



Town of Winchester

Lisa Wong,
Town Manager

Town Manager
71 Mt. Vernon Street
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April 23, 2019

By email (KMiller@masshousing.com) and Mail

Katherine Miller
Planning and Programs
MassHousing
One Beacon Street
Boston, MA 02108

Re: 19-35 River Street, Winchester, MA – Application for Project Eligibility
Town of Winchester's Comments

Dear Mrs. Miller,

This letter addresses the application by SLV River Street, LLC (the "Applicant") for a determination of project eligibility for a project on 19-35 River Street in the Town of Winchester (the "Town"). The Applicant proposes to build (147 units in a single apartment building on 3.15 acres on a site that has a vacant industrial building (the "Project").

The Town supports the creation of affordable housing units as described in the Winchester Housing Production Plan approved by the Department of Housing and Community Development on February 26, 2019. More specifically, it can support the creation of affordable housing at this site. However, the Town has significant concerns about the density and other aspects of this project. Should MassHousing decide to approve the current request for Project Eligibility, the Town recommends that these identified changes in density and size be addressed the subsequent Comprehensive Permit Application prior to the initiation of the associated public hearing by the Zoning Board of Appeals rather than waiting until the hearing process.

The Town's comments are described in more detail in comments by the Town's Planning Department, Planning Board, Conservation Commission, Design Review Committee and Engineering Department, which are attached to this letter as an addendum. The Town has discussed the project, in significant detail, with the Winchester Housing Partnership Board, who will submit comments directly to MassHousing, in normal course.

In addition, the Town posted the application to the Town website and solicited comments from residents via email and phone calls, in person and during a Public Information session held on April 11th at Winchester High School in conjunction with the Applicant. The Town received over a dozen emails and approximately 75 people attended the information session. The session was aired live on WinCam, the town's public access channel, and is available online for viewers at home. Most comments were directed at the size and scale of the project, requesting that the developer consider the visual impacts of the building, mitigate traffic increases from the project, address pedestrian safety concerns and consider the impact on area flooding.



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The Town met with the Applicant on several occasions, including a meeting with the Town Planner a week before the Applicant's submission. The Applicant has also met with public safety officials and the Town Engineer to discuss issues and some of those issues have already been addressed in the design and engineering of the project.

The Town offers the following additional comments to MassHousing, and hopes to work on a collaborative basis with the Applicant to achieve an outcome that balances the developer's financial objectives with the Town's commitment to increase its subsidized housing inventory.

Affordability

The Town supports the creation of affordable housing units, of appropriate size and scale, as detailed in the Winchester Housing Production Plan approved by the Department of Housing and Community Development on February 26, 2019.

The Town recommends that the project is at least 25% affordable and provides mixed-income options in order to meet the Town's affordable housing needs. The Project is proposed as a rental product, with at least 25% of the units rented at a price affordable to households earning 80% or less of area median income, adjusted for household size. The Town requests that the project be at least 25% affordable and provide mixed-income options.

Aging-In-Place

The Town's recent town-wide needs assessment (attached) identified seniors as a high risk population in Winchester. Development pressure can have a serious impact, especially to seniors on limited income. The Town is currently considering a number of options to provide tax relief to seniors who own property, however this project could help seniors who are seeking to rent. The Housing Production Plan recognizes that it is difficult for seniors to stay in town and supports affordable rental housing. The Town would support an Aged-Restrictive Housing Project on this site.

Density and Design

The Winchester Master Plan seeks to define opportunities for appropriate housing growth in coming years. While increased density may be an appropriate outcome in certain areas, such as the Center Business District, 147 units on 3.15 acres constitutes a density of 47 units per acre which far exceeds the density allowed in the Limited Light Industrial ("IL") zoning district, and the density other multi-family housing existing in Winchester. At 70 feet, the building will be one of the tallest buildings, residential or non-residential, in the Town. The height and visual impact of the building should be decreased. *See* the Winchester Design Review Committee's comments, attached. The Town recommends that prior to the issuance of any PEL authorizing a density increase of this magnitude, MassHousing considers the economics of the Project and evaluates reducing the density of the project while maintaining financial viability.



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Environmental

The site has been zoned industrial for decades, and it contains an old factory as well as outside storage. Due to the known history and use as an industrial site, it should be investigated for historic contamination. In particular, a Phase I Initial Site Investigation and, a subsequent Phase II – Comprehensive Site Assessment under the Massachusetts Contingency Plan (310 CMR 40.0000) should be conducted by the applicant.

