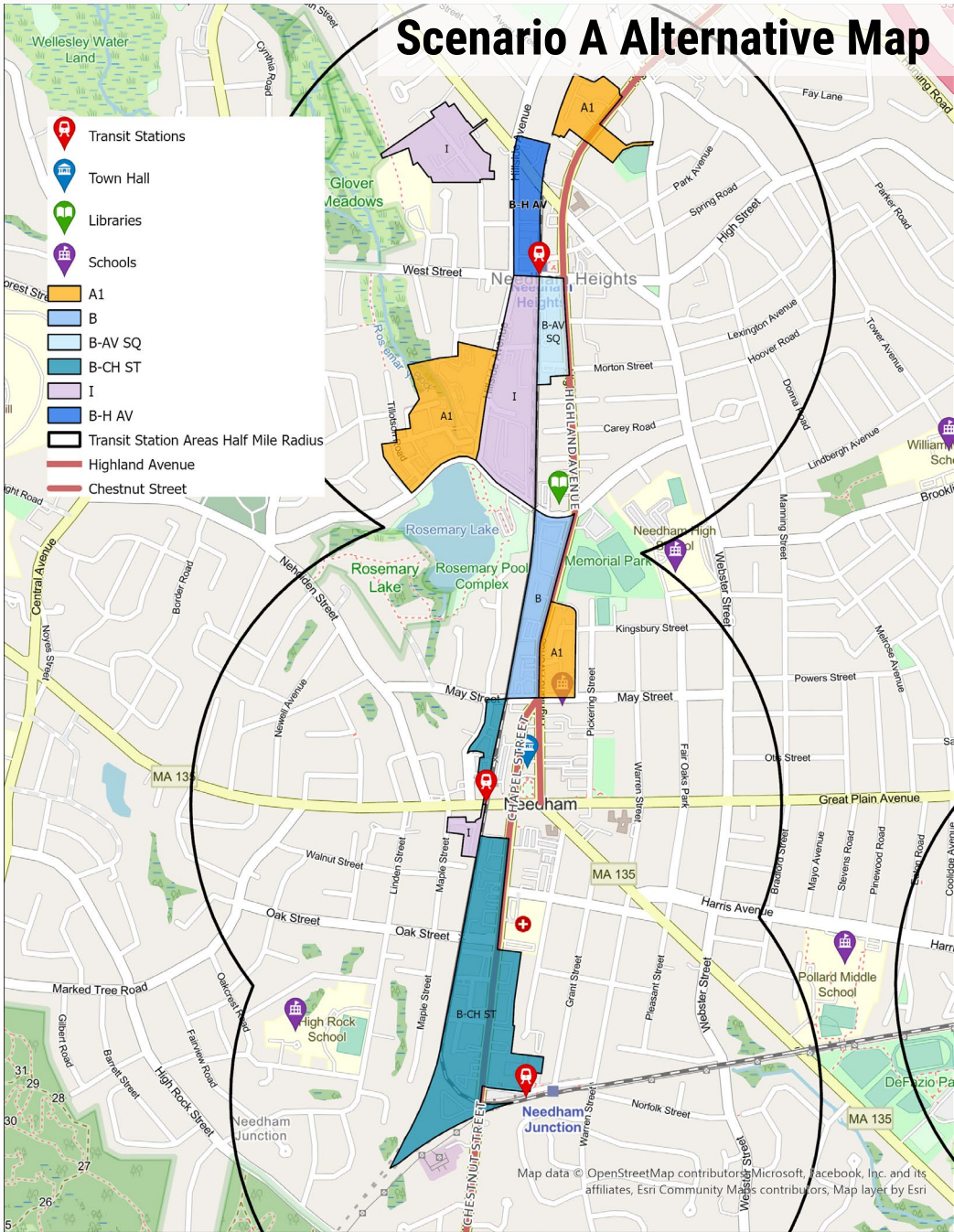
# Scenario A (Base) Zoning Parameters

|                                                 | Apartment A-1 | Business | Avery Square Business | Chestnut Street Business | Hillside Avenue Business | Industrial |
|-------------------------------------------------|---------------|----------|-----------------------|--------------------------|--------------------------|------------|
| Max Units per Lot                               | N/A           | N/A      | N/A                   | N/A                      | N/A                      | N/A        |
| Minimum Lot Size                                | 20000         | 10000    | 10000                 | 10000                    | 10000                    | 10000      |
| Height (Stories)                                | 3             | 3        | 3                     | 3                        | 3                        | 3          |
| FAR                                             | 0.5           | N/A      | 0.7                   | 0.7                      | 0.5                      | 0.5        |
| Max Blg Coverage                                | N/A           | N/A      | N/A                   | N/A                      | N/A                      | N/A        |
| Max Lot Coverage                                | N/A           | 25%      | N/A                   | N/A                      | N/A                      | N/A        |
| Minimum Open Space (%) - MBTA Model Requirement | 20%           | 20%      | 20%                   | 20%                      | 20%                      | 20%        |
| Open Space per Dwelling Unit                    | N/A           | N/A      | N/A                   | N/A                      | N/A                      | N/A        |
| Front Setback                                   | 25            | 10       | 10                    | 25                       | 25                       | 25         |
| Rear Setback                                    | 20            | N/A      | N/A                   | 20                       | 20                       | 20         |
| Side Setbacks                                   | 20            | N/A      | N/A                   | 20                       | 20                       | 20         |
| ResidentialParking per Unit                     | 1.00          | 1.00     | 1.00                  | 1.00                     | 1.00                     | 1.00       |
| Lot Area per Dwelling Unit                      | N/A           | N/A      | N/A                   | N/A                      | N/A                      | N/A        |
| Maximum Dwelling Units per Acre                 | 18            | N/A      | 18                    | 18                       | N/A                      | N/A        |
| Maximum Dwelling Units per Lot                  | N/A           | N/A      | N/A                   | N/A                      | N/A                      | N/A        |

# Scenario A Alternative Map

This maps represents a change to the Avery Square district which only includes the 100 West parcel. This scenario will be further explained by Town staff at the HONE meeting.

| Metric      | Number |
|-------------|--------|
| Gross Acres | 113.2  |
| DDD Acres   | 110.8  |
| Units       | 1,839  |
| DU/AC       | 16.6   |



# Scenario A Alternative (Base) Zoning Parameters

|                                                 | Apartment A-1 | Business | Avery Square Business Alternative | Chestnut Street Business | Hillside Avenue Business | Industrial |
|-------------------------------------------------|---------------|----------|-----------------------------------|--------------------------|--------------------------|------------|
| Max Units per Lot                               | N/A           | N/A      | N/A                               | N/A                      | N/A                      | N/A        |
| Minimum Lot Size                                | 20000         | 10000    | 10000                             | 10000                    | 10000                    | 10000      |
| Height (Stories)                                | 3             | 3        | 3                                 | 3                        | 3                        | 3          |
| FAR                                             | 0.5           | N/A      | 1.0                               | 0.7                      | 0.5                      | 0.5        |
| Max Blg Coverage                                | N/A           | N/A      | N/A                               | N/A                      | N/A                      | N/A        |
| Max Lot Coverage                                | N/A           | 25%      | N/A                               | N/A                      | N/A                      | N/A        |
| Minimum Open Space (%) - MBTA Model Requirement | 20%           | 20%      | 20%                               | 20%                      | 20%                      | 20%        |
| Open Space per Dwelling Unit                    | N/A           | N/A      | N/A                               | N/A                      | N/A                      | N/A        |
| Front Setback                                   | 25            | 10       | 10                                | 25                       | 25                       | 25         |
| Rear Setback                                    | 20            | N/A      | 0                                 | 20                       | 20                       | 20         |
| Side Setbacks                                   | 20            | N/A      | 0                                 | 20                       | 20                       | 20         |
| ResidentialParking per Unit                     | 1.00          | 1.00     | 1.00                              | 1.00                     | 1.00                     | 1.00       |
| Lot Area per Dwelling Unit                      | N/A           | N/A      | N/A                               | N/A                      | N/A                      | N/A        |
| Maximum Dwelling Units per Acre                 | 18            | N/A      | N/A                               | 18                       | N/A                      | N/A        |
| Maximum Dwelling Units per Lot                  | N/A           | N/A      | N/A                               | N/A                      | N/A                      | N/A        |

# Scenario A Options Compared

10

## Scenario A Results

| Model Outputs | Apartment 1 | Business | Avery Square Business | Chestnut Street Business | Industrial | Hillside Ave | Avery School Hamilton Highlands | Total  |
|---------------|-------------|----------|-----------------------|--------------------------|------------|--------------|---------------------------------|--------|
| Gross Acreage | 23.07       | 9.78     | 16.20                 | 34.25                    | 28.08      | 7.10         | 6.62                            | 125.10 |
| DDD Acreage   | 20.77       | 9.78     | 16.20                 | 34.25                    | 28.00      | 7.10         | 6.62                            | 122.72 |
| Unit Capacity | 487.00      | 210.00   | 198.00                | 448.00                   | 348.00     | 56.00        | 103.00                          | 1,850  |
| DU/AC         | 23.4        | 21.5     | 12.2                  | 13.1                     | 12.4       | 7.9          | 15.6                            | 15.1   |

## Scenario A (Alt) Results

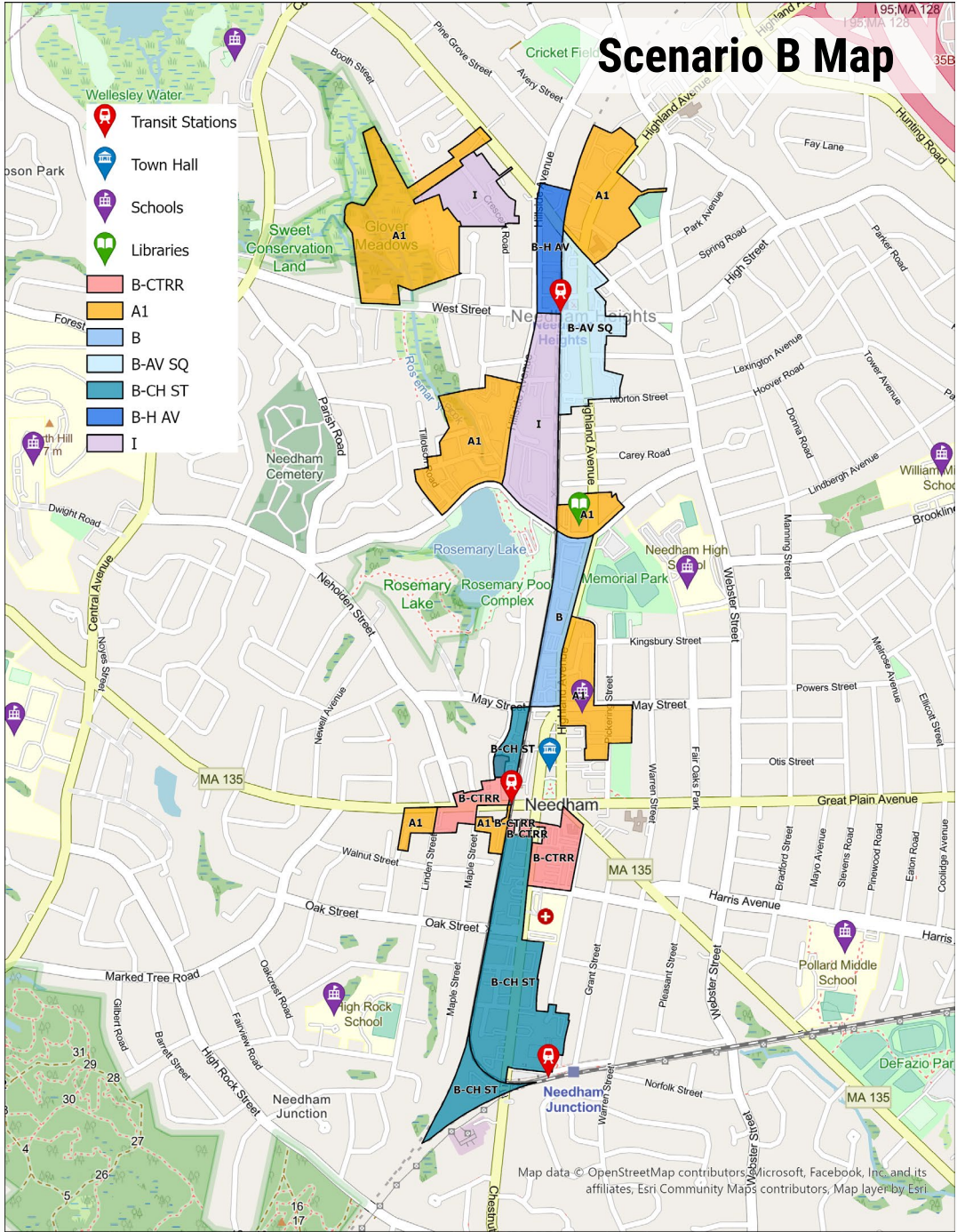
| Model Outputs | Apartment 1 | Business | Avery Square Business | Chestnut Street Business | Industrial | Hillside Ave | Avery School Hamilton Highlands | Total  |
|---------------|-------------|----------|-----------------------|--------------------------|------------|--------------|---------------------------------|--------|
| Gross Acreage | 23.07       | 9.78     | 4.29                  | 34.25                    | 28.08      | 7.10         | 6.62                            | 113.19 |
| DDD Acreage   | 20.77       | 9.78     | 4.29                  | 34.25                    | 28.00      | 7.10         | 6.62                            | 110.81 |
| Unit Capacity | 487.00      | 210.00   | 187.00                | 448.00                   | 348.00     | 56.00        | 103.00                          | 1,839  |
| DU/AC         | 23.4        | 21.5     | 43.6                  | 13.1                     | 12.4       | 7.9          | 15.6                            | 16.6   |

| Metric      | Existing Zoning | Scenario A | Scenario A (Alt) |
|-------------|-----------------|------------|------------------|
| Gross Acres | 75.3            | 125.1      | 113.2            |
| DDD Acres   | 73              | 122.7      | 110.8            |
| Units       | 1,771           | 1,850      | 1,839            |
| DU/AC       | 24.3            | 15.1       | 16.6             |



# Scenario B Map

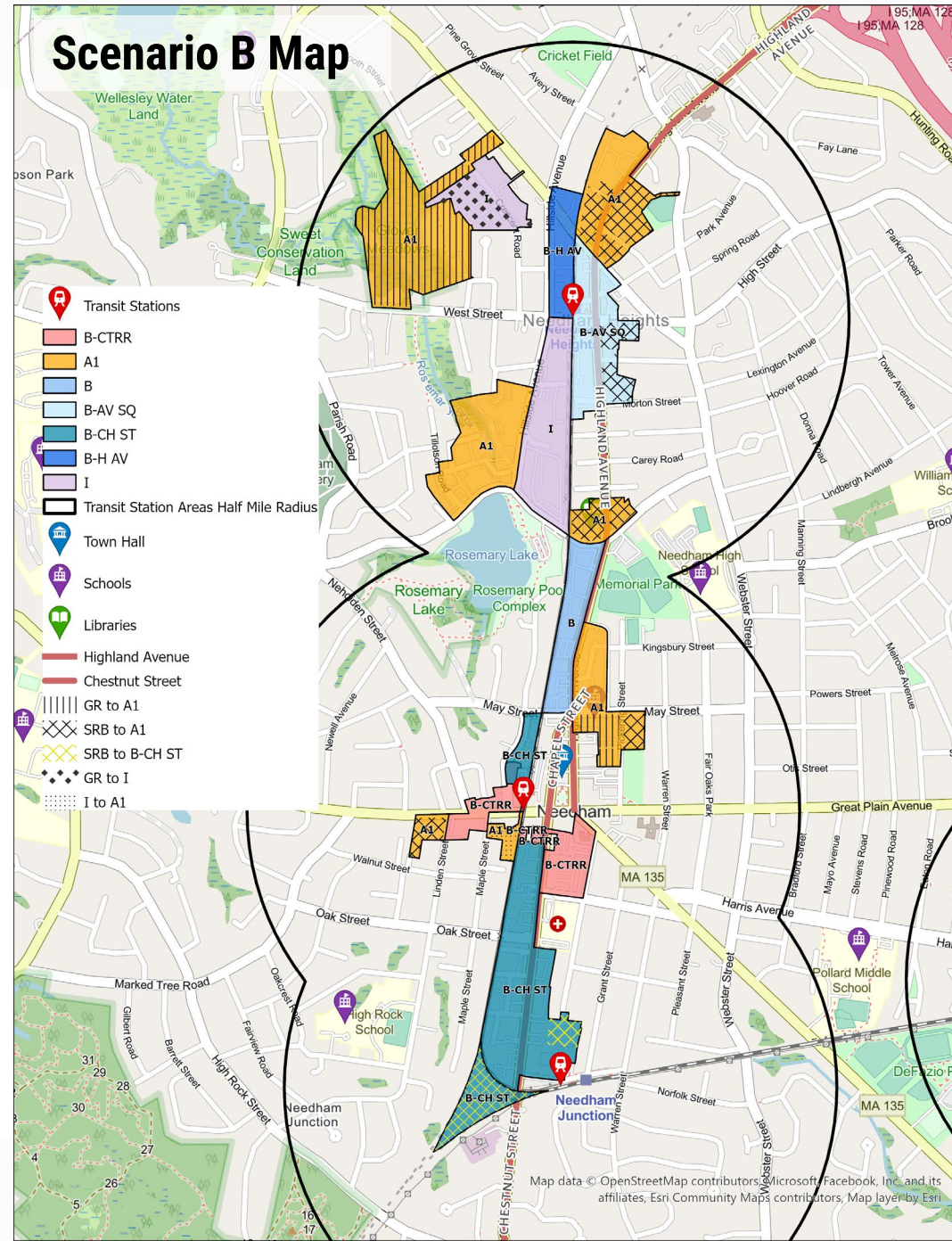
| Metric      | Number |
|-------------|--------|
| Gross Acres | 186.7  |
| DDD Acres   | 166.9  |
| Units       | 2,630  |
| DU/AC       | 15.8   |



# Scenario B Change Map

As requested by HONE, this map shows the parcels that are suggested for rezoning from their current zoning district to a new district under this scenario.

