



Setti D. Warren
Mayor

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James Freas
Acting Director

October 20, 2014

[By Electronic Mail and Regular Mail]

Michael Busby
40B Program Specialist
Massachusetts Housing Finance Agency
One Beacon Street
Boston, MA 02108

RE: Chapter 40B Comprehensive Permit Project Eligibility/Site Approval

Project Name: Goddard Village
Location: 47 Goddard Street, Newton, MA 02461
Number of Proposed Units: Five (5)
Subsidizing Agency: Massachusetts Housing Finance Agency (MassHousing)
Applicant: Marcus Lang Investments, LLC
Development Company: Marcus Lang Investments, LLC

Dear Mr. Busby:

The Planning and Development Department, on behalf of the City of Newton, appreciates the opportunity to comment on the Project Eligibility/Site Approval application recently submitted by Marcus Lang Investments, LLC (the "Applicant") for 47 Goddard Street, Newton, MA 02461 (the "Project"). This letter constitutes the City's response to your letter addressed to Mayor Warren, dated September 18, 2014, seeking comments regarding the Project. Written comments received by the Planning and Development Department (the "Department") from other interested parties are attached (**ATTACHMENT A**); these comments have informed the City's response.

Our City is committed to the creation of affordable and equitable housing opportunities in Newton, and we welcome well planned Comprehensive Permit ("40B") projects. To ensure such

projects represent a good fit for the City and the respective neighborhood in which they are looking to develop in, the City strongly encourages the careful siting, design, and project programming. Overall, Newton supports increasing the diversity and supply of housing, especially affordable housing, and through the *Newton Comprehensive Plan*, adopted in 2007, has a goal of encouraging “*Residential development that is well located in relationship to transportation, schools, commercial services, large employers, and existing patterns of residential type and character.*”¹

The Department has several concerns about the Project, which are heightened by the site’s topography and the context of the existing neighborhood. Our main concerns center around the massive topographical alterations proposed for the site including the number of trees to be removed, the amount of re-grading proposed to accommodate the proposed site layout, the extensive concrete block retaining walls called for in the Applicant’s conceptual plan, and the projects impact on the nearby wetland/conservation area.



View of existing undeveloped lot from Goddard St.

Although the Planning Department has some concerns with the proposed density given the existing neighborhoods single family context, we acknowledge that the Applicant’s proposal adds two units of permanently restricted affordable housing to the City’s inventory of subsidized housing supply. We are however, concerned with the size and heights of the units proposed, and believe that a reduction in the size of the market rate units would improve this Project significantly.

We believe that the site plan would benefit from additional open space left in its current natural state, conserving some of the natural topography and site features including existing landscaping, to help mitigate the impacts of this project on the site and neighborhood. Perhaps a more curvilinear and narrower driveway would help to decrease the amount of impervious surface proposed and create more of a buffer with adjacent residences and the street. Additionally, we recommend the addition of a pedestrian walkway to connect the units to the street.

The Newton Housing Partnership has raised some concerns about the size, programming, and marketability of the affordable units in their comment letter (**ATTACHMENT B**); however, the Planning Department appreciates the diversity this project brings to the City’s affordable housing stock. The Department expects the Applicant to address all concerns raised should this project move forward. The Department offers the following comments in response to the

¹ *Newton Comprehensive Plan*, 2007. Page 5-14

information provided by the Applicant to help MassHousing evaluate this request for Project Eligibility/Site Approval:

A. Land Use, Site Plan Design and Sustainability

The regulation for a Comprehensive Permit under M.G.L. Chapter 40B states that the Subsidizing Agency determine whether *“the conceptual project design is generally appropriate for the site on which it is located, taking into consideration factors that may include proposed use, conceptual site plan and building massing, topography, environmental resources, and integration into existing development patterns.”*²

- **Smart Growth.** The Massachusetts Department of Housing and Community Development (DHCD), through its Sustainable Development Principals, encourages housing developments consistent with smart growth, sustainable design, and green building practices and policies. The Department believes the project is inconsistent with these principles for the following reasons: 1) the development plan significantly alters the natural topography of the site, which removes trees and may have negative impacts on the natural drainage patterns; 2) the proposed site plan provides little usable open space on the site and does not include much outdoor play space proximate to the affordable dwelling units; 3) the Project does not include an on-site walkway to facility pedestrian connections to the street; and 4) the legal arrangement for the on-going maintenance of common infrastructure is unclear, and depending upon its structure may be inequitably burdensome to the affordable dwelling units.
- **Land Use.** While the subject property is currently vacant, the surrounding neighborhood is comprised of parcels used for single-family residential use, as well as a golf course and protected open space (Goddard Street/Christina Street Conservation Area). The project site and surrounding neighborhood are zoned Single Residence 3 (“SR3”), but are proximate to other parcels zoned Single Residence 1 and Public Use. Considering the uses of the existing neighborhood, the Department believes that the site is an appropriate location for a residential use. However, the Department has reservations about the number and size of units being proposed and their placement on the site. The following table provides a zoning comparison of the zoning requirements and the proposed Project.

² (760 CMR 56.04(4)(c))

SR3	Required	Proposed				Proposed Combined
		Lot #1	Lot #2	Lot #3	Lots #4/#5	
Lot Size	10,000	7,747	5,000	5,000	6,250	23,997
Frontage	80	0	0	0	100	100
Setbacks						
Front	30	15.8**	13.75**	13.75**	20	20
Side	10	13	5.92	5.29	15	15
Rear	15	15	15	15	8.5	15
Lot Coverage	30%	24.39%	25.38%	25.38%	21.82%	25%
Open Space	50%	65.76%	45.98%	41.98%	56.38%	58%
FAR (Allowed /Proposed)	***	0.46/.68	0.48/.49	0.48/.49	0.48/.62	.36/.61
# of Stories	2.5	3.5	2.5	2.5	2.5	3.5
Height	36	39	36	36	36	39

* The front setback was measure along the property line between Lots #1 and #2.

** The front setback was calculated from the edge of the common access drive.

*** Is a range dependent on lot size.

The Project deviates from a number of the City's dimensional controls for the SR3 zoning district. Per the table above, the Project will result in the creation of four parcels below the minimum lot size, encroachments into the minimum front, side, and rear setbacks, does not meet the minimum amount of open space required, exceeds the maximum allowable FAR, exceeds the maximum number of stories, and exceed the maximum building height allowed in a residential zone. The Department encourages the Applicant to consider altering the Project to more closely align with the City's dimensional controls and the existing neighborhood context.

