



Addendum

To Memorandum dated April 28, 2023

TO: Patrick Deschenes, Director of Community and Economic Development
FROM: Tyler Maren, AICP, Senior Planner
Judi Barrett, Principal-in-Charge
RE: Supplemental Analysis of Potential District Compliance, MBTA Communities Law
DATE: June 20, 2023

This addendum to a memorandum dated April 28, 2023 (“Memo 1”), describes additional compliance modeling work undertaken after reviewing that memo with Town Staff. Their main request was for us to model ways that the area of the proposed district could be expanded in order to reduce the district-wide residential. The following sections detail two final scenarios incorporating this feedback for the Town to consider.

As in Memo 1, our analysis is based on the revised Section 3A Guidelines dated October 21, 2022. See Memo 1 for more detailed descriptions of the scenarios originally presented to the Town.

Attachment A contains maps of the sites modeled for the two new scenarios described in this addendum. Attachment B is a reference map showing all of the sites we modeled throughout the entire process to date.

Technical Review: Scenario Modeling

Walpole's MBTA Communities district requirements include all of the following parameters:

- Minimum Area: 50 acres

Walpole's MBTA Communities district must be at least 50 acres in size, but this acreage may be spread out between multiple non-contiguous sites, as long as two main criteria are met:

- At least half of the total district area must be contiguous.
- All non-contiguous portions of the district must be at least 5 acres in size.

- Minimum Area within station radius ("Station Area"): 75%

The MBTA Communities guidelines define "station area" as the land located within a 0.5-mile radius around an MBTA transit station. Walpole has two MBTA Commuter Rail stations, including the Plimptonville Station even though it is not currently in operation. Because the Town has over 600 acres of developable land¹ in a station area, a portion of the district equal to at least 75 percent of the Town's minimum district size must be located within that half-mile station area. For Walpole, this is equal to 37.5 acres. It does not matter which station's radius the district is located within, but both scenarios described in this document have over 60 acres near the downtown Walpole commuter rail station.

- Minimum district unit yield ("Unit Yield"): 1,506

Walpole's MBTA Communities district must allow for the development of 1,506 units of multifamily housing by right, a number equal to 15 percent of the community's current number of housing units.. This does not necessarily mean 1,506 *new* units, or that the units must be constructed. As long as the zoning could result in the required number of units, Walpole will be in compliance.

Notably, the station area requirement applies to the unit yield as well, meaning that 75 percent of the 1,506 units the Town is required to zone for (1,130 units) must be located within 0.5 miles of a transit station.

- Minimum Gross Unit Density: 15 units/acre

To determine whether a proposed district meets the minimum density of 15 units per acre, the compliance model uses a formula that is more complicated than simply dividing the number of units by the total district area. Instead, we calculate the site's "gross density" by removing designated wetland areas from the district area before calculating density, thereby avoiding penalizing communities for including wetlands in a district. The densities reported in this document are derived from this formula.

About the Model

The analysis in this document is based on an official compliance model that aims to estimate whether a proposed district is compliant with MBTA Communities guidelines. Communities must demonstrate compliance by inputting information about a district into the model, including total acreage, required

¹ According to the definition in the MBTA Communities guidelines dated October 21, 2022.



parking, maximum lot coverage, a list of parcels included in the district, and more. By adjusting these inputs, we can arrive at a district location and set of regulations that will comply with the MBTA Communities law. Note that compliance is subject to manual review and favorable results from the compliance model do not guarantee that there are no other issues with the district.

Staff asked us to consider expanding the size of the proposed district described in Memo 1 in order to reduce the district-wide residential density to be closer to 15 units per acre. To understand why the original 60-acre district needed to have a density well above 15 units per acre to comply, recall that in addition to the required district size, the Town must zone for a certain number of units. To fit 1,506 units in a land area of only 50 acres, the residential density would have to be roughly 30 units per acre. Therefore, the Town can spread the 1,506 units out over a significantly larger area before it is in danger of dropping below 15 units per acre.