Traffic Impact

As Winchester continues to grow and thrive, traffic safety is a growing concern for residents. Being only six and one half square miles, any increase in housing density creates further risk to safety and quality of life. The Town has recently created a Transportation and Traffic Advisory Committee (TTAC) to adequately address these emergent concerns. As part of the Committee's analysis, the Town triggered a traffic study near the project site on Cross Street. The Town, recommends that the Developer responds to the recommendations from the traffic study in this high-risk corridor. Temporarily, the area will face even more traffic issues due to prolonged work on a large Eversource project in the area, and the applicant should consider the impact of that work during construction. The project's sole residential access point is on a small street with limited room for the traffic that will be generated. The Town supports mitigation measures such as funding a shuttle service and sidewalks improvements are necessary.

Programmatic Considerations

The Town requests that MassHousing include a condition in the PEL that will keep the housing affordable in perpetuity. Because of Winchester's unique size and density and limited opportunity for project sites, affordability will be fleeting if the units become market rate in the future. In addition, the Applicant should be required to establish a local preference for the affordable rental units, to the extent permitted by state and federal law.

Please do not hesitate to contact me with any questions. Thank you for your consideration of the Town's comments.

Sincerely,

Lisa A. Wong
Town Manager



TOWN OF WINCHESTER

OFFICE OF THE PLANNING DEPARTMENT

BRIAN SZEKELY
TOWN PLANNER

71 Mount Vernon Street
Winchester, MA 01890

April 5, 2019

To: Lisa Wong
Winchester Town Manager
71 Mt. Vernon Street
Winchester, MA 01890

Re: 19-35 River Street Application for Site Eligibility

The following is an initial review of the Site Eligibility Application for a 5-story, 147 rental-unit mixed-income deed-restricted project with 37 affordable units and a total of 211 parking spaces, located at 19-35 River Street. The project application lists a density of 46.7 units/acre. The height is proposed for 70'. A further and more detailed analysis will take place if a Project Eligibility Letter is issued by MassHousing.

Section 2: Existing Conditions (page 5)

Total site area is listed at 3.15 acres, however only 2 parcels (13-255 and 13-256) are listed and only add up to 1.6 acres (Pages 3 and 5). One of the parcel IDs is missing from their application, 13-254, which measures 1.56 acres. **The application should be corrected to reflect all parcels that are part of the project.** Currently, Uses on the site consist of a 25,000 SF factory building, a 15,000 SF industrial warehouse and a 2,500 SF tented storage area and associated parking. Current zoning district is in the Light Industrial (IL) zone. River St has 8 structures on it and is adjacent to an 80-unit multi-family housing complex known as the Village. Conant Road, just east of River St is also the site of a 70-unit multi-family housing complex known as the Willows. Additionally, on River St is the location of a kids gym, a Veterans of Foreign Wars club, and an insurance agency.

A large portion of the site is located in the 100-year floodplain and although much of the site is paved, significant work will have to be done in order to accommodate the floodplain restrictions as well as our own local bylaw with respect to pre and post development flow rates and volumes. We will await further drainage calculations and the Engineering Dept will review accordingly.

The Lowell and Haverhill rail lines are both 1.4 miles away from the site. The 134 bus line is west of the site approximately 0.5 miles, does not have frequent service throughout the day,

and at times is over an hour between buses. None of the listed surrounding land uses/amenities are available by public transportation either (Page 6).

Cross St is a local collector street through town and the intersections of Cross/Main and Cross/Holton will need further study to determine what treatments/improvements are necessary to accommodate the vehicles entering and existing the Project Site. The 1997 Triangle Master Plan contemplated zoning changes in this area of town and addressed the traffic problem as the result of potential commercial Uses in the Holton Street area. At the time, Cross St was thought to not be able to accommodate the additional 400 people that would be necessary for a large commercial entity to enter the old IL zone on Holton Street. Therefore it is safe to assume that a similar number of people at the Project Site could pose traffic concerns for the surrounding area. **A major issue regarding this is that the intersection of Cross and Main is in Woburn, and therefore any potential improvements to this intersection would have to be done with their consent. We should be talking with them as soon as possible about this potential issue.**

Section 3: Project Information

The 37 Affordable units proposed are for income levels at 80% of the Area Median Income (AMI), and since this is a rental project, all of the 147 units would count towards the Subsidized Housing Index (SHI). 7,920 housing units exist in Winchester, and counting the 96 units on Cambridge Street, we are at 3.1% on the SHI or 244 units. If this project is built with the proposed number of units, we would jump to 4.8% but would be eligible for a 2 year Safe Harbor from other 40B applications.

Section 7: Checklist

Application checklist on pages 29 and 30 not filled out. Cross Street has sidewalks on both sides while River Street has no sidewalks. Application states that the site is pedestrian friendly, but sidewalks would have to be installed as part of the proposed project along River Street.

