



Massachusetts Housing Finance Agency
One Beacon Street, Boston, MA 02108

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January 13, 2020

David E. Hale
Omni Development, LLC
6 Lyberty Way, Suite 203
Westford, MA 01886

**RE: Cedar Crossing
Project Eligibility/Site Approval
MH ID No. 1049**

Dear Mr. Hale:

This letter is in response to your application as “Applicant” for a determination of Project Eligibility (“Site Approval”) pursuant to Massachusetts General Laws Chapter 40B (“Chapter 40B”), 760 CMR 56.00 (the “Regulations”) and the Comprehensive Permit Guidelines issued by the Department of Housing and Community Development (“DHCD”) (the “Guidelines” and, collectively with Chapter 40B and the Regulations, the “Comprehensive Permit Rules”), under the New England Fund (“NEF”) Program (“the Program”) of the Federal Home Loan Bank of Boston (“FHLBank Boston”).

You have proposed to build two-hundred and forty (240) units of rental housing, including sixty (60) affordable units (the “Project”) on approximately 26-acres of land (the “Site”), concurrent with a homeownership development known as Cedar Edge Condominiums which would consist of sixty (60) ownership units, including fifteen (15) affordable units on approximately 31-acres of land, for a total of approximately 57 -acres of land located at 51-53-55 Summer Street in Walpole, MA (the “Municipality”).

In accordance with the Comprehensive Permit Rules, this letter is intended to be a written determination of Project Eligibility (“Site Approval”) by MassHousing acting as Subsidizing Agency under the Guidelines, including Part V thereof, “Housing Programs In Which Funding Is Provided By Other Than A State Agency.”

MassHousing has performed an on-site inspection of the Site, which local boards and officials were invited to attend, and has reviewed the pertinent information for the Project submitted by the Applicant, the Municipality and others in accordance with the Comprehensive Permit Rules.

Municipal Comments

Pursuant to the Comprehensive Permit Rules, the Municipality was initially given a thirty (30) day period in which to review the Site Approval application and submit comments to MassHousing. At the request of Jim Johnson, Town Administrator, this period was extended to a total of sixty (60) days. The Walpole Board of Selectmen submitted a letter regarding the Application dated November 5, 2019 summarizing comments from Municipal departments, boards and committees, and identifying specific concerns with the proposed Project. Municipal concerns are outlined as follows:

- The Municipality states that the proposal of 240 rental units is significantly denser than the surrounding neighborhood which could negatively impact the character of the area. Further, the Municipality believes the siting of the buildings, the roof lines, and overall architectural style should be readdressed to more thoughtfully fit into the surrounding context.
- The Municipality is concerned about potential traffic impacts on area roadways, particularly at the proposed Project's entrance on Summer Street. Specifically, the Municipality is concerned with possible traffic congestion and potentially hazardous traffic conditions at the MBTA Foxboro high-speed train crossing.
- The Municipality is concerned about the potential for increased noise and light pollution and stormwater management challenges.
- The Municipality is concerned about the location of the proposed access and egress to the Site which abuts the MBTA tracks and believes significant safeguards should be considered in order to protect the development's residents.
- The Municipality believes that the area lacks adequate sidewalks and is not pedestrian friendly.
- The Municipality believes the Site is environmentally sensitive and notes that the Conservation Department has not approved the delineation of wetlands for the entire Site and has concerns with the amount of wetlands resource areas proposed to be altered, with multiple wetlands crossings and wetland fills proposed.
- The Municipality notes that there are three (3) vernal pools which are not indicated on the proposed site plan that should be considered.
- The Municipality notes that a portion of the Site was a contaminated area under the Massachusetts Contingency Plan.