- **Density.** According to the Newton Zoning Ordinance, the minimum lot area per unit in a SR3 zone for a lot created after 1953 is 10,000 square feet per unit. The Applicant is proposing an average of 4,799 square feet of lot area per unit, which is significantly denser than allowed by right or by special permit. While this Project appears to be less dense than some of the recently approved 40Bs in the City, it is located in a lower density neighborhood. In contrast, the Applicant is proposing five dwelling units where one single-family dwelling unit would be allowed by right, and two single-family dwelling units could be allowed by special permit. The Department is concerned about the proposed Project density as many of the properties in the immediate neighborhood have a significantly larger lot area per unit, which contributes to the existing context and character of the neighborhood.
- **Building Massing, Design and Architecture.** We believe the proposed units are too large and too tall for the neighborhood, and are concerned that the three market rate dwelling units are disproportionately larger than the two affordable dwelling units. The Newton Housing Partnership ("NHP") also raised concerns regarding the marketability of

a four-bedroom affordable dwelling unit (**ATTACHMENT B**). Furthermore, the floor plans of the affordable units include 3½ bathrooms, which the Department believes may be excessive given the size and configuration of the dwelling units. The Department encourages the Applicant to consider a unit composition that reduces the unit size disparity, and the elimination of a bathroom in the affordable dwelling units. If the marketability of the four-bedroom affordable dwelling units proves to be unfeasible, the Department suggests the bedroom configuration be reduced to three-bedrooms. We echo the NHP's comments that one or both of the dwelling units proposed on Lot 1 be designed as accessible, and that the applicant incorporate visitability in the remaining units.

- **Green Building.** The Applicant has committed to design the proposed dwelling units so as to satisfy Energy Star Tier II standards. The Department encourages the Applicant to consider how the efficiency and performance of the dwelling units can be modified to better align with the City's policy that the site planning, preservation of trees and topography, building design, construction, maintenance or long-term operation of the premises contribute to the efficient use and conservation of natural resources and energy.
- **Environmental Impact.** While the Project site is not located in a resource sensitive area, the Department notes that the site is proximate to the Goddard Street/Christina Street Conservation Area, which contains sensitive wetland habitat. As the site is currently undeveloped, any development plan will have significant impacts to the site. Care should be taken to minimize these impacts with a goal to conserve the natural topography and site features, and to develop a site plan that responds to the natural topography of the site. Topographic disruption has raised concerns from neighbors of potential water runoff from the site to adjacent properties.

The Department encourages the Applicant to develop a construction management plan with tree protection and erosion protection measures and to direct all water runoff from the site, including roof drains, into the proposed on-site infiltration facilities. The Project's on-site infiltration facilities will be required to meet the City's 100-year stormwater event and should be appropriately sized to handle drainage from snow storage areas. The Department also strongly encourages the Applicant to utilize pervious surfaces for the proposed common drive and walkways.

- **Open Space.** The Project's landscape plan consists of planting beds and areas of lawn, which are retained by a system of retaining walls. The proposed plantings include a mix of arborvitae, Japanese Maples, deciduous and conifer trees, and various decorative shrubs and plantings. The Planning Department has strong concerns that the proposed landscape plan does not preserve more of the existing topography and trees in order to mitigate the mass of the proposed project. We are also concerned with the amount of retaining walls on the site and the proposed materials for these walls. We recommend that the applicant use natural stone as opposed to concrete blocks where possible.

The project site is proximate to Goddard Street/Christina Street Conservation Area (approximately 200 feet) and Nahanton Park (approximately 1,680 feet). The Project appears to provide approximately 13,918 square feet, or 58% of open space area. While the Project is close to a number of recreational and open space areas in the City, the Department is concerned about the disparity of open space opportunities on the site. The Department strongly encourages the Applicant to consider the reconfiguration of the site to allow for more natural open space, especially adjacent to the proposed affordable units. Furthermore, the Application should install an on-site walkway to facilitate pedestrian access from the site to open space opportunities in the surrounding area.

- **Tree Removal.** The Applicant did not submit a tree removal plan; however, it is clear that a majority, if not all, the trees on the site will be removed in order to accommodate the Project as currently designed. The Applicant should submit a revised landscape plan showing all the species and sizes, in caliper inches, of trees to be removed and planted, prior to filing with the Zoning Board of Appeals. The Department strongly encourages the conservation of more trees from the site as well as the planting of additional trees, especially evergreen trees, along the front and side property lines, in order to screen the mass of the structures and to enhance the character of the street.
- **Removal of Historic Resources.** The Project does not appear to impact any known historic resources.
- **Noise and Lighting.** The submitted plan does not indicate the locations for HVAC and other mechanical equipment. The Applicant should carefully select all outdoor equipment models and their location in order to eliminate sound heard by future residents and abutters. Should this project move forward the Applicant should submit a photometric plan and details of site lighting fixtures to ensure that there is no light spillage onto adjacent properties or the street.
- **Construction Management.** The Applicant will be expected to submit a detailed construction management plan as area residents will be concerned about the impact of contractor parking, drainage, dust, noise, staging, and truck traffic on the site and neighborhood streets. Such a plan should include a designated contract person for the construction along with 24-hour contact information, as well as monthly construction updates for distribution to neighbors.

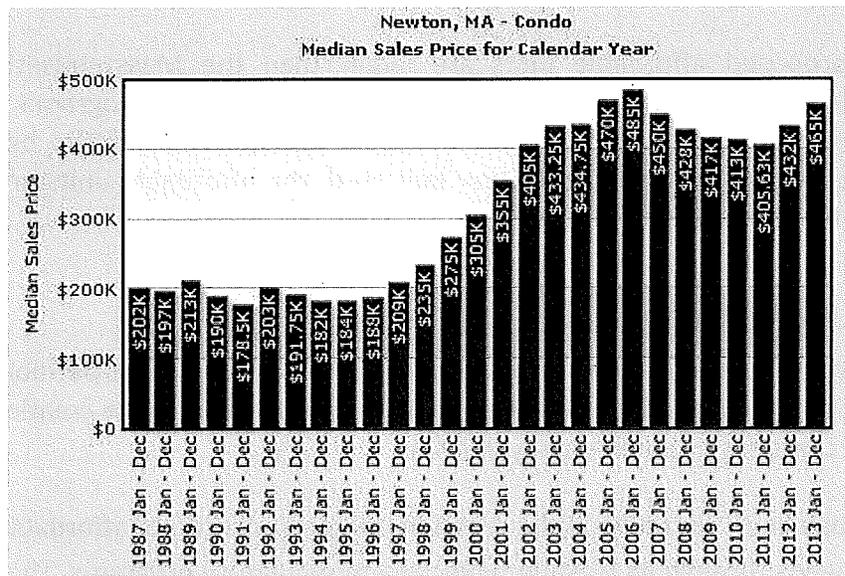
B. Affordable Housing Need

- **Existing Housing Stock and Household Income.** Newton's housing stock is diverse in age, size, design and type. Approximately 54 percent of Newton's housing units are detached single-family homes, 18 percent are two-family homes and 22 percent are multi-family buildings. Although the Newton median household income is \$107,696, approximately 25 percent of Newton households earn less than 80 percent of the area median income (AMI), which is the maximum household income to qualify for most affordable housing programs.

