

West Newbury Open Space Committee
381 Main St.
West Newbury, MA. 01985

July 28, 2020

Board of Selectmen
Town of West Newbury
381 Main St.
West Newbury, MA. 01985

Re: 40B Project Eligibility Letter -- 28 Coffin St. and 566 Main St., West Newbury (revised for 92-unit proposal downsized from 152 units)

To the Board of Selectmen:

The purpose of this letter is to state our opposition to the proposed 92-unit residential development proposed for 8 Coffin St. and 566 Main St. in West Newbury.

The Open Space Committee (OSC) supports affordable housing as outlined in the town's recently adopted Housing Production Plan; however, this proposed project is unacceptable given its size and location. The OSC is concerned that the project could seriously jeopardize West Newbury's rural character, which is the cornerstone of the Open Space and Recreation Plan (OSRP). This plan was approved by the Massachusetts Division of Conservation Services in 2019 and its purpose is summarized below:

"The 2018 OSRP is designed to assist in the dynamic process by which the town evaluates and addresses its open space and recreation needs. The plan's overarching intent is to guide West Newbury as it endeavors to preserve its rural character and plan recreational spaces while community needs change and development increases." **OSRP, Page 4**

The OSRP lays out goals and includes a long-term action plan related to preserving our town's rural character through sensitive development; protecting natural resources, such as water, wetlands, wildlife habitat and endangered species; safe and passive recreation opportunities and enacting measures that promote climate resilience.

The project would create notably adverse impacts in the six areas described below:

1. **COMPROMISES OPEN SPACE**

The proposed development will result in the loss of 73 acres of open space from the town's inventory of important parcels. The undeveloped space in the project plans no longer meets the criteria that made this parcel significant open space. These include:

- Scenic views
- Hilltops
- Trail corridors and greenways
- Agricultural potential
- Passive and active recreation
- A large contiguous parcel

The developer in his revised plan asserts that, as proposed now, 66.74 (around 61% in the first plan) percent of the property would be usable open space without identifying it in the revised plan set. Our review of the revised plans finds that, as built, undeveloped space throughout the parcel would be sparse, fragmented and generally unusable. The developer in the revised plans claims the open space is not fragmented, citing a 35-acre contiguous parcel of open space. What we

can glean from the revised plan set is the largest open space parcel is almost all wetlands, hence not useable for passive recreation. Nearly 10 acres of undeveloped space in the revised plan remains situated under high-tension power lines, rendering that land off limits to the public. It appears that the tally of open space includes the yards of the housing units as well.

Also, adjacent tracts of protected open space include Long Hill to the north (295 acres) and Riverbend and Mill Pond (464 acres) to the east. The land for the proposed project currently functions as a connector between these large tracts. The developer mentions trail connections to Long Hill, Riverbend and Mill Point (Mill Pond is the correct name), but none appear in the revised plan set. Trails his firm promised at The Cottages at River Hill in West Newbury were an afterthought and constructed without regard for engineering specifications (they were made from construction grade wood chips shoveled from the back of a truck with no ground preparation). As a result, these trails are impossible to maintain and are barely distinguishable today.

Like the original plan, the new proposal would be significantly improved with expanded, connected and useable open space clearly identified in the revised plan set.

2. ENDANGERS WETLANDS

The parcels proposed for development by the project include extensive wetland areas and potential vernal pools. Five leaching fields in both the original and revised plan sets remain situated within 100 feet of these resource areas which are down steep slopes on each side of the leaching fields. Maintaining buffers around wetland areas is the most effective means of protecting water quality, habitat and wetland dependent species of wildlife. Building housing units and site infrastructure within the wetland buffer zones has the potential to compromise these resource areas.

3. ENDANGERS WILDLIFE HABITAT

“Maintaining connectivity of open space parcels is a primary goal of the OSRP. Fragmentation of wildlife habitats by human activities or structures is a critical problem in maintaining biodiversity in populated areas. The stability and long-term success of many wildlife populations is threatened by not being able to move freely and safely between habitats in response to natural causes of food and water shortages and to seasonally migrate or to maintain genetic diversity by interbreeding with other populations”.

OSRP, Page 38

The parcel being proposed for development currently functions as part of an extended open space corridor from the Merrimack River to interior parts of town on the south side of Route 113. The heavy development of this parcel would result in the severing of this wildlife corridor, threatening the habitats and life cycles of many animals, birds and aquatic life.