Town Staff identified two areas that might be desirable locations for an expanded MBTA Communities district. The first option is to use additional land adjacent to the existing Central Business District, and keep the entire modeled district contiguous. The second option is to add the parcels that comprise the Walpole Mall, a potential future redevelopment site. In both scenarios we tried to hew as closely to the baseline requirements as possible to illustrate the minimum changes Town would need to make to comply.

SCENARIO 1: ADDITIONAL PARCELS ADJACENT TO CBD

For the first new scenario, we modeled an additional area adjacent to the Central Business District. We envisioned this area as an expansion of the Residential Subdistrict (described in Memo 1) and applied the same dimensional regulations throughout the whole area except for the commercial subdistrict. As expected, increasing the area of the district by over 100 acres allowed us to significantly lower residential density while still producing the required number of units. Most notably, the maximum building height has been capped at 2.5 stories and maximum lot coverage has been reduced in both subdistricts.

This scenario has the advantage of being located mostly within the station area, so the Town would easily meet all station area requirements. The most significant issue is that the district has become so large that the Town would need to zone for over 1,800 units (rather than the required minimum of 1,506) to keep residential density over 15 units per acre. If the Town wants to zone for fewer units, our recommendation is to reduce the size of the district by identifying the lowest-priority parcels.



Table 1: Summary of Potential MBTA Communities District: Scenario 1				
	Original Residential Subdistrict	Commercial Subdistrict	Additional Parcels: Adjacent to CBD	Scenario 1 Total
Model Results				
Area (acres)	45.9	15.9	121.7	183.5
Unit Yield	458	198	1,224	1,880
Gross Density (units/acre)	10.8	13.1	18.0	15.0
Selected Dimensional Regulations				
Max. units on a single lot	460	N/A	460	*
Min. lot size (sq. ft.)	5,000	5,000	5,000	*
Max. building height (stories)	2.5	2	2.5	*
Max. lot coverage	50%	80%	50%	*
Parking spaces per unit	1.75	2	1.75	*
Min. open space	40%	20%	40%	*
*Varies by subdistrict				

SCENARIO 2: WALPOLE MALL

The second site the Town asked us to consider is the Walpole Mall in the southeastern part of Walpole. Because the mall area is currently commercial in nature, we chose to apply dimensional regulations similar to the Commercial Subdistrict (described in Memo 1), with the intention that the Town could encourage mixed use by offering density bonuses.

This scenario can easily satisfy every applicable requirement of the MBTA Communities guidelines except for one: the requirement that 75 percent of required units be located in the station area. If the Town wishes to remain close to the 1,506 unit minimum, that means that in this scenario about 1,100 units must be concentrated in the CBD leaving only 400 for the mall site. The Walpole Mall site is large and could produce far more than 400 units, but it lies entirely outside the station area. To make this work in the model, we had to remove all but the main Walpole Mall parcel from the scenario. The Town may, of course, zone for more than the required 1,506 units, but if it does not wish to do so then our recommendation would be to focus on other options and save the redevelopment of the mall for future planning efforts.



Table 2: Summary of Potential MBTA Communities District: Scenario 2				
	Residential Subdistrict	Commercial Subdistrict	Additional Parcels: Walpole Mall	Scenario 2 Total
Model Results				
Area (acres)	45.9	15.9	30.4	92.2
Unit Yield	927	234	368	1,529
Gross Density (units/acre)	21.9	15.5	12.1	17.4
Selected Dimensional Regulations				
Min. lot size (sq. ft.)	8,000	5,000	10,000	*
Max. building height (stories)	3	2	2	*
Max. lot coverage	70%	70%	60%	*
Parking spaces per unit	1.5	2	2	*
Min. open space	30%	30%	40%	*
*Varies by subdistrict				



Recommendations and Next Steps

- Is it worth trying to find a way to include Walpole Mall in the scenario, or would the Town prefer to pursue another path?
- For Scenario 1, if the Town wants to reduce the size of the district, what would be the most appropriate cuts to make?
- Are there any dimensional regulations used for these scenarios that might be problematic or inappropriate?

Once we determine (in consultation with you) the most appropriate boundaries and basic dimensional regulations to move forward with, we can fine-tune the scenarios to better meet the Town's needs. Then, the next step is to begin helping the Town come up with draft regulatory language for its MBTA Communities District. We can provide an outline of a draft zoning amendment, but writing full district regulations are beyond our current scope.

