



Town of Reading
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TOWN MANAGER

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September 30, 2017

Greg Watson
Manager of Comprehensive Permit Programs
MassHousing
1 Beacon Street
Boston, MA 02108

Dear Mr. Watson:

The following constitutes the Town of Reading's comments on the revised Eaton Lakeview Development, LLC's submittal to MHP dated July 12, 2017 for a Project Eligibility Letter (PEL) for the above named property. If MHP issues a PEL, we anticipate that the applicant will apply to the Reading Zoning Board of Appeals (ZBA) for a Comprehensive Permit under MGL Chapter 40B.

Please note that on September 27, 2017 the Department of Housing and Community Development (DHCD) certified that the Town of Reading is in compliance with its Housing Production Plan. The certification is now effective for an additional year, or for a two-year period beginning on February 23, 2017 through February 22, 2019.

Town of Reading - Affordable Housing

As I indicated in my June 8th comment letter, the Town of Reading has been successful in its efforts to create and sustain affordable housing, by:

- Securing a DHCD approved two-year certification (safe harbor) based on meeting the housing production goal of 1% of the Town's total 10% in one year, which expires in February of 2019.
- Adopting a Housing Production Plan (HPP) which was also approved by the State. The HPP link is: <http://www.readingma.gov/node/2427>. The Town is currently working with a consultant to renew the Housing Production Plan through 2023.
- Reading has amended its zoning bylaw to allow for both dense development and intergenerational living, both of which support affordable housing.
- **DHCD showcases Reading on its website as a model 40R community** - Reading has adopted two MGL Chapter 40R Smart Growth Overlay Zoning Districts that permit 571 new units "by right". The Gateway Smart Growth District (GSGD), includes a portion of Reading Woods; a

424-unit housing development. The GSGD contains 200 units with 20% (43 units) designated as affordable housing. The Downtown Smart Growth District (DSGD) was adopted in 2009 and was the foundation for “by right” residential or mixed-use in a walkable, vibrant downtown with a commuter rail station as its hub. The 2009-approved 26-acre DSGD allows an estimated 258 new residential units.

- **Downtown Smart Growth District Expansion** - Furthermore, in April 2017, Town Meeting adopted, and the AG’s office approved, an expansion of the DSGD to include approximately 21 additional acres, with a projected potential for 113 new residential units. To date, 53 residential units have been built in the DSGD. Recently, the Reading Community Planning and Development Commission (CPDC) approved the application for 40R Plan Review of the adaptive re-use of the historic Reading Post Office which will be a mixed-use project with 50 residential units, 10 of which will be affordable. In addition, the CPDC opened a public hearing earlier this month on another DSGD 40R mixed-use project, which is expected to create 58 additional housing units, 25%-40% of which will be affordable.
- **Economic Development Action Plan (EDAP)** – In 2015, Reading created an EDAP. The EDAP identifies economic development strategies including expanding the DSGD. The EDAP link is: <http://www.readingma.gov/planning-division/files/economic-development-action-plan-with-appendices>
- **Metro North Regional Housing Office (MNRHSO)** – In 2015, Reading established the MNRHSO comprised of the towns of Reading, North Reading, Wilmington, and Saugus. The MNRHSO shares the expenses of a full-time housing coordinator who monitors existing affordable housing and provides expertise related to affordable housing. An Advisory Committee oversees the MNRHSO. Massachusetts has only a handful of RHSO’s and Reading is proud to have developed this for the Metro North region.
- **Comprehensive Update of the Reading Zoning Bylaw (ZBL)** – In 2014, the ZBL was updated to clarify, simplify, and modernize zoning for ease of use by developers. Accessory Apartments are now allowed “by-right” (instead of through a ZBA administered special permit process) if performance standards are met and if the unit is located in an existing structure. Permitting checklists have been developed to simplify zoning further.
- **Reading 2020 Board of Selectmen Strategic Plan** – A planning effort that will establish long term goals and strategic plans for the future was developed in 2014. Planning for future housing needs is an element of this plan so that our policies and regulations support the needs of the community.

The Eaton/Lakeview Development is one of the **five** 40B projects in Reading. The Town of Reading recently approved two 40B projects and two older 40B’s are still pending:

- On July 24, 2017, the Town of Reading issued a Comprehensive Permit for Schoolhouse Commons, a 20-unit multi-family project that is designed as an adaptive reuse of a former school affiliated with St. Agnes Church.
- On February 23, 2017, the Town of Reading issued a Comprehensive Permit for Reading Village, a 68-unit 4-story multi-family development on a site of approximately 42,000 square feet. This project is on a corner across from the commuter rail station.

- In the spring of 2015, Lyle Estates applied to MassHousing for a PEL for 16 new units of townhouse style duplex housing on 2.75 acres. This PEL is still pending; however, a 4-lot subdivision was recently approved by the CPDC with the condition that the application to MassHousing be withdrawn.
- Several years ago, a comprehensive permit was issued for 45 Beacon Court. This project, approved for 10 units, has not been constructed.