The different hatchings on top of the parcels represents the zoning change and is explained in the map legend.





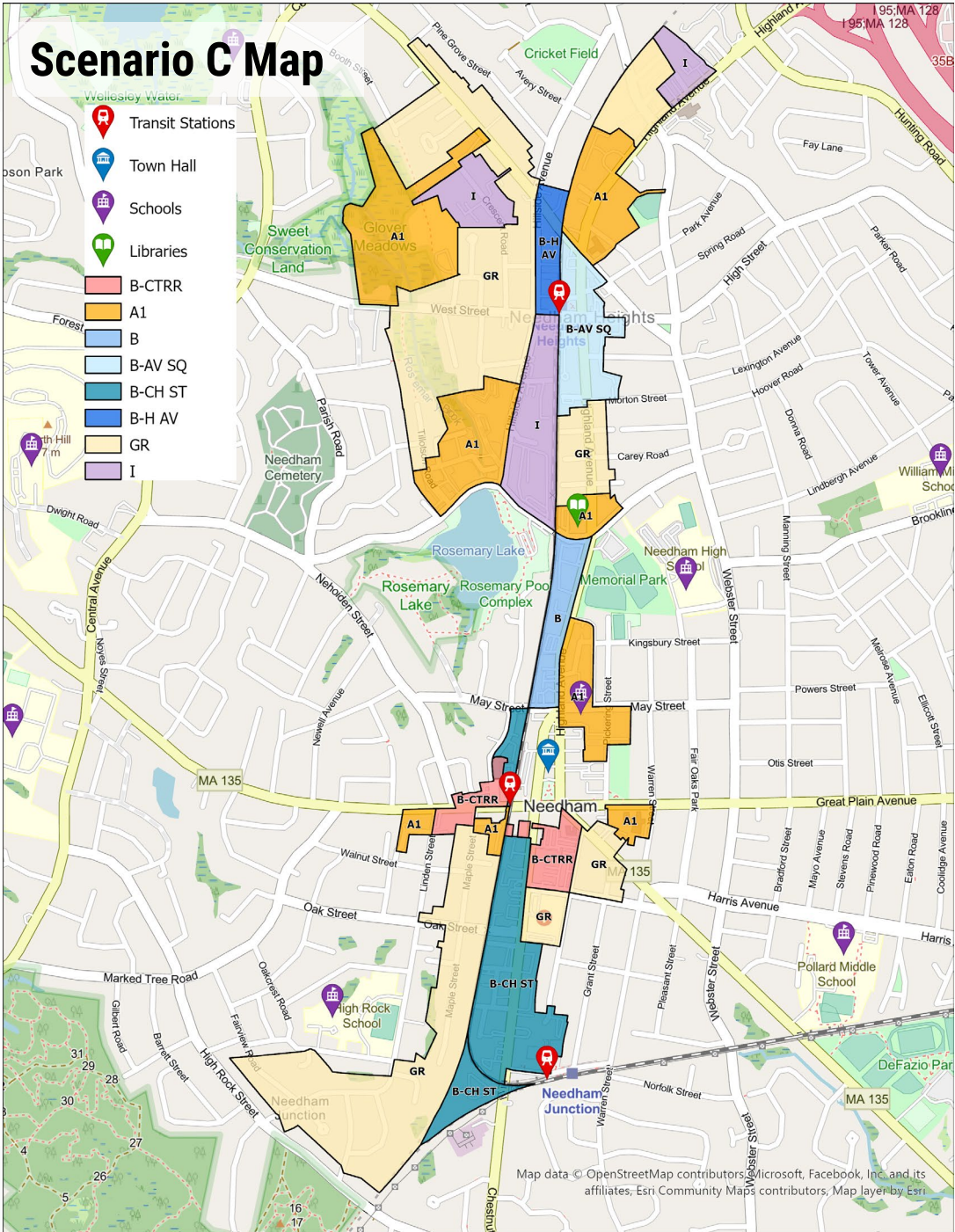
# Scenario B (Housing Plan) Zoning Parameters

|                                                 | Apartment A-1 | Business | Avery Square Business | Chestnut Street Business | Center Business – Residential | Hillside Avenue Business | Industrial |
|-------------------------------------------------|---------------|----------|-----------------------|--------------------------|-------------------------------|--------------------------|------------|
| Max Units per Lot                               | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | N/A        |
| Minimum Lot Size                                | 20000         | 10000    | 10000                 | 10000                    | 10000                         | 10000                    | 10000      |
| Height (Stories)                                | 3             | 3        | 2.5                   | 3                        | 2.5                           | 3                        | 3          |
| FAR                                             | 0.5           | N/A      | 0.7                   | 0.5                      | 1.00                          | 0.5                      | 0.5        |
| Max Blg Coverage                                | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | N/A        |
| Max Lot Coverage                                | N/A           | 25%      | N/A                   | N/A                      | N/A                           | N/A                      | N/A        |
| Minimum Open Space (%) - MBTA Model Requirement | 20%           | 20%      | 20%                   | 20%                      | 20%                           | 20%                      | 20%        |
| Open Space per Dwelling Unit                    | 0             | 0        | 0                     | 0                        | 0                             | 0                        | 0          |
| Front Setback                                   | 25            | 10       | 10                    | 25                       | N/A                           | 25                       | 25         |
| Rear Setback                                    | 20            | 0        | 0                     | 20                       | N/A                           | 20                       | 20         |
| Side Setbacks                                   | 20            | 0        | 0                     | 20                       | N/A                           | 20                       | 20         |
| ResidentialParking per Unit                     | 1.00          | 1.00     | 1.00                  | 1.00                     | 1.00                          | 1.00                     | 1.00       |
| Lot Area per Dwelling Unit                      | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | N/A        |
| Maximum Dwelling Units per Acre                 | 18            | N/A      | N/A                   | N/A                      | 18                            | N/A                      | N/A        |
| Maximum Dwelling Units per Lot                  | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | N/A        |



# Scenario C Map

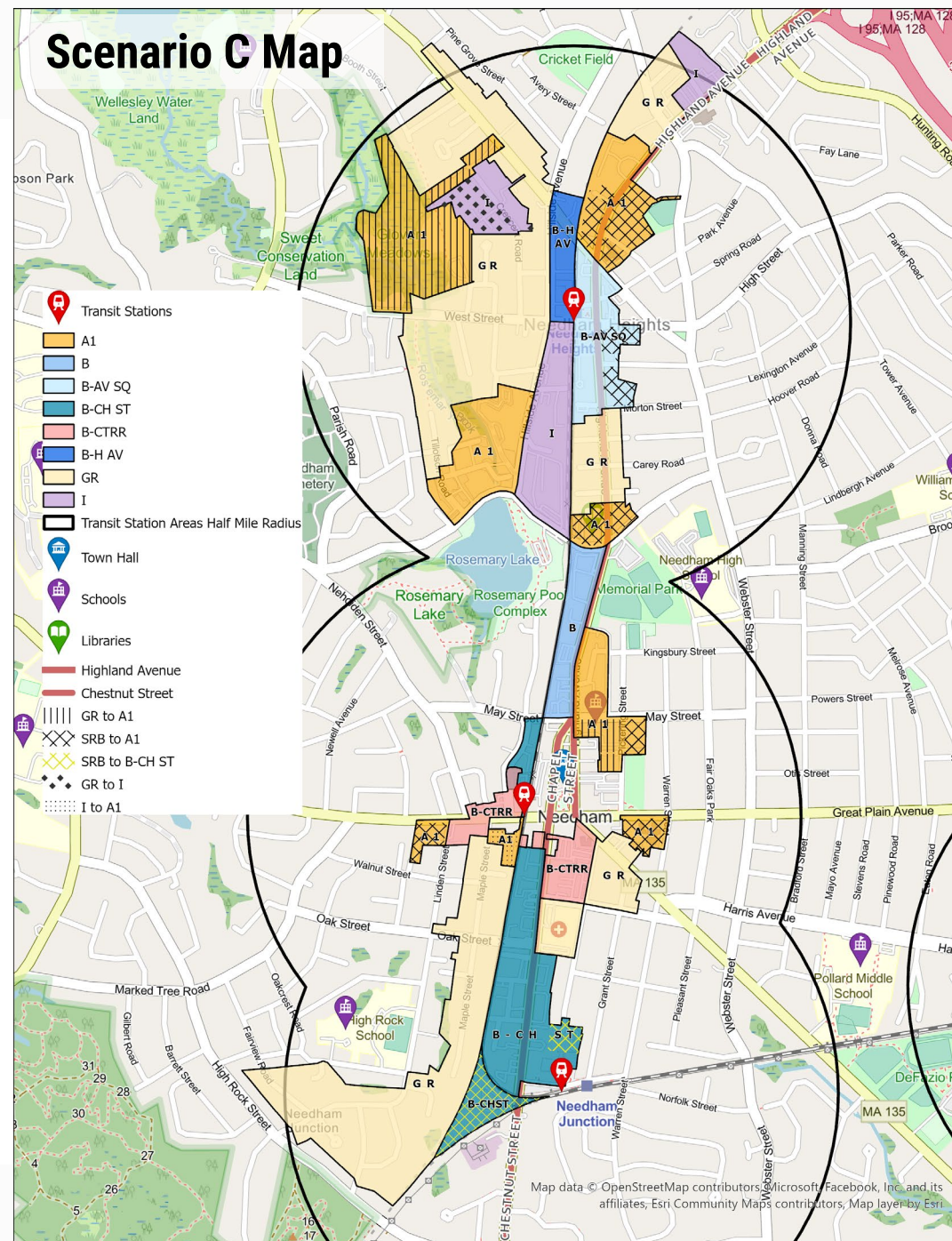
| Metric      | Number |
|-------------|--------|
| Gross Acres | 323.7  |
| DDD Acres   | 290.0  |
| Units       | 4,782  |
| DU/AC       | 15.0   |



# Scenario C Change Map

As requested by HONE, this map shows the parcels that are suggested for rezoning from their current zoning district to a new district under this scenario.

The different hatchings on top of the parcels represents the zoning change and is explained in the map legend.





# Scenario C (Public Input) Zoning Parameters

|                                                 | Apartment A-1 | Business | Avery Square Business | Chestnut Street Business | Center Business – Residential | Hillside Avenue Business | General Residence | Industrial |
|-------------------------------------------------|---------------|----------|-----------------------|--------------------------|-------------------------------|--------------------------|-------------------|------------|
| Max Units per Lot                               | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | N/A               | N/A        |
| Minimum Lot Size                                | 20000         | 10000    | 10000                 | 10000                    | 10000                         | 10000                    | 10000             | 20000      |
| Height (Stories)                                | 4             | 5        | 5                     | 5                        | 5                             | 4                        | 2.5               | 4.5        |
| FAR                                             | 1             | 1.5      | 1.5                   | 1.5                      | 1.25                          | 1.5                      | N/A               | N/A        |
| Max Blg Coverage                                | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | 0                 | N/A        |
| Max Lot Coverage                                | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | 60%               | 0.7        |
| Minimum Open Space (%) - MBTA Model Requirement | 20%           | 20%      | 20%                   | 20%                      | 20%                           | 20%                      | 20%               | 20%        |
| Open Space per Dwelling Unit                    | 0             | 0        | 0                     | 0                        | 0                             | 0                        | 0                 | 0          |
| Front Setback                                   | 25            | 10       | 10                    | 25                       | 25                            | 25                       | 20                | 25         |
| Rear Setback                                    | 20            | 0        | 0                     | 20                       | 20                            | 20                       | 20                | 20         |
| Side Setbacks                                   | 20            | 0        | 0                     | 20                       | 20                            | 20                       | 14                | 20         |
| ResidentialParking per Unit                     | 1.00          | 1.00     | 1.00                  | 1.00                     | 1.00                          | 1.00                     | 1.00              | 1.00       |
| Lot Area per Dwelling Unit                      | 0             | 0        | 0                     | 0                        | 0                             | 0                        | 0                 | 0          |
| Maximum Dwelling Units per Acre                 | 24            | 50       | 50                    | 50                       | 50                            | 50                       | 0                 | 24         |
| Maximum Dwelling Units per Lot                  | N/A           | N/A      | N/A                   | N/A                      | N/A                           | N/A                      | 4                 | N/A        |

### **Framework:**

In order to meet the schedule of the project and have adequate time to prepare for the March public meeting, HONE needs to reach consensus on the refined Scenario B/C at the February 15, 2024 meeting. Recognizing that HONE would like to use this second scenario to encourage housing in appropriate locations and not minimally comply with the MBTA Communities Law, the consultant team is suggesting we have a discussion about each zoning district separately and determine how each should be treated from a zoning perspective. This discussion should include, but not be limited to: allowable uses, dimensional requirements, density provisions, parking, and the boundaries of each district.

For each district we will discuss, the consultant team has outlined a series of questions that will provide us with the information we need to finalize the MBTA Compliance Model and begin framing the zoning language for this scenario. The zoning districts and questions are organized from most complex to least complex (in our opinion) to ensure we tackle the more difficult questions first. Please review these questions in advance of the meeting and be prepared to come with your feedback for discussion.

### **Specific Questions:**

- **General Residence:**
  - Should this district be included at all?
  - If included, should the boundaries be changed (expanded or contracted)?
  - If we include GR as shown in map C but exclude the area along Highland across from Industrial and across from Cricket Field, at a density of 3 dwelling units per acre, can we maintain the overall density needed?
  - Do you want to place density restrictions on a lot? How would you like to do that (DU/AC, max DU per lot)?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements?
- **Central Business District:**
  - Should this district be included at all?
  - Should some of it be carved out for standalone multifamily housing? If yes, which parcels?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements?
  - Do you want to impose any density restrictions?
- **Chestnut Street District:**
  - Should this district allow standalone multifamily or should mixed use be included in some way? If yes, which parcels?

- Do you want to scale the height/density based on proximity to residential development or the side of the road?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements? Do you want to impose any density restrictions?
- **Avery Square:**
  - Should some of it be carved out for standalone multifamily housing? If yes, which parcels?
  - Regarding mixed-use in the Avery Square Business District – The Board of Appeals currently allows only 1 ½ stories above the commercial first floor – should we allow 2 or even 3 stories above commercial, keeping the special permit requirement?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements?
  - Do you want to impose any density restrictions?
- **Hillside Avenue:**
  - Should some of it be carved out for standalone multifamily housing? If yes, which parcels?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements?
  - Do you want to impose any density restrictions?
- **Business District:**
  - Should the boundaries be changed (expanded or contracted)?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements?
  - Should we consider for the Business District along Highland Avenue between May Street and Rosemary Street allowing mixed-use by special permit at 4 stories (with stand-alone MF by right as we approved at our 1/29 meeting)?
  - Do you want to impose any density restrictions?
- **Industrial District:**
  - Should the boundaries be changed (expanded or contracted)?
  - Do you want to adjust the parking requirement?
  - Do you want to adjust height, setback, lot coverage or other dimensional requirements?
  - Do you want to impose any density restrictions?
- **Apartment 1 District:**
  - Should the boundaries be changed (expanded or contracted)?

- o Are we able to tailor the A-1 district including Glover Meadows conservation land to exclude the conservation land?
- o Do you want to adjust the parking requirement?
- o Do you want to adjust height, setback, lot coverage or other dimensional requirements?
- o Do you want to impose any density restrictions?
- **Other Considerations:**
  - o Do you want to include any areas outside the MBTA station areas?
  - o Do you want to include Hersey?
  - o Would the group consider increases in density above current zoning but below the MBTA Communities threshold of an average of 15 units per acre (i.e. increasing the geographic coverage at varying levels of density)?
  - o Would the group consider zoning changes to town-owned parcels? If so, which?
  - o Does the group want to explore reducing minimum lot sizes below 10,000 square feet in certain areas? If so, which?
  - o Are we able to put aesthetic/historic restrictions on the churches at Great Plain and Warren if they were ever to be sold and converted into housing?
  - o Are there any additional areas in the housing plan changed from SRB to GR in which there are actually single-family homes?
  - o Rezoning of the Stephen Palmer property (and rezoning of St. Joseph's School for the sake of contiguity if the SP parcel is not 5 acres) was rejected at the 1/29 meeting because Stephen Palmer might be categorized as "Excluded Land" per EOHLC Guidelines, Section 2 Definitions, which includes "(i) All publicly -owned land, except for lots or portions of lots determined to be developable public land." An argument could be made, depending on facts to be investigated, that Stephen Palmer is "Developable Public Land," which is defined (in part) as "any publicly-owned land that ... (iii) has been designated by the public owner for disposition and redevelopment." At some point in the past, there was likely a Town Meeting vote authorizing the Select Board to lease the property (a form of "disposition") for a long-term – that might satisfy the requirement. If not, the last sentence of the definition of "Developable Public Land" says: "Other publicly-owned land may qualify as developable public land if EOHLC determines, at the request of an MBTA community and after consultation with the public owner, that such land is the location of obsolete structures or uses. Stephen Palmer certainly is obsolete, with no elevators, etc.), or otherwise is suitable for conversion to multi-family housing, and will be converted to or made available for multi-family housing within a reasonable period of time." There is time between now and the end of 2024 for the Select Board to undertake a feasibility study re: conversion "within a reasonable time" of Stephen Palmer to multi-family housing that would have a new life, either by substantial renovation or demolition and reconstruction. Should this strategy be pursued?



# Economic Feasibility Analysis

The economic feasibility analysis tests development scenarios under a hypothetical scenario that does not factor in any site-specific details such as potential remediation, infrastructure, or demolition costs. Like the MBTA Compliance Model, the EFA model is meant to test whether affordability thresholds and specific set asides create hardships for a developer wanting to build under the community's Inclusionary Zoning regulations.

