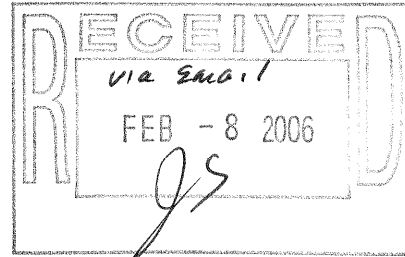


February 7, 2006

William Chin, Chair
Zoning Board of Appeal
c/o Jay Szklut, Planning and Economic
Development Manager
Homer Municipal building
Belmont, MA 02478



**Re: 40B Uplands Proposal
- Residences at Acorn Park**

Dear Mr. Chin:

This letter expresses concerns over sustainable design.

We have reviewed Section 11.0. Sustainable Design of the Chapter 40B Application (the “40B Application”) by AP Cambridge Partners II LLC (the “Applicant”). The Applicant is proposing the development of 299 units of housing including 60 affordable units (the “Project”) on a 15.6 acre parcel on the Belmont/Cambridge border referred to as the “Uplands.”

In the following, first we have copied from the 40B Application in light italics the full text of Section 11.0 SUSTAINABLE DESIGN copied from the 40B Application and broken down by sections consisting of a restatement of the “Guidelines for Project Consistency with the Commonwealth’s Sustainable Development Principles” dated September 19, 2005 (the “Guidelines”) and the Applicant’s answers thereto; which was omitted by the Applicant but which we believe is relevant to our review of the Applicant’s answers to these Guidelines; second we have highlighted in bold regular type wording from the Guidelines; and third we have inserted in bold italics our response to the Applicant’s answers to these Guidelines.

11.0 SUSTAINABLE DESIGN

To insure a strong economic future for the state and a high quality of life for its residents the Commonwealth of Massachusetts created 10 Principles of Sustainable Development. These principles guide a comprehensive approach to housing and community investment in a way that respects landscape and natural resources. The Commonwealth believes that sustainable development can and should take place in all communities and that by bringing the housing market into equilibrium the state can attract new businesses and make strategic land use choices

Toward those ends, projects seeking funding from the Department of Housing and Community Development, financing from MassHousing, MHP, MassDevelopment or CEDAC, or seeking a c. 40B determination of project eligibility from a subsidizing

agency must be consistent with the Principles of Sustainable Development. New development will ideally utilize existing infrastructure and be located near transit, in or around downtowns, village centers, areas of concentrated development or destinations of frequent use. If the project is not in one of these preferred locations, it must offer some other features, such as land protection, enhanced energy efficiency, context sensitive site design and/or be consistent with a regional strategy, that taken together, increases the sustainability of the development. Each proposal will be evaluated for competitiveness in the context of site design and appropriateness of location. This project is seeking a 40B determination of eligibility, and the applicant is committed to developing a sustainable project. Consequently, the proposed apartment building will meet or exceed the requirements that project's seeking state support must meet.

To meet those requirements, this project would have to demonstrate that it either:

(1) contributes to the revitalization of a downtown or neighborhood and/ or is walkable to transit, housing, downtown, a village center, a school, a library, retail, services, employment; or

(2) can meet five of the Commonwealth's 10 Principles of Sustainable Development. Be consistent with at least five (5) of the following Sustainable Development Principles. For projects that involve new construction (except housing projects that meet the Redeveloped First principle above), one of the five (5) must be either Concentrate Development or Restore and Enhance the Environment.

As described below, the proposed project can make both of those demonstrations. The Commonwealth's sustainable design principles are shown in italics below and are followed by a description of the project's consistency with each principle.

For subsection (i), the Project does not contribute to revitalization of a downtown or neighborhood. For walkability, there is only one bus which stops on Frontage Road and Lake Street connecting Arlington and Harvard Square but that bus does not go to either the Alewife T Station or Belmont Center. The proposed pedestrian path to the Alewife T Station would be difficult and long to walk each day in bad weather or with groceries and children. The Applicant shows no sidewalk improvements. There are no details on the proposed shuttle to Alewife. Otherwise the site is inaccessible rather like an island on the edge of the community, especially for the handicapped or for transportation to the schools, the library and Belmont Center, the nearest commercial center.