Since Memo 1, EOHLC has released the guidelines for the economic impact study required to impose an inclusionary housing requirement of greater than 10 percent. You should consider whether this is a route you want to pursue. If so, there are funding sources available to retain a consultant to prepare the required economic analysis.

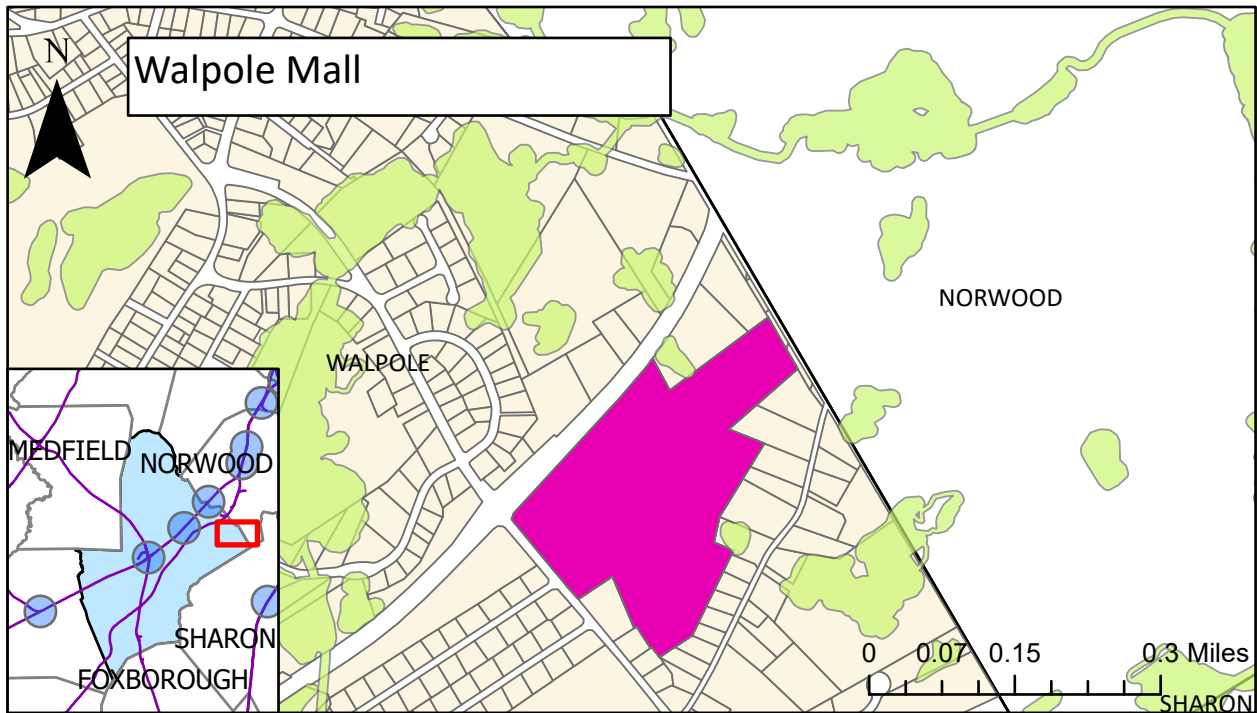
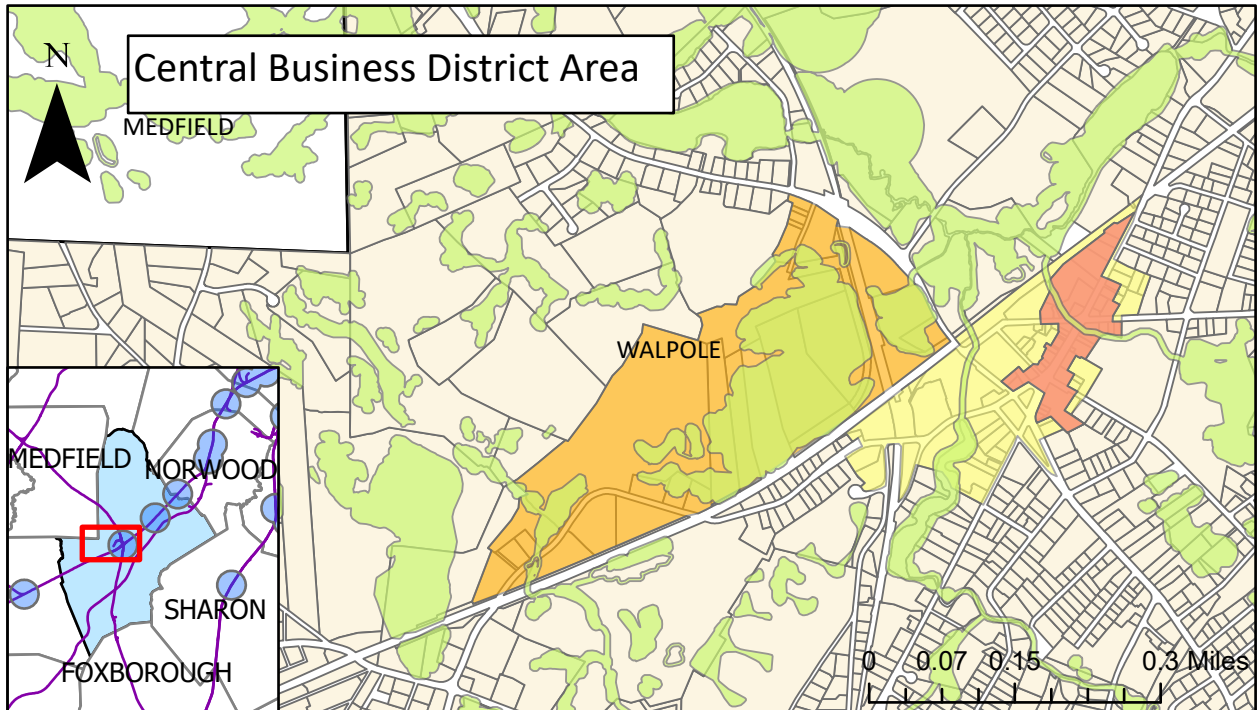
Please let us know how you would like to proceed.