Current market conditions serve as point in time inputs to the EFA model such as asking rents, construction hard costs on a per sqft basis, cap rates, land values, interest rates, and more are outlined on the following pages. One important qualification for this type of analysis is that it is meant to merely test the relationship between zoning requirements and market conditions, it does not factor in site or deal specific details.

For example, if the zoning allows a height maximum of four stories, wood frame construction will be used as an input across the different development scenarios (e.g., 6, 25...200 units). The results may show that a 200-unit wood frame project is feasible but if there are no parcels that are large enough to accommodate a 4 story 200 unit stick built structure with parking, despite the results indicating feasibility, it is unlikely that development would move forward.

| Construction Costs                    | Input    | Source            |
|---------------------------------------|----------|-------------------|
| Land Acquisition (per unit)           | \$50,000 | Assessment Data   |
| Total Land Costs                      | Variable | Assessment Data   |
| Soft Costs (percentage of hard costs) | 20%      | Local Developers  |
| Hard Costs (per SQFT)                 |          |                   |
| Residential                           | \$150    | RS Means          |
| Commercial Stick Built                | \$265    | RS Means          |
| Commercial Podium                     | \$335    | RS Means          |
| Commercial Steel                      | \$450    | RS Means          |
| Parking Assumptions                   |          |                   |
| Parking Ratio (district dependent)    |          | Town of Needham   |
| Parking Cost by Type                  |          |                   |
| Surface (per space)                   | \$8,000  | Local Developers  |
| Structured (per space)                | \$35,000 | Local Developers  |
| Underground (per space)               | \$75,000 | Local Developers  |
| Operations & Expenses                 | Input    | Source            |
| VACL (percentage)                     | 5%       | Moody's Analytics |
| Operating Expense (% of EGI)          | 23%      | Local Developers  |



# Economic Feasibility Analysis: Assumptions

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| Revenue Sources                                               | Input      | Source                    |
|---------------------------------------------------------------|------------|---------------------------|
| <b>Rents by Bed Count (per SQFT)*</b>                         |            |                           |
| Studio/Efficiency                                             | \$4.94     | CoStar/Market Comps       |
| One Bedroom                                                   | \$3.99     | CoStar/Market Comps       |
| Two Bedroom                                                   | \$3.55     | CoStar/Market Comps       |
| Three Bedroom                                                 | \$3.65     | CoStar/Market Comps       |
| <b>Sale Value (per SQFT)</b>                                  |            |                           |
| <b>Other Income</b>                                           |            |                           |
| Parking Revenue (surface/structured)<br>(per month per space) | \$50/\$150 | Local Developers          |
| On-Site Laundry (per month)                                   | N/A        | N/A                       |
| Other (please list)                                           | N/A        | N/A                       |
| Financial                                                     | Input      | Source                    |
| Lending Rate (Percentage)                                     | 6%         | Local Developers / CoStar |
| Lending Term (Years)                                          | 30         |                           |
| Debt Equity Ratio                                             | 70/30      |                           |
| Cap Rate                                                      | 5%         |                           |
| Return Expectations                                           |            |                           |
| Internal Rate of Return (IRR)                                 | 15%        |                           |
| Return on Cost (ROC)                                          | 6.0%       |                           |
| Cash on Cash (CoC)                                            | 5.5%       |                           |



The following table outlines the specifics of each scenario run through the economic feasibility model.

| EFA Scenarios                                                                                                                                                                    | S1 - Minimum Threshold | S2              | S3              | S4              | S5 - Maximum    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----------------|-----------------|-----------------|-----------------|
| Unit Count                                                                                                                                                                       | 6                      | 25              | 50              | 100             | 200             |
| Construction Type                                                                                                                                                                | Stick                  | Stick           | Stick           | Stick           | Stick           |
| Parking Assumption                                                                                                                                                               | Surface                | Surface         | Structured      | Structured      | Structured      |
| Parking Ratio                                                                                                                                                                    | 1                      | 1               | 1               | 1               | 1               |
| For S1 – S5, IZ set asides were tested at 10% though 20% at 2.5pp increments. Parking ratios were held constant at 1 and the area median income threshold was held at 80% of AMI |                        |                 |                 |                 |                 |
| IZ Scenarios                                                                                                                                                                     |                        |                 |                 |                 |                 |
| IZ %                                                                                                                                                                             | 10.0%                  | 12.5%           | 15.0%           | 17.5%           | 20.0%           |
| AMI                                                                                                                                                                              | 80%                    | 80%             | 80%             | 80%             | 80%             |
| Rounding                                                                                                                                                                         | Round up at 0.5        | Round up at 0.5 | Round up at 0.5 | Round up at 0.5 | Round up at 0.5 |

To evaluate the performance of each scenario, three return measures are presented in the results:

- **Internal Rate of Return (IRR)**, which is the annual rate of growth an investment is expected to generate, in this case how profitable is a specific development scenario estimated to be?
- **Cash-on-Cash (CoC)**, which is the cash income earned from cash invested in a development scenario
- **Return on Cost (RoC)**, which is an estimate of how much profit is earned relative to the total cost of the development scenario



## Internal Rate of Return

|                | 10.0%  | 12.5%  | 15.0%  | 17.5%  | 20.0%  |
|----------------|--------|--------|--------|--------|--------|
| S1 – 6 Units   | 20.30% | 20.30% | 20.30% | 20.30% | 20.30% |
| S2 – 25 Units  | 21.55% | 21.55% | 21.09% | 21.09% | 20.04% |
| S3 – 50 Units  | 20.48% | 20.11% | 19.53% | 19.30% | 19.19% |
| S4 – 100 Units | 20.69% | 20.20% | 19.85% | 19.36% | 19.06% |
| S5 – 200 Units | 20.62% | 20.21% | 19.89% | 19.46% | 19.06% |

**Internal Rate of Return (IRR)**, is the annual rate of growth an investment is expected to generate, in this case how profitable is a specific development scenario estimated to be. **Market expectation sits around 15% meaning the results of these hypothetical scenarios exceed market expectations.**

## Cash-on-Cash

|                | 10.0% | 12.5% | 15.0% | 17.5% | 20.0% |
|----------------|-------|-------|-------|-------|-------|
| S1 – 6 Units   | 7.60% | 7.60% | 7.60% | 7.60% | 7.60% |
| S2 – 25 Units  | 8.66% | 8.66% | 8.21% | 8.21% | 7.28% |
| S3 – 50 Units  | 7.88% | 7.52% | 6.98% | 6.78% | 6.68% |
| S4 – 100 Units | 8.06% | 7.60% | 7.28% | 6.83% | 6.56% |
| S5 – 200 Units | 7.99% | 7.61% | 7.31% | 6.92% | 6.56% |

**Cash-on-Cash (CoC)**, is the cash income earned from cash invested in a development scenario. **Market expectation sits around 5.5% meaning the results of these hypothetical scenarios exceed market expectations.**

## Return on Cost

|                | 10.0% | 12.5% | 15.0% | 17.5% | 20.0% |
|----------------|-------|-------|-------|-------|-------|
| S1 – 6 Units   | 7.32% | 7.32% | 7.32% | 7.32% | 7.32% |
| S2 – 25 Units  | 7.63% | 7.63% | 7.50% | 7.50% | 7.22% |
| S3 – 50 Units  | 7.40% | 7.29% | 7.13% | 7.07% | 7.04% |
| S4 – 100 Units | 7.45% | 7.32% | 7.22% | 7.08% | 7.00% |
| S5 – 200 Units | 7.43% | 7.32% | 7.23% | 7.11% | 7.00% |

**Return on Cost (RoC)**, is an estimate of how much profit is earned relative to the total cost of the development scenario. **Market expectation sits around 6 - 6.5% meaning the results of these hypothetical scenarios exceed market expectations.**

## I.4 ZONING ANALYSIS

### Summary

(see Appendix for full memorandum)

### REQUIREMENT OVERVIEW

Needham's parking ratio requirements are relatively high compared to national standards for parking generation (Table 6). The code allows for some flexibility to account for context, but it is limited. Flexibility includes:

| Best Practice Downtown Zoning Flexibility                               | Needham Application                                                                                                                 |
|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Removal of all minimum requirements                                     | In Needham Center, no parking requirements for small retail land uses. Slight reductions for upper levels of multi-story buildings. |
| No change use requirements                                              | In Needham Center and Needham Heights, exemptions for certain changes of use                                                        |
|                                                                         | <i>Additional Options by Special Permit</i>                                                                                         |
| Off-site parking allowed within 2,000 feet and no ownership requirement | Off-site parking allowed within 300 ft and if under same ownership                                                                  |
| Tiered fee schedule to promote use                                      | Off-street parking fund exists for payment in-lieu, but isn't actively used                                                         |
| One bicycle parking space required for every parking space              | One bicycle space required for every 20 parking spaces                                                                              |
| Municipal-wide TDM ordinance                                            | TDM plans required in some districts, but not Needham Center or Heights<br>- NEBC, HC-128, and MU-128 Districts                     |

**Table 6. Needham Zoning Requirements in Comparison to Best Practice National Standards**

| Land Use              | Needham Requirement                                                                | National Standards                | Comparison        |
|-----------------------|------------------------------------------------------------------------------------|-----------------------------------|-------------------|
| <b>Residential</b>    | 1.5 spaces per unit (1 space per unit for affordable units w/ no more than 1 bed.) | 1.15 spaces per unit <sup>1</sup> | <b>Higher</b>     |
| <b>Office</b>         | 3.33 spaces per 1,000 square feet                                                  | 2.39 spaces per 1,000 square feet | <b>Higher</b>     |
| <b>Medical Office</b> | 5 spaces per 1,000 square feet                                                     | 3.23 spaces per 1,000 square feet | <b>Higher</b>     |
| <b>Retail</b>         | 3.33 spaces per 1,000 square feet                                                  | 1.94 spaces per 1,000 square feet | <b>Higher</b>     |
| <b>Restaurant</b>     | 1 space/3 seats, plus 10 spaces/ takeout service station                           | 1 space per 3 seats               | <b>Comparable</b> |

<sup>1</sup> Assumes 2 spaces per bedroom unit



## Zoning Key Takeaways

- Requirements are relatively high
- Waiver requests are frequent, indicating requirements don't match the market
- Limited options for reductions as of right; lengthy review process required
- Although some flexibility exists, it is limited
- Parts of Needham Center/Heights do not fall into these areas

## WAIVER REQUESTS IN THE CENTRAL BUSINESS DISTRICT FROM 2018-2022

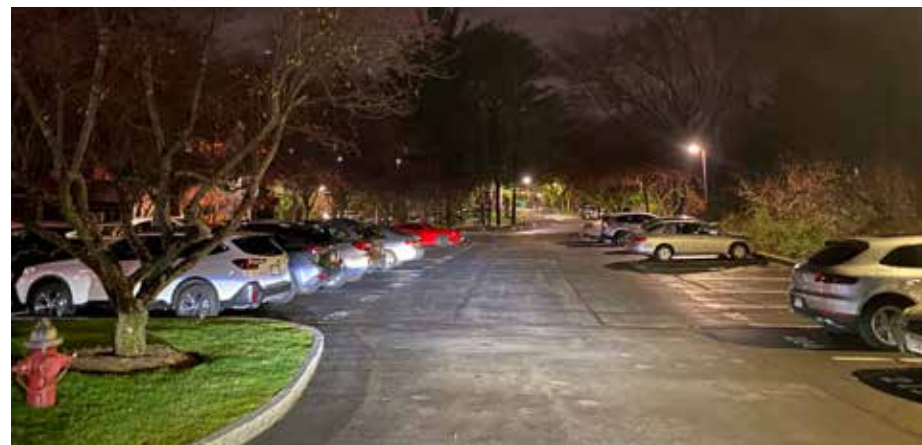
There have been multiple waivers requested to waive parking requirements recently in downtown Needham areas. This indicates that parking requirements do not match with market demands.

Details include:

- 9 waivers requested, all approved
- 7 of 9 provided no off-street parking (retail/medical office/restaurant/gym)
- **Up to 158 parking spaces waived**
- Common justifications:
  - Off-street parking not currently available at the property
  - Minor modifications to the property wouldn't impact vehicle/pedestrian movement
  - Properties in close proximity to municipal lots for employee and/or customer parking
  - Employers would be ordered to purchase parking stickers

## MULTI-FAMILY RESIDENTIAL DEMAND

Based on data from select multi-family properties, the average residential demand in Needham is about 0.84 per unit. The team collected overnight data as part of this study in December 2022 to gain a general understanding of parking demand at peak at a residential location. In addition, the Metropolitan Area Planning Council (MAPC) also conducted counts as part of the HOME Consortium Parking Study. The table below provides additional detail.



View of the southern lot of the Rosemary Ridge property at midnight.

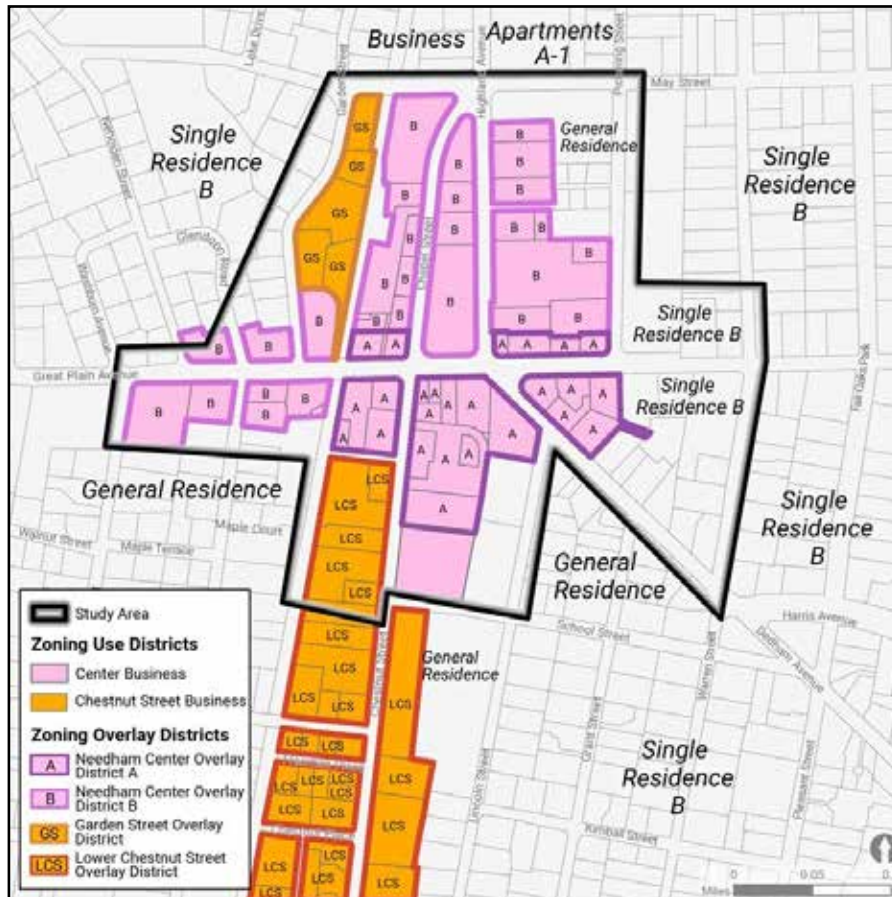
**Table 7. Sample Overnight Multi-family Residential Parking Demand Ratio**

| Property Address    | Total # Vehicles | # Units | Ratio |
|---------------------|------------------|---------|-------|
| 275 2nd Avenue*     | 242              | 390     | 0.63  |
| 757 Highland Avenue | 84               | 77      | 1.10  |
| 100 Rosemary Way    | 88               | 105     | 0.84  |
| 50 Dedham Avenue    | 13               | 10      | 1.30  |