- The Affordable Housing Trust has requested that no less than 50% of the proposed units be designated as affordable. Additionally, the Board of Selectmen has requested that the proposed development consist of only two-bedroom units.¹
- The Municipality stressed that the Project must be designed to ensure the maximum level of emergency access and fire protection. They outlined a variety of requirements for the Project including fire lanes, sufficient roadway widths and intersection radii to accommodate public safety vehicles, hydrants, interior fire suppression systems, elevators, etc.
- The Municipality expressed concerns regarding the sufficiency of the existing water supply and encouraged the implementation of water-saving facilities at the Project. They also questioned the capacity of the Town's sewer system to handle the anticipated quantity of additional flow and noted that a determination on this matter would require further investigation.

Community Comments

In addition to comments from town staff and officials, MassHousing received numerous letters from area residents, expressing various concerns for the proposed Project. While letters from the community largely echoed the concerns identified by the town officials, there were some unique concerns as well. The letters received are summarized below:

- Area residents are concerned that the size and scale of the proposed Project is not in keeping with the modest nature of surrounding neighborhood residences and suggest that in the event of an approval, a reduction in the number of proposed units would be more appropriate.
- Area residents are concerned about increased traffic and pedestrian safety, echoing the Municipality's comments regarding the dangers of the point of access and egress which is near the MBTA Foxboro high-speed train crossing and potential for increased congestion on Summer Street. There is also concern regarding increased traffic during events at the nearby Patriot Place and Gillette Stadium in Foxboro.
- Area residents are concerned about parking and traffic impacts from the proposed Project, including noise and light pollution from residential and maintenance vehicles and lack of visitor parking.
- Area residents are concerned about potential environmental contamination on the portion of the site previously home to the Bird Machine Company, formerly known as the Baker-Hughes Property.

¹ The Subsidizing Agency's core programmatic matters (including affordability requirements and the number of bedrooms per unit), rather than traditional matters of local concern (including public health, safety, land use, and construction), are outside the authority of the Zoning Board of Appeals. This position has been confirmed by the Massachusetts Supreme Judicial Court. *Amesbury v. Housing Appeals Committee*, 457 Mass 748 (2010).

- Area residents are concerned about the protection of the Municipality's sole source aquifer which is located near the Site.
- Area residents are concerned about the preservation of wildlife habitats and endangered species on the Site.

State Representative Shawn Dooley provided a letter reiterating constituent concerns about the Project and its potentially negative impacts on the Town, with a focus on the concerns regarding potential traffic congestion and public safety.

MassHousing carefully considered the Municipality's concerns and, to the extent appropriate within the context of the Site Approval process, has offered responses in the following "Recommendations" section of this letter.

Comments Outside of the Findings

While Comprehensive Permit Rules require MassHousing, acting as Subsidizing Agency under the Guidelines, to "accept written comments from Local Boards and other interested parties" and to "consider any such comments prior to issuing a determination of Project Eligibility," they also limit MassHousing to specific findings outlined in 760 CMR 56.04(1) and (4). The following comments submitted to MassHousing identified issues that are not within the scope of our review:

- The Municipality noted that it is challenging to predict possible impacts of the proposed Project on school capacity and estimated that the Walpole Public Schools would be capable of absorbing new students at this location.

MassHousing Determination and Recommendations

MassHousing staff has determined that the Project appears generally eligible under the requirements of the Program, subject to final review of eligibility and to Final Approval² under the Comprehensive Permit Rules. As a result of our review, we have made the findings as required pursuant to 760 CMR 56.04(1) and (4). Each such finding, with supporting reasoning, is set forth in further detail on Attachment 1 hereto. It is important to note that Comprehensive Permit Rules limit MassHousing to these specific findings in order to determine Project Eligibility. If, as here, MassHousing issues a determination of Project Eligibility, the Developer may apply to the Zoning Board of Appeals of the Municipality for a Comprehensive Permit. At that time, local boards, officials and members of the public are provided the opportunity to further review the Project to ensure compliance with applicable state and local standards and regulations.