Newton has a longstanding commitment to affordable housing, having made measurable progress in creating and preserving opportunities for affordable housing that address the goals of Chapter 40B. As of February, 2014 , 2,441 of the City's 32,346 housing units, or 7.5 percent, were included on the Subsidized Housing Inventory. Currently, an additional 541 eligible units are in the development pipeline (183 of which are restricted, affordable units).

There is a clear demand for affordable homeownership housing in the City. Deed-restricted affordable ownership units make up only three percent of the City's inventory. Approximately 50 income-eligible households entered lotteries for 13 affordable homeownership units sold since 2012. The Department receives dozens of inquiries per month for affordable housing opportunities. A lottery agent hired to market the resale of an affordable one-bedroom unit received over 500 inquiries.

The 2013 median sale price of a condominium in Newton is \$465,000.³ Based on federal and state guidelines, which suggest that households spend no more than 30 percent of their gross income on housing costs, a household of four would need to earn \$135,000 to afford the median priced condominium. The proposed project will provide two ownership opportunities to households earning no more than \$73,200 (assuming a 5 person household).



³ The Warren Group, 2014 <http://rers.thewarrengroup.com/sor/tssearch.asp>

➤ **Unit Mix and Affordability.** The unit mix is provided in the chart below.

Unit Type	Total Units	Market Rate	Affordable	Percent Affordable	Total Unit Type
4-BR	5	3	2	40%	100%
Total	5	3	2	40%	100%

The Project is proposing two affordable 4-bedroom units, which is greater than the State’s policy of providing at least ten percent 3-bedroom units in a project. This policy ensures that new development provides some housing opportunities for families with children, which is a protected class under Massachusetts anti-discrimination law.⁴ The Project responds to the *Comprehensive Plan’s* goal of seeking housing stock that matches the social and economic diversity of Newton’s population, which **“requires increasing both rental and home ownership opportunities for the entire range of low, moderate, and middle income families, for starter households as well as for senior citizens.”**⁵ Housing demand for these household types is increasing throughout the region and the Department supports creating affordable units for families with children, which the Project will likely attract.

The proposed affordable units are larger than the Massachusetts Department of Housing and Community Development’s Local Initiative Program’s minimum square footage and bathroom requirements (1,400 square feet and two bathrooms) for a 4-bedroom unit. However, as earlier indicated, the affordable units are roughly half the size of the market rate units.

C. Previous Municipal Actions

In 2009, the Applicant requested and was denied a special permit petition (BO #388-09) for a rear lot subdivision, which, if approved, would have allowed the creation of two separate lots each containing a single-family dwelling.

The City has been proactive in the creation and preservation of affordable housing to meet existing needs through its existing financial and regulatory programs. The City has provided its support to development projects that provide a higher level of sustainability, accessibility and a greater percentage and mix of affordability. These projects and programs will create significant affordable housing opportunities in the City.

- **New Affordable Housing Development.** The City has expended substantial municipal and federal resources to create and preserve affordable housing. Since 2008, the City

⁴ M.G.L. Chapter 151B

⁵ City of Newton Comprehensive Plan, 2007 (page 5-12)

has provided more than \$7.5 million in Community Preservation Act (CPA), Community Development Block Grant, (CDBG) and HOME funds for affordable housing development projects. Over 30 percent of Community Preservation funds have funded the creation of affordable housing, which is 20 percent more than the regulatory requirement.

- **Inclusionary Zoning.** Newton was one of the first cities in the Commonwealth to enact an inclusionary zoning ordinance. The ordinance requires developments requesting a special permit to create 15 percent of the units as affordable to income-eligible households. Since its adoption in 1977, the ordinance has resulted in the creation of over 250 affordable units. The inclusionary housing ordinance has proven an effective tool as development activity increases due to strong demand. Fifty-six more inclusionary affordable housing units are currently in the pipeline.
- **Planning Efforts and Zoning Reform.** The Planning Department has docketed an item with the Newton Board of Aldermen to enable the creation of scattered, small housing developments with units priced substantially lower than is common without subsidies or deed restrictions. The City is also in the process of redeveloping a municipal parking lot to create a mixed-use project in Newtonville. Twenty-five percent of these units will be affordable. These local efforts will provide additional affordable housing options geared to singles, young couples and empty nesters.
- **Local Initiative Program/Chapter 40B Proposals.** The Department currently has two Local Initiative Program proposals that would yield 16 affordable units once constructed. This includes nine units of affordable homeownership housing in a 36-unit structure on 75-83 Court Street, and 7 affordable rental units as part of the rehabilitation and expansion of two dwelling units on 12 and 18-20 Curve Street. The Department is reviewing a Comprehensive Permit proposal to create 135 rental units at 70 Rowe Street, and the Zoning Board of Appeals is reviewing a Comprehensive Permit proposal that would create 334 units of rental housing at 135 Wells Avenue.

D. Traffic, Parking and Transportation Impacts

- **Traffic and Neighborhood Parking.** The Applicant did not provide a traffic impact assessment for the Project. The Applicant noted that the Project site is close to public transportation, specifically the Massachusetts Bay Transportation Authority's Route 52 bus stop, however this route has a limited schedule. While Goddard Street is frequently used as a pass-through for general traffic accessing the Needham Street corridor, most vehicle trips appear to be generated by the existing residents in the surrounding neighborhood.

The Department has no particular concerns with the number of vehicles potentially added to this roadway as result of the Project. The City's Transportation Division of Public Works believes Goddard Street will be able to accommodate the net increase in the number of vehicles trips generated by the Project.

