



Office of the Town Manager
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To: Jessica Malcolm
40B Program Specialist
One Beacon Street
Boston, MA 02108

From: Robert W. LeLacheur, Jr. CFA

Date: May 21, 2015

RE: Review Comments – **Reading Village** (proposed 40B project)
39-41 Lincoln and 2-12 Prescott Streets, Reading MA

Dear Jessica,

The following constitutes the Town of Reading's comments which have been developed in response to the application for Site Approval submitted to MassHousing by MKM Reading, LLC for the above named property. In 2009 the subject property was initially included in the 40R Downtown Smart Growth District (DSGD). The 2009 Board of Selectmen subsequently removed these parcels due to their concerns over neighborhood impacts.

Several weeks ago, Town staff met with Reading Village representatives and provided feedback including our strong interest in a mixed use redevelopment of the property. The Town wholeheartedly supports redevelopment of the subject property; however, mixed use would be more consistent with our Master Plan. Planning staff has previously identified expanding the DSGD, including this property, as a future article for Town Meeting. In the meantime, we have been working with the neighborhood through an extensive planning process to identify a development scenario that the community could support.

The site was identified as a Priority Development Area (PDA) as part of a regional effort to identify PDA's. The Town of Reading has engaged the Metropolitan Area Planning Council (MAPC), through MassHousing's Priority Development Fund (PDF), to continue to plan for redevelopment of this site as well as a few others. MAPC's work has included a market study, housing analysis, and visualization of potential build out scenarios. A public forum was held on April 1st where stakeholders provided input on density, design, and redevelopment of this site. Preliminary sketches have been developed and included in the attached that reflect the visual preferences expressed at the community forum.

The Town held a Development Review Team (DRT) meeting last week with department heads and others. The DRT comments and follow up emails are included in the attached. The DRT comments included concerns over the proposed height of over 63 feet making this one of the tallest building in the Town of Reading. Another concern was the proposed density which is nearly five times greater than what is allowed under the 40R zoning for the DSGD. Other concerns raised by the DRT include public safety, limited setbacks, excessive height, lack of parking, no landscaping, and scale and massing. The Police Chief's major concern was over a lack of parking, especially guest parking, and how this would impact an already congested neighborhood. The Fire Chief has expressed concerns regarding: (1) the

insufficient clearance provided by the ceiling height in the parking garage impeding access for a fire truck; (2) the site plan limiting a fire truck's access to the rear of building; (3) the height exceeding the fire code; and (4) the proximity of the site to nearby existing structures greatly increasing the risk of a fire extending to other properties unabated.

Additional comments were generated from the neighbors at a meeting held by the developer on May 19th as well as at the Board of Selectmen's meeting on May 20th. The neighbors echoed many of the DRT comments and raised additional concerns as follows:

- Shadows from the height of the building onto the neighborhood that will diminish natural sunlight and create ice and snow buildup on heavily used sidewalk areas
- Limited provision of resident parking (1.03/unit) and lack of Visitor Parking
- Traffic impacts due to current parking lot layout particularly on Prescott Street where there is an entrance and exit to the parking area
- Fumes from vehicles that will be generated by both residents and their guests
- Lighting impacts on the abutters from a development of this size
- Lack of any buffer or landscaping between this dense development and the mostly single and two family residential neighborhood
- Impact on schools from future residents

Reading Village, as proposed, is out of character with the neighborhood. The Town has engaged in an extensive planning and community outreach effort that we think will result in a better development. In general, we prefer to see property such as this one redeveloped as part of an expanded 40R DSGD, not as a 40B. Under 40R, as has been the case with other redevelopment projects in this district, the Community Planning and Development Commission (CPDC) could work with the developer to create a high density development that fits in with the neighborhood and addresses the serious concerns expressed to date by the community, especially the direct abutters. The CPDC has demonstrated their willingness to approve projects that exceed the 40R DSGD density as evidenced by the waiver they granted for 30 Haven Street which is over three times the allowed density.