(6) Transportation Choice page 34 (pages 34 and 35 Explanation not filled out as required). Application states that the project “reduces dependence on private automobiles (eg. Provides previously unavailable shared transportation). There does not appear to be a specific idea on how a new shuttle system would work, who would run it, what the route would be etc. I believe a shuttle system is necessary as part of the project that connects River Street with the Winchester Hospital network, the Town Center, Jenks Center, Stop/Shop and 416 Cambridge Street (if approved). Connecting parts of town through a shuttle service has been floated around before but I believe this project should be the catalyst to actually making it happen. It’s possible that money could be used to expand the existing Winchester Hospital employee shuttle or it could be a new stand-alone service that could be paid by-ride or through other

means. I feel looking into this further is very important, and considering the applicant has said they plan to do a micro-transit or other type of service anyway makes all the sense in the world to make this transit service the best it can possibly be.

Tax Maps: As outlined above, there is a discrepancy between the parcels that are associated with the project. The project narrative and existing conditions plan show that the parcel IDs in question are 13-255 and 13-256 (and leaves out half of the site by not naming parcel ID 13-254). The tax maps shown in TAB 3 highlight 13-254 and 13-256, but now leave out 13-255. All 3 parcel IDs should be part of the site and that has not been shown correctly or consistently.

OVERALL COMMENTS

The density is not as high as other 40B projects in town (416 Cambridge St is essentially 100 units/acre while River St is 50 units/acre), but is higher than nearly every other multi-family with more than 5 units in town. For comparison, the largest density project for a site over 1 acre is Parkview at 318 units on 8.21 acres, for a density of 38.7 units/acre.

I do not believe that the area is blighted according to the Applicants, but River Street has potential for denser development, is near other multi-family and is not right in the middle of a single-family neighborhood. In general, the site is a good one for multi-family, however the density proposed may be too high for what River St or Cross St can handle. After further analysis of the traffic, stormwater, fire protection, and other infrastructure, we will have a clearer picture of how to mitigate any negative effects of the project. More rental housing is necessary in town and the proposed project does fill a need for many older residents wishing to downsize.

Design: The building has an adaptive re-use feel to it even though it is new construction. It looks like an updated mill building of sorts and is attractive in some places with the use of different materials. Although the applicants have stated that the scale of the face of the building towards the western neighbors of Wendell, Kirk and Lochwan St is modest, the look and feel from this neighborhood is still rather dense and has an expansive width. I do not believe that the plan they have used to mitigate the scale of the building in the form of “fingers” of the structure pointing out towards the west is a successful one. I still believe the width and scale of the building can easily be seen and is not shielded from the westerly neighborhood. Views from the west are important and should be shown as soon as possible to determine any visual impacts.

The outdoor space is somewhat inviting but does not appear to be large enough for 147 units, 13% of which have 3-bedroom units. It is anticipated that 88 school-aged children would be part of this project according to the School Committee’s projections. McDonald Field is rather close to the Project Site but generally there is not a lot for younger kids in the form of playgrounds other than the tot lot area. A large portion of the landscaping plan is shown as

private ground level yards or private ground level decks. I believe that goes against the purpose of shared green space and having connections with your neighbors. Although there appears to be a lot of greenspace on site, the programming of the space is not conducive towards fostering a sense of community.

Traffic/Transportation: Looking seriously into a shuttle service connecting multiple points of town is necessary to deal with the potential traffic impacts of this site on Cross St and in particular the Cross St/Main St and Cross St/Holton St intersections. Future commercial or residential developments on Holton Street are possible and therefore any improvements to the traffic flow on Cross St would help the residents and businesses in this area. I do not know what the end result would look like, but there has been a documented need for micro-transit in town both for the younger and older demographics. Coupling with the Council on Aging shuttle and potentially the Winchester Hospital employee shuttle system could be potential solution to the lack of public transportation within town.

Previous Memo regarding a development at River Street.

In 2013, there was a potential redevelopment of this same exact site that would have included about 25 residential units. Below is the Planner's memo to the Planning Board. Low density residential or small technology Uses were the general consensus of the town at the time for this site.