Site and Project

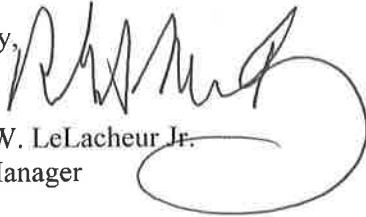
- The Applicant is proposing to redevelop 6 parcels of residentially-zoned land totaling approximately 4.5 acres at the corner of Eaton Street and Lakeview Avenue. The earlier plan included a 160-unit rental 40B project with 40 affordable units available to households earning at or below 80% of the Area Median Income. The revised plan has reduced the total units to 120 total units and the affordable units to 30. The loss of units is disappointing, especially as regards the number of actual affordable units.
- A Development Review Team Meeting was held on July 19, 2017, and the comments generated at that meeting are included in the attached. The site is accessed via Lakeview Avenue, which is a narrow private way that does not conform to Town roadway or pedestrian standards. The attached DRT notes highlight the need for roadway improvements and the need for new sidewalks. One comment is that Lakeview Ave. should become a public road to better serve the whole neighborhood.
- Proximity to Downtown & Amenities – the site is located in a residential neighborhood that is a short walk to downtown and the Commuter Rail Station, and a short walk to nearby grocery stores and shopping opportunities on Walkers Brook Drive. Though this site is within walking distance to downtown and various amenities, it should be noted that the site itself is not really within a walkable neighborhood.
- Additional information should be furnished including:
 - Indicate on plans unit distribution by size, bedrooms, and affordability;
 - More elevations depicting project in relation to Jordan's Furniture retaining wall and as both sites relate to Walkers Brook.
 - Property Management - No documentation was provided regarding property management including how will trash and recycling be handled for the site;
 - Lighting – This was requested at the DRT; nothing has been provided;
 - Parking – Additional details are needed to make sure that this development has been “right-sized” for parking. The DRT notes request consideration of less parking or perhaps phasing the parking as proposed based on actual demand. This would reduce the amount of pavement in favor of adding more landscaping. Consideration of one-way access could further mitigate the need for excess pavement.
 - Landscaping - Existing Trees – As expressed in the DRT, the landscaping should be enhanced especially to provide more of a vegetative buffer for the abutting multi-family use and existing trees should be preserved. These trees should be clearly marked on the site and landscape plans.

Sustainable Development

- The development is in close proximity to an MBTA bus stop located on Walkers Brook Drive, but is not a true transit-oriented development as it is not located in an area in which residents can access all of their needs without a vehicle. A pedestrian bridge to the adjacent Walkers Brook Crossing commercial area would greatly benefit the project. Bike racks should be provided to reduce dependence on automobile use and support alternative forms of transportation.

Thank you again for the opportunity to comment on this project. I am happy to answer any further questions.

Sincerely,



Robert W. LeLacheur Jr.
Town Manager

Attachment (DRT Notes)

cc: Board of Selectmen
Zoning Board of Appeals
Community Planning and Development Commission
Assistant Town Manager
Community Development Director

Development Review Team Meeting

July 19, 2017

Eaton Lakeview Apartments 40B

Staff Present:

Town Manager Bob LeLacheur, Assistant Town Manager Jean Delios, Community Development Director Julie Mercier, Economic Development Director Andrew Corona, Police Lieutenant Christine Amendola, Public Safety Officer Michael Scouten, DPW Director Jeff Zager, Assistant DPW Director Jane Kinsella, Town Engineer Ryan Percival, Conservation Administrator Chuck Tirone, and Health Agent Laura Vlasuk

Applicant / Development Team:

Developers Guy Fodera and Joe Guy Fodera, Francis Curtis and David DiBenedetto of CDA Architects, Attorneys Ted Regnante and Matthew Hadge, Traffic Engineer Kim Hazarvardan, Engineer Chris Sparages of William & Sparages, and 40B Advisor Ed Marchant were present on behalf of the application.

Project Summary:

The Applicant is proposing to redevelop 6 parcels of industrial and residentially-zoned land totaling approximately 4.5 acres at the corner of Eaton Street and Lakeview Avenue with a 120-unit rental 40B project which will include 30 affordable units available to households earning at or below 80% of the Area Median Income. The units will be distributed among 3 buildings: each building will contain 40 residential units across 4 floors with 1 floor of underground parking. The project will provide a total of 181 parking spaces: 94 garage spaces, and 87 surface spaces. A two-way access drive aisle and a system of paths / sidewalks will enable vehicular and pedestrian circulation throughout the site. In addition, there will be a community hall with event spaces and a mail room, and a park in the open space behind Building 1. New fire, water, sewer, electric and gas connections are proposed; stormwater will be managed via underground infiltration chambers.

Portions of the site contain wetlands, wetland buffers, 100-year floodplain and riverfront area. The proposed project encroaches into the 100-foot wetland buffer and as well as the floodplain and riverfront area. The rear of the site along Walkers Brook will be graded to achieve separation from groundwater requirements.