Background

The Town of Reading has aggressively executed planning and zoning strategies that support affordable housing creation. This includes:

- **Efforts to Adopt the Community Preservation Act (CPA)** – Narrowly defeated by the voters, but under review for possible future action.
- **State Approved Housing Production Plan (HPP)** - adopted in 2013 guides strategies for housing development, especially for special populations like older adults and low/moderate income households.
- **Two 40R Smart Growth Overlay Zoning Districts that permit 458 new units “by right”** - adopted under MGL Chapter 40R.
- **Regional Housing Services Office** – developed by Reading planning staff, based in Reading Town Hall. The regional housing office serves the Towns of Wilmington, North Reading, Saugus and Reading with a shared housing coordinator that proactively promotes creation and retention of affordable housing, monitors existing affordable housing, and manages a community's SHI including expiring use agreements.
- **Regional Priority Development Plan** – developed in collaboration with the Metropolitan Area Planning Council and the North Suburban Planning Council. Reading's Priority Development Plan identifies opportunities for both housing and economic development, including expansion

of the existing Downtown Smart Growth 40R District to include the two subject parcels. The implementation phase of this plan is underway and includes a community visioning process. A community forum was held on April 1, 2015 to get input on preliminary plans. Another community forum is scheduled for June 3, 2015 and will include potential build out scenario modeling based on public input from the previous public forum.

- **Comprehensive Update of the Reading Zoning Bylaw** – clarified, simplified, and modernized zoning which is a key to encouraging development. A major change was made to the “Accessory Dwelling Units” regulations such that they are now allowed “by-right” (instead of by special permit from the zoning board of appeals) provided they meet stated performance standards and they are located in an existing structure. This will create many new opportunities for affordable housing and multigenerational living.
- **Reading 2020 Board of Selectmen Strategic Plan** – A dialogue with the community about long term housing production plans including affordable and age restricted units in the downtown area.

Plan Review (see attached notes of 5/13/15 Development Review Team (DRT) Meeting

- Proposed Layout
- Architectural Plans
- Property Management
 - No documentation was provided regarding property management.
 - How will trash and recycling be handled for the site?
- Parking
 - There is a serious concern that parking will be inadequate, as expressed by the Police Chief at the DRT meeting. The ratio provided is below what the DSGD requires. There is no provision for overflow parking. On-street parking is limited to residents only and overnight parking is prohibited. There is a high parking volume for the train station which further limits availability of on-street parking. This poses a major concern for how the proposed development will impact the neighborhood that is already dealing with a parking problem.
- Fire and Life Safety Risk
 - The Fire Chief has expressed concern over several aspects of the redevelopment plans. In addition to the difficulty a fire truck would have accessing the site in an emergency, both due to limited clearances provided in the garage as well as to the rear of the site, the height raises a problem with regard to the fire code. The maximum height for a building of this type with an automatic sprinkler is 60 feet and 4 stories. The proposed building is 5 stories and 63’-7” in height which makes it too many stories and too high. Proximity to existing properties is another concern (see attached email).

To reiterate, Reading proactively plans for affordable housing, by:

1. Modifying zoning to allow:
 - Clearer, simpler, modern zoning
 - Accessory apartments “by right”;
 - Two 40R Smart Growth Districts (Downtown adjacent to the Commuter Rail Station and near the Stoneham line) that allow 458 new units of housing “by right”
2. Creating a State approved Housing Production Plan – identifying a production plan to achieve the required 10% affordable housing.

3. Developing a Priority Development Plan – highlighting areas that could be used for affordable housing, including expansion of the existing 40R Downtown Smart Growth District. Three priority development areas are currently being examined including identifying how many units of housing could be developed. A community engagement component will be included as well to develop consensus and community support.
4. Reading Selectmen’s 2020 Strategic Plan – community based effort to identify housing opportunities for age restricted and affordable housing.
5. Regional Housing Services Office – based in Reading serving the region in supporting affordable housing.

