

August 10, 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:

This letter is submitted by the Winchester Housing Partnership Board in response to the application for site approval filed by Krebs Investor Group, LLC for their Forest Ridge Residences project located off Forest Circle in Winchester, MA.

The Winchester Housing Partnership Board was created by Town Meeting to advise the town on issues related to housing that is affordable to low and moderate income households. The Board consists of thirteen members, six of whom are appointed by the Town Moderator and seven are liaison representatives from the Board of Selectmen, Planning Board, Housing Authority, School Committee, Disabilities Access Commission, Council on Aging, and Conservation Commission.

Members of the Housing Partnership Board have reviewed the site approval application and associated architectural plans, spoken with members of the development team, participated in the June 28 site walk, attended the July 27 public information meeting conducted by the Board of Selectmen, spoken with town staff and officials, and generally familiarized ourselves 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.

While the currently proposed project would provide important housing benefits to the Town of Winchester, we recognize that construction of the present design potentially also may have several important detrimental impacts, as identified in this letter, that deserve to be fully investigated, peer reviewed, and mitigated to the maximum extent possible. The Housing Partnership Board recommends that either the Town of Winchester or MassHousing immediately undertake a positive dialogue with the developer that would both enable an initial response by the development team to the technical issues that have been raised and identify alternatives in size and layout to the current proposal that the developer may be willing to consider. As was demonstrated by the recent 416 Cambridge Street comprehensive permit process, a full and impartial investigation of all issues then can be effectively conducted by the Zoning Board of Appeals, including the performance of independent peer reviews.

Our overall conclusion is that residential development is reasonable for the proposed site and that an application for site approval eventually should be accepted so that a full public hearing and review process can be conducted by Winchester's Zoning Board of Appeals.

Qualifications and Experience of the Development Team

The qualifications and experience of the proposed development team are especially impressive, and far stronger than typically involved with development projects in Winchester. This is especially important given the challenges associated with this particular site. Through their individual professional work, members of the Housing Partnership Board are familiar with the Krebs Investor Group, Elkus Manfredi Architects, S-E-B LLC, Bohler Engineering, Vanesse & Associates, and LEC Environmental Consultants. The quality and objectivity of the work performed by each of these firms is highly respected.

Relation to Local Housing Needs

Winchester has taken important steps in recent years to expand the availability of housing options in the town that are affordable for moderate income families and persons. These include approval of new zoning for the Central Business District (CBD) that allows for the development of mixed use buildings that combine business on the first floor and multi-family residential on the upper floors, and an inclusionary housing provision as part of this new CBD zone. The Winchester Zoning Board of Appeals under provisions of a comprehensive permit recently approved with conditions the construction of multi-family rental housing at 416 Cambridge Street.

At the same time, provisions for the construction of multi-family housing outside the new CBD zoning district remain limited. Winchester's subsidized housing inventory (SHI) has remained around 1.9 percent for years. While approval of the 416 Cambridge Street development will increase this to 3.1 percent, this still remains far below SHI figures for similar towns that are in the range of 5-11 percent. Construction of both the Cambridge Street rental development and the proposed Forest Ridge Residences would increase Winchester's SHI to 6.9 percent, a figure that would then be comparable to those of a number of other communities.

For many years, Winchester under a Request For Proposals process attempted to build 88 housing units of housing on a 12.5 acre portion of Winning Farm, all of which would qualify for inclusion in the SHI. The owner of this land, however, for a number of reasons was unable to complete the original commitments and the land is now in the process of being sold. The new development will consist of 29 town houses, two of which will be affordable under state guidelines. In terms of the SHI, this amounts to a loss of 86 housing units that long have been anticipated.

In order to support a sustainable community, it is urgent that housing opportunities be provided for an expanding population base. The Forest Ridge development will help to achieve this objective. The construction of the 296 housing units proposed for Forest Ridge will provide a mix of unit sizes and types that are suitable for younger people and families, as well as for downsizing seniors. These particular portions of the population currently have only very limited housing opportunities within Winchester. In this regard, the fact that one-half of the units will be studio and one-bedroom units is especially important. The availability of in-garage parking rather than surface parking is an important benefit, if not necessity for many potential residents.

Winchester currently has very limited housing available that is suitable to meet the needs of persons having limited mobility. The handicapped accessible units and provisions to be incorporated into Forest Ridge will be especially beneficial to this population.

A priority housing need within Winchester is to increase the availability of rental housing. In recent years, a number of rental properties, including two-family homes, have been converted to

condominiums. The result has been an overall decrease in the housing opportunity for people who would like to rent rather than purchase. With 25 percent of the housing units available for persons and families earning less than 80 percent of the Boston Area Median Income (AMI), Forest Ridge will help fulfill the critical need for increased rental housing for this segment of the housing market. In this context, the Housing Partnership Board suggests that the developer agree to retain the affordability provisions of Forest Ridge beyond the initial 30 year period, and also not to convert this housing at some future time into condominium ownership.

Appropriateness of Site

Forest Ridge Residences is proposed for a 13.34 acre site located between Fallon Road in Stoneham and Forest Circle In Winchester. This is one of the largest remaining undeveloped pieces of land in Winchester, and based on our conversations in recent weeks one that a majority of residents did not know even existed prior to the submission of this site approval application by the Krebs Investor Group.

The proposed density is 22.2 units per acre. This compares to at least seven other multifamily housing developments in Winchester having a higher density. It is our understanding that the apartment building currently under construction on Fallon Road in Stoneham has 298 units and is located on an approximately 15 acre parcel, resulting in a density of 19.7units per acre.