Based on MassHousing's consideration of comments received from the Municipality, and its site and design review, the following issues should be addressed in your application to the ZBA for a Comprehensive Permit and fully explored in the public hearing process prior to submission of your application for final approval under the Program:

² MassHousing has relied on the Applicant to provide truthful and complete information with respect to this approval. If at any point prior to the issuance of a comprehensive permit MassHousing determines that the Applicant has failed to disclose any information pertinent to the findings set forth in 760 CMR 56.04 or information requested in the Certification and Acknowledgment of the Application, MassHousing retains the right to rescind this Site Approval letter.

- Development of this Site will require compliance with all state and federal environmental laws, regulations and standards applicable to existing conditions and to the proposed use related to building construction, stormwater management, wastewater collection and treatment, and hazardous waste safety. The Applicant should expect that the Municipality will require evidence of such compliance prior to the issuance of a building permit for the Project.
- The Applicant should be prepared to provide sufficient data to assess potential traffic impacts on area roadways and intersections, including the safety of proposed site access and egress, and to respond to reasonable requests for mitigation.
- The Applicant should be prepared to address concerns regarding pedestrian access around the Site.
- The Applicant should be prepared to verify that the site plan is fully compliant with public safety standards relative to emergency access and provisions for fire suppression.
- The Applicant should be prepared to provide detailed information relative to proposed water and sewer use, potential impacts on existing capacity, and appropriate mitigation. The Applicant should consider engaging an LSP to make certain that activity would not have a negative impact on the Municipality's water supply and residents.
- The Applicant is encouraged to incorporate additional energy-saving and sustainability features into the Project. Possible features may include trash and recycling efficiencies, renewable energy sources, geothermal heating and cooling, drought tolerant landscaping, pervious surfaces, green infrastructure, and/or bike storage and electric vehicle infrastructure.
- The Applicant should be prepared to discuss sidewalk connections and updated infrastructure.
- The Applicant should consider partnering with Walpole Emergency Management's CERT program to provide for proper emergency planning, evacuation and sheltering plans on Site.

MassHousing has also reviewed the application for compliance within the requirements of 760 CMR 56.04(2) relative to Application requirements and has determined that the material provided by the Applicant is sufficient to show compliance.

This Site Approval is expressly limited to the development of no more than two-hundred and forty (240) rental units under the terms of the Program, of which not less than sixty (60) of such units shall be restricted as affordable for low or moderate-income persons or families as required under the terms of the Guidelines. It is not a commitment or guarantee of financing and does not constitute a site plan or building design approval. Should you consider, prior to obtaining a Comprehensive Permit, the use of any other housing subsidy program, the construction of

additional units or a reduction in the size of the Site, you may be required to submit a new Site Approval application for review by MassHousing. Should you consider a change in tenure type or a change in building type or height, you may be required to submit a new site approval application for review by MassHousing.

For guidance on the Comprehensive Permit review process, you are advised to consult the Guidelines. Further, we urge you to review carefully with legal counsel the M.G.L. c.40B Comprehensive Permit Regulations at 760 CMR 56.00.

This approval will be effective for a period of two (2) years from the date of this letter. Should the Applicant not apply for a Comprehensive Permit within this period this letter shall be considered to be expired and no longer in effect unless MassHousing extends the effective period of this letter in writing. In addition, the Applicant is required to notify MassHousing at the following times throughout the two-year period: (1) when the Applicant applies to the local ZBA for a Comprehensive Permit, (2) when the ZBA issues a decision and (3) if applicable, when any appeals are filed.

Should a Comprehensive Permit be issued, please note that prior to (i) commencement of construction of the Project or (ii) issuance of a building permit, the Applicant is required to submit to MassHousing a request for Final Approval of the Project (as it may have been amended) in accordance with the Comprehensive Permit Rules (see especially 760 CMR 56.04(07) and the Guidelines including, without limitation, Part III thereof concerning Affirmative Fair Housing Marketing and Resident Selection). Final Approval will not be issued unless MassHousing is able to make the same findings at the time of issuing Final Approval as required at Site Approval.