- **Site Access.** The Project will provide vehicular access to Goddard Street via a common drive, which appears to be approximately 20 feet wide and is located on the western side of the site. Individual driveways connect each garage to the common drive. As currently proposed, the Project's common drive will be located approximately 10 feet from the property line with 55 Goddard Street. The Department is very concerned with the lack of separated pedestrian access from the site to Goddard Street. The Applicant should incorporate a walkway on the site linking each proposed dwelling unit to Goddard Street, thus minimizing the potential for pedestrian and vehicular conflicts. The Applicant should also evaluate whether the proposed planting location adversely impact visibility and site lines at the entrance. The Applicant must provide additional information regarding the legal arrangement for the on-going maintenance of common infrastructure in order to ensure the responsibility for maintaining this infrastructure is not unnecessarily burdensome for the affordable dwelling units.
- **On-Site Residential Parking.** The Project is proposing ten parking stalls, two parking stalls per dwelling unit, on the site. For each of the market rate units, the Applicant is proposing an attached garage that will accommodate two vehicles. Whereas, the Applicant is proposing an attached garage for the affordable dwelling units that will only accommodate one vehicle. As such, each of the affordable units will have one unenclosed parking stall tandem stacked in front of the garage. The Department believes that the proposed number of parking stalls will be sufficient when considering the unit sizes, likely demographic of potential buyers, and access to public transportation.
- **Access to Public Transportation.** The Project site is proximate to the Massachusetts Bay Transportation Authority's Route 52 bus stop and other bus routes on Needham Street, which does provide access to the Green Line. The Department has no particular concerns with the Project's access to public transportation but notes that service is limited and may not be sufficiently convenient to deter vehicle trips.

E. Summary of Concerns

The Department is concerned about the impact of the Project on the surrounding neighborhood, particularly in terms of the topographical alterations proposed for the site, which will significantly change on- and off-site drainage patterns, and transform how the site interacts with abutting properties and the street. The Department strongly encourages the Applicant to consider the reconfiguration of the site to respond to the existing topography and to allow for more natural open space, especially adjacent to the proposed affordable units. Furthermore, the Application should install an on-site walkway to facilitate pedestrian access from the interior of the site to the street. We also recommend the the Applicant reduce the massing and height of the units so as to reduce the disparity between

the market rate units and the affordable units, and to be more in keeping with the surrounding single-family neighborhood.

Please do not to hesitate to contact me if you have any questions about the contents of this letter.

Sincerely,



James Freas
Acting Director, Planning and Development Department

Cc Mayor Setti D. Warren
Donnalyn B. Lynch Kahn, City Solicitor
Mark Schwarz, Marcus Lang Investments, LLC
Edward Marchant, EHM / Real Estate Advisor
Alderman Cheryl Lappin
Alderman Richard Lipof
Alderman David Kalis

Attachments:

ATTACHMENT A: Neighborhood Comment Letters Received
ATTACHMENT B: Newton Housing Partnership Letter, dated October 20, 2014

From: John Koot [mailto:jkoot@verizon.net]
Sent: Friday, October 10, 2014 4:26 PM
To: 47 Goddard Street
Cc: Cheryl Lappin; David Kalis; Rick Lipof
Subject: Please reject the application for a 40B project on this site

To the Planning Department:

I believe that the proposed construction of four residences (one consisting of two affordable units) on this 23,000+ sq.ft. lot is inappropriate for the following reasons:

- The houses are too large for the lots allocated to them, creating an overly-dense development. While there are some houses in the neighborhood on old 5,000 sq. ft. lots, those homes are considerably smaller both in height and floor area. In addition, even under old-lot standards, the minimum lot size in a Single Residence 3 (SR3) zone is 7,000 sq. ft.
- The fact that each of the residences contains 4 bedrooms implies that there could easily be two cars associated with each household, That would mean ten cars exiting from a single driveway multiple times per day, creating traffic contention on what is a busy cut-through street on which cars tend to pick up speed as they come down the hill from Winchester St, just at the point of approaching what would be the driveway for the site.
- The way each house fills its lot means that there is very little yard space in which children could play, yet the number of bedrooms in each residence seems designed to attract families with children. I am concerned that the children would be drawn to wander down the hill into the wetlands to enjoy the water and mud which, though enjoyable, could also be dangerous.
- The location of the building site upslope of the wetlands, and the necessary regrading of the lot means that drainage is a major consideration. The large-scale removal of trees required to permit construction of the 4 buildings is bound to increase runoff, as will both the large expanses of roof and the long paved driveway that will run from the front to the back of the property, some 210 feet. I worry about the effects on the conservation area.
- Although the developer and his consultant have stated that the site is served by public transportation, this is misleading. While it's true that the stop for the No. 52 MBtA bus on Winchester St. is only a few hundred yards from the lot, that bus runs infrequently (5 or 6 times per day) and at hours inconvenient for a working person. The first northbound trip (i.e. heading towards the Newton Highlands T stop and the Watertown Yard) on a weekday morning comes about **10:45**. The first southbound trip (heading towards the Dedham Mall) comes about 8:45. And the last trips in the evening are about 7 p.m. The bus doesn't run at all on weekends. The No. 59 bus on Needham St., fortunately, runs at least 10 times per day, including an early morning trip to Newton Highlands, but it's about a half-mile walk to the nearest bus stop, along a route that's difficult to negotiate in bad weather.

Thank you,

John Koot
430 Winchester Street

From: Diane Dion [<mailto:dianecarasikdion@gmail.com>]
Sent: Friday, October 10, 2014 2:30 PM
To: Robert Muollo
Subject: Re: 47 Goddard Street

To: The Newton Housing Partnership
Re: 47 Goddard Street proposal
Date: 10.10.14

This project is highly questionable in a number of aspects, including wetlands impact and extreme density. It shoe-horns an excessive number of structures and, if commercially successful, people into insufficient space.

The best thing about this project is the single structure with two 40B units, but as it stands, with three additional structures, it would be massively overbuilt for this site.

Submitted by:
Arthur and Diane Dion
409 Winchester Street (corner of Goddard)
Newton Highlands 02461

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DIANE DION
Writer • Editor • Wordsmith
[617.959.1592](tel:617.959.1592)
dianecarasikdion@gmail.com

From: Paul Crowley [<mailto:mchmss77@gmail.com>]
Sent: Friday, October 10, 2014 2:31 PM
To: 47 Goddard Street; Robert Muollo
Subject: Re: Public comments

Hello, please note the correction, in red below, to my earlier email.

Thank you, Paul Crowley

This data shows that the lots proposed at 47 Goddard are smaller, and the **average** House Size square footage are larger than the average current Goddard St house. This leads to much more density than currently exists in the neighborhood.

Please note the differences in the House Size / Lot Size ratio between current houses and the proposed development...the proposed development is much more dense.

Also note the average story height of current Goddard St houses.

Goddard St is very narrow and on-street parking creates traffic jams. Given the number of parking spots that will be required on-site by this development, and the concentrated density shown below, will there be enough green space / play area on these lots?

Thank you for your consideration,

Paul Crowley

423 Winchester St

On Fri, Oct 10, 2014 at 11:08 AM, Paul Crowley <mchmss77@gmail.com> wrote:

Below please find information from the Newton Assessors database and the Comprehensive Permit Site Approval Application for the proposed 47 Goddard St development. This data shows that the lots proposed at 47 Goddard are smaller, and the House Size square footage are larger than the average current Goddard St house. This leads to much more density than currently exists in the neighborhood.