11.1 Concentrate Development

Examples of ways projects could satisfy this include:

- ◆ *The project is at a higher density than the surrounding area.*
- ◆ *The project mixes uses or adds new uses to an existing neighborhood.*
- ◆ *The project produces multi-family housing.*
- ◆ *The project is infill development.*
- ◆ *The project utilizes existing water and/or sewer infrastructure.*
- ◆ *The project is compact and/or clustered so as to preserve undeveloped land*

The project is consistent with the principle of concentrating development. It proposes to develop housing at a higher density than the density surrounding the site. It adds a new use to the area, which includes commercial development on Route 2, the Cambridge Discovery Park (an office park), and lower density residential development. The project will leave approximately 55 percent of the site undeveloped. The applicant will protect 7.0 acres from development by placing them under a Conservation Restriction. The applicant has committed to make certain improvements to the 7.0 acres proposed to be protected under a Conservation Restriction and to maintain the protected area in perpetuity. The project will connect to existing water supply and sewer infrastructure.

Six examples are given. The Project meets only the following three of the six examples and these are not necessarily positive in impact: higher density than the surrounding area, multi family housing, and proposed clustered/compact with conservation restriction on seven acres. However, most of the land being made subject to the conservation restriction is wetland, wetland buffer, flood plain, and riverfront. Higher density of the Project does not restore or enhance the environment. The Project does not add new uses to an existing neighborhood since it is currently open space across a pond from single family homes in the Winn Brook District and separated from office use by open land/swamp. The Project does not utilize existing water/sewer connections since there are none on the Property. The Project requires a sizeable force main extension along Acorn Park Drive and the Service Road. The Project is not infill development since there is no development on the Uplands.

11.2 Restore and Enhance the Environment

Examples of ways projects could satisfy this include:

- ◆ *The project is at a higher density than the surrounding area. **Note: As stated in the Principles, this does not belong here. It was covered under Section 11.1.***
- ◆ *The project mixes uses or adds new uses to an existing neighborhood. **Note: As stated in the Principles, this does not belong here. It was covered under Section 11.1.***
- ◆ *The project involves the creation or preservation of open space or recreational facilities.*
- ◆ *The project protects sensitive land and/or resources from development.*
- ◆ *The project involves environmental remediation or clean up.*
- ◆ *The project is part of the response to a state or federal mandate (e.g., clean drinking water, drainage).*
- ◆ *The project eliminates/reduces neighborhood blight.*
- ◆ *The project addresses a public health and safety risk.*
- ◆ *The project significantly enhances an existing community or neighborhood by restoring an historic landscape*

The project will convert an underutilized site in poor condition into a residential building, associated parking areas, landscaped areas, and amenities. The site was previously-developed as a farm and had become overgrown. In the 1950s, during off-site construction projects (including construction of Route 2), significant quantities of excess fill material was dumped on the project site, thereby significantly altering the topography and vegetation.

The proposed Conservation Restriction will protect 7.0 acres of the project site from development in perpetuity. At the same time, the project will provide housing at a substantially higher density than is available elsewhere in the vicinity of the site.

- *Does provide a Conservation Restriction (“CR”) but this development does not enhance what is currently pristine open space without development. Loss of habitat through construction is not mitigated by CR on largely unbuildable wetlands.*
- *Preservation of sensitive natural resources: again only those unbuildable wetlands as well as buffer and riverfront which will be impacted by loss of uplands and impact of construction. In addition the “development “of the open space with the CR involving parking, kiosk and trails means intrusion into the already disturbed and stressed habitat and wetland buffer and riverfront.*
- *Remediation: the site functions without remediation. The only remediation needed will be post construction mitigation to try to repair the damage done.*
- *The Project with parking lot runoff and only the minimum required storm water facilities does not meet clean drinking water/ drainage mandate. There is no clean drinking water on the site, no wells or springs.*
- *Open space/silver maple forest is not a neighborhood blight.*

- *Project causes public health and safety risk and does not eliminate it. Force sewer main requires pumping, storage of sewage, running sewer lines from site a long distance before connecting to inadequate Town sewers. This connection in an area prone to flooding and high ground water creates public health and safety risks and does not mitigate them,*
- *The Project does not restore an historic landscape. Restoration would actually require re-establishment of a pig farm. This landscape has restored itself to a functioning habitat and the construction of the Project on open space does not represent a neighborhood enhancement. The Alewife Reservation includes Little Pond. The Project impairs the view across the Pond.*

Text: The claim of dumping of Route 2 spoils is immaterial since the site is considered as it is found: with a variety of types of established vegetation complementing the mature Silver Maples on the site. These obviously predate the 1950s and 60s when reconstruction took place. In any case, fifty years of vegetation and soil buildup create a habitat that is stable and established, not an “underutilized site”. Just because something is not developed or built upon does not mean it is underutilized. In addition soil corings show not only construction debris well under the soil but a four foot layer of peat indicating a filled wetland consistent with the history of the site as a swamp. This unstable ground will make construction of foundations challenging. Density of housing in a less dense neighborhood is not an improvement. Therefore it can be claimed that this principle has not been met since the CR protects only a fraction of what currently is totally open space so that cannot be seen as an improvement.

