



Planning Board

Town of Truro

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Date: September 4, 2020
To: Truro Zoning Board of Appeals
From: Truro Planning Board
Re: Cloverleaf Truro Rental Housing Comprehensive Permit Application

The Truro Planning Board (hereafter Board) submits these comments to the ZBA to help inform their decisions on the proposed Cloverleaf Project. This letter addresses the highest priorities and most pressing concerns of the Planning Board. We also bring to the ZBA's attention a document that we recently identified and believe to be helpful. This document, Handbook: Approach to Chapter 40B Design Reviews, was developed by the 4 Massachusetts Housing agencies authorized to review and approve site eligibility for Chapter 40B affordable housing developments. We are sharing this with you in the hope that is useful as you continue to move through this complicated process. The Handbook contains checklists as well as specific criteria for project evaluation. Two of the more relevant sections are: Section 1: Purpose (pages 1-2) and Attachment B: Guidelines for Reviewing Design (pages 29-31), especially Parking & Access pages 30-31). The document is attached and the link to the document on the Commonwealth of Massachusetts website is below.

<https://www.mass.gov/files/documents/2017/10/16/handbook-approachtoch40b-designreviewa.pdf>

We are available for further conversation with the ZBA to clarify or expand on the items listed here as well as other waiver requests or issues.

HEALTH & SAFETY CONCERNS

Sidewalks

1. The current plan does not provide a safe pedestrian path from Highland Road to the units in the development, except for Buildings 1-3 & 5-7. Nor is it possible to walk on the sidewalk all the way around the development.
 - a. According to the Landscape Plan a pedestrian would need to cross the roadway 1 or more times to get from Highland Road to any building except Building 1-3 & 5-7 using the sidewalk.

- b. For many buildings, including all the buildings surrounding the oval, except 1,2,3, there is no sidewalk outside the building. Residents would have to walk in the roadway, cross the roadway to find the sidewalk or walk on seeded/snow storage areas and cross driveways,
2. If the sidewalk down to Highland Avenue is snow or ice covered, the pedestrians will be forced to walk on a street that is steeper than allowed in the Truro Zoning Regulations.
- 3: An illustration is attached that shows how a sidewalk could be constructed that would completely encircle the property.

Parking

There is no Parking Plan provided. This information is based on parking shown on the Landscaping Plan.

1. The current plan shows at least 11 obstructed spaces. In an emergency this is a significant safety concern.
2. Approximately 20 spaces back directly onto street at a 90-degree angle. If this were a parking lot, the driving lane to back out into would be required to be 24' wide. In this case the proposed roadway is proposed as 16,' plus 2 12" berms. For context here are the lengths of 2 common vehicles: Honda CR-V 16'-17' long; Ford F150 pickup truck 17'6"-20'8 inches.
3. On both sides of the "oval" there is parking adjacent to both sides of the street. In the event of a blockage of the street; delivery vehicle, accident, breakdown, etc. access for emergency vehicles will be delayed or prevented.

Wastewater

We support the Board of Health members who have thus far kept our water resources safe. The complications denoted in the Weston & Sampson report of 2014 identified 'hot spots', the continuing runoff problem from Route 6, and the density proposed on the Cloverleaf project pose many potential problems and we support the Board of Health in their decisions in this matter.

Density The density on this site is the source of many health & concerns and challenges including, but not limited to wastewater and parking. The RFP was for 30-40 units, however the ZBA is not bound by the numbers in the RFP and could consider an even lower number of units. The Planning Board strongly supports the ZBA discussing a potential reduction in the number of units to address these concerns.

PROTECTION FOR TRURO & TRURO RESIDENTS

The Planning Board strongly recommends:

1. Denial of request for waiver of requirement to post a bond, cash, Letter of Credit, or impose Planning Board Covenants, related to site development. This is a protection for the Town and the future residents of the Cloverleaf and is required for a

subdivision of any size.

2. Denial of the following waiver requests – they are too broad. The Applicant should identify specific regulations he is requesting a waiver of.

- Relief is requested from any other zoning bylaw, general bylaw or regulations or procedures that may be identified in the review process if full compliance is not physically or economically feasible.
- Relief is requested from the applicability of such other sections of the Zoning By-law, the Subdivision Control Regulations, or of such other local rules and regulations that would otherwise be deemed applicable to this development.

IMPORTANT ADDITIONAL INFORMATION AND WAIVER REQUESTS

Parking -

1. The Applicant needs to request a waiver of Truro Zoning Bylaws Section 30.9. The parking indicated on the current landscape plan does not meeting the requirement of Section 30.9 of the Zoning Bylaws including:

- an inadequate number of parking spaces
- inclusion of obstructed spaces, which do not count in the number of spaces according to Truro Zoning Bylaws

2. In order to assess a request for a waiver of the Parking Regulation the Applicant should supply the ZBA with a Parking Plan that indicates at minimum: the assignment of spaces to specific units, the Management Office, Visitor Parking and Handicapped Parking; as well as the dimensions of the spaces. Only once this Parking Plan is received can the ZBA adequately assess the request.

Wastewater/Stormwater

The Horsley Witten Letter of September 3, 2020 notes the need for more specific information about erosion control and stormwater management. This information is needed “to ensure site stability both during and after construction.” We recommend that the ZBA confirm that all information noted as lacking has been provided before making a decision on the application.

Cross Sections of Property

The visual impact of all buildings grouped together, as well as the visual impact of the buildings along Route 6, are just as important as the visual impact of individual buildings. Currently it is impossible to adequately assess the visual impact of the proposal with the information provided. Several cross-section diagrams of the property will provide the ZBA with critical information the ZBA should have as it makes its decisions. If the Town of Truro will be responsible for snow plowing &/or road maintenance this information is even more important. At minimum 2 cross sections of the property showing both roadway and buildings are needed.

These will provide both a front to back and a side to side profile of the project. A roadway and parking profile is a required part of Site Plan Review.

1. Cross Section running from the front of the site at Highland Road to the back boundary. This will allow the ZBA to better assess:
 - the grade of the entrance roadway and the walkway and its potential impact safety issues including:
 - Snow & ice concerns on roadway & walkway
 - Potential runoff onto Highland Road
 - The height of a number of the building and the oval as compared to Highland Road
2. Cross section running from the side closest to Route 6 across to the far side at the level of the oval which will allow ZBA to:
 - See the elevation of structures in relation to Route 6 and better assess impact of road noise and dust hazard. At the site visit the road noise was significant throughout the site. Would a berm provide mitigate these issues for Cloverleaf residents?
 - The height of a number of buildings in relation to Route 6 which will aid in assessing the visual impact.

As the ZBA works to shape the Cloverleaf project to be the best project for Truro we encourage you to review this application in the context of Truro's Local Comprehensive Plan (LCP), approved overwhelmingly at Town Meeting. Addressing the need for affordable housing is an integral part of this LCP, but not the only integral goal. In the Executive Summary it states, "Truro's greatest treasure is the rural character we have preserved." (p 5) The challenge for the ZBA today is the same as that identified In the Vision section the Plan "The challenge for the town is to retain the elusive 'Rural Character' and to accept change at the same time – or better yet to shape that change towards a common vision of Truro's future. (p 14) The Board should balance the need for affordable housing against concerns for public health, safety, preserving rural character and protecting water resources.

Thank you for your work on this important and complex project.

Anne Greenbaum
Chair – Truro Planning Board