To: Winchester Planning Board
From: Betsy Ware, Town Planner
Date: June 17, 2013
Subject: Rezoning of River Street

The Planning Board has asked me to review the zoning issues, density and future rezoning in response to the exploratory discussions held by the Board and the development team for 19-35 River Street. The River Street property is presently zoned IL and would not allow residential land uses without zoning relief or a rezoning of the properties. Based on the information from the development team and the Planning Board's request, I offer the following information and comments:

Background: The Triangle Master Plan

In 1996 the Winchester Planning Board hired John Brown Associates, with association with the Bluestone Planning Group, to study the roughly 585 acres that makes up the Triangle Area. The area is defined by Washington Street (easterly), City of Woburn municipal line (northerly), Sylvester Avenue and Middlesex Road (westerly) and Skillings Road (southerly). The goal of the study was to create a long-range vision for this area and work to eliminate disparate uses within the district. This master plan was adopted as policy by the Winchester Planning Board.

River Street.

River Street is a short dead-end street which feeds off of Cross Street, a major connector road in Winchester. At the intersection with Cross Street, the uses are residential but, once on River Street, the uses are industrial in nature. Several of the present uses on the street include gymnastics facility,

fraternal organization and small scale business and industrial uses. The Village residential development lies between River Street and the Aberjona River and there is an access point into the Willows residential development. The lower portion of the street is within a 100 year floodplain (elevation 24).

Uses.

“The long-range vision for the Triangle Area seeks to protect and enhance the area’s existing residential areas while retaining and stabilizing compatible nonresidential uses that are an important part of the Town’s economic base.....This will be largely achieved by 1) removing obsolete and isolated pockets of industrial zoning that most disturb the Triangle’s residential neighborhoods; 2) retaining existing commercial/business properties for commercial use that do not impact the tranquility of the Triangle’s residential neighborhoods; 3) acquiring or reclassifying portions of certain key parcels for open space use adjacent to rivers and streams to add recreational lands and provide continuity to the area’s linear bike and trailway system; and 4) encouraging one and two-family use on existing infill lots.”¹

In this report it is recommended that properties be reclassified. Page E-1 of the plan states “It is recommended that the current Limited Light Industrial District zoning category be either revised or replaced to reflect a more modern office/research/high tech orientation rather than traditional industrial use.”²

Goals for the Triangle area, as it relates to River Street, include, but are not limited to:

- Protect the existing neighborhood-scale residential environment of the Triangle Area
- Maintain moderate housing densities similar to densities of existing homes
- Retain the housing diversity within the area, which provides housing for a wide variety of income ranges and family sizes
- Phase out or reduce conflicts with industrial zoning, where current uses are inappropriate.
- Protect and enhance the economic base and tax base of the Town as a whole
- Encourage long-term neighborhood stability while considering the most suitable uses for available sites
- Eliminate economic stagnation and misuse of Triangle Area property
- Avoid encroachment of incompatible nonresidential uses into residential area

Specific to the River Street industrial land, the report notes that “In addition, the irregular shaped light industrial district centered on River Street that presently form a light-industrial “pocket” in the midst of an otherwise residential neighborhood should be designated for a long term residential use so as to eventually remove the negative influence from the residential community. This long term use designation will reflect the desired future land policy for this area even though the existing uses may remain for some years to come.”³

Additionally, the goal of the plan is to continue to offer a considerable mix of single, two-family, multi-family apartments, senior apartments and other housing options. Specifically noted in the report was a

¹ Brown, John, The Triangle Master Plan, 1997, page E-1

² Ibid, page E-1

³ Ibid, page 14

need to address housing for seniors. It is further noted that “as the current industrial area centered on River Street is phased out, it will be a suitable location for one-, two- and three-family homes.”⁴

Present Allowed Uses.

Uses presently allowed in the Winchester Zoning Bylaw in the IL zoning district include, but are not limited to:

- Uses of land or structures for educational purposes
- Child care center
- Use of land or structures for religious purposes
- Library or museum
- Public park or public recreational facility
- Private club or lodge
- Use of land for agricultural purposes
- Essential services (utilities)
- Retail store (by special permit)
- Personal service establishment
- Food service facility
- General service establishment
- Trade shop
- Bank or business office
- Veterinary establishment, kennel, or place of boarding of animals, conducted in the building (by special permit)
- Business or professional office
- Medical or dental laboratory
- Commercial greenhouse salesroom or stand for the sale of nursery, garden and other agricultural produce
- Trade, professional or other school conducted as a gainful business
- Storage, distribution or wholesale marketing of products (with limitations)
- Lumber yard, contractor’s yard, etc.
- Printing or publishing plant, bottling works, etc.
- Laboratory for scientific experiments, research, test or investigation
- Wireless facilities (by special permit)

Based on the number of uses allowed in the IL district, there are clearly a number of uses compatible with the immediate neighborhood but there are also uses, such as lumber yard or contractor’s yard, distribution center, etc. that, depending on the scale, might not be in harmony with the residences on Loring, Lochwan, Wendell and other adjacent streets.