Please note that MassHousing may not issue Final Approval if the Comprehensive Permit contains any conditions that are inconsistent with the regulatory requirements of the New England Fund Program of the FHLBank Boston, for which MassHousing serves as Subsidizing Agency, as reflected in the applicable regulatory documents. In the interest of providing for an efficient review process and in order to avoid the potential lapse of certain appeal rights, the Applicant may wish to submit a "final draft" of the Comprehensive Permit to MassHousing for review. Applicants who avail themselves of this opportunity may avoid significant procedural delays that can result from the need to seek modification of the Comprehensive Permit after its initial issuance.

If you have any questions concerning this letter, please contact Michael Busby at (617) 854-1219.

Sincerely,



Chrystal Kornegay
Executive Director

cc: Janelle Chan, Undersecretary, DHCD
The Honorable Paul R. Feeney
The Honorable John H. Rogers
The Honorable Louis L. Kafka
The Honorable Shawn C. Dooley
The Honorable Paul McMurtry
Mark Gallivan, Chairman, Board of Selectmen
John Lee, Chairman, Zoning Board of Appeals

Attachment 1

760 CMR 56.04 Project Eligibility: Other Responsibilities of Subsidizing Agency Section (4) Findings and Determinations

Cedar Crossing, MH ID No. 1049

MassHousing hereby makes the following findings, based upon its review of the application, and taking into account information received during the site visit and from written comments:

(a) that the proposed Project appears generally eligible under the requirements of the housing subsidy program, subject to final approval under 760 CMR 56.04(7);

The Project is eligible under the NEF housing subsidy program and at least 25% of the units will be available to households earning at or below 80% of the Area Median Income, adjusted for household size, as published by the U.S. Department of Housing and Urban Development ("HUD"). The most recent HUD income limits indicate that 80% of the current median income for a four-person household in Walpole is \$89,200.

The affordable units will have rent levels of \$1,547 for the 32 one-bedroom units, \$1,822 for the 24 two-bedroom units, and \$2,085 for the 6 three-bedroom units, less assumed utility costs of \$126, \$185, and \$234, respectively. MassHousing's Appraisal and Marketing Division (A&M) has reviewed proposed affordable rents and report that they are within current affordable rent levels for the Boston-Cambridge-Quincy HMFA under the NEF Program.

The Applicant submitted a letter of financial interest from Enterprise Bank, a member bank of the FHLBank Boston under the NEF Program.

(b) that the site of the proposed Project is generally appropriate for residential development, taking into consideration information provided by the Municipality or other parties regarding municipal actions previously taken to meet affordable housing needs, such as inclusionary zoning, multifamily districts adopted under c.40A, and overlay districts adopted under c.40R, (such finding, with supporting reasoning, to be set forth in reasonable detail);

Based on a site inspection by MassHousing staff, internal discussions, and a thorough review of the application, MassHousing finds that the Site is suitable for residential use and development and that such use would be compatible with surrounding uses and would address the local need for housing.

The Town of Walpole has a DHCD-approved Housing Production Plan. According to DHCD's Chapter 40B Subsidized Housing Inventory (SHI), updated through November 18, 2019, Walpole has 484 (SHI) units (5.39% of its housing inventory), which is 414 units short of the statutory minima requirement of 10%.

(c) that 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 (such finding, with supporting reasoning, to be set forth in reasonable detail);

In summary, based on evaluation of the site plan using the following criteria, MassHousing finds that the proposed conceptual Project design is generally appropriate for the Site. The following plan review findings are made in response to the conceptual plan, submitted to MassHousing:

Relationship to Adjacent Building Typology (including building massing, site arrangement, and architectural details):

The Site Plan consist of four, five-story multi-family buildings and forty (40) townhomes with a combination of surface and underground structured parking. Two (2) of the multi-family buildings will be slab-on-grade and two (2) will be built over structured parking. The Applicant's objective is to create a "New England-style" development. The buildings will have sloped roofs and muted colors. Adjacent to this Rental Project, the Applicant has proposed development of sixty (60) single-family homes. The surrounding neighborhood is comprised of primarily older single-family homes on small parcels of land. The Applicant proposes to develop housing at a higher density than the single-family home uses found throughout this neighborhood and introduces a different building type to the area, but these differences are mitigated by incorporating a design theme that takes cues from the prevailing architectural context.