11.3 Be Fair

Examples of ways projects could satisfy this include:

- ◆ The project involves a concerted public participation effort (beyond the minimally required public hearing), including the involvement of community members, residents of the development and/or key stakeholders in the planning and design of the project.
- ◆ The project involves a streamlined permitting process, such as 40B or 40R.
- ◆ The project conforms to Universal Design standards and/or incorporates features that allow for “visitability”.
- ◆ The project creates affordable housing in a neighborhood or community whose residents are predominantly middle to upper income and/or meets a regional need.
- ◆ The project targets a high-poverty area and makes available affordable homeownership and rental opportunities.
- ◆ The project promotes diversity and social equity and improves the neighborhood.
- ◆ The project targets a high-poverty area and makes available affordable homeownership and rental opportunities.

- ◆ The project promotes diversity and social equity and improves the neighborhood

The project involves streamlined permitting under Chapter 40B. The community of Belmont is predominantly middle to upper income and severely lacks affordable housing. The project will provide approximately 299 units of rental housing, 20 percent (60 units) of which will be affordable to low or moderate income households. The project will convert an underutilized site in poor condition into a residential building and associated parking areas and amenities. The protected open [space] that will result from this project will provide neighborhood recreation space.

- *There was no public participation effort leading up to the Applicant's Application to MassDevelopment for preliminary financial feasibility; nor leading up to the filing of the 40B application in mid-December; and there is no ongoing public participation process paralleling the formal ZBA hearing process.*
- *The Project does involve Chapter 40B. The Applicant filed a 40B Project after the Planning Board in review of the Applicant's rezoning request to allow a large condominium project raised reasonable questions of size and density.*
- *On Project "visitability", the Project is not readily accessible from other housing neighborhoods. The design shows no attempt to relate the buildings into the rest of Belmont. Nor have there been efforts through improved sidewalks, bus shuttles, or bike paths to make the Project more accessible to Belmont, Arlington and Cambridge residences. Three out of the five buildings are surrounded by parking lots.*
- *This Project does create affordable housing in a community which is below the 10% level; however, it does so by building in a remote and isolated area of Town which does not connect to the Town's business, cultural or educational life. With the Town's affordable housing bylaw 25% of any sizeable project must be affordable. This proposal tries to limit the affordability to 30 years and provide only 20% low income instead. Therefore it does less than the Town's current bylaw to promote affordable housing. The project can not be described as being in a "neighborhood". There is no assessment of new residential projects built or proposed and their vacancy rate in Cambridge to meet the need for regional housing.*
- *This is not a high poverty area.*

A reading of Belmont's voter list shows that there is already great ethnic and economic diversity in the Town than often assumed.

Text: While the Town needs affordable housing, claiming that this is a site in poor condition that is underutilized is erroneous. The protected open space is largely wetland, buffer zone and riverfront that will not be enhanced by use as public recreation area. Other than the pool, there are no plans listed for recreation for the residents and there does not appear to be any place for same without placement in the buffer zone which negatively impacts the wetlands.

11.4 Conserve Resources

Examples of ways projects could satisfy this include:

- ◆ *The project complies with EPA's Energy Star guidelines, in addition to those required by code.*
- ◆ *The project uses energy efficient technologies, recycled and/or non-/low-toxic materials, exceeds energy codes and otherwise results in waste reduction and conservation of resources.*
- ◆ *The project uses alternative technologies for water and/or wastewater treatment that result in land or water conservation*

The project's design is still schematic, and detailed engineering design is not complete. The applicant, however, is committed to evaluating opportunities to incorporate resource conservation into the project.

The Applicant commits to energy efficient construction but with no detailed descriptions nor schematics, and the like. Particularly important are claims for water conservation and wastewater treatment when there are currently no water or sewer connections to the site and any development will have a negative impact on natural water resources on the site. Therefore at this point the Project does not appear to meet this principle.