Additionally, there are a number of uses, such as technology “incubator” spaces for small “start up” firms, “innovation centers”, and other similar non-noxious updated lighter industrial uses that might work in concert with the immediate residential neighborhood

⁴ Ibid, page 20

Density.

In addition to addressing rezoning and adjusting the allowed uses within the Triangle Master Plan area, there was a recommendation to address density. Perhaps the most significant recommendation was to increase the minimum lot size in the General Residential District (RG) from 6,500 square feet to 10,000 square feet. This recommendation was made to reduce the number of future lots within the study area.

Additionally, it was acknowledged that, “based on preferred uses on available sites in the Triangle Area, it is not anticipated or recommended that any significant additional multi-family (except for the Willows site) be developed in the Triangle Area.”⁵ It was noted that, while the Willows development already had a covenant and was moving forward, the “residents of the area believe that the Triangle Area should not be the location of additional multi-family housing, other than the already approved Willows development (70 units) on Cross Street.”⁶

In addition to the Willows on Cross Street, there are a number of apartment and condominium complexes in Winchester. For density comparison purposes, see the table below:

Development	Location	No. of Units	Lot Size	Sq. Ft per Unit
Stetson Hall	Elmwood Ave.	28	9783 s.f.	349 s.f./unit
666 Main Street	Main Street	48	63,874 sf	1330 s.f./unit
Residences	19-35 River St.	58	3.15 acres	2365 s.f./unit
The Willows	Cross Street	70	7 acres	4356 s.f./ unit
Wyman School	Church Street	18	110, 006 s.f.	6111 s.f./unit
The Village	Swanton Street	80	12.83 acres	6896 s.f./unit
Graystone	Cambridge St.	50	10 acres	8,712 s.f /unit

As indicated on the table above, the proposed residential development at 19-35 River Street would result in a fairly dense development, almost double the square foot per unit density as the Willows project. It should be noted that both the Willows and the Village residential developments are near the proposed 19-35 River Street project.

Rezoning Options.

While the development team has brought in several proposals for redevelopment at 19-35 River Street, the Planning Board should take into consideration the entire IL zoned area on River Street, not just several parcels. The rezoning should be considered as comprehensively as possible in order to achieve the goals of the Triangle Master Plan. Additionally, the Board needs to keep in mind that protection and

⁵ Ibid, page 20

⁶ Ibid, page 20

enhancement of the economic tax base is a desired result. Traffic, parking and related pedestrian safety should also be considerations.

Residential Use.

As indicated in the Triangle Master Plan, one of the recommendations is to rezone the property to one-, two-, or three family residential densities and to increase the lot size from the existing 6,500 s.f to 10,000 s.f. Based on the town's present zoning which allows duplexes to be constructed on an 11,000 s.f. lot, the density per acre would be 8-9 units vs. the almost 20 acres/unit proposed by the property owner and his development team. It may be more cost efficient to develop in a multi-family style development at that density than generating single family, duplexes or triplexes, particularly given the existence of the 100-year floodplain within the property and area generally.

If the Planning Board were to recommend residential zoning for this district, as is the policy that they adopted through the adoption of this planning document, then consideration should be given to the style, bulk, massing and other details, should the rezoning not be to one to three unit buildings.

Industrial Use.

Another option for the Board to consider is to keep the zoning a light industrial zone but keep uses a little more in keep with the residential neighborhoods that abut the River Street area. Certainly adjusted industrial uses, "incubator space", and other light industrial uses (small scale distribution, machine shops, etc.) may work within the neighborhood.

There are a number of business-related uses that would not work well close to a residential neighborhood and need to be adjusted to protect the "tranquility" the adjacent residential neighborhoods. Those uses include, but are not limited to, lumber yards, banks, business offices and other uses that, depending on the scale, could be quite intrusive to the neighborhood.

Combined industrial/business/residence.

While seemingly counter to protection of residential neighborhoods, the Town of Concord, MA. recently drafted and adopted a zoning bylaw that would allow mixed use in an industrial zone in West Concord. Light industrial uses like bakery, woodworker's shop, and light assembly are living in a cooperative environment with upper story residential units. Some combination of 20% affordability is required (10% residential, 10% industrial/business or 20% residential) with no residential units being allowed on the first floor. To date, one project has been constructed and seems to be working successfully. The upper floor residences have the convenience to walk downstairs to a start-up bakery and several other small scale business and industrial uses. This type of zoning may be an option that the Board wishes to consider.

Summary.

In summary, the Triangle Master Plan anticipates a change in zoning for the River Street area. This change could be to a low density residential, or to updated tech/industrial uses that provide less impact to the immediate neighborhood. Any rezoning of the area should take all properties on River Street into consideration.