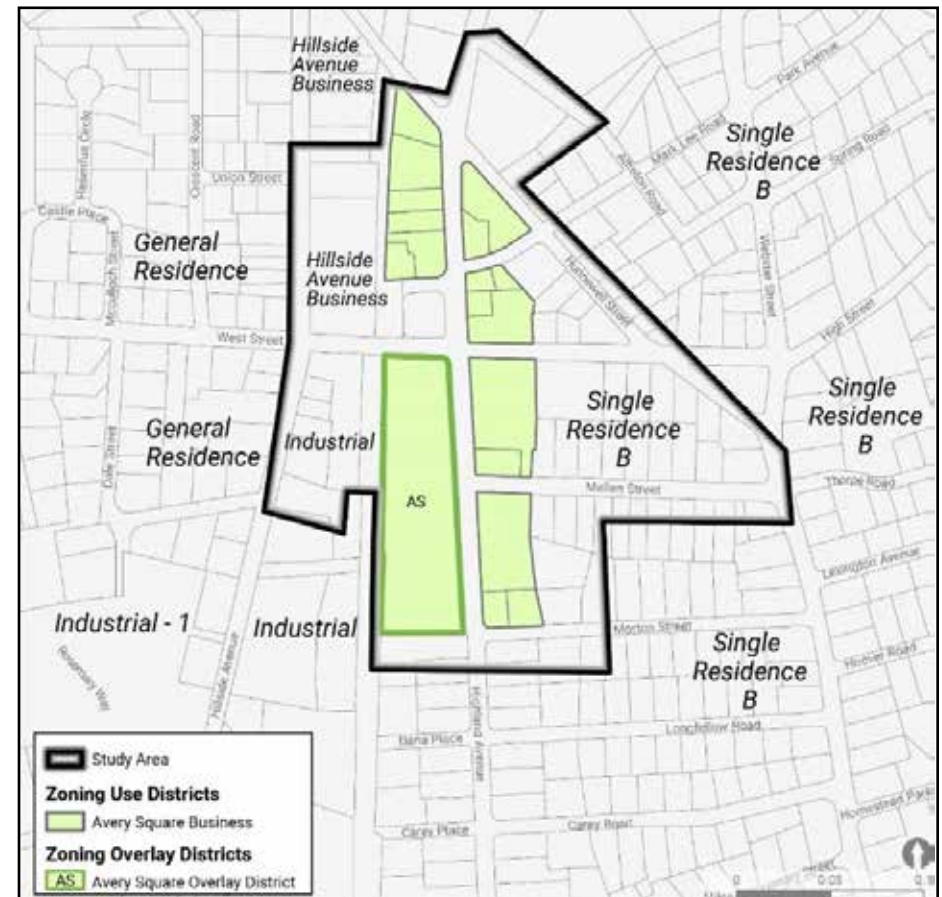
\*Data courtesy of MAPC, June 2022



**Fig. 19- Needham Center Zoning Overlay/Districts**



**Fig. 20- Needham Heights Zoning Overlay/Districts**



**Table 8. Zoning Requirement Comparison Between Needham Zoning Overlays/Districts**

|                                                                                                                                                              | Center Business District | Needham Center Overlay | Lower Chestnut St Overlay | Garden St Overlay | Avery Sq Business District |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|------------------------|---------------------------|-------------------|----------------------------|
| <b>Relief from Requirement by Right</b>                                                                                                                      |                          |                        |                           |                   |                            |
| Retail uses > 800 sf of floor area                                                                                                                           | X                        | X                      |                           |                   |                            |
| Buildings with 40% or more of its usable floor area above the ground floor, upper-story non-medical uses only need to provide 80% of the parking requirement | X                        | X                      | X                         | X                 |                            |
| Change of use requires nine or fewer additional off-street parking spaces for compliance                                                                     | X                        | X                      | X                         | X                 | X                          |
| <b>Special permit to relieve or waive parking requirements if:</b>                                                                                           |                          |                        |                           |                   |                            |
| Project replaces or substantially improves an existing building or site                                                                                      | X                        | X                      |                           |                   |                            |
| Promotes the goal of preserving and enhancing the Center Business District as a pedestrian-oriented local shopping and business district                     | X                        | X                      |                           |                   |                            |
| Incorporates the recommendations of the Design Review Board                                                                                                  | X                        | X                      |                           |                   |                            |
| Demonstrates that the maximum number of off-street parking spaces practicable are provided                                                                   | X                        | X                      |                           |                   |                            |
| Applicant demonstrates it cannot accommodate parking in an economical way ( <b>in-lieu fee required</b> )                                                    |                          | X                      | X                         |                   |                            |
| Applicant demonstrates it cannot accommodate parking via adjoining shared parking ( <b>in-lieu fee required</b> )                                            |                          | X                      | X                         |                   |                            |
| Project has been designed to reduce required parking ( <b>in-lieu fee required</b> )                                                                         |                          | X                      | X                         |                   |                            |
| Complementary uses (Shared parking), or other reduction devices pursued                                                                                      |                          |                        |                           |                   | X                          |
| Off-site parking to meet requirement for non-residential                                                                                                     |                          |                        |                           |                   | X                          |

# Memorandum

To: Members of WestMetro HOME Consortium

From: Adi Nochur, MAPC Transportation Department

Date: April 25, 2023

Re: WestMetro Parking Utilization Study (Perfect Fit Parking Initiative, Phase 4)

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## Background

The WestMetro HOME Consortium approached MAPC in 2021 to request a parking utilization study at multifamily housing developments in the Consortium's member municipalities west of Boston (Bedford, Belmont, Brookline, Concord, Framingham, Lexington, Natick, Needham, Newton, Sudbury, Waltham, Watertown, and Wayland). The Consortium was motivated to pursue this study by their Analysis of Impediments to Fair Housing (2021-2025), which contends that excessive parking requirements are a barrier to multifamily housing development and recommends that municipalities reconsider their residential parking standards. In an August 20, 2021 memo regarding these issues, Consortium members noted that "requiring more off-street parking than needed to meet demand unnecessarily increases development costs and may, particularly when combined with other regulatory requirements, discourage such development."

As part of its [Perfect Fit Parking Initiative](#), MAPC previously conducted three phases of parking utilization research at multifamily housing sites in Greater Boston between 2015 and 2020. Phases 1 and 2 collectively examined nearly 200 sites in 14 Inner Core municipalities (including 10 sites in the Consortium municipalities of Newton, Waltham and Watertown), while Phase 3 examined an additional 20 sites in four North Shore municipalities.

The Phase 1 and Phase 2 results showed that only 70% of the off-street parking spaces provided at multifamily developments were occupied during peak hours (in the middle of the night), while Phase 3 similarly found only 76% parking utilization during peak hours. Detailed statistical modeling of the Phase 1 and Phase 2 results further found that parking supply was the single largest factor associated with parking demand — the more spaces provided, the more cars were parked there, all other things being equal. The analysis also found that good transit access to jobs and the presence of deed-restricted affordable units were both associated with reduced parking demand.

## WestMetro Data Collection

Through a new round of Perfect Fit Parking research (hereafter referred to as "Phase 4"), the Consortium sought to better understand patterns of parking availability and utilization in their region, with the goal of creating more equitable and data-driven approaches to local parking policy. Data collection for the Phase 4 study took place during 2022 and replicated the methodology used in the prior phases of MAPC's parking utilization research. (All the Consortium's member municipalities participated in the study except for Wayland.) Municipal staff used an MAPC-provided survey to collect baseline data on multifamily housing sites from local property owners and managers. The staff then conducted overnight weeknight parking counts at sites to get data on peak parking utilization.

Over 40 sites were covered by both the property surveys and the overnight parking counts, with 36 sites across six municipalities having sufficient data for full analysis (including the same statistical modeling used in Phases 1 and 2). **Table 1** shows the average parking supply, average parking

demand, and average parking utilization percentage for each municipality, as well as the averages across all municipalities. These figures were calculated as follows:

- Parking supply per unit: the total number of parking spaces divided by the total number of housing units
- Parking demand per unit: the number of occupied parking spaces divided by the number of occupied housing units
- Parking utilization: the number of occupied parking spaces divided by the total number of parking spaces

**Table 1.** Average Parking Supply, Demand, and Utilization by Municipality<sup>1</sup>

| Municipality     | Number of Sites | Parking Supply Per Unit (Total Spaces / Total Units) | Parking Demand Per Unit (Occupied Spaces / Occupied Units) | Parking Utilization % (Occupied Spaces / Total Spaces) |
|------------------|-----------------|------------------------------------------------------|------------------------------------------------------------|--------------------------------------------------------|
| Brookline        | 2               | 0.80                                                 | 0.65                                                       | 87%                                                    |
| Concord          | 3               | 2.32                                                 | 1.05                                                       | 53%                                                    |
| Needham          | 2               | 1.59                                                 | 0.62 <sup>2</sup>                                          | 62%                                                    |
| Newton           | 10              | 1.52                                                 | 0.83                                                       | 50%                                                    |
| Sudbury          | 2               | 1.40                                                 | 0.98                                                       | 71%                                                    |
| Watertown        | 17              | 1.45                                                 | 0.99                                                       | 62%                                                    |
| <b>All Sites</b> | <b>36</b>       | <b>1.58</b>                                          | <b>1.00</b>                                                | <b>61%</b>                                             |

The parking supply, demand, and utilization figures varied by municipality. Parking supply ranged from 0.80 spaces/unit in Brookline to 2.32 spaces/unit in Concord, parking demand ranged from 0.62 spaces/unit in Needham to 1.05 spaces/unit in Concord, and parking utilization ranged from 50% in Newton to 87% in Brookline. In every municipality and at every development, parking was oversupplied, with fewer than one-third of spaces being used in some cases. Those municipalities with the most parking per unit had the lowest utilization, meaning developers had to build hundreds of parking spaces that are not needed.

Overall, just 61% of the off-street parking spaces were utilized during peak hours – an even lower percentage than was observed during the first three phases of MAPC’s Perfect Fit Parking research. The discrepancy between the average parking supply of 1.58 spaces/unit and the average parking demand of 1.00 spaces/unit further highlights that parking is overbuilt at the Phase 4 sites studied, to the detriment of providing more housing units (including more affordable units), improved transit access, and increased open space.

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<sup>1</sup> - The figures for individual municipalities in Table 1 are unweighted averages of local site-level data.

<sup>2</sup> - At one of the Needham sites, municipal staff were unable to count parked vehicles inside the garage. Parking utilization for this site was therefore calculated as *surface vehicles observed divided by surface spaces*. However, the parking demand calculation could not be similarly adjusted, and was therefore omitted from the municipal summary. Thus the parking demand of 0.62 spaces/unit for Needham reported in Table 1 is based only on the single site which had complete data. Parking utilization and parking supply statistics for Needham reflect survey data from both sites.



## Analysis

To better understand the factors influencing parking demand across the Consortium municipalities, MAPC incorporated the results into the statistical model that was previously used in the Phase 1 and Phase 2 studies. This model is designed to predict parking demand per unit as a function of 25 building and neighborhood variables, which are summarized below in **Table 2**. MAPC ran the model in one configuration with just the Phase 4 data and in another configuration that included the Phase 4 data along with the broader regional dataset from the previous three phases. (The Phase 3 data were modeled for the first time ever as part of the latter configuration.)

Both model configurations produced results consistent with previous phases of MAPC's research. **Specifically, the same three variables explain most of the variation in parking demand: parking supply, transit access to jobs<sup>3</sup>, and housing affordability.** Increased parking supply again was the dominant factor associated with increased parking demand, with each additional parking space per unit associated with an increase of 0.22 parked cars per household for the Phase 4 data alone.

Similarly, increased numbers of jobs accessible by transit and increased percentages of deed-restricted affordable units were again associated with reduced parking demand. The impact of transit-accessible jobs was very small, but statistically significant: every 100,000 additional jobs accessible by a 30-minute transit ride from the site was associated with a decrease in parking demand of 0.06 cars per household. The impact of affordable units was much larger: a one percent increase in the share of affordable units in the building was associated with a decrease in parking demand of 0.26 cars per household. This is likely a reflection of a correlation between vehicle ownership and income, but nonetheless remains a statistically significant finding of the analysis.

**Table 2.** Evaluated Building and Neighborhood Characteristics

| Building Features                                                                                                                                                                                                                                                | Parking Features                                                                                                                                                                                                                                                                                                                                                               | Built Environment                                                                                                                                                                                                                                                                                                                                                                                                        | Socioeconomic Context                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Percentage of units that are affordable</li><li>• Year of construction</li><li>• Average bedroom count</li><li>• Average rent or purchase price</li><li>• Number of units in building</li><li>• Housing tenure</li></ul> | <ul style="list-style-type: none"><li>• Presence of bicycle parking</li><li>• Parking cost</li><li>• Ratio of parking cost to monthly rent cost per bedroom</li><li>• Ratio of parking cost to monthly rent cost per unit</li><li>• Percent of provided parking spaces that are garaged</li><li>• Ratio of garage to surface parking spaces</li><li>• Parking supply</li></ul> | <ul style="list-style-type: none"><li>• Number of jobs accessible by 30-minute transit trip</li><li>• Neighborhood population density</li><li>• Neighborhood employment density</li><li>• Neighborhood population and employment density (cumulative)</li><li>• Presence of MBTA commuter rail station within half-mile</li><li>• Presence of MBTA rapid transit station within half-mile</li><li>• WalkScore®</li></ul> | <ul style="list-style-type: none"><li>• Median annual income (Census tract)</li><li>• Average household size for rental households (Census tract)</li><li>• Average household size for ownership households</li><li>• Share of households in U.S. Census tract that are renter-occupied</li><li>• Share of households in U.S. Census tract with zero vehicle</li></ul> |

<sup>3</sup> - While the study model did not include the presence of bus stops within a half-mile of the sites as a variable, the transit access variable included jobs accessible from the sites via all transit modes (bus, subway, rail).

## Recommendations

While multifamily housing sites in suburban locations may have higher parking demand than sites in more transit-accessible locations in the Inner Core, MAPC's parking utilization research – now including the Phase 4 study – has consistently found that parking is oversupplied at these sites throughout Greater Boston. As such, the same policy prescriptions noted in earlier phases of Perfect Fit Parking research are applicable to the WestMetro HOME Consortium member municipalities as well. These recommendations include the following:

- Shifting from parking minimums to maximums
- Reducing parking ratios
- Unbundling parking from housing costs
- Exploring strategies for shared parking

The results of MAPC's statistical modeling provide further insights into how municipalities might more specifically target their parking policies. Given that increased jobs accessible by transit and percentages of affordable units are associated with reduced parking demand, cities and towns can require less parking at transit-oriented sites and enable lower parking requirements in exchange for more affordable units.

## Conclusion

The Perfect Fit Parking Phase 4 study marks another contribution to an increasingly robust regional dataset that highlights opportunities to right-size parking in line with affordable housing and transit goals. MAPC looks forward to continuing to work with the Consortium municipalities, as well as other cities and towns in Greater Boston, to implement data-driven local parking reforms that advance equity and access.



**From:** [James Goldstein](#)  
**To:** [Planning](#); [Heidi Frail](#); [N. Espada](#); [Lee Newman](#)  
**Subject:** Comments for Jan. 29 HONE meeting and HONE's process for selecting a Final Base Model  
**Date:** Monday, January 29, 2024 4:44:05 PM

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HONE Advisory Committee,

We have reviewed the meeting packet for tonight's HONE meeting. The final agenda item, VI, is Selection of Final Base Model for MBTA Communities Compliance. It is unclear from the packet precisely what is included in the Final Base Model that RKG is presenting.

It appears that the Scenario A: Framing Questions (pdf p. 65) relate to the Final Base Model. If this is the case, given that the Final Base Model has not yet even been discussed by HONE, let alone adopted by HONE or presented to the public for comment, it seems premature to discuss these questions.

What appears to be the Final Base Model seems close to Scenario A (minimum number of units for compliance) that was presented at the Jan. 18 public meeting held by HONE. According to the survey results, 48% of respondents preferred more than the 1,784 minimum units, yet those preferences do not seem to have impacted the proposed Final Base Model. If this is the case, we urge HONE to consider all input received, not just that of a slim majority (52%), and develop a Final Base Case that includes additional zones in the MBTA District, as well as more allowable units. Also, we suggest that the Town's submission for compliance should have a 10% buffer on the total unit count to allow for the possible review and removal of areas during the state's review, which might put Needham out of compliance. This would suggest a Final Base Case of a modified Base Model between Scenarios B and C from the Jan. 18 HONE materials.

As implied by the above comments, the Needham Housing Coalition urges HONE to provide an opportunity for the public to weigh in on the proposed Final Base Model before HONE adopts a new Base Model and discusses the framing questions, as these questions will change depending on the parameters of whatever new Base Model is adopted.

Thank you,

Needham Housing Coalition MBTA Working Group  
Paula Dickerman  
Mike Fisch  
Jim Flanagan  
James Goldstein  
Cathy Mertz  
Oscar Mertz  
Margaret Murphy

Henry Ragin  
Jan Soma

**From:** [jennifer tirnauer](#)  
**To:** [Planning](#)  
**Subject:** Feedback on HONE scenarios  
**Date:** Monday, January 29, 2024 4:22:19 PM

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Hi Everyone,

Thanks for all the careful work on the HONE scenarios and thanks to Lee for taking the time to explain them to me. This is complicated and confusing, even after listening to the 2 hour recording. But it's important, for the town and for me, since I live right on the edge of the Center business district at 1141 GPA, looking out at the post office, GPA businesses, and gas station, so I want to give good feedback.

Here are some thoughts:

- 1) Obviously yes to complying with state requirements.
- 2) Agree in principle to going farther by adding more affordable housing near public transit. Devil is in the details. Parking and traffic issues must be addressed simultaneously. People always underestimate the need for parking. Also, footprint (I know you have a fancy name for that but I forget what it is) - if small homes get torn down for McMansions and apt buildings, we need better infrastructure to keep trees, parks, green areas (on the roof?) and deal with water runoff and flooding. Any solution has to have plans for these follow-on issues.
- 3) It's important to maintain the charm and vibrancy of our downtown. To me, that means we have to have a critical density of good restaurants and shops in walking distance of each other. On top of costs, pandemic, Amazon, etc, it is harder for businesses to succeed, and the high turnover in Needham worries me. So, while I support more affordable housing (see below), I don't want it to be at the expense of these restaurants and shops. If we keep the size/height the same and allow multifamily housing that is not mixed use, my understanding is that developers would prefer to make multifamily apt buildings without commercial on the first floor. If they do that, eventually our town will lose its town center charm and become more of a suburb of Wellesley and Dedham, and that would be sad.
- 4) Personally I'd be okay if it was first floor commercial and 2nd/3rd floor apartments, or side-by-side, or any other way to keep the amount of businesses or even increase (more restaurants and shops would be great, not more banks, nail salons, or gift stores). There are so many great business ideas we could use. Independent book store, more coffee shops, kitchen gadgets, clothing, computer fix-it, optical, shoes, coats, used books, specialty foods, prepared foods, yard stuff, hardware (Harvey's closing left such a hole). If zoning changes cause fewer businesses to open, it will become a bad spiral.
- 5) It may make more sense to keep mixed use in the central business district and more multi-family in other areas like Chestnut St, Highland St, and Hillside. But the issues of parking, green space, water runoff/flooding, traffic must be incorporated.
- 6) Please keep sending surveys and asking feedback the entire process. It may seem obvious when you've been deep in the weeds for months, but for those of us just starting to understand, it's a lot to think about.

Respectfully, Jennifer Tirnauer

**From:** [Lynne Stratford](#)  
**To:** [Planning](#)  
**Subject:** Rezoning Plan  
**Date:** Thursday, February 1, 2024 6:10:29 PM

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Planning Board:

Originally from Westwood, I have been living in Needham for 35 years, on Otis Street, Fair Oaks Park and now on Webster Street. I have raised 4 children in this town utilizing both Needham Public Schools and Saint Joseph's Parochial School. My resume includes working for a residential builder, as a real estate appraiser, property manager and real estate broker for over 40 years, currently with Louise Condon Realty. So, I guess it is safe to say I know a couple of things about real estate, Needham and surrounding towns.

