

October 25, 2016

Ms. Katharine Lacy
Monitoring and Permitting Specialist
Comprehensive Permit Program
MassHousing
One Beacon Street
Boston, MA 02108

RE: Forest Ridge Residences, Winchester - Comprehensive Permit Site Approval Application by Krebs Investor Group, LLC

Dear Ms. Lacy:

The Winchester Housing Partnership Board submitted comments on August 10, 2016 regarding the proposed Forest Ridge Residences project in Winchester. As stated in that letter, those comments were based on a review of the site approval application and associated architectural plans, participation in the June 28 site walk, attendance at the July 27 public information meeting conducted by the Winchester Board of Selectmen, discussions with town staff and officials, conversations with members of the development team, and a familiarization with the site and neighboring properties in Winchester and Stoneham, including a similarly sized rental apartment building currently under construction on Fallon Road in Stoneham.

Subsequent to the August 10 letter, Attorney Mark Bobrowski submitted on September 1 a letter on behalf of the Winchester Board of Selectmen, additional correspondence has been submitted to the Board of Selectmen, and neighbors of the proposed project met with the Winchester Housing Partnership Board as a part of Board meetings held on September 7 and 28. As a part of these discussions, we were asked to submit a second letter to MassHousing commenting on whether this additional input in any way changed the recommendations contained in the August 10 submission.

Members of the Housing Partnership Board, however, have not yet had the opportunity to discuss as a group the letter submitted by Attorney Ronan of Goulston & Storrs that was provided to the town on October 17. In addition, the town is working, at the request of the neighbors, to arrange a second site walk where members of town boards, together with neighbors, will be able to tour the full site. The Housing Partnership Board will continue to review and discuss new information concerning the proposed Forest Ridge Residences project as it becomes available.

The contribution of Forest Ridge Residences to meeting *local housing needs* was addressed as part of the August 10 letter, but was not covered as part of Attorney Bobrowski's September 1 letter. The documented need for additional housing serving moderate and lower income households remains. Winchester's affordable housing inventory, based on actual built units, is 1.9 percent, one of the lowest levels in the state. In comparison, the inventories for similar towns are in the range of 5-11 percent. Work conducted by the Housing Partnership Board over the past two months has demonstrated that the current housing market in Winchester mirrors that of many inner suburban towns. While households with higher incomes are well served, households

in the middle and lower ends of the income spectrum increasingly are finding few or even no choices. Construction of rental housing such as proposed for the Forest Ridge land that satisfies the provisions of the Comprehensive Permit law would make an important contribution to meeting local housing needs.

Both Attorney Bobrowski's September 1 letter and the September 14 letter from the Stoneham Board of Selectmen identify important *legal questions* that have arisen in the review of the Forest Ridge Site Approval Application. While the Housing Partnership Board was aware of some but not all of these legal issues at the time of our August 10 letter, we did not specifically comment on these points since we considered them to be outside our direct expertise. We agree, though, that it is essential that these legal questions be resolved before MassHousing makes a decision to either approve or not approve a Site Approval Application from the Krebs Investor Group for this Forest Ridge land.

The August 10 Winchester Housing Partnership Board letter identified ten *potential issues* associated with the proposed Forest Ridge housing. As stated in Attorney Bobrowski's September 1 letter, these ten issues mirror those detailed in his submission on behalf of the Winchester Board of Selectmen. Before any Site Approval Application is approved by MassHousing, at least three of these are sufficiently significant that the Krebs Investor Group needs to demonstrate that the identified concerns can be overcome. These are: 1) the mitigation of projected traffic impacts, 2) the mitigation of storm-related drainage and protection of wetlands, and 3) the use of Forest Circle for emergency and school access. Members of the Housing Partnership Board also are concerned that the size and scope of the proposed project are considerable for this particular site. As a result, we encourage MassHousing to explore with the development team the possibility of alternative design configurations that differ in both size and design layout from the currently proposed proposal. An additional potential concern was raised during the September 7 meeting of the Housing Partnership Board that should be investigated as part of any comprehensive permit public hearing process that is undertaken by the Winchester Zoning Board of Appeals. This is the effect of Interstate 93 and local traffic on ultra fine and fine particulate matter outdoor and indoor air quality for the Forest Ridge site.

As part of both the September 28 and October 19 meetings of the Housing Partnership Board, members stated they were comfortable with the comments and *recommendations* made in the August 10 submission. Specifically:

- Since the Forest Ridge land is zoned for residential use, the Housing Partnership Board feels that construction of multifamily rental housing represents a potentially viable use for this land and would expand the opportunity for this type of living in Winchester. At the same time, members of the Housing Partnership Board feel that the current proposal should be significantly reduced in size and reconfigured in design so as to improve its compatibility with the adjacent residential neighborhood.
- Additional technical information should be made available for consideration before initiating a Zoning Board of Appeals comprehensive permit public hearing process. At a minimum, this additional information should address the specific issues identified in the paragraph above.
- The Housing Partnership Board encourages constructive dialogue between the development team and MassHousing, as well as with the town and the neighbors.

Experience throughout the Commonwealth demonstrates that a "friendly" Chapter 40B project almost always ends up being superior to one based on a process of contentious testimony. Such a dialogue would permit alternatives to the currently proposed project size and scale to be explored.

Sincerely,

A handwritten signature in cursive script that reads "John H. Suhrbier". The signature is written in dark ink on a white background.

John H. Suhrbier, Chair
Winchester Housing Partnership Board

cc: Richard Howard; Winchester Town Manager
Lance Grenzeback; Chair, Winchester Board of Selectmen
Joan Langsam; Chair, Winchester Board of Appeals
Brian Szekely; Winchester Town Planner