April 12, 2019

To: Winchester Select Board
From: Winchester Planning Board
Re: 19-35 River Street Preliminary Application

The Planning Board met on April 9th to discuss the preliminary application for a 40B development at 19-35 River Street. We have concerns regarding the quality of the submission, as well as on issues of transportation, sustainability, open space, and design. These are highlighted below.

Heather Saucedo Hannon, Clerk

Transportation:

- The application is missing the MBTA #134 bus route on Main Street.
- The application misrepresents the commute to Boston. Walking to commuter rail station is 1.2mi and would take 25min.
- We would like to see the project address transportation options to shops, grocery, schools, jobs, and commuter rail. The context map does not even locate schools.
- The application makes false claims that this is a pedestrian friendly site, that it is near jobs, and that this project is reducing the reliance on automobiles or increasing bike and pedestrian access. None of these claims are substantiated in the application.
- The proposed site is isolated from any of the listed activities, and is on a dead-end street without sidewalks which connects to a busy connector road. It is not integrated into an existing pedestrian friendly area as defined by principle 1 and does not create such a district.
- The application needs to include a traffic study for turning left onto Cross Street or left onto River during peak times.
- The application needs to propose a redesign of River Street to handle the increase in cars, as well as overflow parking, and sidewalks to Cross Street, especially for children walking or biking to school.
- We would like to see bike racks, car sharing, and possibly a shuttle.

Sustainability:

- A project of this size should be demonstrating more innovative sustainability practices and be meeting more strict goals. Energy star appliances and recycled materials in the common areas are not worthy of calling the entire project sustainable.
- The application states that the project will reduce the overall energy consumption by 20%. What is the baseline and how will they achieve this?
- The application falsely claims to promote clean energy.
- We would like to see solar panels on the roof.

Open Space:

- The application does not create anything which resembles the typical definition of open space. It only populates the roof of a parking structure with plants.
- There is not enough open space provided for the proposed number of residents.
- There is not the right type of open space provided for that many children. There are no other nearby playgrounds.
- We would like to see more landscape screening at the rear of the property.
- We would like to see more landscape in the parking lots.
- We would like to see more open space other than hardscape and parking decks, permeable surfaces and real soil for growing large trees.

Design:

- We see sections and renderings but no elevations. These are misleading to understand massing and difficult to understand design elements.
- We would like to see a street elevation that shows the outlines of existing buildings on River and behind, for neighborhood scale context.
- We have some concern about the height of the building. The building height at the rear is too tall and would loom over the rear residential neighbors.
- We would like to see renderings at eye level from the neighborhood showing the views from yards once the new building is there and large trees have been removed. We are concerned that privacy is being lost.
- We would like to see some garden flats and apartment entrances from the street.
- We would like to see balconies/porches for some of the units. If the typology is an old mill building, many of those have since added balconies for residents.
- We find the use of clapboards odd and have concerns that the wood will not wear well.
- We would like to see depth in the window detailing.
- The style of the building does not match the style of neighborhood buildings.
- We would like to see higher quality architecture.

Other:

- The application falsely claims that the neighborhood is blighted. It is an active light industrial zones bordered by active and well maintained residential neighborhoods.
- We would like to understand why the market comparables are lower but for larger units.
- Parking for affordable units should be discounted accordingly.
- There is not adequate explanation for miscellaneous fees. Will this be discounted for affordable units?
- The application claims to provide permanent jobs for low- or moderate-income persons and that the jobs will be near transit. This is not shown in the application.

To: Lisa Wong, Town Manager
From: Elaine Vreeland, Conservation Administrator
Date: April 3, 2019
Re: 19-35 River Street Comments