I have been to two meetings concerning the rezoning and left each meeting with many questions and no answers. My first question is, what is the amount we would allegedly forfeit from the state of Massachusetts if we do not comply with the mandate. This is important because if we do comply and adopt any of the proposals, the town will incur monumental expenses that I have yet to hear even acknowledged.

Additionally, I am perplexed that all the proposals presented exclude Hersey Station. If I am to understand the rezoning plans presented by the town and the HONE Committee correctly, this is an welcomed opportunity for the town as a whole and a chance for current residents to build wealth by taking advantage of the opportunities rezoning will provide.

The Hersey Station neighborhood already has a private secondary school ( buying up land for athletic fields), a skating rink, Hersey T Station, Gulf gas station, Dunkin Donuts, Hazel's Bakery, a Golf Course, and Atrius Health with the Great Plain Ave exit ramp to 128. Clearly this is a small village in Needham and should be included in the rezoning. The exclusion of Heresy Station neighborhoods is either bias to the residents by prohibiting them from the same financial benefits or the powers to be know rezoning will erode property values and are protecting this area.

--

***Lynne Collins Stratford***

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**From:** [JOY SMITH](#)  
**To:** [Planning](#)  
**Subject:** Flood concerns for HONE consideration  
**Date:** Thursday, February 1, 2024 9:24:08 PM  
**Importance:** High

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To members of the HONE advisory group,

When you are proposing rezoning and more development near the Needham Junction train stop, please consider that the ends of Grant St., Lincoln St., and Chestnut St. nearest to the train station have been severely flooded, not just in recent storms but for years. (We have lived at 146 Lincoln St. since 1987 and our backyard becomes a lake when it rains hard because the catch basins overflow down Lincoln St. and water turns the corner onto Garfield St. and pours into our backyard. The street at times has become a torrent of water. This makes our backyard nearly unusable.) The storms that flood seems to be coming with more frequency.

Unless the town can rebuild the drainage system, which we're told will be exorbitantly expensive, further development will only exacerbate our problem and further devalue our property. The DPW is aware of the issues at this end of town. Kate Fitzpatrick is aware of them as well. But we want to make sure the HONE committee also is informed. We believe further development at this end of town will only cause more flooding issues, which are not sustainable for homeowners.

Thank you for your consideration,  
Joy and Steven Smith  
781-455-8331



**From:** [Dennis Lonigro](#)  
**To:** [Planning](#)  
**Subject:** HONE  
**Date:** Monday, January 29, 2024 3:04:13 PM

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Dear Planning Department Members,

I'm writing to express my concern over a Needham MBTA area rezoning issue that has recently come to my attention. I am concerned (and surprised) that such a major impactful issue to the town's look, feel, and quality of life (ALL kinds of municipal services, capacity, wear and tear and access, school systems, safety, funding, etc.) has little to NO awareness, education, or knowledge among Needham citizens. Most/all people I know or meet have no knowledge of this issue, its potential impact on their neighborhoods/town, and its rush to pass legislation.

I'm surprised that there is not (or has not been to my knowledge) more information/notices on a subject (pros and cons, maps, studies, etc.) published in something like the HomeTown Weekly newspaper or elsewhere. I believe that **widespread** education and analysis like this should take place and a concerted effort made to gather real citizen input before rushing to enact.

Respectfully submitted,  
Dennis Lonigro

February 6, 2024

**BY ELECTRONIC MAIL**

Housing Needham Advisory Group (HONE)  
Needham Town Hall  
1471 Highland Avenue  
Needham, MA 02492  
Email: [planning@needhamma.gov](mailto:planning@needhamma.gov)

Re: 100 West Street, Needham, Massachusetts (the “Property”) – MBTA  
Communities Act Compliance

Dear Members of the HONE Advisory Group:

We are counsel to Welltower Inc., which owns the Property by and through an affiliate (“Property Owner”). We are writing to thank HONE and the Town of Needham (“Town”) for its thoughtful and substantial work to ensure that the Town complies with M.G.L. c. 40A § 3A, also known as the “MBTA Communities Act,” and to offer comments concerning the Property’s potential to assist in this compliance effort.

We have reviewed “Scenario A”, “Scenario B” and “Scenario C” as presented at HONE’s most recent meeting on January 29, 2024. We also understand that HONE is considering addressing compliance in two phases: (i) an initial re-zoning to establish minimum compliance with the MBTA Communities Act (the “Base Compliance Re-Zoning”) and, (ii) a future, second re-zoning that would potentially add additional density and zoning beyond the Base Compliance Re-Zoning. As set forth below, **we strongly believe that there are significant benefits to including the Property as part of the Base Compliance Re-Zoning** given the potential for the Property to contribute, in the near term, to the supply of housing in the Town in compliance with the MBTA Communities Act and to revitalize an underutilized site.

By way of background, the majority of the Property is located in the Avery Square Business District (“ASBD”) with a portion of the Property to the south located in the Single Residence – B District (“SRBD”). The portion of the Property in the ASBD is also located in the Avery Square Overlay District (“ASOD”) governed by Section 3.15 of the Town of Needham Zoning By-Law (the “By-Law”).

As you may be aware, the Property was rezoned and subsequently obtained Major Project Site Plan Review Special Permit (SPMP No. 2021-01) dated May 18, 2021 and recorded in the Norfolk County Registry of Deeds at Book 39525, Page 70 (the “Existing Decision”) to allow for the redevelopment of the Property into a senior living project (the “Prior Project”).

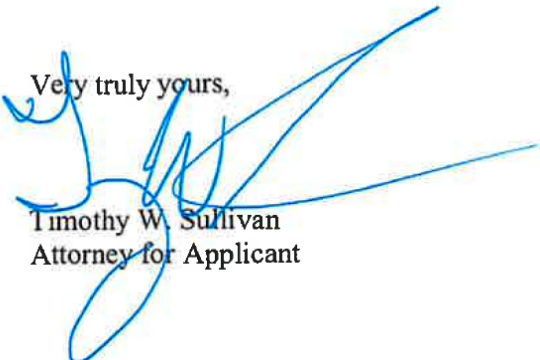
**The ASOD and the Existing Decision issued thereunder demonstrate that the Town has already accepted a redevelopment of the Property with the height, setbacks, parking, and other parameters allowed by the ASOD.**

If the Property were included in the Base Compliance Re-Zoning to allow multi-family use as-of-right, subject to dimensional controls slightly more favorable than those already allowed by the ASOD (and slightly less favorable than those modeled in Scenario C), we can confirm that there is a very realistic opportunity that the Property could be developed in the near-term as a multi-family project. In furtherance of the foregoing, we have enclosed herewith proposed revisions to the ASOD, which could be included as part of the Base Compliance Re-Zoning to help ensure creation of MBTA Communities Act-compliant units at the Property, which would have the effect of reducing the number of units needed in other locations. **We note that the maximum height (stories) and FAR in the attached edits are less than those modeled in Scenario C but necessary to support a redevelopment of the Property in light of the extensive costs of demolishing the existing structure (which is antiquated and designed for a different use) and rebuilding a first-class multi-family building.**

By adopting the attached edits to the ASOD, the Town could (i) create much needed housing at a site that has already been accepted for redevelopment; (ii) revitalize an active corner in Town; and (iii) reduce the number of units that must be included in the Base Compliance Re-Zoning elsewhere in Town.

Thank you again for your diligent efforts to ensure the Town complies with the MBTA Communities Act. We are continuing to follow this process and look forward to the next HONE Community Meeting on March 7, 2024. If you have any questions or would like additional information on a potential re-zoning, please do not hesitate to contact us.

Very truly yours,



Timothy W. Sullivan  
Attorney for Applicant

cc:

Katie King, Deputy Town Manager ([kking@needhamma.gov](mailto:kking@needhamma.gov))

Lee Newman, Director of Planning & Community Development ([lnewman@needhamma.gov](mailto:lnewman@needhamma.gov))

### **3.15 Avery Square Overlay District**

#### **3.15.1 Purposes of District**

The purposes of the Avery Square Overlay District (“ASOD”) are to promote the health, safety, and general welfare of the community by creating opportunities for housing ~~primarily,~~ including multifamily housing within close proximity to the MBTA commuter rail station and housing serving individuals 55 years old or older, who wish to live in independent apartments and/or who may need to live in Assisted Living and/or Alzheimer’s/Memory Loss facilities, within walking distance of goods and services, public transportation, and the civic life of the town; to promote a vibrant, walkable area within the ASOD, and to encourage and allow redevelopment of the existing property within the ASOD in a manner that will further these purposes. Toward these ends, development in the Avery Square Overlay District shall, as set forth in this Section 3.15, be permitted to exceed the density and dimensional requirements that normally apply in the underlying zoning district(s) provided that such development complies with all other requirements of this Section 3.15.

*~~Town of Needham M4 Zoning By Law, printed October 2022-122~~*

### **3.15.2 Scope of Authority**

In the Avery Square Overlay District, all requirements of the underlying district shall remain in effect except where this Section 3.15 conflicts with and/or provides an alternative to such requirements, in which case the requirements of this Section 3.15 shall prevail. If the provisions of the Avery Square Overlay District are silent on a requirement that applies in the underlying district, the requirements of the underlying district shall apply.

By filing an application for a Special Permit, site plan review or building permit under this Section 3.15, an applicant shall be deemed to accept and agree to the provisions and requirements of this Section 3.15. If an applicant elects to proceed pursuant to zoning provisions of the underlying district, the provisions and requirements of this bylaw applicable in the underlying district shall control and the provision of the Avery Square Overlay District shall not apply.

### **3.15.3 Use Regulations**

#### **3.15.3.1 Permitted Uses**

The following uses are permitted in the Avery Square Overlay District as a matter of right:

- (a) Uses exempt from local zoning control under M.G.L. c.40A, s. 3.
- (b) Public, semi-public and institutional uses permitted as of right in the underlying district.
- (c) Business uses permitted as of right in the underlying district.
- (d) Accessory uses permitted as of right in the underlying district.
- (e) A building containing ten (10) or more multi-family dwelling units together with any accessory uses customarily incidental to the use and operation of multi-family residential developments of similar scale and quality (a "Multi-family Project").

#### **3.15.3.2 Special Permit Uses**

The following uses are allowed in the Avery Square Overlay District by Special Permit issued by the Planning Board:

- (a) All uses allowed by special permit in the Avery Square Business District as set forth in Section 3.2.2 of this Bylaw, except those uses permitted as a matter of right as set forth in Section 3.15.3.1, above.
- (b) Assisted Living and/or Alzheimer's/Memory Loss Facilities.
- (c) Independent Living Apartments.



- (d) Buildings with multiple uses containing, as a primary use, such uses as are allowed by special permit or by right in the Avery Square Overlay District or the Avery Square Business District, as well as accessory uses subordinate to and customarily incidental to the primary uses.

### **3.15.4 Dimensional Regulations**

#### **3.15.4.1 Building Height and Related Requirements**

The maximum building height ~~(including mechanical structures such as HVAC equipment)~~ in the Avery Square Overlay District shall be 44~~49~~ feet. ~~This height limitation shall not apply to~~ Equipment and architectural features built above the roof line and not designed for human occupancy, including, but not limited to: rooftop mechanical equipment, skylights, penthouses, elevator shaft overruns, which and similar elements shall not exceed a maximum ~~be excluded from the calculation of building height of 49 feet.~~

A new building or structure which is located on property in the Avery Square Overlay District may include, but not exceed, four (4) stories, all of which may be occupied, ~~except in the.~~ The following circumstances provisions shall apply to reuse of the existing building:

- (a) With respect to the existing building, if a different use is proposed for the building that does not include one or more of: multi-family dwelling units and/or Independent Living Apartments and/or Assisted Living and/or Alzheimer's/ Memory Loss Facilities as the primary use(s), then the proposed use shall be governed by the use regulations of Section 3.15.3, above, but the fourth story cannot be occupied without a special permit.
- (b) If the Special Permit described in subparagraph (a), above is not granted, the fourth story shall remain unoccupied for any use without a Special Permit, but the fourth story, and any associated mechanical equipment, does not need to be demolished.
- (c) In the event the existing building is demolished, if the primary use(s) of the successor building is not one or ~~both~~ more of the uses described in Sections 3.15.3.2 (b) ~~or~~ 3.15.3.2 (c), or 3.15.3.1 (e), then the successor building shall not be permitted to have a fourth story.

The ability to use and occupy the fourth story, when permitted by a Special Permit granted pursuant to Sections 3.15.3.2 (b) and/or 3.15.3.2 (c), shall continue notwithstanding (i) a shift in the number of units from the use described in Section 3.15.3.2 (b) to the use described in Section 3.15.3.2 (c), or vice-versa; or (ii) the elimination of one of the uses described in Sections 3.15.3.2 (b) or 3.15.3.2 (c), provided such shift or elimination is allowed by such Special Permit or amendment thereto.

For the fourth story of any building that does not include multi-family dwelling units, minimum setback requirements, measured from the façade(s) of the building on which such fourth story is located, shall be as follows: from the eastern façade of the building (facing Highland Ave), fifteen (15) feet; from the northern façade of the building (closest to and facing West Street), one hundred and ten (110) feet; from the western façade of the building, zero (0) feet; from the southern façade of the building, thirty-five (35) feet. No fourth story setback from the north-facing building façade is required with respect to a Multi-family Project or any portion of any building that is set back from West Street at least two hundred (200) feet.

The total floor area of ~~any~~ a fourth ~~floor~~ floor addition to the existing building may not exceed thirty-five percent (35%) of the total roof area of the building. Mechanical equipment, including but not limited to HVAC equipment, whether or not enclosed, shall not be included in the calculation of maximum allowable floor area hereunder.

*Town of Needham MA Zoning By Law, printed October 2022* 124

A Multi-family Project shall not be subject to the residential setback requirements of Section 4.4.8.4.

Buildings developed under the regulations of the Avery Square Overlay District shall not be subject to any other height limitations nor any other limitations contained in Section 4.4.3.

#### **3.15.4.2 Building Bulk and Other Requirements**

The maximum floor area ratio in the Avery Square Overlay District for a Multi-family Project shall be 1.4 and for all other uses allowed hereunder shall be 1.1. Property contiguous with and in common ownership with property in the Avery Square Overlay District shall be included in the lot for purposes of calculating floor area ratio. The enclosed area of a building devoted to off-street parking shall not be counted as floor area for purposes of determining the maximum floor area ratio. ~~Buildings for any use allowed by right or special permit under this Section 3.15, including, without limitation, parking areas and parking structures associated with a Multi-family Project. Any building~~ developed under the regulations of the Avery Square Overlay District shall not be subject to any other limitations on floor area ratio, lot coverage, or building bulk contained in Sections 4.4.2, 4.4.7 and 4.4.9; and any Multi-family Project developed under this Section 3.15 shall not be subject to the maximum setback requirement from Highland Avenue set forth in Section 4.4.4.

#### **3.15.4.3 Multi-family Project Site Plan Review Requirements**

Notwithstanding anything to the contrary in this By-Law, a Multi-family Project shall only be subject to the site plan review requirements for a Minor Project and shall not be subject to the requirement to obtain a special permit as part of site plan review, notwithstanding anything to the contrary in Section 7.4. [Note: As an alternative approach; this section could reference site plan review requirements adopted pursuant to the larger MBTA Communities Act re-zoning]

#### **3.15.5 Off-Street Parking**

Except as provided below, the off-street parking regulations in Section 5.1 and the regulations for enclosed parking in Section 4.4.6 shall apply in the Avery Square Overlay District.

- (a) The minimum number of off-street parking spaces in Section 5.1.2 shall apply except as follows:
  - (1) For Independent Living Apartments, there shall be one space per Apartment.
  - (2) For Assisted Living units and Alzheimer's/Memory Loss units, the parking requirement shall be one space for every two beds, plus one space for each two employees on the largest shift.
  - (3) For Multi-family dwelling units in a Multi-family Project, the parking requirement shall be 1.3 space(s) per unit.<sup>1</sup>

<sup>1</sup> The parking design requirements in Section 5.1.3 shall not apply to a Multi-family Project and such Multi-family Project's parking design requirements shall be those approved during the site plan review process.

(b) Notwithstanding anything to the contrary elsewhere in this By-Law, including but not limited to Section 4.4.8.4, in the event that land located in the Single Residence B Zoning District

(1) is adjacent to the Avery Square Overlay District;

(2) is in common ownership with adjacent land located in the Avery Square Overlay District; and

(3) prior to approval of this Section 3.15, was improved as a parking area associated with a building located in the Avery Square Overlay District;

then, provided that said land extends into the Single Residence B Zoning District not more than one hundred ~~(100)~~and eighty (180) feet from the boundary line between the Single Residence B Zoning District and the Avery Square Business District, said land may, as a matter of right, be used as (i) a Multi-family Project and/or (ii) a parking area accessory to uses permitted in the Avery Square Overlay District by right or by special permit.



Draft Revisions to Section 3.15  
(edits shown in accompanying  
redline)

*Town of Needham MA Zoning*  
*By Law, printed October 2022*——  
~~125~~

### **3.15.6 Affordable Housing**

Any building with ten or more Independent Living Apartments or any Multi-family Project shall include ~~affordable housing units~~ Affordable Housing Units as such term is defined in Section 1.3 of this By-Law, as may be modified in this Section 3.15.6.

The following requirements shall apply to a development that includes ten or more Independent Living Apartments:

~~(a) For a development with ten or more Independent Living Apartments,~~  
~~twelve~~ Twelve and one-half percent (12.5%) of the total number of Independent Living Apartments shall be ~~affordable units~~ Affordable Housing Units. In the instance of a fraction, the fraction shall be rounded up to the nearest whole number. There shall be no affordable housing requirement for nursing homes, convalescent homes, Assisted Living and Alzheimer's/Memory Loss Facilities, or residential care institutions or facilities.