Please note the differences in the House Size / Lot Size ratio between current houses and the proposed development...the proposed development is much more dense.

Also note the average story height of current Goddard St houses.

Goddard St is very narrow and on-street parking creates traffic jams. Given the number of parking spots that will be required on-site by this development, and the concentrated density shown below, will there be enough green space / play area on these lots?

Thank you for your consideration,

Paul Crowley

423 Winchester St

Goddard St
houses

Address	Lot size (s.f.) * * per Newton Assessor's database website 10/9/14	Front. (f.)	House size (s.f.) *	Story height *	House size s.f / Lot s.f. ratio
11 Goddard St	16,000	100	2,696	1	.17
17 Goddard St	8,000	50	1,674	1.75	.21
21 Goddard St	8,000	50	2,994	2.5	.14
22 Goddard St	5,000	50	2,058	2.75	.41
27 Goddard St	16,487	100	1,976	1.75	.12
32 Goddard St	10,000	100	832	1	.08
33 Goddard St	9,462	50	1,089	1	.12
37 Goddard St	10,437	50	2,264	2	.22
38 Goddard St	5,000	50	1,899	1.75	.38
42 Goddard St	5,000	50	1,456	2	.29
48 Goddard St	10,000	100	2,284	1	.23
54 Goddard St	10,000	100	2,596	2	.26
55 Goddard St	27,696	100	1,360	1	.05
66 Goddard St	10,000	100	1,120	1	.11
72 Goddard St	10,000	100	2,900	2	.29
80 Goddard St	7,000	70	1,152	1.5	.16
86 Goddard St	7,000	70	1,444	1.75	.21
Goddard St - current averages	10,299		1,870	1.63	0.20
<u>Per</u>					
<u>Comprehensive</u>					
<u>Permit Site</u>					
<u>Approval</u>					
<u>Application</u>					
47 Goddard - #1	7,747		4,275		.55
47 Goddard - #2	5,000		3,480		.70
47 Goddard - #3	5,000		3,480		.70
47 Goddard - Avg #4 and 5	3,125		1,607		.51

47 Goddard - Avg #4 and 5	3,125	1,607	.51
47 Goddard averages	4,799	2,890	0.59

Dear Members of the Newton Housing Partnership,

My name is Alan Filzer and I and my family reside at 27 Goddard St. I urge you not to approve the building of 5 housing units on the 47 Goddard St property. The 23,500 sf lot is zoned for a single family home. In 2010 the Bd of Aldermen did not approve the developer's request to build 2 homes on the site. Consideration for the adjacent wetlands, drainage, ledge, topography, and traffic safety was carefully considered by the aldermen.

In the new proposal one house alone at 4275 sf is larger than any house on all of Goddard St. Adding the other 4 units will mean that more than 14,000 sf of homes would be constructed. This would have a huge and detrimental impact on the entire Goddard, Christina, Charlemont area.

On Oct. 8, 2014 the developer Mark Schwarz in his discussion before you stated "that in recent years the city has moved to expand building on PRE EXISTING 5000 sf lots". There are no pre existing 5000 sf lots on the 47 Goddard St property.

The sewage drainage issue of 5 housing units is of paramount concern and will certainly affect the wetlands.

The traffic density and increase of at least 8 to 10 cars will affect our entire street negatively. The entire scope of this project is beyond anything in the Goddard , Christina and Charlmont st area. No one has ever objected to any single family home to be built on the 47 lot property.

After reviewing the plans for the project it is abundantly clear that the developer is using the 2 40 B units as a veneer to get his 3 market rate buildings approved in order to circumvent the 1 family zoning designation of the Goddard st area.

The 2 40B units are the smallest of the project and are tucked in on the property. What is also quite evident in spite of Mr. Schwarz's statement is that there are no nearby parks and play spaces near the property. The nearby conservation area at the junction of Christina and Goddard streets is a restricted conservation area, not a park, and certainly not a play area.

In response to a question posed regarding public transportation Mr. Ed Marchant working on the developoer's behalf states "the bus stop is only 850 ft away". That is almost 3 football fields away. It is not close by, as implied by Mr. Marchant.

I urge the NHP not to be misled by this obvious ruse and not allow this complete perversion of the intent and spirit of the 40B statute to occur.

Sincerely,

A. Filzer

Dr. A. Filzer

Director Dept of Dentistry

Boston Health Care For the Homeless

780 Albany St

Boston Ma. 02118
phone 857 654 1885

From: Paul Crowley [mailto:mchmss77@gmail.com]
Sent: Friday, October 10, 2014 11:08 AM
To: 47 Goddard Street
Subject: Public comments

Below please find information from the Newton Assessors database and the Comprehensive Permit Site Approval Application for the proposed 47 Goddard St development. This data shows that the lots proposed at 47 Goddard are smaller, and the House Size square footage are larger than the average current Goddard St house. This leads to much more density than currently exists in the neighborhood.

Please note the differences in the House Size / Lot Size ratio between current houses and the proposed development...the proposed development is much more dense.

Also note the average story height of current Goddard St houses.

Goddard St is very narrow and on-street parking creates traffic jams. Given the number of parking spots that will be required on-site by this development, and the concentrated density shown below, will there be enough green space / play area on these lots?

Thank you for your consideration,

Paul Crowley

423 Winchester St

Goddard St
houses

Address	Lot size (s.f.) * * per Newton Assessor's database website 10/9/14	Front. (f.)	House size (s.f.) *	Story height *	House size s.f / Lot s.f. ratio
11 Goddard St	16,000	100	2,696	1	.17
17 Goddard St	8,000	50	1,674	1.75	.21

21 Goddard St	8,000	50	2,994	2.5	.14
22 Goddard St	5,000	50	2,058	2.75	.41
27 Goddard St	16,487	100	1,976	1.75	.12
32 Goddard St	10,000	100	832	1	.08
33 Goddard St	9,462	50	1,089	1	.12
37 Goddard St	10,437	50	2,264	2	.22
38 Goddard St	5,000	50	1,899	1.75	.38
42 Goddard St	5,000	50	1,456	2	.29
48 Goddard St	10,000	100	2,284	1	.23
54 Goddard St	10,000	100	2,596	2	.26
55 Goddard St	27,696	100	1,360	1	.05
66 Goddard St	10,000	100	1,120	1	.11
72 Goddard St	10,000	100	2,900	2	.29
80 Goddard St	7,000	70	1,152	1.5	.16
86 Goddard St	7,000	70	1,444	1.75	.21

Goddard St -
current
averages 10,299 1,870 1.63 0.20

Per
Comprehensive
Permit Site
Approval
Application

47 Goddard - #1	7,747		4,275		.55
47 Goddard - #2	5,000		3,480		.70
47 Goddard - #3	5,000		3,480		.70
47 Goddard - Avg #4 and 5	3,125		1,607		.51
47 Goddard - Avg #4 and 5	3,125		1,607		.51
47 Goddard averages	4,799		2,890		0.59

To: The Newton Housing Partnership
Re: 47 Goddard Street proposal
Date: 10.10.14

This project is highly questionable in a number of aspects, including wetlands impact and extreme density. It shoe-horns an excessive number of structures and, if commercially successful, people into insufficient space.