DPW/Engineering	
	Comment
1. Lakeview Ave	Whole length of Lakeview Ave will be upgraded so Town can take it by Eminent Domain. Sidewalks and other practical improvements will be needed.
2. Eaton Street	Proposal only includes patching for utilities and adding a sidewalk along property frontage. The Applicant shall consider re-doing whole street as benefit to neighbors.
3. Sewer	Existing sewer main ends part way up Lakeview; will need to be extended.
4. Sewer Calcs	Calculations shall be provided showing that system can handle additional flow.
5. MS4 Permit	Project shall adhere to new MS4 permit coming out in July 2017.

6. I/I Fee	Fee will be required and is twice the flow x\$4.00.
7. Stormwater	Calculations will be needed along with more detailed drainage design plans. System will include a series of BMP's with deep sumps, pre-treatment oil-water separators, and subsurface infiltration. Will need to meet new MS4 permit; no phosphorous fertilizers allowed. The Applicant shall consider LID features and rain gardens.
8. Natural Gas	Will need to be extended for project.
Fire	
	Comment
1. Drawings	Full size drawings required for comprehensive plan review.
2. Turning Radius	Will need to be provided and verified by Fire Department.
3. Hydrants	Hydrant locations TBD. Flow tests to be done and apparatus plan submitted.
4. Water Main	Determine whether water main is sufficient size to handle Fire flow.
5. Assembly	Wood frame over podium = mixed-use building → sprinklers required.
6. Sprinklers	Buildings will be fully sprinklered with standpipes in stairwells.
7. Hookups	Locations for Fire/water hookups require review and approval.
8. Amplifier	Directional amplifier for communicating out will be required - Fire & Police frequencies.
9. CO Monitors	Carbon monoxide system AND nitrous oxide sensor required for underground parking.
10. Gas Meters	Shall be in designated place on exterior of building (not inside parking garage).
11. Dumpsters	3 proposed at the ends of drive aisles, will be covered and meet BOH regulations – minimum 10' from buildings.
12. Snow Removal	Fire access must be maintained at all times.
13. Gas Grills	Gas grills not allowed on balconies; association documents shall prohibit them.
14. Garages	Will have communication systems.
Police	
	Comment
1. Traffic Volume	Traffic volume high in this area due to Market Basket.
2. Loading	Designated loading area shall be provided on-site; not allowed on-street unless approved by Board of Selectmen.
3. Const. Hours	General Bylaw Section 8.9.8 outlines construction hours allowed in Town.
Planning / Housing	
	Comment
1. Pedestrian Access & Lakeview Ave.	Consider providing sidewalks and street improvements along the length of Lakeview Ave for better pedestrian / vehicular access to Walkers Brook Drive and New Crossing Road. Pedestrian bridge across Walkers Brook from project site to Walkers Brook Crossing is strongly encouraged. Improving Lakeview Ave so that it can become a public road will make the whole neighborhood better.
2. Elevations	Provide elevations depicting project in relation to Jordan's Furniture retaining wall, and as both sites relate to Walkers Brook.
3. Paper Street	Provide more information regarding extent of paper street.
4. Pavement	Explore ways to reduce paving on-site, such as one-way access, removal of surface parking (potential to build it later if needed).
5. Snow Storage	Not encouraged in parking areas, will be provided on-site.
6. Trash/Recycling	Details TBD, will be huge component of development program.
7. Parking	Assigned based on need; garage access restricted to residents. The Applicant shall consider phasing the additional surface parking and only building it if needed.

8. Traffic Study	To include Village St/Lakeview Ave intersection and Hunt Park on Eaton St. Should also include actual routes people will use to get to/from the site. The ZBA is likely to want a complete traffic impact and access (TIA) study that makes recommendations for the Town.
9. Setbacks	Applicant encouraged to increase setback between 1-way drive aisle and abutter and/or to move Building 1 further south.
10. Abutters	Applicant encouraged to meet with abutters prior to submitting to the ZBA.
11. Landscaping & Trees	Consider enhancing landscape buffers to abutters; maintain as many trees as possible, especially those that screen Jordan's retaining wall from site.
12. Lighting	Lighting specs and photometrics shall be provided with ZBA filing.
13. Accessibility	Elevator access in all buildings; ADA compliant units to be provided.
14. Affordable Units	30 affordable units proposed at 80% AMI; rents will include utility allowance.
15. Local Preference	State allows up to 70% of affordable units to be local preference but must be justified.
Conservation	
	Comment
1. Path	Consider adding path at rear of site connected to Lakeview Apartments path (a la "fitness path" at Johnson Woods).
2. Easement	Dumpster, stockade and chain link fences on abutting property appear to be within a Town drainage easement.
3. Habitat Value	Wetland Protection Act requires that habitat value be maintained; removing trees will adversely impact habitat value on the site.
4. Tree Removal	Trees will be removed from the BVW buffer area; Planting Plan will be needed.
RMLD	
	Comment
1. Pole Line	Pole line between two properties will need to be maintained.
2. Electric Plan	Loads will need to be determined and electric plan reviewed & approved by RMLD.
3. Transformer	Location TBD in coordination with RMLD; may need one for each building.