Relationship to Adjacent Streets

The Site is located in a predominately residential area and is one of the last larger sites in the area. It is bounded on the north by the Neponset River and the Cedar Hill Swamp. Primary roadways serving the Site include Main Street, Route 1, Washington Street, Winter Street and Summer Street. Public transportation is provided by the MBTA with commuter rail and bus service from Walpole to surrounding towns and the greater Boston area. There appear to be adequate lines of sight for vehicles entering and exiting the proposed Site. The proposed development is able to successfully integrate with existing development patterns.

Density

The Applicant proposes to build two-hundred and forty (240) units on approximately 26 acres, of which approximately 18.95 acres are buildable. The resulting density is 12.66 units per buildable acre, which is acceptable given the proposed housing type and the uses found in the surrounding context.

Conceptual Site Plan

The Site Plan consist of four, five-story multi-family buildings and forty (40) townhomes with a combination of surface and underground structured parking, adjacent to sixty (60) single-family homes with individual one-car garages and private driveways. The Site has frontage with an existing curb cut along Summer Street. Access the to the Site will be through a newly constructed boulevard driveway that can provide two ways in and out. Three (3) single-family homes will be sited at the Site entrance off Summer Street, preserving the development patterns seen throughout the existing neighborhood. The roadway continues by one (1) multi-family

building and through a portion of the proposed rental townhomes and the single-family homeownership development. Some ownership units are directly accessed from the loop while others are accessed from another sub-loop road. The road continues through the three (3) remaining multi-family rental buildings and additional townhomes that are situated at the rear of the parcel. Landscaping on the Site will focus on a combination of native, drought and area tolerant species that provide for seasonal color and character. Open space elements are proposed throughout the Project, including a dog park and community garden. A total of four-hundred and seventy-one (471) parking spaces results in a parking ratio of 1.96 spaces per unit.

Topography

The topography for the Site varies from flat towards Summer Street to slightly sloping northward with moundings and large rock outcroppings. The topographic features of the Site have been considered in relationship to the proposed Project plans and do not constitute an impediment to development of the Site.

Environmental Resources

To the north the Site is bound by a 361-acre conservation parcel owned by the town of Walpole and to the west the property is bound by one large single-family home lot that is mostly forested and abuts the Cedar Swamp. Wetlands found throughout the Site will limit the development to upland areas identified by the Applicant. Development of the Site will require careful attention to current best management practices to avoid any adverse impacts to the protected wetland resource areas. These resource areas will ultimately serve to break down the perceived massing of the Site, provide visual screening, and surround the residential portions of the Site with natural features. Wetland resources in these areas will be subject to further review by the local Conservation Commission under a Notice of Intent. Additionally, a portion of the Site has been considered contaminated under the Massachusetts Contingency Plan.

(d) that the proposed Project appears financially feasible within the housing market in which it will be situated (based on comparable rentals or sales figures);

MassHousing's Appraisal and Marketing (A&M) Division reports that there is strong history of rent growth, fast absorption, very low vacancy, and strong rental demand in Walpole's market area. Vacancy rates at comparable properties in the area are lower than 2% and the average capitalization rate over the past year was 4.5%. The proposed Project appears to be able to be competitive within the housing market in which it will be situated.

(e) that an initial pro forma has been reviewed, including a land valuation determination consistent with the Department's Guidelines, and the Project appears financially feasible and consistent with the Department's Guidelines for Cost Examination and Limitations on Profits and Distributions (if applicable) on the basis of estimated development costs;

MassHousing has commissioned an as "As-Is" appraisal which indicates a land valuation of \$907,333. The Project pro forma includes a proposed investment of \$20,517,814 in private equity. A preliminary review of the pro forma indicates that the per-unit construction costs are within the normal range for similar multi-family developments. Based on estimated development costs, the Project appears to be financially feasible and within the limitations on profits and distributions.