Attachment A

Maps of Draft MBTA Communities District Sites





Legend (for all maps)

- | | | |
|---------------------------------------|------------------------------------|--|
| Regular Service Commuter Rail | Limited Access Highway | Commercial Subdistrict (from Memo 1) |
| Used Seasonally or for Special Events | Multi-lane Hwy, not limited access | Residential Subdistrict (from Memo 1) |
| Density Denominator Deductions | Other Numbered Highway | Potential Expanded District (Scenario 1) |
| Transit Station Half Mile Radius | Major Road, Collector | Walpole Mall Parcel (Scenario 2) |
| | Ramp | Parcels Outside District |

Attachment B

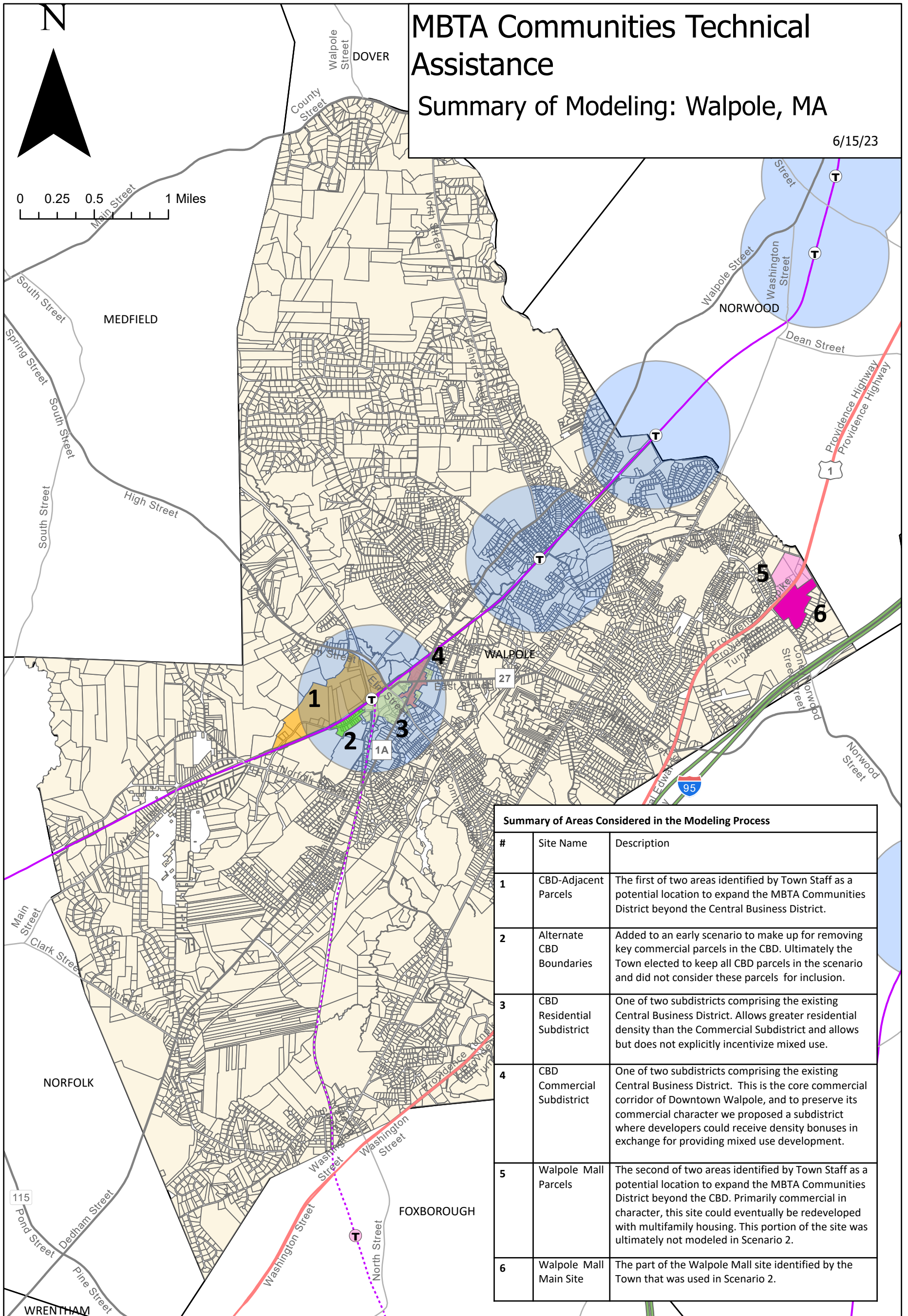
Summary Map of All Considered MBTA Communities District Sites



MBTA Communities Technical Assistance

Summary of Modeling: Walpole, MA

6/15/23



Summary of Areas Considered in the Modeling Process		
#	Site Name	Description
1	CBD-Adjacent Parcels	The first of two areas identified by Town Staff as a potential location to expand the MBTA Communities District beyond the Central Business District.
2	Alternate CBD Boundaries	Added to an early scenario to make up for removing key commercial parcels in the CBD. Ultimately the Town elected to keep all CBD parcels in the scenario and did not consider these parcels for inclusion.
3	CBD Residential Subdistrict	One of two subdistricts comprising the existing Central Business District. Allows greater residential density than the Commercial Subdistrict and allows but does not explicitly incentivize mixed use.
4	CBD Commercial Subdistrict	One of two subdistricts comprising the existing Central Business District. This is the core commercial corridor of Downtown Walpole, and to preserve its commercial character we proposed a subdistrict where developers could receive density bonuses in exchange for providing mixed use development.
5	Walpole Mall Parcels	The second of two areas identified by Town Staff as a potential location to expand the MBTA Communities District beyond the CBD. Primarily commercial in character, this site could eventually be redeveloped with multifamily housing. This portion of the site was ultimately not modeled in Scenario 2.
6	Walpole Mall Main Site	The part of the Walpole Mall site identified by the Town that was used in Scenario 2.

Legend

- Tax Parcels
- Roads**
- Interstate
- U.S. Highway
- State Route
- Non-numbered Road
- T Commuter Rail Station
- Regular Service Commuter Rail
- Used Seasonally or for Special Events