The best thing about this project is the single structure with two 40B units, but as it stands, with three additional structures, it would be massively overbuilt for this site.

Submitted by:
Arthur and Diane Dion
409 Winchester Street (corner of Goddard)
Newton Highlands 02461

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DIANE DION
Writer • Editor • Wordsmith
[617.959.1592](tel:617.959.1592)
dianecarasikdion@gmail.com

Hello,
I have attached comments from the Murtagh's of 46 Charlemont Street.
Thank you.
Michael F and Caroline V Murtagh

October 10, 2014

City of Newton
Department of Planning and Development
City Hall
Newton, MA

Via email

Re: 47 Goddard Street proposal

Hello,

We are one of the north side abutters to the 47 Goddard Street proposed development. I (Mr. Murtagh) attended the hearing on Wednesday, October 8th at City Hall.

We oppose this proposal for a number of reasons, most of which have been echoed by our neighbors in their letters of opposition already sent to you. I know that ALL abutters, save possibly the owner of the west boundary of the proposed project, are against this development. The fact that so many of the abutters and neighbor's are against this should be reason enough for you to pass on this proposal.

Simply stated, this lot is zoned for a single house. The 40B application to put 5 units should not be considered, as there are many aspects of the plan that do not truly fit the needs of those looking for affordable housing in Newton. From what I heard at the hearing it seems the need for these units is in question. While I would not question the developer's motives for providing affordable housing units in order to qualify for the 40B exceptions to zoning, it seems that the plan is to stuff two units with the same amount of rooms as the non-affordable units, into half the space of those units. With 4 bedroom units, there is a likelihood of those homes housing children. There is no consideration to outdoor space on this lot for this. Using the "It's Newton, there are plenty of playgrounds around." answer should not suffice. The affordable housing part of this seems insincere and not well thought out.

The so called "Goddard Swamp" might be technically called a swamp but it is home for many species of wildlife. I am not sure cramming these buildings into this space will do anything but affect this delicate area negatively. It is also important to note that one of the abutters described the ravine that runs through the north side of the property. In looking at that from my back yard it is easy to see how that goes away with this plan.

At the meeting it was said that this proposed project looks similar to that at 192 Lexington Street in Newton. A look at that property shows a much different neighborhood than the Goddard Street locale. There may be some houses on that street near the project; however,

across the street are all apartment buildings. This area is that of small single family homes with the exception of the eyesores currently on Charlemont Street.

I would also like to point out a technical note that I have not heard from anyone else yet. In looking at the plot lines on the 47 Goddard Street proposal, they do not match those that are found of the City of Newton Assessor's database map. On the Assessor's website 46 Charlemont and 42 Charlemont share the north side line of the proposed project. On the developer's plans the lines almost totally align with my 46 Charlemont property line. Is there someone on your committee that can look into this?

Thank you for the opportunity to comment on this project. Please keep us informed about any updates or meetings that come up concerning this project, as we are very concerned about this proposal.

Sincerely,

Michael F. Murtagh

Caroline V. Murtagh

46 Charlemont Street
Newton, MA 02461

From: Sally Pomeroy [mailto:sallypomeroy@rcn.com]
Sent: Thursday, October 09, 2014 12:40 AM
To: 47 Goddard Street
Subject: Comments on Development of 47 Goddard Street

Dear Ms. Ananth and Mr. Freas,

I received your letter of September 25 regarding the proposed construction on 47 Goddard Street. As requested, I have attached my comments for your evaluation of the project.

Please let me know if you have any questions, or need further clarification.

Best Regards,
Sally Pomeroy

28 Charlemont Street
Newton, MA 02461

October 8, 2014

Mr. James Freas, Acting Director
Ms. Alexandra Ananth, Chief Planner for Current Planning
Department of Planning and Development
1000 Commonwealth Avenue
Newton, MA 02459

Re: 47 Goddard Street

Dear Mr. Freas and Ms. Ananth,

Thank you for providing the information and opportunity to reflect and respond on the proposed development of 47 Goddard Street by Marcus Lang Investments LLC project.

I have read Mr. Schwartz's application at: <http://www.newtonma.gov/gov/planning/> as well as the attachments. There are several inconsistencies throughout the documents as filed. I want to comment on a few of those troubling sections.

As recently as 2010, Mr. Schwartz was denied special permits for a project on this same property. At that time Mr. Schwartz was seeking a rear lot subdivision in order to construct 2 large houses, requiring extensive excavation of the sloped property and the erection of retaining walls in excess of 4 feet. There is a shear drop off at the rear of the lot, and a protected wetlands within a few hundred feet of the property.

1. Topography

In Mr. Schwartz's Narrative Description of Design Approach he states that the general topography surrounding the project area is relatively flat with some slopes and goes on to state there is a significant grade difference which will require retaining walls, including parking areas to be screened by retaining walls, with a series of stone retaining walls placed in terraces.

This property is located in the middle of a steep hill on a street with high volume of traffic. Goddard Street is a cut thru from Needham Street to Winchester Street for drivers trying to avoid the congestion of Needham Street. With the redevelopment of Needham Street and Needham Industrial Park into the N2 Corridor, the traffic will most likely increase not decrease.

The topography of the property will be substantially altered. The excavation for the underground parking and foundation levels of the proposed structures will necessarily remove a significant portion of the sloped property.

Excessive Paving:

Page 10 of Mr. Schwartz's Application for Chapter 40B Eligibility, the section Parking states there will be 16 parking spaces or parking for 3.2 cars per unit. Considering the size of the typical SUV, I cannot understand how there is enough space for all those cars and the houses and

still have 51.7% usable open space. Perhaps the sheer drop at the rear of the property is counted as usable open space? The two lane driveway will pave over what little space there is between the houses and the edge of the property.

Environmental Impact:

Additionally, the paving of a 2 lane driveway the length of the property, bordered by stone retaining wall could have a serious detrimental effect upon the protected wetlands in the Goddard-Christina Conservation Area by interrupting the natural flow of water into the wetlands which feed into the Charles River.