(f) that the Applicant is a public agency, a non-profit organization, or a Limited Dividend Organization, and it meets the general eligibility standards of the housing program; and

The Applicant meets the general eligibility standards of the NEF housing subsidy program and has executed an Acknowledgment of Obligations to restrict their profits in accordance with the applicable limited dividend provisions.

(g) that the Applicant controls the site, based on evidence that the Applicant or a related entity owns the site, or holds an option or contract to acquire such interest in the site, or has such other interest in the site as is deemed by the Subsidizing Agency to be sufficient to control the site.

The Applicant owns a portion of the Site (parcels 52-59 and 52-60) via Deed from WRG Cofsky Realty to 55 SS, LLC, a related entity to the Applicant dated August 28, 2019 and recorded with the Norfolk Registry of Deeds in Book No. 37105 and Page No. 482. The Applicant owns the remainder of the Site (parcel 52-78) via Deed from Hughes Baker Process Systems, Inc. to Omni Development, LLC dated October 31, 2019 and registered with the Norfolk County Land Court as Document No. 1.433.280 Certificate No. 201454.



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6 Lyberty Way, Suite 203
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Project Eligibility/Site Approval
MassHousing #1050**

Dear Mr. Hale:

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You have proposed to build sixty (60) single-family homes, including fifteen (15) affordable homes (the “Project”), on approximately 31-acres of land, (the “Site”) concurrent with a rental development known as Cedar Crossing which would consist of two-hundred and forty (240) units, including sixty (60) affordable units of rental housing, on approximately 26-acres of land, for a total of 57-acres of land at 51, 53 and 55 Summer Street in Walpole, MA (the “Municipality”).

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Based on MassHousing’s consideration of comments received from the Municipality, and its site and design review, the following issues should be addressed in your application to the ZBA for a Comprehensive Permit and fully explored in the public hearing process prior to submission of your application for final approval under the Program:

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This approval is expressly limited to the development of no more than sixty (60) homeownership units under the terms of the Program, of which not less than fifteen (15) of such units shall be restricted as affordable for low or moderate-income persons or families as required under the terms of the Guidelines. It is not a commitment or guarantee of financing and does not constitute a site plan or building design approval. Should you consider, prior to obtaining a Comprehensive Permit, the use of any other housing subsidy program, the construction of additional units, a reduction in the size of the Site, a change in tenure type or a change in building type or height, you may be required to submit a new site approval application for review by MassHousing.

For guidance on the Comprehensive Permit review process, you are advised to consult the Guidelines. Further, we urge you to review carefully with legal counsel the M.G.L. c.40B Comprehensive Permit Regulations at 760 CMR 56.00.

This approval will be effective for a period of two (2) years from the date of this letter. Should the Applicant not apply for a Comprehensive Permit within this period or should MassHousing not extend the effective period of this letter in writing, this letter shall be considered to have expired and no longer be in effect. In addition, the Applicant is required to notify MassHousing at the following times throughout this two-year period: (1) when the Applicant applies to the local ZBA for a Comprehensive Permit, (2) when the ZBA issues a decision and (3) if applicable, when any appeals are filed.

Should a Comprehensive Permit be issued, please note that prior to (i) commencement of construction of the Project or (ii) issuance of a building permit, the Applicant is required to submit to MassHousing a request for Final Approval of the Project (as it may have been amended) in accordance with the Comprehensive Permit Rules (see especially 760 CMR

56.04(07) and the Guidelines including, without limitation, Part III thereof concerning Affirmative Fair Housing Marketing and Resident Selection). Final Approval will not be issued unless MassHousing is able to make the same findings at the time of issuing Final Approval as required at Site Approval.