The following requirements shall apply to a Multi-family Project:

Ten percent (10%) of the total number of multi-family dwelling units shall be Affordable Housing Units. In the instance of a fraction, the fraction shall be rounded up to the nearest whole number.

The inclusion of Affordable Housing Units pursuant to this Section 3.15.6 shall be subject to the following:

(a) ~~(b)~~ If the Applicant provides at least one-half of the ~~affordable Independent Living Apartments~~ Affordable Housing Units required herein for households with incomes at or below 50% of area median income, the remaining ~~affordable Independent Living Apartments~~ Affordable Housing Units may be rented to households with incomes up to 100% of area median income even if the latter units are therefore not eligible for the Subsidized Housing Inventory, regardless of any requirements to the contrary set forth in Section 1.3.

(b) ~~(e)~~ Affordable units shall be dispersed within the building and not concentrated in one area or on one floor. They shall generally be comparable in size, energy efficiency, quality, convenience, and unit-specific real estate-related amenities to the development's market-rate units. Services and other amenities that may be purchased by residents on a voluntary basis are not to be considered unit-specific real estate-related amenities and are excluded from such comparability requirements.

- (c) ~~(d)~~ The selection of eligible homebuyers or renters for the affordable units shall be in accordance with a marketing plan approved by the Needham Planning Board prior to the issuance of any building permits for the development.
- (d) ~~(e)~~ The affordable units shall be subject to an affordable housing restriction as defined in Section 1.3 of this By-Law with limitations on use, occupancy, resale prices or rents, as applicable, and which provides for periodic monitoring for compliance with the requirements of said restriction.

### **3.15 Avery Square Overlay District**

#### **3.15.1 Purposes of District**

The purposes of the Avery Square Overlay District (“ASOD”) are to promote the health, safety, and general welfare of the community by creating opportunities for housing, including multifamily housing within close proximity to the MBTA commuter rail station and housing serving individuals 55 years old or older, who wish to live in independent apartments and/or who may need to live in Assisted Living and/or Alzheimer’s/Memory Loss facilities, within walking distance of goods and services, public transportation, and the civic life of the town; to promote a vibrant, walkable area within the ASOD, and to encourage and allow redevelopment of the existing property within the ASOD in a manner that will further these purposes. Toward these ends, development in the Avery Square Overlay District shall, as set forth in this Section 3.15, be permitted to exceed the density and dimensional requirements that normally apply in the underlying zoning district(s) provided that such development complies with all other requirements of this Section 3.15.

### **3.15.2 Scope of Authority**

In the Avery Square Overlay District, all requirements of the underlying district shall remain in effect except where this Section 3.15 conflicts with and/or provides an alternative to such requirements, in which case the requirements of this Section 3.15 shall prevail. If the provisions of the Avery Square Overlay District are silent on a requirement that applies in the underlying district, the requirements of the underlying district shall apply.

By filing an application for a Special Permit, site plan review or building permit under this Section 3.15, an applicant shall be deemed to accept and agree to the provisions and requirements of this Section 3.15. If an applicant elects to proceed pursuant to zoning provisions of the underlying district, the provisions and requirements of this bylaw applicable in the underlying district shall control and the provision of the Avery Square Overlay District shall not apply.

### **3.15.3 Use Regulations**

#### **3.15.3.1 Permitted Uses**

The following uses are permitted in the Avery Square Overlay District as a matter of right:

- (a) Uses exempt from local zoning control under M.G.L. c.40A, s. 3.
- (b) Public, semi-public and institutional uses permitted as of right in the underlying district.
- (c) Business uses permitted as of right in the underlying district.
- (d) Accessory uses permitted as of right in the underlying district.
- (e) A building containing ten (10) or more multi-family dwelling units together with any accessory uses customarily incidental to the use and operation of multi-family residential developments of similar scale and quality (a “Multi-family Project”).

#### **3.15.3.2 Special Permit Uses**

The following uses are allowed in the Avery Square Overlay District by Special Permit issued by the Planning Board:

- (a) All uses allowed by special permit in the Avery Square Business District as set forth in Section 3.2.2 of this Bylaw, except those uses permitted as a matter of right as set forth in Section 3.15.3.1, above.
- (b) Assisted Living and/or Alzheimer’s/Memory Loss Facilities.
- (c) Independent Living Apartments.
- (d) Buildings with multiple uses containing, as a primary use, such uses as are allowed by special permit or by right in the Avery Square Overlay District or the Avery Square Business District, as well as accessory uses subordinate to and customarily incidental to the primary uses.

### **3.15.4 Dimensional Regulations**

#### **3.15.4.1 Building Height and Related Requirements**

The maximum building height in the Avery Square Overlay District shall be 49 feet. Equipment and architectural features built above the roof line and not designed for human occupancy, including, but not limited to: rooftop mechanical equipment, skylights, penthouses, elevator shaft overruns and similar elements shall be excluded from the calculation of building height.

A new building or structure which is located on property in the Avery Square Overlay District may include, but not exceed, four (4) stories, all of which may be occupied. The following provisions shall apply to reuse of the existing building:

- (a) With respect to the existing building, if a different use is proposed for the building that does not include one or more of: multi-family dwelling units and/or Independent Living Apartments and/or Assisted Living and/or Alzheimer's/ Memory Loss Facilities as the primary use(s), then the proposed use shall be governed by the use regulations of Section 3.15.3, above, but the fourth story cannot be occupied without a special permit.
- (b) If the Special Permit described in subparagraph (a), above is not granted, the fourth story shall remain unoccupied for any use without a Special Permit, but the fourth story, and any associated mechanical equipment, does not need to be demolished.
- (c) In the event the existing building is demolished, if the primary use(s) of the successor building is not one or more of the uses described in Sections 3.15.3.2 (b), 3.15.3.2 (c), or 3.15.3.1 (e), then the successor building shall not be permitted to have a fourth story.

The ability to use and occupy the fourth story, when permitted by a Special Permit granted pursuant to Sections 3.15.3.2 (b) and/or 3.15.3.2 (c), shall continue notwithstanding (i) a shift in the number of units from the use described in Section 3.15.3.2 (b) to the use described in Section 3.15.3.2 (c), or vice-versa; or (ii) the elimination of one of the uses described in Sections 3.15.3.2 (b) or 3.15.3.2 (c), provided such shift or elimination is allowed by such Special Permit or amendment thereto.

For the fourth story of any building that does not include multi-family dwelling units, minimum setback requirements, measured from the façade(s) of the building on which such fourth story is located, shall be as follows: from the eastern façade of the building (facing Highland Ave), fifteen (15) feet; from the northern façade of the building (closest to and facing West Street), one hundred and ten (110) feet; from the western façade of the building, zero (0) feet; from the southern façade of the building, thirty-five (35) feet. No fourth story setback from the north-facing building façade is required with respect to a Multi-family Project or any portion of any building that is set back from West Street at least two hundred (200) feet.

The total floor area of a fourth-floor addition to the existing building may not exceed thirty-five percent (35%) of the total roof area of the building. Mechanical equipment, including but not limited to HVAC equipment, whether or not enclosed, shall not be included in the calculation of maximum allowable floor area hereunder.

A Multi-family Project shall not be subject to the residential setback requirements of Section 4.4.8.4.

Buildings developed under the regulations of the Avery Square Overlay District shall not be subject to any other height limitations nor any other limitations contained in Section 4.4.3.



#### **3.15.4.2 Building Bulk and Other Requirements**

The maximum floor area ratio in the Avery Square Overlay District for a Multi-family Project shall be 1.4 and for all other uses allowed hereunder shall be 1.1. Property contiguous with and in common ownership with property in the Avery Square Overlay District shall be included in the lot for purposes of calculating floor area ratio. The enclosed area of a building devoted to off-street parking shall not be counted as floor area for purposes of determining the maximum floor area ratio for any use allowed by right or special permit under this Section 3.15, including, without limitation, parking areas and parking structures associated with a Multi-family Project. Any building developed under the regulations of the Avery Square Overlay District shall not be subject to any other limitations on floor area ratio, lot coverage, or building bulk contained in Sections 4.4.2, 4.4.7 and 4.4.9; and any Multi-family Project developed under this Section 3.15 shall not be subject to the maximum setback requirement from Highland Avenue set forth in Section 4.4.4.

#### **3.15.4.3 Multi-family Project Site Plan Review Requirements**

Notwithstanding anything to the contrary in this By-Law, a Multi-family Project shall only be subject to the site plan review requirements for a Minor Project and shall not be subject to the requirement to obtain a special permit as part of site plan review, notwithstanding anything to the contrary in Section 7.4. **[Note: As an alternative approach; this section could reference site plan review requirements adopted pursuant to the larger MBTA Communities Act re-zoning]**

#### **3.15.5 Off-Street Parking**

Except as provided below, the off-street parking regulations in Section 5.1 and the regulations for enclosed parking in Section 4.4.6 shall apply in the Avery Square Overlay District.

- (a) The minimum number of off-street parking spaces in Section 5.1.2 shall apply except as follows:
  - (1) For Independent Living Apartments, there shall be one space per Apartment.
  - (2) For Assisted Living units and Alzheimer's/Memory Loss units, the parking requirement shall be one space for every two beds, plus one space for each two employees on the largest shift.
  - (3) For Multi-family dwelling units in a Multi-family Project, the parking requirement shall be 1.3 space(s) per unit. <sup>1</sup>
- (b) Notwithstanding anything to the contrary elsewhere in this By-Law, including but not limited to Section 4.4.8.4, in the event that land located in the Single Residence B Zoning District
  - (1) is adjacent to the Avery Square Overlay District;

<sup>1</sup> The parking design requirements in Section 5.1.3 shall not apply to a Multi-family Project and such Multi-family Project's parking design requirements shall be those approved during the site plan review process.

(2) is in common ownership with adjacent land located in the Avery Square Overlay District; and

(3) prior to approval of this Section 3.15, was improved as a parking area associated with a building located in the Avery Square Overlay District;

then, provided that said land extends into the Single Residence B Zoning District not more than one hundred and eighty (180') feet from the boundary line between the Single Residence B Zoning District and the Avery Square Business District, said land may, as a matter of right, be used as (i) a Multi-family Project and/or (ii) a parking area accessory to uses permitted in the Avery Square Overlay District by right or by special permit.

### **3.15.6 Affordable Housing**

Any building with ten or more Independent Living Apartments or any Multi-family Project shall include Affordable Housing Units as such term is defined in Section 1.3 of this By-Law, as may be modified in this Section 3.15.6.

The following requirements shall apply to a development that includes ten or more Independent Living Apartments:

Twelve and one-half percent (12.5%) of the total number of Independent Living Apartments shall be Affordable Housing Units. In the instance of a fraction, the fraction shall be rounded up to the nearest whole number. There shall be no affordable housing requirement for nursing homes, convalescent homes, Assisted Living and Alzheimer's/Memory Loss Facilities, or residential care institutions or facilities.

The following requirements shall apply to a Multi-family Project:

Ten percent (10%) of the total number of multi-family dwelling units shall be Affordable Housing Units. In the instance of a fraction, the fraction shall be rounded up to the nearest whole number.

The inclusion of Affordable Housing Units pursuant to this Section 3.15.6 shall be subject to the following:

- (a) If the Applicant provides at least one-half of the Affordable Housing Units required herein for households with incomes at or below 50% of area median income, the remaining Affordable Housing Units may be rented to households with incomes up to 100% of area median income even if the latter units are therefore not eligible for the Subsidized Housing Inventory, regardless of any requirements to the contrary set forth in Section 1.3.
- (b) Affordable units shall be dispersed within the building and not concentrated in one area or on one floor. They shall generally be comparable in size, energy efficiency, quality, convenience, and unit-specific real estate-related amenities to the development's market-rate units. Services and other amenities that may be purchased by residents on a voluntary basis are not to be considered unit-specific real estate-related amenities and are excluded from such comparability requirements.
- (c) The selection of eligible homebuyers or renters for the affordable units shall be in accordance with a marketing plan approved by the Needham Planning Board prior to the issuance of any building permits for the development.
- (d) The affordable units shall be subject to an affordable housing restriction as defined in Section 1.3 of this By-Law with limitations on use, occupancy, resale prices or rents, as applicable, and which provides for periodic monitoring for compliance with the requirements of said restriction.

**From:** [Nordo Nissi IV](#)  
**To:** [Planning](#)  
**Subject:** HONE Advisory Group - 433 Chestnut Street  
**Date:** Thursday, February 8, 2024 9:45:09 PM

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Hello:

I attended the workshop on 1/18 and I was pleased to read that you have opted to move ahead with a two plan approach. Developing a plan to minimally comply with the MBTA Communities Law and a separate plan to encourage additional development in town is the best path forward.

I wanted to reiterate my comment during the meeting that the Hartney Greymont property (433 Chestnut street) is a very unique parcel. I do not oppose development of this property. But I do think it needs to be done with special considerations due to the impact that development would have on flooding in my part of town. In addition, the entrance to the property is extremely tight and may require some redesign work or at the very least an additional sidewalk. Therefore, I ask that the HONE group not include this property in the proposal to comply with the MBTA Communities Law. I could support inclusion of the property in a second proposal which would allow for some community participation in the development process.

Thank you for your time and consideration.

Nordo Nissi  
450 Chestnut St, Needham, MA 02492

**From:** [Michael Haynes](#)  
**To:** [Planning](#)  
**Subject:** HONE Advisory Group - 433 Chestnut Street  
**Date:** Friday, February 9, 2024 10:14:17 AM

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Hello - it is my understanding that a two-plan approach to minimally comply with the MBTA Communities Law while encouraging separate development.

I wanted to include our support to what our neighbor, Nardo Nissi, commented on during a recent meeting. We experience considerable flooding in our neighborhood. Therefore, we would ask that any development of the Hartney Greymont property (433 Chestnut street) be done so with special considerations due to the impact that development would have on flooding in our part of town. In addition, the entrance to the property is extremely tight and may require some redesign work or at the very least an additional sidewalk. Therefore, I ask that the HONE group **not** include this property in the proposal to comply with the MBTA Communities Law. I could support inclusion of the property in a second proposal which would allow for some community participation in the development process.

Thank you for your time and consideration.

Michael & Rebecca Haynes  
456 Chestnut St, Needham, MA 02492

**From:** [Elizabeth Handler](#)  
**To:** [Planning](#)  
**Subject:** Suggestion to share information  
**Date:** Friday, February 9, 2024 8:52:42 PM

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Hello,

My family owns a summer house in Manchester-by-the-Sea, Massachusetts, and I have set myself up to receive informational notices from the town, which is also subject to the MBTA Communities Act.

They just shared a 16-minute informational video to give residents an idea of what kinds of density already exist in Manchester. I don't know if you're already planning to do something like this, because I know you have included photographs of the different areas of town and explained their density, but perhaps a short video that could easily be shared on social media, etc. would be helpful (if you aren't already planning to do something like this).

<https://www.youtube.com/watch?v=pqjPZ3OhHB0>

Thanks for all the time and effort you're putting into this!

Elizabeth Handler  
TMM, Precinct H

**From:** [Lionel Desrosiers](#)  
**To:** [Planning](#)  
**Subject:** HONE Advisory - 433 Chestnut  
**Date:** Saturday, February 10, 2024 4:46:41 PM

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To The Members of the HONE Advisory,

I am writing in regards to the upcoming changes to comply with the MBTA Communities Law. I am pleased to read that you have opted to move ahead with a two plan approach. Developing a plan to minimally comply with the MBTA Communities Law and a separate plan to encourage additional development in town is the best path forward.

I wanted to reiterate thoughts by a friend and neighbor of mine that the Hartney Greymont property (433 Chestnut street) is a very unique parcel. I do not oppose development of this property, but I do think it needs to be done with special considerations due to the impact that development would have on flooding in my part of town. In addition, the entrance to the property is extremely tight and may require some redesign work or at the very least an additional sidewalk. Therefore, I ask that the HONE group not include this property in the proposal to comply with the MBTA Communities Law. I could support inclusion of the property in a second proposal which would allow for some community participation in the development process.

Thank you for your time and consideration.

Lionel Desrosiers  
117 Linden St



**Needham Housing Coalition Message to HONE**  
**re: MBTA Compliance Base Plan and Housing Choice Plan (Articles 1 & 2)**  
February 12, 2024

The Needham Housing Coalition is very interested in the MBTA Communities Act proposed scenario that will be a more expansive “Housing Choice Plan” presented as a second article after the “Base Compliance Plan” (article 1). We appreciate the amount of work that has gone into the development of a plan to comply with the mandates of the MBTA Communities Act.

We recognize that the HONE Advisory Group is going to introduce new multifamily zoning in areas close to the train stations in Needham. We know the zoning alone does not guarantee any new housing in Needham.

The goal of the Needham Housing Coalition is to help create much needed housing in Needham including senior housing, affordable housing and workforce multifamily housing, all of which is to be part of a broad range of housing choices (different prices and sizes) to meet a dramatic missing middle of housing types needed for Needham and the greater Boston community. After the zoning is passed, there will still be many months of planning, approvals, financing, and construction before any housing opportunities can begin to develop. The completion of real housing production is projected to take many years and be modest in total units created because the regional economy faces significant cost, labor, financing, and regulatory challenges in the production of multi-family housing.

We have carefully reviewed the proposed “Base Compliance Plan” map and have made several proposed modifications to the plan inspired by the goal of leaving the Heights ground floor commercial core blocks as mixed use (MXU) development. We found places where there could be small additions of multifamily housing to make up for lost unit count if the Heights business district remains MXU. Many are in locations near major employers such as the hospital or in our two main commercial areas. Small changes will create housing zoning that will fit into the neighborhood and add to the economic vitality of the area. The changes are enclosed on the attached map “BASE PLAN (Modified)”.

