



**Town of Reading**  
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**TOWN MANAGER**

**(781) 942-9043**

June 8, 2017

Clark Ziegler, Executive Director  
Massachusetts Housing Partnership  
160 Federal Street  
Boston, MA 02110

Dear Mr. Ziegler:

The following constitutes the Town of Reading's comments on Eaton Lakeview Development, LLC's submittal of April 14, 2017 to MHP for a Project Eligibility Letter (PEL) for the above named property. Thank you for approving a 30-day extension of time and allowing us to submit by June 15, 2017. I understand that if MHP issues a PEL, the next step would be for the applicant to apply to the Reading Zoning Board of Appeals (ZBA) for a Comprehensive Permit under MGL Chapter 40B.

**Town of Reading - Affordable Housing**

The application notes that in 2013 the Town of Reading adopted a Housing Production Plan which was also approved by the State. The HPP provides a roadmap for the Town to follow to proactively plan for new housing. The housing production strategies are designed to encourage housing development, especially for special populations like low/moderate income households. The HPP link is: <http://www.readingma.gov/node/2427>. It should be noted that the Town requested and DHCD approved a one year certification (safe harbor) based on meeting the housing production goal of .5% of the Town's total 10% in one year, which expires in February of 2018.

Reading is recognized as a leader in municipal planning, and is frequently invited to speak to planning groups throughout the region on its accomplishments including planning for affordable housing. Reading has amended its zoning bylaw to allow for both dense development and intergenerational living, both of which support affordable housing. Reading has a strong record of proactively planning for housing as further evidenced by:

- **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) is comprised of Reading Woods, a 424-unit housing development located on the Stoneham line. The GSGD includes a portion of Reading Woods comprising 200 units with 20% (43 units) designated as affordable housing. In accordance with the Master Plan, 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 approved expanding 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. The Reading Community Planning and Development Commission (CPDC) anticipates two more

sites being redeveloped in the near future with one having already filed an application for 40R Plan Review. These redevelopments are estimated to add 133 additional housing units (possibly 30 of which are affordable).

- **Economic Development Action Plan (EDAP)** – In 2015, working with the Metropolitan Area Planning Council (MAPC), 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 which is 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 additional 4 pending 40B projects are described below in chronological order:

- Several years ago a comprehensive permit was issued for 45 Beacon Court. This project, approved for 10 units, has not been constructed.
- 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.
- In August of 2015, MassHousing issued a PEL for Reading Village, a 77-unit 5-story multi-family development on a site of approximately 35,000 square feet. A comprehensive permit was filed on January 7, 2016 which was approved by the ZBA roughly 14 months later. Through a series of extensions of time and project modifications the plans were revised and the approved project consists of a 68-unit 4-story multi-family building on a roughly 42,000 square foot tract of land (an additional parcel is now included). This project is on a corner across from the commuter rail station.

- In December of 2016, MassHousing issued a PEL 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. The ZBA is currently reviewing that comprehensive permit application.

### 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 with a 160-unit rental 40B project which will include 40 affordable units available to households earning at or below 80% of the Area Median Income. The units will be distributed among 3 buildings:
  - Building 1 will contain 32 units on 4 floors, with 1 floor of underground parking;
  - Buildings 2 and 3 will each contain 64 units on 4 floors, with 1 floor of underground parking.
- The project will provide a total of 270 parking spaces: 184 garage spaces, and 86 surface spaces. A two-way access drive aisle and a system of paths / sidewalks will enable vehicular and pedestrian circulation throughout the site. 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 as well as the floodplain and riverfront areas. The rear of the site along Walkers Brook will be graded to achieve separation from groundwater requirements. A retaining wall with a parapet and fence will help prevent access to the brook and hazardous steep areas. Note that Conservation has expressed concerns included in the attached DRT notes including a redesign idea and a walking path suggestion.
- 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 sever 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.
- The floor plans, landscaping plan, and site plan included in this application generally describe the site layout, landscaping, unit mix and provision of off-street parking. The tabulation provided on Sheet A-0.1 shows that there are 160 units planned with 72 - 1 bedrooms, 72 - 2 bedrooms and 16 - 3 bedrooms. The tabulation does not include the number of bathrooms per unit. The plans do not include information describing the affordable units or where the affordable units are located.
- Additional information should be furnished including:
  - Indicate on plans unit distribution by size, bedrooms, and affordability;
  - 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.