- #35 is within the 100 year floodplain.
- #19 is outside the 100 year floodplain.
- As a 40B project, the local wetlands bylaw will not apply.
- For 40B purposes, the Conservation Commission's Order of Conditions is considered a state permit, and the project will require review by the Commission under the Wetlands Protection Act.
- Only that portion of the proposed project that lies within the floodplain will require review from the Conservation Commission under the Wetlands Protection Act.
- The project lies outside the 100 foot Buffer zone to the nearest wetland – Buffer Zone regulations will not apply.
- The project lies outside the 200' Riverfront Area – Riverfront regulations will not apply.
- The project must meet the performance standards for development within a floodplain.
 - The project must provide compensatory storage as per the regulations and/or
 - Be constructed above the flood elevation as per the regulations.
- Landscaping within the Commission's jurisdiction should emphasize native New England Species that will provide food and cover for wildlife.
- Stormwater management must meet the requirements of the Wetlands Protection Act. The Commission would look favorably on green infrastructure and low impact development solutions.
- I WOULD ADVISE the developer to construct the building and the stormwater structures so as to meet the Town's stormwater standards. The structure is within the floodplain, and the best available information on rainfall is the standard used by the Town. Foresight now may prevent a flooded and damaged building, and its attendant costs later.
- MEPA:
 - A project is under MEPA jurisdiction if it is undertaken by a state agency, requires a permit from a State Agency, or it involves Financial Assistance or a Land Transfer by a State Agency. 310 CMR 11.01(2)(a).
 - Executive Order 569: Establishing an Integrated Climate Change Strategy for the Commonwealth. This Order seeks to ensure that Massachusetts will meet Green House Gas emission reductions limits established under the Global Warming Solution Act of 2008. This Executive Order directs agencies within the administration to develop and implement an integrated strategy that leverages state resources to combat climate change and prepare for its impacts.
 - This project is using the Massachusetts Housing Financing Agency (MassHousing) to finance the project, and could would qualify as a project involving financial assistance from a state agency.
 - This project may require MEPA review.

The DRC has the following comments on this proposal:

1. Transportation and Recreation context map shows neighboring resources; however, there is no pedestrian sidewalk on River Street that would allow people to get to mass transit or local parks without a car.
2. Neighborhood Scale and Materials context maps show only the largest building Winchester and do not reflect the majority of the adjacent buildings. (The Willows is the one exception).
3. There is proposed work in the Flood way, (more than the existing footprint) normally construction is not allowed in the flood way.
4. Increase in impervious surface is troubling in the flood way and 100-year flood zone.
5. How will the stormwater be managed during a flood event?
6. Traffic concerns:
 - a. the size of River Street and the lack of a turnaround,
 - b. existing River Street onto Cross,
 - c. the intersection of Cross and Main (which currently backs up at rush hours),
 - d. the intersection at Cross and Holton Street,
 - e. the intersection at Cross and Forest,
 - f. the intersection at Cross and Washington.
7. Size of the building is tall and large in relation to the neighboring buildings and street.
8. The aerial perspective shows that the building is huge compared to the surrounding buildings and that it has far less green space, however it does not show the huge proposed retaining walls.
9. The preliminary grading plan shows retaining walls at approximately 6 to 11 feet height. There is a change in grade of 18 feet from Kirk Street to the on-site drive way.
10. Sections that show the proposed grades and building heights in relation to the surrounding topography and buildings would be useful to study this.
11. Site lighting plan with light levels is needed. Light spill and bright lighting will impact neighbors.
12. Will mechanical equipment be located on the roof? Screening should be included.
13. Noise levels from mechanical equipment could affect neighbors and future residents. Can choice of equipment or muffling technique be used?
14. Parking spaces are shown perpendicular to River Street, so drivers have to back out on to the street. This is typically not allowed and unsafe. In the revised plan these were eliminated but they remain in the grading plan.
15. Parking spaces within the site are shown touching the building and retaining wall, which will be difficult to build and unattractive.
16. The driveway is shown directly on the eastern property line, which may be difficult to resolve with grades on abutting properties. In other places the driveway has small radii and odd configurations and may not allow cars to turn easily.
17. Tight spacing of roadways next to the building may not allow visibility around the corners of the building, which would be unsafe for drivers and anyone walking.
18. Size of the tot lot is small compared to the number of residents.
19. Size of the rain garden is small compared to the amount of impervious surface.
20. We have some concern with the large roof terraces so close to the abutting neighbors and the potential noise due to large gatherings.
21. We feel the building design overall is well thought out and we are encouraged by this generally appropriate response to Chapter 40B housing.



TOWN OF WINCHESTER
ENGINEERING DEPARTMENT
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PHONE 781-721-7120 / FAX 781-721-7166

TO: Lisa Wong, Town Manager
FROM: Beth Rudolph, PE, Town Engineer 
DATE: April 4, 2019
RE: 19 – 35 River Street – MassHousing Application for Site Eligibility
Engineering Department Comments

On March 5, 2019, SLV River Street LLC submitted a Project Eligibility Application to MassHousing for a proposed 40B development at 19 – 35 River Street. The project consists of a 5-story building with 147 rental units, 37 of which are affordable, and 211 parking spaces.

The Engineering Department has reviewed the application and offers the following comments related to water and sewer infrastructure; stormwater management; traffic, pedestrian, and bicycle improvements; and flooding concerns.