Little effort in the first and second proposals have been made toward maintaining existing wildlife corridors. The revised and original plans show significant grading of the property, which would diminish habitat value.

4. PROJECT DENSITY INCONSISTENT WITH TOWN'S RURAL CHARACTER

The revised project's proposed 92-unit site plan with hundreds of parking spaces threatens to overwhelm the town. The original plans specified 638 parking spaces, but the revised plan does not disclose if fewer spaces are projected. The Chapter 40B Design Principles Handbook requires projects to use the site and its context to help determine a generally appropriate density. The scope of the project indicates little effort by the developer to build with sensitivity to the neighborhood and topography of the land, as state affordable housing regulations direct. A 2014

A LandVest appraisal report posited a low-density development plan at eight house lots and medium density at 16 as the “maximum theoretical lot yield.”

The high density in the proposal runs counter to the OSRP goals to promote sensitive development and preservation of West Newbury’s rural character. Indeed, the point is addressed in the OSRP.

“The relatively low population density of West Newbury reflects its agricultural history, current landscape and past efforts to maintain open space.” **OSRP, page 13**

In the most recent town-wide survey conducted for the OSRP, rural character emerged as a top reason why people move to West Newbury. Similar surveys in 2002 and 2008 revealed the same sentiment. Open space, working farms, access to nature and wildlife and respect for the town’s history are the chief contributors to West Newbury’s “small-town feeling.” Survey respondents also stated that the town is losing its rural character as more building reduces open space and increases population and traffic.

A sampling from the most recent survey respondents demonstrates the importance of the community’s rural character in their lives:

“People live in West Newbury because it’s rural. We’re surrounded by nature. As we continue to build homes, we lose nature. We lose the very point of living here.”

“We love the rural qualities of this town. We moved here 10 years ago because it was beautiful and rural. TOO many new homes and developments. Stone walls, farms and space between neighbors are very, very important.”

“We’ve been very disappointed with the ugly developments we’ve seen built [in] the last few years. It’s ruining the town’s character. We should be protecting as much open space as possible. I watched Reading’s last farmland turn into apartment buildings. I don’t want to see it happen here. Unchecked development will turn West Newbury into just another suburb.”

“One of the reasons we moved here from the Boston area was for the open space, rural beauty, woods and wildlife.”

5. THREATENS SAFE RECREATION

River Road is a designated River Trail and link to the town’s Riverbend Recreational Area. Many residents take advantage of the low traffic on River Road to enjoy scenic river views, bird and wildlife watching, fishing, river access, bicycling and walking. Narrow Coffin Street, which has dangerous curves and poor visibility even in good weather conditions, provides access for this recreational use, a place where the site plan shows a point of exit. Based on the number of parking spaces in the original 152-unit plan, 2,552 daily auto trips are anticipated from this project. The projected number of parking spaces for the revised plan was not given. Regardless, the addition of at least several hundred daily auto trips by development’s residents poses a safety concern for residents who use this area for passive recreation.

6. INCREASES CLIMATE CHANGE VULNERABILITY

The OSRP identified climate change as one of the principal environmental challenges that the town faces, with a high priority action item of participating in the Massachusetts Municipal Vulnerability Preparedness (MVP) program. The town has completed the workshop component of this program, identifying the hazards, strengths and vulnerabilities that the town faces related to climate change. As action items to address these vulnerabilities are identified and grant funding sought to implement them, the town will focus on nature-based solutions. These include open

space preservation and low impact development. Developing this large tract of open space without adhering to low impact development principles, such as preserving the natural landscape and especially carbon-sequestering trees, will increase the town's vulnerability to climate change.

In closing, the West Newbury Open Space Committee views this development as inconsistent with the town's open space needs and goals for the reasons outlined. We strongly urge MassHousing to reject granting the developer a Project Eligibility Letter.

Respectfully submitted,

A handwritten signature in black ink that reads "John Dodge". The signature is written in a cursive, slightly slanted style.

John Dodge, Chair
West Newbury Open Space Committee

OSC Members

Jessica Azenaro, Don Bourquard, Brad Buschur, Carol Decker, Jean Lambert, Patricia Reeser, Wendy Reed, Marlene Switzer