While we appreciate the desire to submit a minimum compliance plan to meet HONE’s fiduciary obligation, we do not believe it is sufficient to meet the goals of the Needham Housing Plan Working Group (HPWG) approved on December 22, 2022. Based on feedback from developers, it is unlikely the Base Compliance Plan is sufficient to encourage the managed growth in multi-family residential development necessary to address the very limited housing choices in Needham, thereby threatening the Town’s economic prosperity and diverse and intergenerational character.

The main purpose of our current input to HONE is to provide, a second map, “Housing Choice Plan”, with additional proposed changes to the MBTA district to increase the likelihood that a diverse range of multifamily housing will actually be developed over the coming decades.

We would welcome an opportunity to discuss these proposed MBTA plan modifications and look forward to the opportunity to do so. Meanwhile, we hope you will consider these suggestions as you craft the second article, which we understand is on the agenda for your February 15th HONE meeting.

- We reviewed the Housing Plan MBTA map and included some of the sites proposed in the plan.
- We have made refinements to proposed height and density limits based on the specific locations and adjacent neighborhood conditions. Adding to the height in some specific locations will create housing without changing the amount of land used, such as at the Rosemary Apartment (A-1) district.
- Some of the locations in the HONE plan are either already developed or are public parcels with existing uses (like the Public Library), which will certainly not be locations for new housing, so those proposed housing units should not be included as proposed net new units in any assessment of potential housing production.
- We have attempted to be very intentional with new MF housing parcels in the Heights to respect the voiced concerns of the Heights community. We have also worked to develop more multi-family housing opportunities to support our downtown and Chestnut street corridor where more housing density will be very important to provide housing choices and much needed support for our denser commercial areas and enhance their ongoing and future vitality.

attachments:

HONE\_NHC comments\_Base Amended MAP\_021124.pdf

HONE\_NHC comments\_Housing Choice MAP\_021124.pdf

# BASE PLAN: (Modified for Hts MXU core blocks)

NHC comments  
submitted 02.11.2024

## Scenario Overview

Protect ground floor commercial in the core Heights downtown blocks including 100 West.

1. Remove stand-alone MF in these core blocks
2. Find the make-up MF units in the highlighted areas noted on this map
3. Consider allowing 100 West as 4 stories / 45-50u/ac stand-alone residential to preserve building environmentally

Stand-alone MF west of Maple St / Glendon Rd (Comella's block)

Stand-alone MF including: 1180 Great Plain (red), Congreg. Church, PO and commercial parcels

Rezone skilled nursing facility for stand-alone MF to be part of Chestnut St district

Amend Chestnut district FAR/density/ ht limits to 4 stories for stand-alone MF

Add Carter School MF to Hamilton Highlands MF (A-1)

Rezone small MF project and Methodist church for stand-alone MF (A-1)

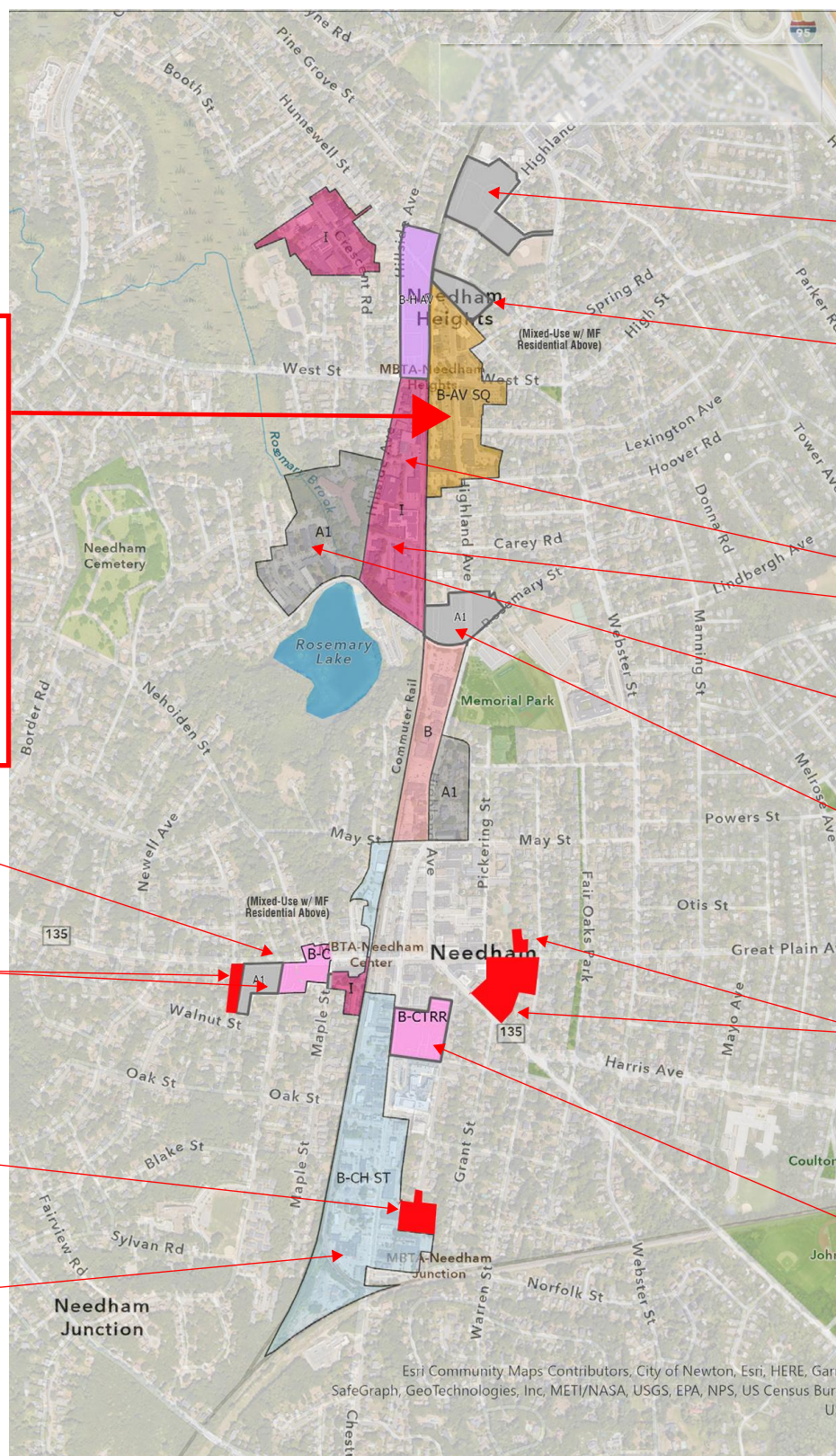
Add height and density to Industrial district:  
to 3.5 stories and 36u/ac (north)  
to 4.5 stories and 45u/ac (south)

Add height and density to A-1 district for 4.0 stories and 24-30u/ac

Rezone Library and Christ Episcopal church for stand-alone MF (A-1)

Rezone SRB & GR as Stand-alone MF including: YMCA, Hillcrest Gardens, 2 churches and the small GR (w/ small MF) along Dedham Ave (45u/ac)

Rezone for Stand-alone MF behind the ground floor commercial (45u/ac)





# HOUSING CHOICE PLAN:

## Scenario Overview

The following adjustments to the MBTA District reflect additional area to provide more diverse housing opportunities for the MBTA district area to address Needham's spectrum of missing middle housing needs. These additional areas are added to the parcels / changes proposed in the NHC Base Plan modifications dated 02/01/24 which were intended to make up residential units to allow the Hts Core blocks to remain MXU with protected ground floor retail.

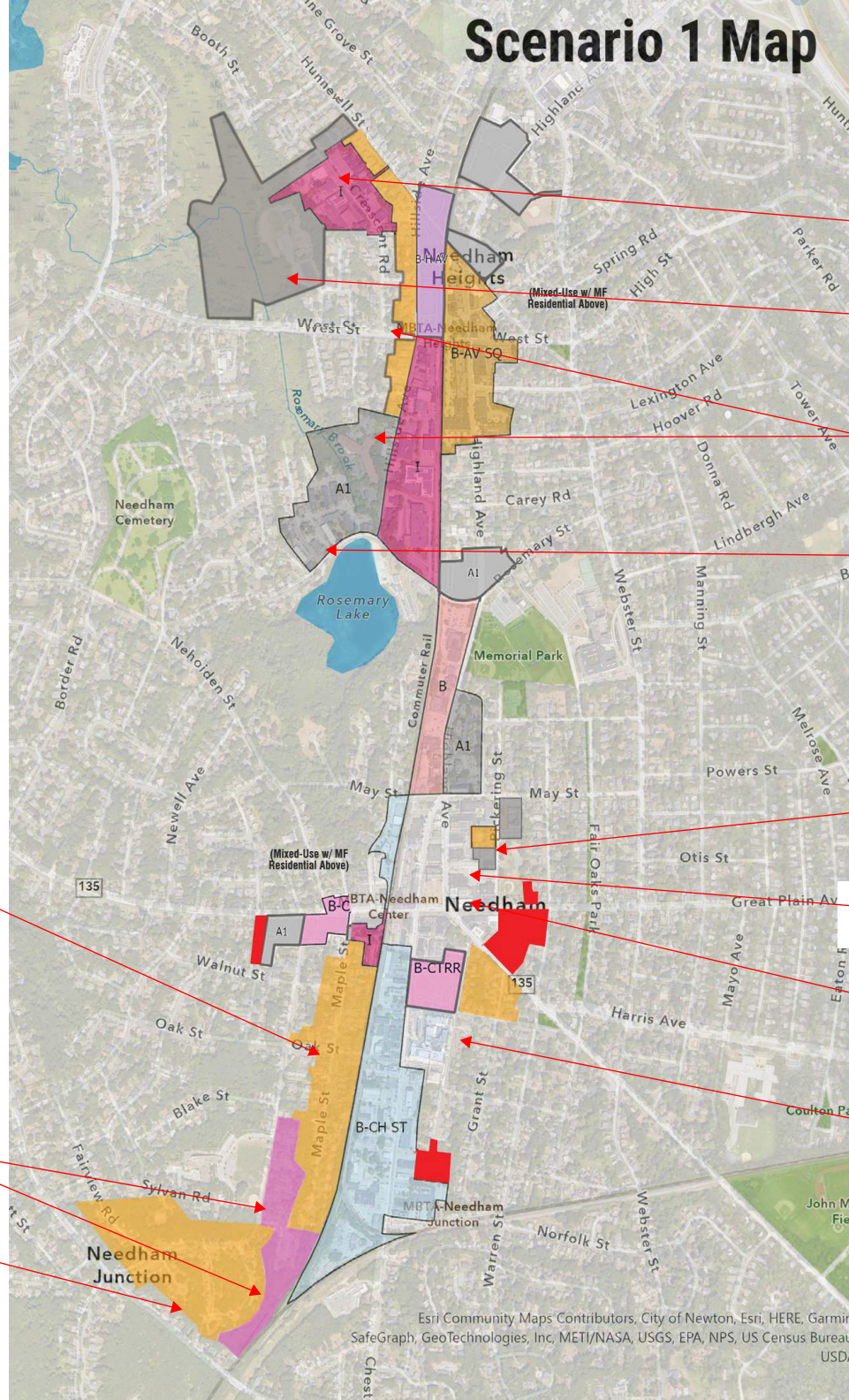
Rezone GR for 3u/ac minimum density MF (This area represents a great housing choice opportunity adjacent to the Chestnut Street / Downtown commercial area, the Hospital district and two MBTA stations)

Rezone NHA (Linden / Chambers) parcels for MF

Rezone NHA GR for 3u/ac minimum density MF (opportunity for more Needham public housing units to meet waiting list demand)

## Scenario 1 Map

NHC comments  
submitted 02.11.2024



Rezone Brookline Oriental to GR at 3u/ac minimum density MF

Rezone Hillside school parcel to A-1 MF (potential for public or private development).

Rezone GR at 3u/ac minimum density MF for parcels along Hillside only

Add height and density to A-1 Rosemary district up for 4.5 stories and 36 - 40u/ac with 3 st adjacent to residential neighborhood

Rezone Stephen Palmer as A-1 MF from SRB

Rezone GR (Pickering Place) to allow 3u/ac minimum density MF

Rezone Verizon and Bailit Health parcels to A-1 from SRB to allow stand alone residential on the park

Rezone GR for 3u/ac minimum density MF

Esri Community Maps Contributors, City of Newton, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA

**From:** [B Mac](#)  
**To:** [Planning](#)  
**Subject:** Fwd: HONE PROPOSED CHANGES  
**Date:** Monday, February 12, 2024 3:18:19 PM

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----- Forwarded message -----

From: **B Mac** <[oaklangley@gmail.com](mailto:oaklangley@gmail.com)>  
Date: Mon, Feb 12, 2024 at 3:12 PM  
Subject: HONE PROPOSED CHANGES  
To: <[KKEANE@needhamma.gov](mailto:KKEANE@needhamma.gov)>, <[HFRAIL@needhamma.gov](mailto:HFRAIL@needhamma.gov)>, <[NESPADA@studioeneee.com](mailto:NESPADA@studioeneee.com)>, <[PLANNING@needhamma.cov](mailto:PLANNING@needhamma.cov)>

Hello,

I am a community member and live in the area of the Stephen Palmer Center, and Saint Joseph's School and Church.

I have been following the HONE ADVISORY GROUP and would appreciate a more concise picture & understanding of the proposed zoning changes.

The maps in their current state are very difficult to understand.

It would be helpful to see a break-down of the **existing** number of apartment units in each parcel, and the **proposed** number of housing units in each of the proposed scenario housing plans (A,B,C) with a legend explaining the density, and other proposed changes.

While the existing packet is helpful for an overall view of the number of units, a more detailed packet of the proposed changes would be more beneficial to the community members directly affected by these changes, and should be made available as soon as possible given the timelines involved in reaching the committee goals.

My last comment is to propose that the Town of Needham have an active / interactive email list to send out notifications for important town business like the HONE, for future Town business. The low response rate to the survey would indicate a need for review of the current postcard system, or at the very least a supplement by way of email.

Thank you for your time and consideration.

Barbara McDonald

**From:** [Paula Dickerman](#)  
**To:** [Planning](#); [Heldt Email](#); [N. Espada](#)  
**Subject:** New MBTA-CA Resource!!  
**Date:** Monday, February 12, 2024 6:39:18 PM

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To Members of the HONE Advisory Group,

Here, from our friends at CHAPA, is the first edition of the Upzone Update, a new newsletter about everything going on related to the MBTA Communities Act, including resources. Please take a look. It's from Boston Indicators and is written by Amy Dain. I hope you will subscribe.

Respectfully,  
Paula Dickerman  
for the Needham Housing Coalition

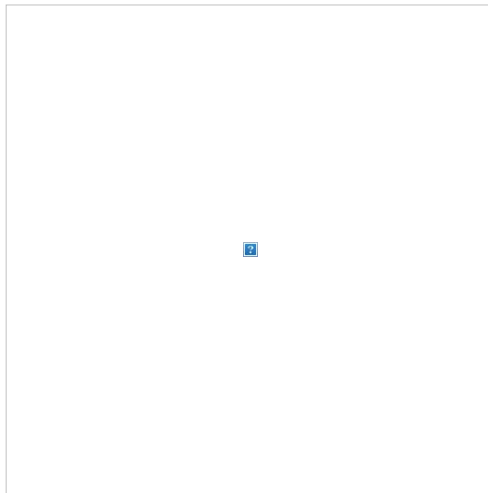


UPZONE UPDATE

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## Meaningful or marginal?

By Upzone Update • 9 Feb 2024  
[View in browser](#)



Malden's MBTA Communities Zoning Map

## MBTA Communities impact rides on local compliance approaches.

By Amy Dain

One question reverberating through many MBTA Communities deliberations is whether the new municipal zoning rules should go beyond the state's minimum requirements or not. For some municipalities, it is a question of meaningful compliance versus paper compliance.

So, for example, in Brookline, it was possible for the town to meet the state requirements by drawing new zoning districts over existing multifamily housing, basically legalizing what exists on the ground, but not allowing much new housing to be built. In other words, the town could have come into compliance, without actually taking part in the state's effort to address our housing shortage. This was Brookline's "fallback option," if meaningful reform were to have failed.

But, Brookline voted for meaningful compliance, a scenario that involved approving the "fallback" zoning, plus additional zoning, significantly along Harvard Street. Some advocates had hoped for Brookline to allow even more housing.

In Newton, the scenario of "minimum compliance" that ultimately passed does offer more than paper compliance. The new zoning districts allow for many properties to be built with more housing units than currently exist on those properties. But, many city counselors and residents wanted to go beyond the

minimum scenario and rezone all 13 of Newton's villages, because upzoning offers public benefits like needed housing, village vitality, and enhanced multi-modal mobility. In the end, Newton rezoned six of the 13 village centers.

After Brookline's vote, pro-housing advocates hugged to cheer the victory over paper-compliance zoning. After Newton's vote, many pro-housing advocates were disappointed at the loss of their more comprehensive plan. But which municipality's new zoning makes way for more housing?

Comparing zoning across municipalities is infamously challenging. Zoning requirements can cover hundreds of pages. Figuring out what they actually allow on any given parcel of land is a big task; figuring out what they allow *in total* across whole districts is a next-level perplexer.

But then, remarkably, the Commonwealth of Massachusetts invented, as a part of the MBTA Communities compliance guidelines, a new concept called zoning capacity to compare zoning districts across municipalities, to serve as a standard—a performance metric—for measuring the size of zoning districts. And just as remarkably, the new measuring system has worked in implementation. Municipal planners and planning consultants are plugging into a spreadsheet simple metrics related to their zoning districts, such as minimum lot size requirements, maximum height allowances, floor-area-ratio (FAR) allowances, minimum open space requirements, minimum setback requirements, and parking requirements—and the spreadsheet communicates with a map of parcels—and then yields a capacity number for the districts in question. Zoning capacity counts how many multifamily dwelling units are allowed by zoning across all of the existing properties in a district, regardless of what is currently on those properties or what development the market might favor.