Excessive Height:

The project design is not generally appropriate for the site. The houses are too large and too dense for the site . Mr. Schwartz states the heights of the proposed houses are consistent with the neighborhood, typically 2.5 stories. The description of the proposed houses are 4 stories -. however, the language used to describe the stories is intentionally deceptive. Instead of calling the first level the basement floor, he calls it the lower level, then a first floor, second floor and the top level is called the attic level, not a 3rd floor. The attic level consist of bedrooms and bathrooms, it is living space .. not rafters and storage space - 4 stories are not in character with the neighborhood.

Affordability Question:

This project will have the effect of removing affordability from the neighborhood. This is a neighborhood zoned single residence that is under attack from developers. The smaller, modest homes are being bought up by developers at more than asking price, knocked down and replaced with very large, very expensive homes which are out of the reach of many of the current residents. (Please visit Wallace Street, Carl Street, Winchester Street, and the 2 houses on Charlemont Street that are currently being demolished for this purpose.)

Mr. Schwartz proposes to build 4 new structures for 5 family units, 3 of which are intended to be priced well over ONE MILLION DOLLARS, on a lot zoned for a single house. The front house, will be two large condominium units- not a single family residence, which after the “affordable” price will also have to pay taxes, possible fees for trash removal in addition to condo fees paid to Mr. Schwartz. Who will determine the other common area maintenance fees for the Condo and the Village? I wonder if someone purchasing a \$1.5 Million home has any idea of the budget constraints of someone trying to purchase an affordable \$225K home.

At least there won't be any landscaping fees... I don't see any lawn to mow, or play areas to keep trimmed. I guess there won't be any children in any of those 4 bedroom houses.

Thank you for taking the time to read my initial thoughts on this matter.

Very truly yours,

Sally B. Pomeroy

From: Johannes Fruehauf [mailto:jofruehauf@gmail.com]
Sent: Sunday, October 05, 2014 11:16 PM
To: 47 Goddard Street
Cc: Alexandra Ananth
Subject: Comments regarding proposed project on 47 Goddard Street

Dear Newton Planning Department,

dear Alexandra Ananth, dear James Freas,

thank you very much for inviting comments from neighbors regarding the proposed development on 47 Goddard Street.

I am a direct neighbor to the 47 Goddard lot on Charlemont street and my property directly abuts the proposed development. I do have a number of concerns based on the questions and criteria given to determine Project Eligibility by MassHousing. For convenience, I have outlined my concerns in the attached letter.

Unfortunately I will be unable to attend the Newton Housing Partnership meeting on 10/8 but I hope that the neighbors' concerns will be heard and included in the city's deliberations.

thank you for your consideration,

Johannes

Johannes Fruehauf MD
42 Charlemont Street
Newton MA 02461

617.331.0523
jofruehauf@gmail.com

Johannes Fruehauf MD
42 Charlemont Street
Newton MA 02461

To
City of Newton
Department of Planning and Development
James Freas Acting Director Via e-mail
Cc: Alexandra Ananth, Chief Planner for Current Planning

Dear Sir,

In response to your letter dated September 25, 2014, please allow me to submit my comments to the project planned for 47 Goddard Street, Newton:

I am a concerned neighbor and direct abutter to the property in question. Based on the observations listed below I believe the Subsidizing Agency should decline Project Eligibility for this project based on the fact that it is not appropriate for the proposed site.

My assessment is in response to your request for comments on the following aspects:

1. Building massing:

The project proposes to build 5 residential units on a lot which is zoned for a single dwelling. All neighboring construction is single family houses of modest size and the character of this neighborhood is characterized by its wooded lots and free spaces. The proposed project not only disregards this existing character but also destroys and cannibalizes the contingent wooded area between Goddard and Charlemont streets.

2. Topography:

The project is to be built on a vacant lot with challenging and steep grades. This topography, presumably, is the reason that this large lot has so far been undeveloped within a desirable neighborhood of Newton. Building the proposed development (with 4 large structures, a double-lane driveway, extensive retaining wall structures and pavements) on this lot will result in significant grading changes and will significantly influence the protected wetlands located just 150 feet downstream of the property.

3. Environmental resources:

The project disregards the existing use of land in the area. Aerial photographs demonstrate that the center area between Charlemont and Goddard streets – the respective “backyards” of the homeowners- has been preserved as a contiguous wooded area extending from the wetlands all the way up the steep slope. This area is not fenced by any of the abutters and provides regular paths to a wide variety of wildlife. The proposed development will disrupt the movement of wildlife in this area significantly. Furthermore, the lot is located directly upstream of a protected wetlands area (Goddard-Christina Streets) on a steep hill providing runoff and groundwater supply. The proposed grading changes, massive construction and paving will significantly impact the water flow towards this wetlands area. The proposal does not sufficiently address this issue and does not provide an explanation or study of environmental impact on the wetlands.

4. Integration into existing development patterns:

The proposed project is not in line with the existing, low-density development of the area. The neighbors are very concerned with the use of the lot for multiple buildings because of the impact of the increased density.

On these grounds the Board of Aldermen rejected a request for a zoning exemption by the same developers for this same project in 2010.

Thank you for inviting our comments, and I look forward to providing further stakeholder input into this process where appropriate.

Please do not hesitate to contact me if I can assist with any additional information at this point. My phone number is 617 331 0523.

Best regards,



Johannes Fruehauf MD

From: Linda Green [mailto:greenmiller@comcast.net]
Sent: Thursday, October 02, 2014 11:44 PM
To: 47 Goddard Street
Cc: dan.miller@goddard-associates.com
Subject: Comments on this project

I live at 54 Goddard Street, diagonally across the street and to the west of the property. I reviewed the application and the site plans available on the City's website.

I begin by saying that Newton needs more affordable housing. I have some concerns that I would like the applicant to address so that the new development will be a better fit in our neighborhood.

I have the following comments and concerns about the application:

On page 7, the applicant states that a nearby MBTA bus stop is served by the 52 bus. The applicant did not report that this bus runs north along Winchester just five times a day and runs south just six times a day. The earliest weekday bus towards Newton Center is just before 10:50 AM, long after rush hour and there is no evening or weekend service. The applicant should not cite this minimal service as qualifying public transportation – it's clear that residents will have to rely on personal vehicles.

The applicant should commit to using appropriate materials to construct the retaining wall at the street front: According to the plans, a wall will line the edge of the property along the sidewalk. This wall curves around the driveway and will be fully visible from my property. The applicant should select materials for the wall that are in keeping with residential construction. Large precast concrete blocks such as those placed at the new construction on Winchester Street just north of Charlemont are inappropriate and out of scale with the neighborhood. Natural stone is far preferable to precast blocks of any kind. The applicant should also provide drawings of the street front elevation showing the wall and landscaping so that we can understand the commitment to a wall that ranges between two and five feet high in height as measured from the sidewalk.

