



TOWN of BROOKLINE

Massachusetts

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May 12, 2015

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MELVIN A. KLECKNER
Town Administrator

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, Mass. 02114

Re: The Residences of South Brookline, Brookline, Massachusetts
Request for Advisory Opinion

Dear Secretary Beaton:

On behalf of the Brookline Board of Selectmen, I hereby formally request that you issue an Advisory Opinion pursuant to 301 CMR 11.01(6) in regard to The Residences of South Brookline, a proposed development to be located on the Brookline portion of the Hancock Village residential complex, located on Independence Drive in both Brookline and Boston.

MassDevelopment deemed the project eligible under c.40B to receive tax-exempt bond financing in its October 8, 2013 Project Eligibility Letter. Subsequently, the Brookline Zoning Board of Appeals issued a Comprehensive Permit to the Applicant, The Residences of South Brookline, LLC, to construct 161 units on part of Hancock Village, which is deemed eligible for listing in the National Register of Historic Places. Given that MassDevelopment will provide tax-exempt bond financing to this project, The Residences of South Brookline clearly falls under the jurisdiction of MEPA. Although the Town recognizes that it is the responsibility of the project proponent to submit an Environmental Notification Form (ENF) if the proponent determines that the project meets or exceeds one or more thresholds pursuant to 301 CMR 11.03, the Town has not received notification via MEPA's *Environmental Monitor* that an ENF has been filed and therefore assumes that no such determination has been made.

The Town maintains that at least one of the threshold categories specified in the regulations, "Historical and Archaeological Resources," applies to this proposed development:

"Demolition of all or any exterior part of any Historic Structure listed in or located in any Historic District listed in the State Register of Historic Places or the Inventory of Historic and Archaeological Assets of the Commonwealth;" (301 CMR 11.03(10)(b)(1)—emphasis added)

The regulations further define "Historic Structure" as "any historic property...that is significant to the history or prehistory of the Commonwealth, its counties, or municipalities" (301 CMR 11.020—emphasis added).

Historic Significance of Hancock Village Site

In 2012, the Massachusetts Historical Commission (MHC) deemed Hancock Village eligible for listing in the National Register of Historic Places, a status that, as you know, grants the property automatic listing in the State Register. A 44-acre, 800-unit complex straddling Boston and Brookline, Hancock Village is significant as a far-sighted collaboration between the Town of Brookline, the City of Boston and the Hancock Insurance Company to provide both employment and housing for returning World War II veterans.

Designed as a "garden village," the development consists of a series of two-story apartment houses arranged in distinct U-shaped patterns to allow for a hierarchical system of private and semi-private courtyards interspersed with open lawns and access roads. This development pattern is historically significant not only because it was designed by Olmsted Associates, a nationally renowned Brookline firm, but because it is based on the Garden City philosophy advocated in the first decades of the twentieth century by social reformer Ebenezer Howard, who called for the creation of new towns that were limited in size and density, surrounded by a ring or belt of undeveloped land. The objective of such developments was a planned community with affordable housing, low density, curving streets, separation of automobiles and pedestrians, shallow building plans to allow for light and ventilation, and common spaces designed around the apartments forming a continuous park. A further objective was to preserve as much open space as possible and to respect the existing natural conditions and vegetation. A successful example of these applied principles, Hancock Village is the first and largest garden village housing development in Massachusetts.

Project Description and Area of Impact

The pending project consists of sixty-two units of rental housing distributed in eleven buildings in the six-acre open-space green belt, which has historically served to buffer the abutting single-family neighborhood and Hancock Village. An additional ninety-nine units are to be located in a 500-foot long three- and predominantly four-story mid-rise apartment building between two clusters of the existing U-shaped housing, thereby bisecting the distinctive development pattern that defines the historic Hancock Village complex. A project site plan is enclosed.

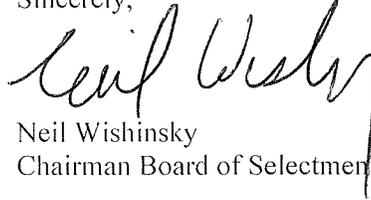
Furthermore, although existing buildings are not slated for demolition, the distinct development pattern of this historic property will indeed be impacted by the project. Specifically, the ring of open space designed to buffer this complex from the abutting single-family neighborhood and provide outdoor recreation for occupants of the complex will be eliminated. In addition, the two-acres of puddingstone outcroppings would site a 500-foot long mid-rise, which will obstruct the uninterrupted pedestrian access and sight lines that were the aim of the garden village layout. The siting of this project also sets a disturbing precedent for future development of the open space corridors characteristic of this historically significant development pattern. Finally, it is important to note that Hancock Village abuts the Veterans of Foreign Wars (VFW) Parkway, which is listed in the National Register of Historic Places.

Because of the significance of this complex to the State's and arguably the nation's history, mitigation measures designed to reduce the impact of the project and possible future development at Hancock Village are critical. Accordingly, the Town of Brookline respectfully requests that you issue an Advisory Opinion relative to whether or not the proposed project warrants a MEPA review. Town staff is available to provide any information that may facilitate your review.

For your reference, the Town has concurrently notified MHC in its April 28, 2015 letter to Secretary William F. Galvin that the project may have an impact on nearby properties listed in the State and Federal Registers of Historic Places. At this time, we understand that the state funding source, MassDevelopment, has not filed a Project Notification Form (PNF) to MHC to prompt the Commission's review.

The Board of Selectmen urges your favorable action in order to help the Town identify and apply all possible mitigation measures that would help protect the historic integrity of Hancock Village. On behalf of the Town of Brookline, thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Wishinsky". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Neil Wishinsky
Chairman Board of Selectmen

Cc: Representative Edward Coppinger

Enclosure