In general, the Town has made notable progress in the past 5 years to achieve significant milestones in affordable housing. The proposed Reading Village is out of character with the rest of the Downtown and its height would be 30 feet more than what is allowed under the 40R Smart Growth district.

The Town believes that these previous efforts illustrate that the community is committed to implementing development plans on priority development sites, particularly residential development, and amending zoning to advance those opportunities, and creating housing that supports regional and local housing goals.

Thank you for the opportunity to review this application for MassHousing Comprehensive Permit Site Approval.

Sincerely,

Robert W. LeLacheur Jr.

Town Manager

Attachments: Development Review Team (DRT) Notes
Email correspondence from Fire Chief Greg Burns
MAPC sketch of site development

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

Development Review Team Meeting
 Wednesday, May 13, 2015
 Proposed 40B, Lincoln and Prescott Street

Staff Present (see attached sign in sheet for contact info): Town Manager Bob LeLacheur, Assistant Town Manager Jean Delios, Community Development Administrator Jesse Wilson, Fire Chief Greg Burns, Police Chief Jim Cormier, Safety Officer David Savio, Building Inspector Glen Redmond, Health Director Greg Erickson, Town Engineer George Zambouras

Applicant: Reading MKM, LLC

Material Reviewed: Notice of Application for Chapter 40B Site Eligibility Letter – Masshousing New England Fund Project: “Reading Village” 39/41 Lincoln Street and 2-12 Prescott Street, Reading MA

The proposed project is to develop 77 units on two parcels of land under Chapter 40B. The 36,064 square foot site on Lincoln and Prescott Street will offer 20 affordable housing units. One parcel of the site is currently used as a moving and storage building known as Doucette Moving and the other parcel is occupied by a former furniture store. The new building would feature an at-level parking garage with 4 floors of residential units above.

The following is a list of comments from the DRT. These comments are based on the Application for Site Eligibility and material submitted therein.

DRT Comments		
Planning		
	Comment	Policy/Regulation
1. Density	The project is far denser than the proposed density of the Downtown 40R Smart Growth District. It is about 5 times what is allowed under 40R (current Downtown 40R allows 20units/acre).	Zoning Bylaw Section 10.5
2. Three Bedroom units	State requires certain amount of 3 bedroom units.	MGL Chapter 40B
3. Setbacks	The setbacks to the property lines are very limited and could pose to be an impact on adjacent property owners.	Zoning Bylaw Table of Dimensional Controls 6.3
4. Height	The proposed building height of 63-feet would be 30-feet more than what is allowed under the 40R Downtown Smart Growth District. This building would be the tallest in Reading and out of character for the Downtown.	Zoning Bylaw Section 10.5.6.2

Fire		
	Comment	Policy/Regulation
1. Parking Garage	The height of the parking garage is not tall enough for a fire truck to get through.	
2. Access	Rear of building inaccessible to fire truck. This is a concern for safety.	
SEE ATTACHED EMAIL		
Police		
	Comment	Policy/Regulation
1. Parking	The proposed amount of parking would not provide for any visitors. On-street parking is limited to residents only and does not allow for overnight parking. This would severely limit areas for visit parking. There is high parking volume for the train station further diminishing the availability for on-street parking.	Town of Reading Parking Regulations
2. Construction	Construction management will be key for this site. Special consideration for limitation on downtown parking is needed. The commuter rail station is one of the busiest on the Haverhill Line.	NA
Building		
	Comment	Policy/Regulation
1. Building Code	All structures will be required to meet applicable building and energy codes.	Massachusetts State Building Code
2. Parking	Not enough handicap parking spots.	AAB/ADA
3. Height	Height of the building would be highest in downtown	Zoning Bylaw Table of Dimensional Controls 6.3 and Section 10.5.6.2
DPW/Engineering		
	Comment	Policy/Regulation
1. Water	The Applicant would be required to pay the buy in for the MWRA	BOS Policy
2. I/I	The Applicant would be subject to the Inflow/Infiltration Fee	BOS Policy
3. Garage Design	The garage design will have to be reviewed for compliance with handicap accessibility.	AAB/ADA
4. Trash/Recycling	Additional details will be needed for the trash and recycling facilities.	NA