11.5 Expand Housing Opportunities

Examples of ways projects could satisfy this include:

- ◆ *The project increases the number of rental units available to residents of the Commonwealth, including low- or moderate-income households.*
- ◆ *The project increases the number of homeownership units available to residents of the Commonwealth, including low- or moderate-income households.*

- ◆ *The project increases the number of housing options for special needs and disabled populations.*
- ◆ *The project expands the term of affordability.*

The purpose of the project is to provide housing opportunities. The project will provide approximately 299 units of new housing, 20 percent (60 units) of which will be affordable to low or moderate income households.

Affordable units will be available to households earning up to 50 percent of the area median income. For a two-person household, the income limit is \$33,100. For a four-person household, the income limit is \$41,350.

Affordable units will be distributed throughout the project. Finishes will be similar to the market rate units.

- ***The Project does increase low to moderate income rental housing units.***
- ***The Project does not provide homeownership units since it is all rental.***
- ***Any project must meet ADA requirements so this is no more an advantage to the Town than the current sheltered homes and subsidized housing units are. It does not appear that any special efforts are being made to serve persons with special needs or disabilities.***

Point four is redundant to points one and two. Therefore this argument meets one of the four examples cited.

11.6 Provide Transportation Choice

Examples of ways projects could satisfy this include:

- ◆ *The project is walkable to public transportation.*
- ◆ *The project reduces dependence on private automobiles (e.g., provides previously unavailable shared transportation (such as zip car or shuttle buses).*
- ◆ *The project reduces dependence on automobiles by providing increased pedestrian and bicycle access.*
- ◆ *For rural areas, the project is located in close proximity (e.g. approximately 1 mile) to a transportation corridor that contains access to employment centers, retail/commercial centers, civic or cultural destinations.*

The Massachusetts Bay Transit Authority (MBTA) currently operates the following five public bus routes that serve the immediate vicinity of the project site:

- ◆ *Route 62 Bedford V.A. Hospital - Alewife Station via Lexington Center and Arlington Heights.*
- ◆ *Route 67 Turkey Hill - Alewife Station.*
- ◆ *Route 76 Hanscom Air Base - Alewife Station via Lexington Center.*
- ◆ *Route 78 Arlmont Village - Harvard Station via Park Circle.*
- ◆ *Route 84 Arlmont Village - Alewife Station.*

The MBTA Alewife Station on the Red Line is located within a short walking distance of the project site. From the Red Line, connections to the other subway lines can be made via Park Street, Downtown Crossing, Government Center, and North and South Stations (Amtrak (South Station), commuter rail, and bus).

In addition, two bicycle/multi-use paths exist in the vicinity of the project site. The Minuteman Commuter Bikeway extends from Arlington to Bedford and provides access to the MBTA Alewife Red Line station. Linear Path provides a connection between the Alewife and Davis Square Red Line stations. An unnamed, unpaved, multi-use path also exists to the south of the project site, parallel to the Alewife Brook.

The proponent will provide a dedicated shuttle bus to run between the project site and the MBTA Alewife Red Line station.

The proponent will consult with Zipcar or a similar car sharing service to determine the feasibility of establishing a shared car space on the site.

- ***Four of the five routes mentioned rely on access to the Alewife Station. The only bus, 78, does not connect to other parts of Belmont and is slated for a decrease in coverage due to low ridership. Therefore, reaching the business and cultural parts of Belmont is impossible by public transportation. The prediction of T use over auto use is optimistic.***
- ***An increase of over 1800 auto trips a day is predicted. This is not an improvement over auto access to the site which is currently zero, therefore it cannot be said to lead to a reduction in auto traffic.***

- ***The Project lacks secure storage for bicycles. No bike lanes on Acorn Park Drive and the Service Road or through the Bulfinch property are recommended. Without improved sidewalks and bike paths, children will not bike to school and other recreational events. There is no ready access to the two bike paths referenced by the Applicant.***
- ***Items two and three are redundant in aim.***
- ***This is not a rural area.***

11.7 Increase Job Opportunities

Examples of ways projects could satisfy this include:

- ◆ *The project creates or retains permanent jobs.*
- ◆ *The project creates or retains permanent jobs for low- or moderate-income persons.*
- ◆ *The project locates jobs near housing, service or transit.*
- ◆ *The project creates housing near an employment center.*

It is anticipated that the project will create a significant number of temporary construction jobs and approximately 8 full-time equivalent permanent jobs.