One of the comments made during the July 27 public information meeting was that the proposed site was too remote from public transportation and other services. Affordable housing, instead, should be located within Winchester's Town Center. It should be noted that if the Town Center is fully built out, this will result in the construction of just 20 new affordable housing units based on the projections of Winchester's Planning Board. Winchester long has followed a "scattered site practice" where affordable housing units are located throughout town rather than concentrating these units within one particular area.

An important question is how the Forest Ridge site, already zoned for residential purposes, should be developed. Based on our overall familiarity with the town and the results of examining this particular location and the adjoining land in Stoneham, members of the Housing Partnership Board have concluded that the size and characteristics of this parcel are consistent with the construction of multifamily housing.

Potential Issues

While construction of the proposed Forest Ridge housing will meet important Winchester housing needs and notably enhance the town's real estate tax revenues, there also are potential concerns that still need to be further evaluated and peer reviewed. Given that single family residential development previously proposed for this site was not approved, the Krebs Investor Group needs to demonstrate how it will be possible overcome these earlier concerns with a larger development.

In any decision-making process, potential adverse impacts need to be balanced against potential benefits. In a comprehensive permit process, this is a responsibility that Winchester's Zoning Board of Appeals has demonstrated they can competently perform.

The following are ten considerations of the Forest Ridge proposal that merit detailed analysis, review, and mitigation:

- Traffic - What are the traffic impacts on Fallon Road and the nearby streets in Stoneham and Winchester, especially Forest Street, where peak period congestion already is common? How will Forest Ridge interact with the new apartment building currently under construction in Stoneham on Fallon Road? Is it possible to arrange for a transportation shuttle capability that would serve both of these rental developments? What steps can be taken to improve pedestrian safety, especially for school age children? The Housing Partnership Board recommends that the connection to Forest Circle be gated and limited to pedestrians and emergency vehicles.
- Architectural Design - Winchester's Design Review Committee, composed primarily of architects, should be invited to comment on the proposed design and layout. In addition to architectural design, their review can include the proposed use of insulation, sound absorbing materials, and the energy efficiency techniques to be employed.
- Landscape Design - How will the existing landscape be affected by the proposed construction in terms of the removal of existing trees and vegetation? What is the proposed new landscape design?
- Visual - A three dimensional electronic model should be constructed using equivalent horizontal and vertical scales and including vegetation that will permit the development to be viewed from nearby properties in Winchester and Stoneham. This visual analysis will determine if the proposed development is appropriately sized and adequately screened from nearby homes.
- School Age Children - While the Housing Appeals Committee (HAC) has determined that the impact on schools is a community rather than a developer responsibility and, therefore, cannot be taken into consideration in evaluating a comprehensive permit application, this is nonetheless an important issue and we encourage the developer to work cooperatively with the town using marginal or incremental costs for each school affected rather than system wide average costs. Will Winchester school enrollment continue to increase over time or, like the majority of other Massachusetts communities, will school enrollment at some point in the future level off and even decline? The developer, in addition, should describe the play areas and facilities that will be provided as part of the development that are suitable to pre-school and elementary age children.
- Drainage - Part of the Forest Ridge parcel drains into Winchester and part drains into Stoneham. Because of the ledge, storm runoff and flooding of nearby homes are historic problems. The Krebs Investor Group, though, has the resources and the expertise to examine these drainage issues in a careful and professionally competent manner.
- Sewerage - Are there sewer capacity issues that need to be addressed?
- Emergency Access - How will Winchester fire and other emergency vehicles access Forest Ridge Residences? Even though the Housing Partnership Board recommends that the Forest Circle access be gated, fire vehicles still should have the ability to utilize this entrance on an emergency basis, similar to the Graystone access onto Salisbury Street. Consideration also should be given to upgrading the current pavement on Forest Circle to facilitate travel by school buses and fire equipment, as well as by local residents.
- Excavation - The developer should describe how much ledge will have to be removed to accommodate the proposed design, the methods that will be used for this excavation, the

time periods during which this work will be performed, and the steps that will be taken to protect nearby homes.

- Hazardous Materials - It has been reported that hazardous building materials, at one point, were placed on the site. How extensive are these materials? Will they be removed or capped during the construction process?

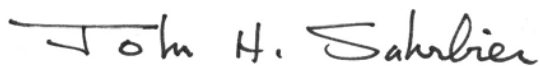
Recommendation

The Housing Partnership Board recommends that the proposed site be used for the construction of multifamily rental housing, thereby expanding the opportunity for this type of living in Winchester. At the same time, the Housing Partnership Board recommends that additional technical impact information should be made available for consideration before initiating a Zoning Board of Appeals comprehensive permit public hearing process. This would include design and mitigation plans currently being considered by the development team as well as the exploration of possible alternative project sizes and configurations.

The recommendation of the Housing Partnership Board, therefore, is that the issues identified both in this letter and in correspondence submitted by town residents should be immediately addressed in a collaborative dialogue initiated by either the Town of Winchester or MassHousing that would enable an initial response by the development team to the technical issues that have been raised and explore the possibility of alternatives to the current proposal. This working conversation then would serve as the basis for a subsequent Zoning Board of Appeals comprehensive permit public hearing process. Members of the proposed development team have demonstrated a willingness and an ability to work cooperatively with the town and neighbors, and the flexibility to adapt a proposed design.

Our assessment of the public hearing process conducted by the Zoning Board of Appeals for the 416 Cambridge Street project was that the Board was fair, open, patient, and adhered to the principle of relying on sound, correctly performed technical analyses. This included taking full opportunity for the use of independent peer reviews and determining the degree to which potential negative impacts could be mitigated. As a result of this process, the Zoning Board of Appeals then came up with a set of reasonable conditions which were included as part of their approval. We are confident that a similar process can be conducted for this Forest Ridge proposal, thereby retaining responsibility at the local level of government.

Sincerely,



John H. Suhrbier, Chair
Winchester Housing Partnership Board

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