Please note that MassHousing may not issue Final Approval if the Comprehensive Permit contains any conditions that are inconsistent with the regulatory requirements of the New England Fund Program of the FHLBB, for which MassHousing serves as Subsidizing Agency, as reflected in the applicable regulatory documents. In the interest of providing for an efficient review process and in order to avoid the potential lapse of certain appeal rights, the Applicant may wish to submit a "final draft" of the Comprehensive Permit to MassHousing for review. Applicants who avail themselves of this opportunity may avoid significant procedural delays that can result from the need to seek modification of the Comprehensive Permit after its initial issuance.

If you have any questions concerning this letter, please contact Michael Busby at (617) 854-1219.

Sincerely,



Chrystal Kornegay
Executive Director

cc: Janelle Chan, Undersecretary, DHCD
The Honorable Paul R. Feeney
The Honorable John H. Rogers
The Honorable Louis L. Kafka
The Honorable Shawn C. Dooley
The Honorable Paul McMurtry
Mark Gallivan, Chairman, Board of Selectmen
John Lee, Chairman, Zoning Board of Appeals

Attachment 1

760 CMR 56.04

Project Eligibility: Other Responsibilities of Subsidizing Agency
Section (4) Findings and Determinations

Cedar Edge Condominiums, MH ID No. 1050

After the close of a 30-day review period MassHousing hereby makes the following findings, based upon its review of the application, and in consideration of information received during the site visit and from written comments:

(a) that the proposed Project appears generally eligible under the requirements of the housing subsidy program, subject to final approval under 760 CMR 56.04(7);

The Project is eligible under the NEF housing subsidy program and at least 25% of the units will be available to households earning at or below 80% of the Area Median Income (AMI), adjusted for household size, as published by the U.S. Department of Housing and Urban Development ("HUD"). The most recent HUD income limits indicate that 80% of the current median income for a four-person household in Walpole is \$89,200.

The Applicant submitted a letter of financial interest from Enterprise Bank, a member bank of the FHLBank Boston under the NEF Program.

(b) that the site of the proposed Project is generally appropriate for residential development, taking into consideration information provided by the Municipality or other parties regarding municipal actions previously taken to meet affordable housing needs, such as inclusionary zoning, multifamily districts adopted under c.40A, and overlay districts adopted under c.40R, (such finding, with supporting reasoning, to be set forth in reasonable detail);

Based on a site inspection by MassHousing staff, internal discussions, and a thorough review of the application, MassHousing finds that the Site is suitable for residential use and development and that such use would be compatible with surrounding uses and would directly address the local need for housing.

The Town of Walpole has a DHCD-approved Housing Production Plan. According to DHCD's Chapter 40B Subsidized Housing Inventory (SHI), updated through November 18, 2019, Walpole has 484 (SHI) units (5.39% of its housing inventory), which is 414 units short of the statutory minima requirement of 10%.

(c) that 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 (such finding, with supporting reasoning, to be set forth in reasonable detail);

In summary, based on evaluation of the site plan using the following criteria, MassHousing finds that the proposed conceptual Project design is generally appropriate for the Site. The following plan review findings are made in response to the conceptual plan, submitted to MassHousing:

Relationship to Adjacent Building Typology (including building massing, site arrangement, and architectural details)

The neighborhood is comprised of primarily older single-family homes on small parcels of land. The Applicant's objective is to create a "New England Village-style" development which features attractive landscaping and homes facing a collection of roads throughout the site. The proposed homes will be wood-framed with exterior cladding requiring minimal maintenance and designed to maximize the aesthetic characteristics of the development. The architectural designs and building scale are compatible with the style of homes found in the surrounding neighborhood. The proposed homes will be a maximum of three stories high, which is similar in height to housing found throughout the area. Adjacent to this Project, the Applicant has proposed the development of two-hundred and forty rental units consisting of four, five-story multi-family buildings and forty (40) townhomes with a combination of surface and underground structured parking.