These jobs will be located proximate to transit. The Massachusetts Bay Transit Authority (MBT A) currently operates the following five public bus routes that serve the immediate vicinity of the project site:

- ◆ *Route 62 Bedford V.A. Hospital - Alewife Station via Lexington Center and Arlington Heights.*
- ◆ *Route 67 Turkey Hill- Alewife Station.*
- ◆ *Route 76 Hanscom Air Base - Alewife Station via Lexington Center.*
- ◆ *Route 78 Arlmont Village - Harvard Station via Park Circle.*
- ◆ *Route 84 Arlmont Village - Alewife Station.*

The MBT A Alewife Station on the Red Line is located within a short walking distance of the project site. From the Red Line, connections to the other subway lines can be

made via Park Street, Downtown Crossing, Government Center, and North and South Stations (Amtrak (South Station), commuter rail, and bus).

In addition, two bicycle/multi-use paths exist in the vicinity of the project site. The Minuteman Commuter Bikeway extends from Arlington to Bedford and provides access to the MBT A Alewife Red Line station. Linear Path provides a connection between the Alewife and Davis Square Red Line stations. An unnamed, unpaved, multi-use path also exists to the south of the project site, parallel to the Alewife Brook.

The proponent will provide a dedicated shuttle bus to run between the project site and the MBT A Alewife Red Line station.

There are more than 1.9 million sf of office space within the Alewife/Fresh Pond office market, providing numerous job opportunities proximate to the project site.

While this project, as any construction project, will provide temporary jobs, once completed the very few jobs will be maintenance positions, low paying and not a major addition to the local economy. It is unlikely that the maintenance staff will walk or bike from Alewife station, especially in inclement weather. The transit information is largely based on access to the Alewife T station.

Access to commercial sites does not create jobs.

Foster Sustainable Businesses (examples of ways projects could satisfy this include):

- **The project supports natural resource-based businesses, such as farming, forestry, or aquaculture.**
- **The project reuses or recycles materials from a local or regional industry's waste stream.**
- **The project involves the manufacture of resource-efficient materials, such as recycled or low-toxicity materials.**
- **The project supports businesses which utilize locally produced resources such as locally harvested wood or agricultural products.**

Plan Regionally (examples of ways projects could satisfy this include):

- **The project is consistent with a municipally supported regional plan that identifies sub region, area or location, and the number and type of housing units or jobs needed.**

- **The project addresses at least one of the barriers identified in a regional Analysis of impediments to Fair Housing.**
- **The project has a measurable public benefit beyond the applicant community.**

The last two criteria are omitted. There is no regional analysis. Cambridge is undertaking the rezoning of the nearby Quadrangle and Triangle. The Applicant provides no answer as to how the Project fits with this proposed commercial and residential development. The same question should be asked concerning the Bulfinch Smithsonian Project and plans for redevelopment along Route 2. Has the Applicant analyzed the regional traffic, stormwater, sewage and related combined sewer overflows ("CSOs"), and environmental impacts? Will the Project be feasible in light of the transformation of the Alewife/Route 2 region?

11.8 Sustainable Development Features

The Commonwealth also identifies the following sustainable design features that could serve to improve a project:

- ◆ *Parking located where it does not visually dominate the development from the street and allows easy and safe pedestrian access to buildings.*
- ◆ *The project contributes to the public streetscape with pedestrian-friendly amenities such as benches, lighting, street trees, trash cans, and windows at street level.*
- ◆ *The project creates or enhances community spaces such as public plazas, squares, parks, etc.*
- ◆ *Water usage and wastewater is handled sustainably (i.e. plantings are of a type that require minimal watering, water conservation measures are taken in the homes, and wastewater is effectively treated and kept in watershed).*
- ◆ *The proponent made efforts to involve members of the community in the planning and design of the project.*
- ◆ *Impervious surface is minimized by measures such as providing only as much parking as is necessary, structured parking, narrow streets, short driveways, and best management practices for storm water collection and recharge.*
- ◆ *The project proponent strives to use mechanisms that will permanently protect open space.*

- ◆ *Overall building size kept to a minimum while still meeting occupants' needs. (e.g., 1600 SF plus 200 SF per bedroom).*
- ◆ *The project expands the local tax base.*
- ***The project could be downsized to lessen impact on environs and built on a smaller footprint to meet the claims of environmental consideration.***

The following sections respond to the list of sustainable design features above.

11.8.1 Parking

The project's parking areas have been broken into small blocks interposed between the buildings so that they will not visually dominate the development. In addition, more than half of the parking spaces will be located underground, so out of sight entirely. Wooded portions of the site will shield exterior parking from the site's nearest residential neighbors.

