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Barney S. Heath
Director

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Secretary Kathleen Theoharides
Executive Office of Energy and Environmental Affairs (EEA)
Attn: MEPA Office
100 Cambridge Street, Suite 900
Boston MA 02114

**Subject: Hannover Wellesley, 20 & 40 William Street, Wellesley, MA
Comments on the November 15, 2019 Environmental Notification Form**

Dear Secretary Theoharides,

MEPA requires that project proponents study the environmental consequences of their actions and take all feasible measures to avoid, minimize, and mitigate damage to the environment. The ENF review process allows for public comment on the project, its alternatives, its potential environmental impacts, mitigation measures, and what to require in the scope of the EIR. Under MEPA Regulations, 301 CMR 11.00, section 11.06, ENF Review and Decision, state that an Agency shall comment on the following three issues.

- Agency Actions the City of Newton will be required to take for the Project
- Aspects/issues of the Project requiring additional description or analysis in an EIR.
- Opportunities to maximize consistency and facilitate coordination between the Agency Action and MEPA review or any other Agency Actions

Newton Planning and Development staff and Engineering staff have read the Environmental Notification Form for Hanover Wellesley at 20 and 40 William Street in Wellesley, Massachusetts and offer their praise for:

- Addressing the area's need for affordable housing
- Promising to construct all-electric buildings to minimize greenhouse gas emissions associated with the development

Newton staff offer their concerns about the following areas of potential impact.

- Wetlands
- Water and Sewer Infrastructure
- Transportation and Traffic

Wetlands

- The plans for compensatory flood storage need further consideration. Provision of subsurface flood storage rarely meets the Wetlands Protection Regulations performance standards

contained in 310 CMR 10.57: “Compensatory storage shall be incrementally equal to the theoretical volume of flood water at each elevation, up to and including the 100-year flood elevation, which would be displaced by the proposed project. Such compensatory volume shall have an unrestricted hydraulic connection to the same waterway or water body.”

Sewer Utilities

- Background: Sewer flows from the proposed Wellesley Office Park development flow northwest through the town of Wellesley to the Boulevard Road sewer pump station. There the sewage is pumped to the Cochituate Aqueduct in Newton (on Waban Ave). This sewage flows through Newton to the Commonwealth Golf Course, then to the MWRA interceptor pipe in Brighton. Newton provides capacity within the Cochituate Aqueduct for Wellesley’s sewer flows from the Boulevard Road sewer pump station, and Wellesley pays an annual capacity fee for this. Historically, during intense rain events, Newton has experienced sewer overflows along the Charles River, just upstream of the Boulevard Road pump station discharge to the Cochituate Aqueduct. Here, Newton diverts sewer flow to the Cochituate Aqueduct via the Quinobequin Road sewer pump station, and to the sewer interceptor pipe flowing northerly to Lyons Field, and to Cheesecake Brook. Sewer overflows have also been experienced at Lyons Field during intense rain events.
- The City of Newton is concerned about the additional sewer flows from the proposed development. Although proposed sewer flows will be somewhat offset by the existing sewer flows, proposed sewer flows may be significantly more, based on the proposed number of bedrooms. Like Newton’s existing sewer system, Wellesley’s existing sewer system experiences excessive sewer infiltration/inflow.
- City of Newton recommends that the Town of Wellesley ask for sewer infiltration/inflow mitigation funds from the developer, at a rate of 4:1, or 4 gallons removed for every gallon added, so that Wellesley may reduce the extraneous sewer infiltration/inflow in their system, and allow for the proposed additional sewer flows from the development. The funds would be used to reduce sewer infiltration/inflow in Wellesley’s sewer system. Newton requires this sewer infiltration/inflow mitigation for developments such as this, based on Newton’s annual sewer discharge permit with the MWRA, and per DEP guidelines and recommendations.

Vehicular Transportation

- Background: Both the Ellis Street/Route 9 EB Off-Ramp intersection and at the Quinobequin Road/Route 9 WB On-Ramp intersection are four-legged intersections under MassDOT jurisdiction, with STOP-sign control on three approaches. The unconventional traffic control causes confusion and uncertainty for drivers and is an existing safety concern. The only way to access the project site when traveling east-bound on Route 9 is by undertaking a U-turn at the Quinobequin Road/Route 9 WB On-Ramp intersection.

The traffic study included in Attached C of the ENF identified 30 vehicle crashes at these two intersections over the 5-year period that was examined, 28 of which were angle-type crashes. The report also identified that both intersections experienced a crash rate greater than the MassDOT statewide and District 6 average crash rate for unsignalized intersections.

Currently a Wellesley Police detail facilitates cars exiting the site by blocking off part of the access road, forcing cars coming from Newton to veer out into Route 9 traffic, a very nerve-racking and dangerous situation.

- The City of Newton is concerned that the existing queuing, confusion, and resulting safety issues will be exacerbated by the additional traffic volumes at the Ellis Street/Route 9 EB Off-Ramp intersection and at the Quinobequin Road/Route 9 WB On-Ramp intersection resulting from the proposed project. Currently only signage and paint improvements are recommended (with no specific details for what the signage and pavement markings might be) for these heavily impacted intersections in Newton while numerous improvements to Williams Street in Needham are recommended.
- The City of Newton recommends that the project proponent evaluate the feasibility of four-way STOP control at these intersections to improve safety and clarity to drivers, and work with MassDOT to implement four-way STOP control, real improvements to the William Street intersection, and/or other safety-related improvements deemed appropriate by MassDOT.

Transportation Alternative Connectivity

- Background: To truly offer an attractive, easily accessed alternative to traveling to and from the Wellesley Office Park by car, existing connections to extremely nearby public transportation portals need improvement and investment.
- The City of Newton is concerned that new residents to the Office Park will not avail themselves of the nearby Green Line MBTA stops (Waban and Elliot) because the basic infrastructure to support and encourage this choice is not available.
- The City of Newton recommends the following infrastructure investments to establish the connections to extremely nearby transportation alternatives.

The sidewalk width connecting the Office Park heading east towards the Elliot Street MBTA station is extremely narrow (and results in an intimidating walk given the speed of the vehicles along the adjacent service road). The recommendation would be to widen and improve the sidewalk path to Cragmore Road, which leads directly to the Elliot Street MBTA Station.

An even more direct connection to the Waban MBTA stop would be to construct a pedestrian/bicycle bridge from the Office Park across the Charles River to Quinobequin Road (near Lakerspur), which would result in a short walk or bike ride to the Waban MBTA stop.

Other Transportation

- Background: The proposed residential project will result in a lot of new cars in the area.
- The City of Newton is concerned that the current mitigation proposals include relatively weak commitments to: “become a member of the Route 128 Business Council ...”, “Coordinate ... to establish a dedicated shuttle...”, and “Initiate discussions with the Town and MetroWest Regional Transit Authority ...”
- The City of Newton recommends that more defined commitments to Transportation Demand Management efforts be required.

Thank you for the opportunity to comment. We look forward to continuing to work closely with the proponent on this very important project.

On behalf of the City of Newton,

A handwritten signature in cursive script that reads "Barney Heath".

Barney Heath, Director of Planning

CC: Mayor Ruthanne Fuller, City of Newton
Megan Jop, Executive Director of General Government Services, Town of Wellesley
Michael Palewonsky, AICP, Stantec Consulting Services, Inc., 226 Causeway St. Boston, MA 02114