- **Municipal Sewer Capacity** – The Town of Winchester owns and operates an 8-inch sewer line in River Street, which ties into the MWRA sewer just southeast of River Street. If the project moves forward to the comprehensive permit process, the applicant will need to investigate the condition and capacity of the existing sewer line, and determine whether it has sufficient capacity to handle the increased discharges from the project. The Engineering Department recommends that the Town retain the services of a peer reviewer, at the applicant's expense, during the ZBA process to assist with the sewer capacity analysis.
- **I&I Fee** – The Town's current I&I policy requires the payment of \$2400 per unit for new sewer connections. This fee has historically been charged to subsidized and non-subsidized units alike. If a Project Eligibility Letter (PEL) is issued, MassHousing should require the applicant to pay this fee for all 147 units. This fee would be in addition to any other financial contributions required for necessary sewer improvements identified during the capacity analysis discussed above.
- **Municipal Water System** – The Town of Winchester owns and maintains an 8-inch water main on River Street. The applicant will need to demonstrate that the existing line has sufficient pressure to provide adequate fire protection and domestic water supply to the building. The Engineering Department recommends that the Town retain the services of a peer reviewer, at the applicant's expense, during the ZBA process to assist with the water system analysis.

- **Floodplain** – As shown in the plans provided with the application to MassHousing, the site is located partially within the 100-year floodplain and the regulatory floodway. If a PEL is issued, the project will need to comply with the compensatory flood storage requirements in the Wetlands Protection Act, and will need to provide a “No Rise” analysis in accordance with FEMA requirements. The Engineering Department recommends that the Town retain the services of a peer reviewer, at the applicant’s expense, during the ZBA process to assist with the review of flood-related concerns.
- **Stormwater Management** – A detailed review of the site drainage and stormwater controls will be completed as part of the comprehensive permit process, if the project progresses to that point. The project should be designed in accordance with the “Rules and Regulations Regarding the Use of Public Sewers and Storm Drains in the Town of Winchester, Massachusetts”, which has both a volume and rate control requirement. Further, the applicant should be required to use the 24-hour rainfall values developed by the Northeast Regional Climate Center (NRCC) at Cornell University for all hydrologic and hydraulic modeling. The NRCC rainfall data is the Town’s standard, not than the outdated TP-40 rainfall estimates developed in the 1960s. The Engineering Department recommends that the Town retain the services of a peer reviewer, at the applicant’s expense, during the ZBA process to assist with the review of stormwater management system.
- **Traffic and Pedestrian Impacts** – The project is located on River Street, which is a dead end street off of Cross Street. Cross Street is a major, east-west arterial road connecting Main Street to Washington Street, and serves to convey local and regional commuter traffic.

The site is approximate 0.5-miles east of the intersection of Cross and Main Streets, which is located just over the municipal border in Woburn. The Cross and Main Street intersection is already a high accident location, with significant congestion in the mornings and evenings. The site is with less than 0.1-miles of the intersection of Cross Street and Loring Avenue, which is a local residential street, but is often used by drivers to bypass the intersection of Cross and Main. Vehicular traffic from the proposed development has the potential to exacerbate these problems; impacts from the project will need to be studied as part of the comprehensive permit process.

The site is also located approximately 0.25-miles west the intersection of Cross Street, Holton Street, East Street, and Lowell Avenue. This intersection has difficult geometry, difficult sight lines due to the nearby railroad bridge, and significant congestion in the mornings and afternoons, as regional commuter traffic commonly uses the Holton Street corridor north-south travel. Impacts from the project to this intersection will need to be studied as part of the comprehensive permit process.

In addition to the traffic-related concerns, there are several pedestrian-related deficiencies in the project area that will need to be considered by the applicant during the comprehensive permit process. Specifically, there are no on sidewalks on River Street between the project site and Cross Street, and there are limited crosswalks across Cross

Street to get from one side to the other. None of the crosswalks in the project vicinity are equipped with safety features such as bump outs or Rectangular Rapid Flashing Beacons (RRFB) to increase pedestrian visibility. While the site is located 0.4-miles west of the Tri-Community Bikeway crossing at Davidson Park, there are no bike lanes or other facilities to allow safe biking on Cross Street to get there.

Prior to our knowledge of the proposed 40B development, the Town of Winchester independently initiated a corridor study on Cross Street to evaluate existing vehicular, pedestrian, and bicycle amenities on Cross Street between Washington and Main Streets. The results of this study can be used to inform potential additional analysis or mitigation measures that may be relevant to the proposed River Street project. The Engineering Department recommends that the Town retain the services of a peer reviewer, at the applicant's expense, during the ZBA process to assist with the review of traffic, pedestrian, and bicycle related impacts and mitigation measures.

cc: Jay Gill, DPW Director
Brian Szekely, Town Planner