



TOWN OF YARMOUTH

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Planning
Division

MEMORANDUM

To: Cape Cod Commission

CC: Yarmouth Planning Board
Yarmouth Board of Selectmen
Karen Greene, Director of Community Development
Jack McCormack, Cape Cod Commission Representative

From: Kathy Williams, Town Planner

Date: January 11, 2019

Subject: Cape Cod Commission – Draft Technical Bulletins

Thank you for the opportunity to comment on the Draft Technical Bulletins related to the 2018 Cape Cod Regional Policy Plan (RPP) update and for extending the comment period to January 13, 2019. A great deal of effort and technical knowledge has gone into the preparation of these documents by Commission Staff, and they have been well coordinated with the RPP update. Specific comments are outlined below:

1. Placetype: As some of the methods for meeting the Objectives outlined in the Draft Technical Bulletins vary by Placetype, only one dominant Placetype should be identified for each project to avoid having to meet conflicting Placetype strategies and objectives.
2. Methods for meeting the Objective: Most of the methods listed are not mandatory, but a list of options available to meet the Objective. Although this approach provides flexibility for developers as they can choose the methods that most readily fit with their development, it may also result in some ambiguity as to whether the methods chosen will ultimately meet the Objective. This is something that will end up playing out in the DRI review process.
3. Objective Methods by Placetype: What do these Areas of Emphasis by Placetype mean? Are they mandatory or are they another method for meeting the Objective?
4. General: Through our Zoning, Yarmouth has emphasized the desire to redevelop Route 28 with more traditional patterns of develop through the creation of village centers. With much of Route 28 likely being designated as commercial Suburban Development Areas, the Technical Bulletins should actively promote and encourage redevelopment of commercial Suburban Development Areas in such a way as to move towards the creation of Community Activity Centers. Many of the Technical Bulletins do this, but some still encourage development specifically in the Community Activity Centers. Yarmouth's currently mapped Community Activity Center is not likely to see any significant development as it is mostly located in

Residential Zoning Districts, including our most restrictive RS-40 Residential District, and also includes the South Yarmouth/Bass River Historic District.

5. Open Space: To promote the redevelopment of commercial Suburban Development areas to Community Activity Centers, a 1:2 open space ratio should also apply to commercial Suburban Development. Or, a middle ground of 1:1.5 for commercial Suburban Development areas could be utilized.
6. Housing:
 - a. Objective HOU3 – Protect and improve existing housing stock: Although this is a desirable goal, it is unclear how this Objective can be met for raze and replace projects. Are off-site improvements of existing housing required? Further clarity is needed for this Objective and when it applies.
 - b. Housing affordability (HOU4): Multi-unit residential developments proposing 100% rental units of 1,200 sf or less do not have to provide affordable units. I realize this is to promote much needed workforce rental units, but how do we ensure these units remain affordable over time and are rented to year-round residents? Yarmouth has inclusionary zoning which would apply to DRI projects, but this may have impacts in other communities.
 - c. Create small lot residential development: This section notes that “over 80% of Cape Cod’s existing housing stock is in the form of single-family homes, typically on lots of one or more acres”. This is somewhat misleading as most residential lots are not one acre or larger. In Yarmouth, about 80% of our residential lots are less than half an acre, which has resulted in our very high residential density.
 - d. Off-site Option and Land Donations: Any off-site affordable units or land should be located in the same Town as the DRI project. Also, it is unclear who would receive the donation of the land or existing units and how does the Commission ensure the land is developed?