The applicant should ensure that neighbors are shielded from lights installed on and around the properties: Lights along the driveway and on the west and south sides of Lot 3, 4&5 will be directly visible from my property. The applicant should ensure that all lighting points downward. No lights should be unshielded or shine upwards. Light pollution for neighboring properties, including across the street, should be controlled.

The applicant should plant mature trees. The site is currently all woods. The construction process will clear out a lot of the trees. The applicant should plant large trees at the street front and along the edge of the western border of the property to maintain the sense of privacy and green space that currently characterizes the area.

The applicant should ensure sufficient off street parking for residents: The plans are not clear about where the 16 spaces are located. Lot 4&5 each have one car garages; Lots 4&5 have two car garages, for a total of 8 garage spots. Given the inadequate access to public transit, Lot 4&5

owners could be reasonably expected to own two cars. Goddard Street is an extremely busy cut through for hundreds of cars a day traveling between Needham Street and Dedham/Parker. While the City asserts that the street is not unusually narrow, drivers going in opposite directions cannot pass if there is an on-street parked car. The applicant should ensure that each unit has designated parking for at least two cars so that residents do not de-facto park on the street.

The applicant should provide off-street parking during construction and ensure that it is used by workers: Construction workers typically park on the street during a project. Goddard Street is relatively narrow, and on street parked cars shrink the travel lanes from two to one. Traffic slows to a stop when oncoming cars have to decide who gets to go first. People are not good at taking turns, and anything that makes this situation more complex is dangerous. The applicant should create off street parking for workers.

The applicant should describe the plan for snow removal on the property: This neighborhood has been conscientious about keeping the sidewalks clear during the winter, particularly because many children walk down Goddard Street to reach the school bus stops for all three schools. I would like to see where residents (or their plowing service) has a place to put snow and avoid creating huge snow piles that block the sidewalk. Given that the City has a snow clearing ordinance, the applicant should explain how this site plan will enable residents to comply.

Give neighbors a break and start later on Saturdays: Though the City's noise ordinance calls for work to start no earlier than 8 AM on Saturdays, workers typically arrive earlier and begin set up as early as 7:15 or 7:30AM. I strongly recommend that the applicant direct his crews to start no earlier than 8:30 AM on Saturdays.

Thank you for your attention to my concerns.

Linda Green
617.244.0764

Lucille Keril,
37 Goddard Street,
Newton,MA02461

To:City of Newton
Department of Planning and Development
James Freas
Acting Director
Via e-mail
Cc:Alexandra Ananth, Chief Planner for Current Planning

Thursday, October 4, 2014

Dear Sir,

I live at 37 Goddard Street, next door to the 47 Goddard Street project.

This project has morphed from a 2 house plan denied in 2010 by the city, into a more extreme version of 5 residences in an area zoned for single family homes.

Not only is this plan too dense but destroys the character of the neighborhood as the houses are lined back from the street into the woods that all abutters have left untouched.

In this neighborhood all houses line the street, none are set back and with this, 47 Goddard would be incongruent.

The conservation area on the corner of Goddard and Christina streets, established in the 1960's, encroaches upon 55 Goddard (abutting 47) bringing the wetlands within 100 feet of this project.

Building 5 residential units on this steep and challenging lot requires drainage systems that would then preclude any natural run off from the slopes starting higher up on Goddard and Charlemont streets and risk the viability of the wetlands.

This 47 Goddard street project is massive housing on a scale totally inappropriate for this forested neighborhood on a street which already has one disputed development and high volume traffic from unresolved issues on Needham street.

Clearly the developer is using affordable housing as leverage to get exemptions and waivers from city building regulations to ram through this outrageous project and maximize his profits.

Please do not hesitate to contact me if I can assist with any additional information.



CITY OF NEWTON, MASSACHUSETTS

Newton Housing Partnership

October 20, 2014

Michael Busby
40B Program Specialist
Massachusetts Housing Finance Agency
One Beacon Street
Boston, MA 02108

Setti D. Warren
Mayor

James Freas
Acting Director
Planning & Development

Robert Muollo
Interim Housing Programs
Manager

Members

Dan Violi, Chair
Matt Yarmolinsky,
Vice-Chair
Andrew Franklin
Judy Jacobson
Phil Herr
Peter Macero
Lynne Sweet
John Wilson

Re: 47 Goddard Street Project Eligibility Letter Application

Dear Mr. Busby:

The Newton Housing Partnership, the City of Newton's advisory committee on affordable housing development proposals, held a public meeting on October 8, 2014 with Mr. Mark Schwarz of Marcus Lang Investments, LLC (the "Applicant"), regarding the 47 Goddard Street proposal. The Partnership did not make a recommendation at the meeting. At this time, we offer the following comments and observations for MassHousing's consideration.

- We appreciate the provision of two (2) deed-restricted, affordable homeownership units, which is above the required number under M.G.L. Chapter 40B. However, we are concerned about the marketability of four-bedroom affordable units. A poll of affordable housing lottery agents concluded that little demand exists for this number of bedrooms.
- Given the likelihood that children will occupy these units and that neighbors described Goddard Street as a "cut-through" street to avoid traffic, we strongly suggest that the Applicant add a walkway within the site to enhance pedestrian safety and that the Applicant increase outdoor play space.
- The Applicant should provide the calculations used to determine the affordable unit pricing. There was concern expressed about the sustainability of a moderate-income household maintaining a 1,607 square foot home with 4 bedrooms and 3 and ½ baths.
- We seek further clarification on the proposed easements and other legal mechanisms used to provide access for each homeowner. We also seek further clarification regarding any impact the proposal may have on the wetlands located near the property.
- We suggest that the dwelling unit proposed on Lot 1 be designed as accessible, and that the Applicant incorporate visitability in the remaining units.
- We ask for further clarification on the parking arrangement for owners and guests, as well as how trash and snow removal will be handled.
- We ask that the Applicant further articulate the development team's fair housing and affirmative marketing capacity.

1000 Commonwealth Ave.
Newton, MA 02459
T 617/796-1120
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www.newtonma.gov

CITY OF NEWTON, MASSACHUSETTS
Newton Housing Partnership

Thank you for including our comments in MassHousing's evaluation of the 47 Goddard Street Project Eligibility Letter Application. It is our hope that the Applicant will meet again with the Partnership if MassHousing grants a Project Eligibility Letter. If there are further questions for the Partnership please let me know.

Very truly yours,



Matthew Yarmolinsky, Vice Chair

Cc Mark Schwartz, Marcus Lang Investments, LLC
James Freas, Acting Director
Newton Housing Partnership