The difficulty remains, though, that the zoning capacity number does not tell us how many homes are likely to be built—because, for example, it can count “allowed housing units” in places already built as densely as the zoning allows, like with Brookline's fallback zoning. Also, the zoning capacity number is meant specifically to help assess compliance, in broad strokes; it has not been developed as a tool for land use planning generally. A zoning capacity number is not a legal guarantee of how many housing units are allowed to be built on a given parcel. The spreadsheet might say your parcel of land has a capacity of six dwelling units, but when you puzzle through all of the requirements that apply to your property, you might find out that only three units will actually fit. On the other hand, the zoning might allow fourplexes on properties where duplexes might generate more profit.

As a novel concept, zoning capacity has led to some misunderstandings. A Newton resident just this week commented on a public Facebook conversation that the MBTA Communities law “requires Newton to add at minimum 8,330 units. It's rather hard to gloss over that number.” This is just wrong, even though the sentiment keeps reverberating.

Per the state law, Newton's zoning needs to *allow* that many units, but across parcels that are mostly built upon, many with buildings in excellent shape, many already containing multifamily housing. It is a super wonky distinction—like, if a triple decker exists, doesn't that mean it is “allowed”? In this case, no. If the parcel that the triple decker sits on is zoned for single-family-only, then the building is considered “pre-existing, non-conforming,” and the *zoning capacity for multifamily housing* of that parcel would be counted as zero, even though the building (containing three dwelling units) is right there.

Right now, across Greater Boston, there is a whole lot of housing that exists but that is not technically “allowed” by zoning. Most actual multifamily housing is pre-existing, non-conforming. As discussed above, some municipalities can come into “paper compliance” with the state law, just by allowing what already exists, and not allowing any additional homes.

So the people want to know: How many new houses do we expect to see built in the coming decades under this new zoning? In Newton? In Brookline? In every community that passes new zoning?

Where the new zoning for multifamily housing covers a parcel with a single-story, cheaply-built, 1950s retail box that is now sitting vacant, there is a good chance the parcel will see redevelopment. Where a parcel contains a relatively new condo building, redevelopment is highly unlikely. If municipalities want to see significant development, they can draw new zoning around parcels ready for denser redevelopment. If municipalities want to see marginal change, they can draw districts around valuable newer developments where zoning changes won't unlock additional development potential. Many parcels represent situations between the two extremes, with varying likelihoods of redevelopment.



*Image: Analysis of the likelihood of redevelopment of properties on one street in Newton under then proposed zoning rules. Regardless of the probability of redevelopment, the zoning capacity for every property in the district is counted. (Credit: Utile for the City of Newton)*

Each municipality is assigned a zoning capacity target as a percent of existing dwelling units in the municipality. In municipalities served by rapid transit, like Newton and Brookline, the required zoning capacity targets are set at 25 percent of existing dwelling units. Newton's target is 8,330. Brookline's is 6,990. Neither will get that many units through their new zoning. Entrepreneurial and energetic analysts could try to estimate expected buildouts for new districts, but we generally do not have those numbers at this time.

The thing is, to solve the state's housing challenges, many of Boston's suburbs will need to see thousands of homes built; they will need to meet their "capacity targets" in actual construction. The MBTA Communities law will not get us there. How far it gets us depends, in part, on how many municipalities choose the route of minimal or paper compliance, and how many go beyond the minimum requirements.

The zoning capacity targets are not construction targets for municipalities, but perhaps, in the near future, they should be.

## Compliance Status Updates

The Massachusetts Executive Office of Housing and Livable Communities is posting the **status of municipal applications for determination of compliance** with the MBTA Communities zoning law on its [website](#).

Relatedly, we have created a [new interactive map](#) on our MBTA Communities Tracker site that shows which municipalities have received determinations of compliance, or have submitted applications for determinations. It also provides some additional information, such as links to local 3A websites. We will update this map with new information over time.



So far, the state has approved Salem's application, and given conditional approval to Lexington. The state is currently reviewing the applications from 11 of the 12 municipalities served by rapid transit (Braintree, Brookline, Cambridge, Chelsea, Everett, Malden, Medford, Newton, Quincy, Revere, Somerville). The status of Milton, the 12th municipality served by rapid transit, is pending Milton's [referendum](#), scheduled for this coming Tuesday!

In addition, Arlington, Dedham, Essex, Grafton, Haverhill, Lowell, Northbridge, Pembroke, Stoneham, and Wareham have all submitted applications for determinations of compliance, based on their zoning. The state is reviewing the applications.

Also this week [Danvers voted](#) to amend its zoning to come into compliance.

## Events, Hearings, Votes

This weekend volunteers will be **canvassing in Milton** to get out the vote. If you are interested in joining, email Nora Harrington or Meghan Haggerty: [nth02186@gmail.com](mailto:nth02186@gmail.com) or [meghanhaggerty@gmail.com](mailto:meghanhaggerty@gmail.com).

**Burlington's Working Group #2 for MBTA Communities Compliance** will meet at the Town Hall Annex Basement and access via [webex](#), on February 11, from 5:30 to 7:30 pm. The meeting will include discussion of an updated zoning map and text for the bylaw.

**Sharon's Planning Board** will hold a [public outreach meeting](#) at the Sharon Community Center Ballroom, 219 Massapoag Ave., Sharon, and virtually on February 13 at 7:00 pm. The meeting link will be posted on the [townofsharon.net](http://townofsharon.net) website.

**Medfield** will host its second [MBTA Communities Zoning workshop](#) at the Public Safety Building on March 18 at 7:30 pm.

**Belmont's MBTA Communities Advisory Committee and MAPC** are hosting their third public forum at the Beech Street Center, on February 15 at 7:00 pm. The forum is part of a community-driven effort to develop zoning recommendations for expanded housing opportunities and compliance with the MBTA Communities zoning law.

**MAPC** is hosting an event to explain its **District Suitability Analysis Tool** on [Zoom](#) on February 27, from 12:00 to 1:30 pm. This tool supports stakeholder-



driven decision-making in the design of zoning districts. The tool helps municipalities within the MAPC region to identify locations that advance regional and local goals.

The **Attorney General's Municipal Law Unit** is offering a training seminar on the processes of passing and filing amendments to zoning. The seminars will be held [February 26](#) from 1:00 pm to 2:30 pm and [February 28](#) from 10:00 am to 11:30 am.

**Sherborn's Planning Board** will hold a [hearing](#) on MBTA Communities zoning amendments at Town Hall on February 20 at 7:15 pm.

**Wakefield** will hold a public hearing about its [MBTA Communities Multi-Family Zoning Overlay District](#) on February 13 at 7:15 pm. Information about this meeting and others can be found [on Wakefield's website](#). Wakefield's proposal is to allow multifamily housing, up to three stories with no more than four units per lot, by right in the district. The plan is for Wakefield's Spring Town Meeting to vote on the zoning.

**Shrewsbury** will hold its [MBTA Communities Zoning Outreach Meeting](#) at Shrewsbury Senior Center on February 13 at 6:00 pm.

**Easton's Planning Board** will hold [hearings](#) at the Corona Meeting Room on February 12 at 6:30 pm and at Frothingham Hall on February 27 at 6:30 pm.

**Wellesley** will host a forum on Zoom on March 7 at 6:30 pm. Register [online](#). Wellesley Executive Director Meghan Jop and Planning Director Eric Arbeene will present at the forum.

The **Massachusetts Municipal Association (MMA)** is hosting a [free webinar](#) on MBTA Communities zoning on February 26, from 12:00 to 1:00 pm. Attorneys Donna Brewer and Susan Murphy with the Massachusetts Municipal Lawyers Association will review the process and schedule for municipal compliance, as well as potential enforcement of non-compliance. They will also discuss the distinctions between the MBTA Communities law, Chapter 40B and Chapter 40R.

## Articles, Blog Posts, and Updates

The **Boston Globe's Andrew Brinker** this week wrote three informative articles on MBTA Communities. First, he highlighted **Attorney General Andrea Joy Campbell's work** enforcing housing laws, including MBTA Communities. Second, he wrote a feature about **Deb Crossley** who led Newton's rezoning effort. "I simply know that we as a city need to build more housing and help our village centers," Crossley said. Third, Brinker explained that **Milton could face a lawsuit** if it votes down compliance at Tuesday's referendum.

**Jack Clarke and Paul Lundberg** discuss why [MBTA Communities zoning is good for Gloucester](#) in this Gloucester daily times commentary.

Massachusetts Planning, a publication of the Massachusetts Chapter of the American Planning Association, featured **Lowell's MBTA Communities zoning** in a [2022 article](#). The article explains that Lowell went beyond the state's minimum zoning capacity requirements. The article is more than a year old, but still highlights important themes.

In December, **Greg Reibman of the Charles River Region Chamber** explained how [Wellesley's likely zoning approach will deliver far fewer homes](#) than its "zoning capacity target". "Most discouraging is that Wellesley's proposal includes 850 units at the Nines on Williams Street. But that project and those units are already approved, a little less than half built and 90 percent occupied! That means, at best, Wellesley is creating a path for only for 583 new homes that aren't already in the pipeline. That's not likely either. Consider that many of the remaining 583 units (split between Wellesley Hills and Wellesley Square) includes parcels that may not be redeveloped for decades. Or ever."

The regional planning agency, **MAPC**, is offering [technical assistance](#) to help municipalities come into compliance with MBTA Communities.

On WCVB's [On the Record](#), **Lieutenant Governor Kim Driscoll** said about Milton's referendum, "We hope it passes for Milton. We don't want to take tools away from any community." The Healey-Driscoll administration has provided nearly \$6 million in technical assistance grants to 156 communities to help them comply with the law, the article notes.

In January, the Federal Reserve Bank of Boston hosted a forum, [now available](#)

online, on **the future of the New England economy**, with a focus on housing, places, and flexible work.

Arlington is considering a proposal to allow **three-family homes** throughout Arlington, as long as they meet already-existing dimensional requirements such as maximum height, maximum stories, and minimum setbacks.

In case you missed it earlier, check out **Amy Dain's report** **Exclusionary by Design**, published by Boston Indicators.

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**To:** Housing Needham Advisory Group (HONE)  
**From:** Needham Housing Coalition (NHC) MBTA Working Group  
**Date:** February 13, 2024  
**Re:** Comments regarding HONE's second scenario and warrant article

In addition to the specific comments we submitted to HONE on February 12, the Needham Housing Coalition's MBTA Working Group has two general comments related to HONE's ongoing work. One relates to the language HONE uses to describe the second scenario and warrant article it is developing. The second relates to the modeling efforts for the second scenario.

In HONE's materials for the February 13 update to the Select Board, HONE's slide titled "Community Workshop #3 \*\*New Date: March 28 at 7 PM\*\*" includes the following:

- “• Anticipate presenting two proposals, both recommended for EOHLC and Town Meeting:
  - One with limited zoning changes to bring Town into compliance with MBTA Comts.
  - Second with additional zoning changes to authorize multi-family housing to a greater degree than is necessary to simply achieve compliance with MBTA Communities”

The language describing the second zoning change is not positive (“to a greater degree than is necessary to simply achieve compliance”). We believe HONE's description for this scenario/article should be more positive, perhaps something like “to authorize additional multi-family housing aimed at meeting the goals of the Needham Housing Plan of December 2022.”

Also, following the scenario materials in the Select Board packet is the “MBTA Communities Act Scope of Work/Timeline” from Jan. 25, 2024. For HONE's Feb. 25 meeting the timeline includes reference to:

“Decision Points:

- Finalize add-on scenario boundaries
- Finalize add-on scenario zoning parameters”.

And for the March 28 HONE Community Meeting No. 3, it refers to “Base and Add-on Scenarios presented.”

The “add-on scenario” terminology is unfortunate as it sends a message that it's unnecessary and more than we want to do, and should be changed to something at least neutral if not positive (e.g., “Housing Plan” or “Housing Choice Plan”). NHC's February 12 submission to HONE refers to the second scenario as the Housing Choice Plan. While this may not be HONE's preferred title, something more positive than “add-on” is definitely needed.

Thank you for your ongoing work and for considering our input.

Needham Housing Coalition MBTA Working Group

Paula Dickerman

Mike Fisch

Jim Flanagan

James Goldstein

Cathy Mertz

Oscar Mertz

Margaret Murphy

Henry Ragin

Jan Soma

February 14, 2024

**BY ELECTRONIC MAIL**

Housing Needham Advisory Group (HONE)  
Needham Town Hall  
1471 Highland Avenue  
Needham, MA 02492  
Email: [planning@needhamma.gov](mailto:planning@needhamma.gov)

Re: 100 West Street, Needham, Massachusetts (the “Property”) –  
Alternative Scenario A

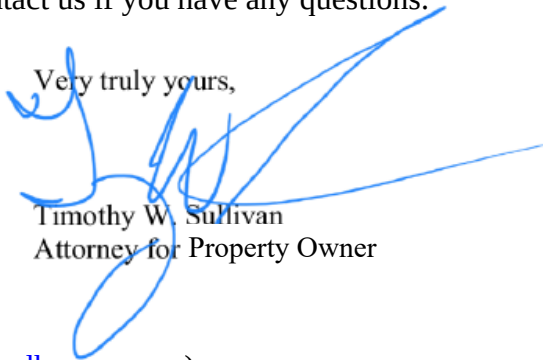
Dear Members of the HONE Advisory Group:

We represent Welltower, Inc, which owns the Property by and through an affiliate (“Property Owner”) and are writing to follow-up on our letter to HONE dated February 6, 2024, to provide additional comments based on our review of the materials posted online in advance of HONE’s meeting on February 15, 2024.

We understand that HONE will be reviewing a “Scenario A Alternative” at this upcoming meeting, which, in part, focuses on changing the zoning related to Property to achieve baseline compliance with the MBTA Communities Act. As the Property Owner, we are writing to convey our strong support for the Scenario A Alternative with two changes to the zoning parameters for the Avery Square Overlay District (“ASOD”) shown in the enclosed document (i.e. changing Height to 4 stories and FAR to 1.4). These two changes would allow for a multi-family housing redevelopment of the Property of similar scale to the senior living project that is currently approved for the Property (as detailed in our prior letter). Additionally, as noted in our prior letter, this suggested rezoning may be achieved very efficiently by amending the ASOD provisions of the Zoning By-Law (Section 3.15), which would only require a simple majority vote of Town Meeting.

Again, we thank HONE for its efforts and we look forward to working together as this process continues. Please do not hesitate to contact us if you have any questions.

Very truly yours,

  
Timothy W. Sullivan  
Attorney for Property Owner

cc:

Katie King, Deputy Town Manager ([kking@needhamma.gov](mailto:kking@needhamma.gov))

Lee Newman, Director of Planning & Community Development ([lnewman@needhamma.gov](mailto:lnewman@needhamma.gov))

# Scenario A Alternative (Base) Zoning Parameters

## Avery Square Overlay District (ASOD)

|                                                 | Apartment 1 | Business | Avery Square Alternative | Chestnut Street Business | Hillside Ave Business | Industrial |
|-------------------------------------------------|-------------|----------|--------------------------|--------------------------|-----------------------|------------|
| Max Units per Lot                               | N/A         | N/A      | N/A                      | N/A                      | N/A                   | N/A        |
| Minimum Lot Size                                | 20000       | 10000    | 10000                    | 10000                    | 10000                 | 10000      |
| Height (Stories)                                | 3           | 3        | <del>3</del> 4           | 3                        | 3                     | 3          |
| FAR                                             | 0.5         | N/A      | <del>1.0</del> 1.4       | 0.7                      | 0.5                   | 0.5        |
| Max Blg Coverage                                | N/A         | N/A      | N/A                      | N/A                      | N/A                   | N/A        |
| Max Lot Coverage                                | N/A         | 25%      | N/A                      | N/A                      | N/A                   | N/A        |
| Minimum Open Space (%) - MBTA Model Requirement | 20%         | 20%      | 20%                      | 20%                      | 20%                   | 20%        |
| Open Space per Dwelling Unit                    | N/A         | N/A      | N/A                      | N/A                      | N/A                   | N/A        |
| Front Setback                                   | 25          | 10       | 10                       | 25                       | 25                    | 25         |
| Rear Setback                                    | 20          | N/A      | 0                        | 20                       | 20                    | 20         |
| Side Setbacks                                   | 20          | N/A      | 0                        | 20                       | 20                    | 20         |
| Residential Parking per Unit                    | 1.00        | 1.00     | 1.00                     | 1.00                     | 1.00                  | 1.00       |
| Lot Area per Dwelling Unit                      | N/A         | N/A      | N/A                      | N/A                      | N/A                   | N/A        |
| Maximum Dwelling Units per Acre                 | 18          | N/A      | N/A                      | 18                       | N/A                   | N/A        |
| Maximum Dwelling Units per Lot                  | N/A         | N/A      | N/A                      | N/A                      | N/A                   | N/A        |

**From:** [Gary Ajamian](#)  
**To:** [Planning](#)  
**Subject:** Please distribute in advance of tonight's HONE Meeting 2/15/202.  
**Date:** Thursday, February 15, 2024 4:20:19 PM

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Kindly distribute this in advance of tonight's HONE Meeting 2/15/202.

**Thank you,  
Gary Ajamian  
TMM Precinct F, 47 Meetinghouse Circle**

Citizens across Needham are puzzled and ask why Hersey is shielded from participating in the HONE study. Specifically, HONE's Comment Section, Q10 has generated 219 comments with 35 demanding that Hersey be included in the proposed rezoning plans.

By example, a planning board member stood up and said this very thing: "we need to consider Hersey," yet HONE ignores the citizen voices of Needham.

There is no logic to it and it is not equitable. Every neighborhood in Needham should share in this process, regardless of its wealth or social status: the Heights, the Junction, and Hersey, too.

We need to join together behind the MBTA Communities Act and treat everyone in Needham as equals. Not pit parts of the town against each other.

All four stations must be treated through the same objective lens.

HONE must consider and include HERSEY as part of its base compliance plan.

HONE Survey Answer # 173. "not including Hersey station is shameful..."