Relationship to Adjacent Streets

The Site is located in a predominately residential area and is one of the last larger sites in the area. It is bounded on the north by the Neponset River and the Cedar Hill Swamp. Primary roadways serving the Site include Main Street, Route 1, Washington Street, Winter Street and Summer Street. Public transportation is provided by the MBTA with commuter rail and bus service from Walpole to surrounding towns and the greater Boston area. There appear to be adequate lines of sight for vehicles entering and exiting the proposed Site. The proposed development is able to successfully integrate with existing development patterns.

Density

The Applicant proposes to build sixty (60) homes on approximately 31 acres, of which approximately 17.62 acres are buildable. The resulting density is 3.40 units per buildable acre, which is acceptable given the proposed housing type and the uses found in the surrounding context.

Conceptual Site Plan

The Site Plan consists of sixty (60) single-family homes with individual one-car garages and private driveways adjacent to four, five-story multi-family buildings and forty (40) townhomes with a combination of surface and underground structured parking. Similar to most subdivisions in Walpole and surrounding towns, the Applicant proposes moderate-sized detached homes on small individual lots creating an opportunity to preserve as much open space as possible. The Site is accessed from Summer Street and includes an internal network of roads that provide frontage for the proposed housing. The Applicant proposes to build three (3) homes at the Site entrance off Summer Street, preserving the development patterns seen throughout the existing neighborhood. The remaining single-family homes are proposed to be placed at regular intervals along two roadways set back from Summer Street. The overall effect is of a complete, small neighborhood of homes linked by a public sidewalk and shared common open space areas.

Topography

The topography for the Site varies from flat towards Summer Street to slightly sloping northward with large rock outcroppings. The topographic features of the Site have been considered in relationship to the proposed Project plans and do not constitute an impediment to development of the Site.

Environmental Resources

The Site is a large parcel with undisturbed wetland areas. Wetlands found throughout the Site will limit the development to upland areas identified by the Applicant. Development of the Site will require careful attention to current best management Practices to avoid any adverse impacts to the protected wetland resource areas. These resource areas will ultimately serve to break down the perceived massing of the Site, provide visual screening, and surround the residential portions of the Site with natural features. Wetland resources in these areas will be subject to further review by the local Conservation Commission under a Notice of Intent. Additionally, a portion of the Site has been considered contaminated under the Massachusetts Contingency Plan.

(d) that the proposed Project appears financially feasible within the housing market in which it will be situated (based on comparable rentals or sales figures);

The Project appears financially feasible based on a comparison of sales submitted by the Applicant.

(e) that MassHousing finds that an initial pro forma has been reviewed, including a land valuation determination consistent with the Department's Guidelines, and the Project appears financially feasible and consistent with the Department's Guidelines for Cost Examination and Limitations on Profits and Distributions (if applicable) on the basis of estimated development costs;

The initial pro forma has been reviewed for the proposed residential use, and the Project appears financially feasible with a projected profit margin of 13.20%. In addition, a third-party appraisal commissioned by MassHousing has determined that the "As Is" land value for the Site of the proposed Project is \$937,667.

(f) that the Applicant is a public agency, a non-profit organization, or a Limited Dividend Organization, and it meets the general eligibility standards of the housing program; and

The Applicant meets the general eligibility standards of the NEF housing subsidy program and has executed an Acknowledgment of Obligations to restrict their profits in accordance with the applicable limited dividend provisions.

(g) that the Applicant controls the site, based on evidence that the Applicant or a related entity owns the site, or holds an option or contract to acquire such interest in the site, or has such other interest in the site as is deemed by the Subsidizing Agency to be sufficient to control the site.

The Applicant owns a portion of the Site (parcels 52-59 and 52-60) via Deed from WRG Cofsky Realty to 55 SS, LLC, a related entity to the Applicant dated August 28, 2019 and recorded with the Norfolk Registry of Deeds in Book No. 37105 and Page No. 482. The Applicant owns the remainder of the Site (parcel 52-78) via Deed from Hughes Baker Process Systems, Inc. to Omni Development, LLC dated October 31, 2019 and registered with the Norfolk County Land Court as Document No. 1.433.280 Certificate No. 201454.