Wilson, Jessie

From: Delios, Jean
Sent: Friday, May 15, 2015 1:26 PM
To: Wilson, Jessie
Subject: FW: Proposed 40B - Lincoln Street and Prescott Street

Follow Up Flag: Follow up
Flag Status: Flagged

fyi

Jean J. Delios
Assistant Town Manager
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Town Hall Hours - M, W, Th: **7:30 a.m. - 5:30 p.m.**
Tuesday: **7:30 a.m. - 7:00 p.m.**
FRIDAY: CLOSED

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Please let us know how we are doing by filling out a brief customer service survey at <http://readingma-survey.virtualltownhall.net/survey/sid/8cebfd833a88cd3d/>

From: Burns, Greg
Sent: Friday, May 15, 2015 10:04 AM
To: LeLacheur, Bob; Delios, Jean
Subject: RE: Proposed 40B - Lincoln Street and Prescott Street

Bob and Jean,

The information on the construction of the proposed building is limited in the proposal. However, In reviewing the Massachusetts State Building Code 780 CMR 8th edition I believe the building project as presents a fire and life safety risk based upon the following:

Section 504.2 Automatic Sprinkler System Increase.

The building as presented does not comply with this section. The maximum height for a Group R building equipped throughout with an automatic sprinkler system is 60 feet and 4 stories. The proposed building is 5 stories and height of 63'-7" and is therefore has too many stories and is too high.

Section 509.7 Open Parking Garage beneath Groups A,I,B,M and R

The height and area of the portion of the building above the open parking garage shall not exceed the limitations in Section 503 for the upper occupancy. The height, in both feet and stories, of the portion of the building above the open parking garage shall be measured from the grade plan and shall include both the open parking garage and the portion of the building above the parking garage. This section reinforces the maximum height of 60 feet and 4 stories above a Group R building with an open parking garage.

Proximity to Existing Properties:

I am very concerned with how close the project is to existing properties. The project is proposed to be constructed 3.0 feet from the property lines of properties located on 1 Fulton Street, 6.4 feet from 16 Prescott Street, 10.9 feet from 31 Lincoln Street and 5.6 feet from 96 Washington Street. Considering the location of these existing properties to their lot lines this new building creates an unnecessary life hazard.

A fire in the proposed building or an existing neighboring building would present an extreme exposure hazard that would likely result in fire extending from one structure to another and the destruction of more than one property. Although the proposed building will be equipped with internal fire sprinklers. This system will not be able to control the spread of fire on the exterior of the building. Fire traveling up the exterior of the building has the potential to enter the building on multiple floors and exceed the design requirements of the sprinkler system. I have witnessed a fire extend up the exterior of an occupied four story residential building located on Avalon Drive in Wilmington Massachusetts on February 8, 2013 and enter the building on several floors and attic. As a result of this fire the building was completely destroyed.

As we are provided with more information I may have additional comments.

Greg

Chief Gregory J. Burns
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From: Wilson, Jessie
Sent: Tuesday, April 28, 2015 4:36 PM
To: Delios, Jean; Redmond, Glen; Zambouras, George; Zager, Jeff; Burns, Greg; Keating, Bob; Cormier, James; LeLacheur, Bob; Segalla, Mark; Huggins, Joe; Savio, David; Erickson, Greg; Saunders, Caitlin; Saunders, Kim
Subject: RE: Proposed 40B - Lincoln Street and Prescott Street

Enclosed is the application which includes a description of the proposal and site plans.

DRAFT hand-drawn rendering – PDA #1B redevelopment potential