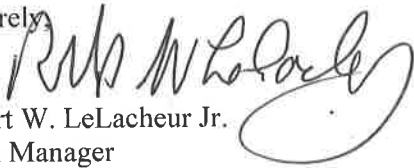
- Landscaping - Existing Trees – As expressed in the DRT the landscaping should be enhanced especially to provide more of a vegetative buffer for the abutting multi-family use and existing trees should be preserved. These trees should be clearly marked on the site and landscape plans.

### Sustainable Development

- The development is in close proximity to a 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**  
May 10, 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, Public Safety Officer David Savio, Police Lieutenant Christine Amendola, Fire Chief Greg Burns, Deputy Fire Chief Paul Jackson, DPW Director Jeff Zager, Assistant DPW Director Jane Kinsella, Civil Engineer Peter Reinhart, Conservation Administrator Chuck Tirone, Regional Housing Services Coordinator Laurie Stanton, and RMLD Engineer Brian Smith

**Applicant / Development Team:**

Architect David DiBenedetto, Engineer Chris Sparages, Attorney Ted Regnante, and 40B Advisor Ed Marchant were present on behalf of the application.

**Project Summary:**

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 with a 160-unit rental 40B project which will include 40 affordable units available to households earning at or below 80% of the Area Median Income. The units will be distributed among 3 buildings: Building 1 will contain 32 units on 4 floors, with 1 floor of underground parking; and Buildings 2 and 3 will each contain 64 units on 4 floors, with 1 floor of underground parking. The project will provide a total of 270 parking spaces: 184 garage spaces, and 86 surface spaces. A two-way access drive aisle and a system of paths / sidewalks will enable vehicular and pedestrian circulation throughout the site. 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. A retaining wall with a parapet and fence will help prevent access to the brook and hazardous steep areas.

<b>DPW/Engineering</b>	
	<b>Comment</b>
1. Lakeview Ave	Consider developing Lakeview Avenue to Town standards.
2. Sewer	Existing sewer main ends part way up Lakeview, will need to be extended.
3. Sewer Calcs	Calculations shall be provided showing that system can handle additional flow.
4. MS4 Permit	Project shall adhere to new MS4 permit coming out in July 2017.
5. I/I Fee	Fee will be required and is twice the flow x\$4.00.
6. Stormwater	Calculations will be needed along with more detailed drainage design plans.
7. Natural Gas	Will likely need to be extended for project.

<b>Fire</b>	
	<b>Comment</b>
1. Drawings	Full size drawings required for comprehensive plan review.
2. Access Road	12' does not meet NFPA standards, must be 20' wide, paved and looped (no hammerhead).
3. Hydrant	Hydrant location TBD.
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	Building 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. Trash Rooms	Details of trash rooms will be needed per Building Code.
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.
<b>Police</b>	
	<b>Comment</b>
1. Traffic Study	Shall include Village St/Lakeview Ave intersection and Hunt Park on Eaton St.
2. Traffic Volume	Traffic volume high in this area due to Market Basket.
3. Loading	Designated loading area shall be provided on-site; not allowed on-street unless approved by Board of Selectmen.
4. Const. Hours	General Bylaw Section 8.9.8 outlines construction hours allowed in Town.
<b>Planning / Housing</b>	
	<b>Comment</b>
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.
6. Trash/Recycling	Details TBD, will be huge component of development program.
7. Parking	Assigned based on need; garage access restricted to residents.
8. Parking Safety	Parking by retaining wall shall be safely secured with curb stops / bollards / berms, etc.
9. Abutters	Applicant encouraged to meet with abutters prior to submitting to the ZBA.
10. Landscaping & Trees	Consider enhancing landscape buffers to abutters; maintain as many trees as possible, especially those that screen Jordan's retaining wall from site.
11. Lighting	Lighting specs and photometrics shall be provided with ZBA filing.
12. Accessibility	Elevator access in all buildings; ADA compliant units to be provided.
13. Common Spaces	Consider providing rentable/programmable tenant common spaces in the buildings.

14. Affordable Units	40 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.
<b>Conservation</b>	
	<b>Comment</b>
1. Redesign Idea	Slight shift in building / parking layout would pull building further out of wetland buffer and make room for additional Fire access lane width.
2. Path	Consider adding path at rear of site connected to Lakeview Apartments path (a la “fitness path” at Johnson Woods).
3. Playground	Opportunity to sink playground and use area for compensatory flood storage.
4. Easement	Dumpster, stockade and chain link fences on abutting property appear to be within a Town drainage easement.
5. Habitat Value	Wetland Protection Act requires that habitat value be maintained; removing trees will adversely impact habitat value on the site.
<b>RMLD</b>	
	<b>Comment</b>
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.