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June 13, 2022

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Re: Preliminary Architectural Peer Review of Mill Creek Marshfield 40B

Dear Bob:

I am writing to provide you with a preliminary architectural peer review of the proposed 40B development at 39 Commerce Way in Marshfield. I understand that you are representing the Town on this matter, and I trust that you will distribute this letter report to the ZBA, and any other stakeholders that you identify. Thanks again for asking me to participate in the review of this project!

As is typical at this stage of a development of this type, the architectural and engineering drawings are at a schematic level, so for the purpose of this letter, I will restrict most of my comments to the "project fundamentals", mainly discussing the site strategy, mitigation options, overall scale and massing, etc. (as opposed to detailed analysis of floor plans, building elevations, etc.). This site-focused analysis is particularly appropriate for this development, as immediately next door is the first phase of the larger project that includes the proposal under consideration. Most of the completed buildings in the abutting site are identical to, or very similar to the proposed new structures. This opportunity to review "fullscale mockups" of the architecture is unusual, and provides an easy way to visualize the current proposal (although it is important to note that the Phase 2 project includes four, 4-story elevations with garages at grade, an adaptation due to the cross slope of the site).

This letter follows the format that I outlined in my April 15, 2022 fee proposal. I am looking forward to presenting a summary of these thoughts and answering any questions the Board may have at your virtual ZBA hearing that is scheduled for the evening of June 14, 2022.

1. ***Review the developer's application, plans and drawings, reports from other peer reviewers and Town officials, letters from neighboring residents, etc.*** For the proposed project on Commerce Way, I have reviewed the following materials:

From the Development Team:

- Project Eligibility Letter from MassHousing dated January 25, 2022.
- Mill Creek Marshfield drawing set prepared by The Architectural Team and Hancock Associates dated 2/04/22 (18 sheets).
- Moderna Marshfield Phase II rendered Site Plan prepared by Hawk Design dated 2/4/22.
- Mill Creek Marshfield Presentation to the Marshfield Zoning Board of Appeals dated March 8, 2022.
- Various exhibits from Comprehensive Permit Application (including Project Impact Narrative, Existing Conditions Narrative, Proposed Site Development Narrative, Cover Letter).
- Comprehensive Permit Site Approval Application to MassHousing (undated).
- Response to Peer Review Comments letter to the ZBA from Mill Creek dated May 9, 2022.

Town, Peer Review, and other Consultant Reports:

- (Response to Peer Review Comments letter to the ZBA from Mill Creek dated May 9, 2022..includes embedded comments from Pesce Engineering and Amory Engineers).

Communications from citizenry:

- None received or reviewed to date.

(REFERENCE MATERIALS)

- Chapter 40B Handbook for Zoning Boards of Appeal published by MHP in cooperation with DHCD, MassHousing, and MassDevelopment dated March 2017.
 - Handbook: Approach to Chapter 40B Design Reviews, prepared by The Cecil Group, Inc. for DHCD, MassDevelopment, MassHousing, and MHP, January, 2011
2. *Participate in an initial meeting at the site with the developer's design team and a representative of the Town.* This reviewer has not made a site visit with any member of the development team. If requested, this can be arranged.
 3. *Conduct site visit and reconnaissance assessment of surrounding residential and nonresidential areas within 1/2 mile of the project site.* This letter includes comments based on a Google Earth reconnaissance, as well as research on local amenities, etc.



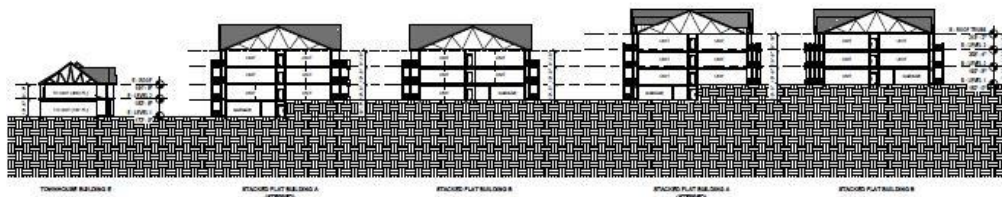
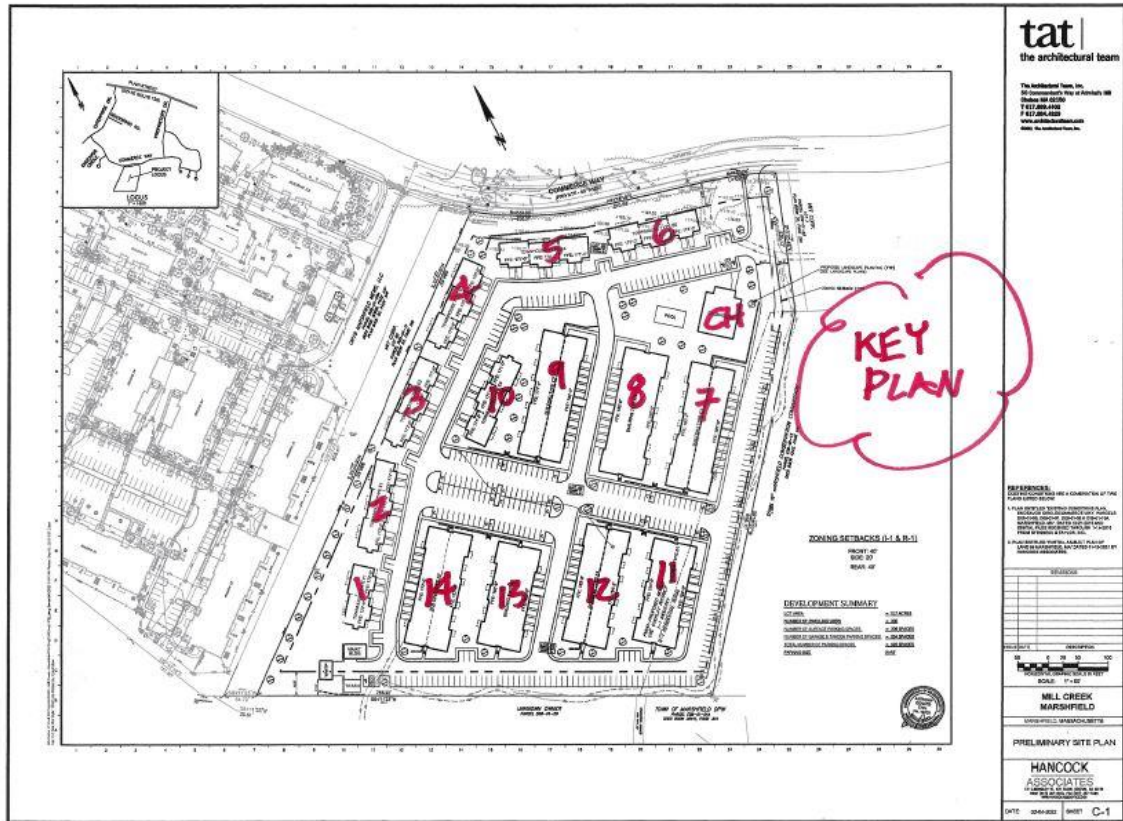
View of context within approximately half mile of site.