Providing some parking under the building is desirable, however, this will be the first area to flood being below grade. There will be no woodland features left to screen parking once the site is developed on the woodland portion of the Uplands. Pervious surfaces should be used for exterior parking areas and driveways.

Surface parking concept appears to be that of a commercial development, and three of the five buildings are completely surrounded by parking lots.

11.8.2 Community Spaces

The proposed Conservation Restriction will protect 7.0 acres of open space in perpetuity. The applicant has committed to make certain improvements to that open space and to maintain the protected land. On-site landscaping will comprise a mix of native plants and non-invasive ornamental varieties. Depending on their locations on the site, plant materials will be selected for drought resistance, hardiness, or tolerance for an urban environment, or for a combination of these factors.

- ***Existing vegetation, while including some invasives, is established and mature and provides major wildlife habitat. Landscaping after construction cannot begin to match the quality of habitat that is being destroyed. Removing most if not all of the mature trees on the site is necessary to construct the Project. The Applicant provides no details on sizes and types***

of vegetation nor sizes of open space remaining on the built-on portion of the site.

11.8.3 Water Conservation

As new construction, the project will incorporate low-flow, water conserving fixtures. The applicant will commit to eliminate inflow and infiltration from the Town of Belmont's storm drainage system, in an amount to be agreed by the Town and the applicant.

- *Is this in addition to that provided under the MOA of the R&D that specified the sum of \$115,000 due in Spring 2005 for mitigation of inflow and infiltration?*

11.8.4 Community Participation

The applicant will participate in a one or more public meetings to take comment on the project from Town residents. The applicant anticipates that it will also participate in multiple Board of Appeals and Conservation Commission meetings.

- *To date, there has been no effort to involve the public in planning and design beyond the required public hearing process.*

11.8.5 Impervious Area

As mentioned above, more than half of the parking will be locating underground. Creating so much structured parking, in addition to shielding it from view, reduces the impervious area necessary for the project

- *Covered parking does not reduce impervious surface since the roof of the building is impervious. Building uncovered parking of pervious materials would help cut down on runoff.*

11.8.6 Protected Open Space

The proponent has committed to place 7.0 acres of the project site under a Conservation Restriction, to make certain improvements to the protected land, and to maintain it in perpetuity.

- *It has been reported that the Conservation Restriction for the R&D MOA took effect in Spring of 2005. It covered land that is largely unbuildable since it is either wetlands, buffer zone or Riverfront Area. No map has been submitted for the new proposed CR to compare with the R&D CR.*

- ***The complex has extended westward to about 20 feet of the radial property line, greatly reducing the conservation taking in this area. It is also shifted south, reducing the conservation taking in this area. The effect is to fragment and make the conservation areas less useful to wild life and visitors.***

11.8.7 Unit Size

The Commonwealth's sustainable design guidelines indicate a preference for smaller units, and set a standard maximum size of 1,600 gross square feet plus 200 gross square feet per bedroom. The proposed project's unit size will be well below that standard, with an average of 1,093 gross square feet per unit, and an average of 888 net square feet per unit.

- ***Unit size is less an issue than the number of units. The project is too dense considering the location and the sizes of buildable parcel. The parcel was rezoned for a 245,000 sq. ft. Research and Design building. This project appears to be at least 400,000 sq. ft. in size, plus parking, roads and amenities.***

11.8.8 Expands Local Tax Base

The proposed project will generate approximately \$750,000 in one-time building permit fees and approximately \$750,000 in real estate and excise taxes in the first year. The project will have a modest impact on City services, because of the small number of school children typically occupying apartment complexes, the presence of on-site staff, and the Petitioner pays for snow removal, rubbish removal, landscaping, and maintenance.

- ***The burden on the Town services including education is apt to be greater than estimated. The presence of on site staff does nothing to reduce impact on Town services. The assumption that children will not live in the two and three bedroom apartments considering how desirable Belmont's school system is to surrounding communities is unrealistic. Already school choice program is overbooked by students from nearby towns.***

11.9 Mass Fair Housing Principles

As described above, the applicant is a leader in meeting and promoting the Massachusetts Fair Housing Principles. This proposed project will provide 299 rental units, 20 percent (60 units) affordable.

William Chin, Chair
Zoning Board of Appeal
February 7, 2006
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Very truly yours,

Frederick S. Paulsen, Chair
Uplands Advisory Committee

FSP/fcc

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