Brief Comments on site reconnaissance: The site is located on the south side of Commerce Way, about 1.7 miles east of the interchange with Route 3. To the west is a 240-unit project recently completed by the same developer, to the east is Sprague Forest and the Drake-Powell Memorial Forest, as well as other recently developed residential neighborhoods.

As is noted elsewhere in this letter, for a largely motor-dependent site, this one is relatively "amenity rich." Within an easily walkable range, facilitated by existing sidewalks, there is a supermarket, brewery, a few restaurants, and other commercial uses. Public facilities and open spaces include (or will include) the Rockwood Road Field Complex, a dog park, a Boy's and Girl's Club, and an Elementary and High School. There are also recently developed, very pleasant walkable residential areas nearby that include both singlefamily homes and multi-family developments.

There do not appear to be any dedicated bike lanes on any of the roadways within 1/2 mile of the site.

- 4. Consult with the Applicant's design team, as appropriate. There has been no contact with any development team members at this point other than a text exchange that confirmed this reviewer's access to the application materials.
- 5. Provide an initial oral presentation to the ZBA. Said presentation typically includes comments and preliminary recommendations on the following (presentation is scheduled for June 14th, 2022):



a. Orientation of building in relation to parking areas, open space and on-site amenities.

Comments (see Key Plan above for building numbers): The proposed development consists of fourteen residential buildings, varying in height from two stories to four stories, as well as a reportedly 9000 SF clubhouse building of unknown detailed dimensions and program (there are no drawings of the clubhouse included in the submitted materials) on a 12.7-acre site. The clubhouse is in a good location on the site, essentially the first building that comes into view after entering past one of the streetside townhouse buildings. There is a swimming pool in the vicinity of the clubhouse.

The proposal is a total of 300 residences, including 40 townhouse units, each with 3-bedrooms and 2.5 bathrooms. Each townhome appears to include an indoor parking space, and potentially an outdoor space in the driveway (although the plans are not adequately detailed to determine if that is the intention). Civil drawings indicate that there are 306 surface parking spaces, along with 204 garages and tandem spaces, adding up to 505 (306 + 204 actually totals 510...this reviewer does not know which number is accurate).

The remaining 260 units are one, two, and three-bedroom flats (117@ 1-BR, 1 bath; 116@ 2-BR, 2 bath; and 27@ 3-BR, 2 bath). We do not know how many fully accessible (Group 2) units are proposed, or where they are located. There are a total of 550 bedrooms, including all flats and townhouse units. This translates to 250 bedrooms that could potentially be inhabited by children.

The site is organized with two of the 2-story townhouse buildings along the north border oriented towards Commerce Way (buildings 5 and 6 on the key plan), and four of them (1, 2, 3, and 4) along the west border facing the nearby 240-unit project developed by the same team. These smaller structures likely provide some visual buffering of the larger buildings from the street and the adjacent development. There is an additional townhouse building (10) that is clustered with the seven taller, longer buildings with flats (7, 8, 9, 10, 11, 12, 13, and 14) in the central part of the site. There is a wastewater treatment structure (no drawings provided), along with maintenance and trash structures (also, no drawings provided) in the southwest corner of the site.

There is open space near the clubhouse, including land that surrounds the building, as well as a larger area with a swimming pool centered in it. There appears to be about 8000SF that is potentially programmable (including the space taken by the swimming pool). The rendered site plan indicates that part of that space is programmed as a tot lot. There is also open space indicated to the north and west of building 9 that includes a dog run.

There are also open areas indicated between buildings 7 and 8, 9 and 10, 11 and 12, and 13 and 14. Width of these spaces is typically between 40 and 50 feet. Where balconies face each other across these linear spaces, the distance is narrowed to under 40 feet. The space between 9 and 10 is of irregular width with a "pinchpoint" of about 25 feet at the narrower end. The rendered site plan indicates walkways and plantings located within these interstitial areas.

Similar to the "sister" development to the west, the townhouse structures along Commerce Way are set back approximately 50 feet, the setback space indicated on the rendered site plan as landscaped. It is likely that that area is at too great a slope to be programmable.

There are large parking areas (double-double loaded) that lie between building clusters 9/10 and 13/14, and a double-loaded parking lot between building clusters 7/8 and 11/12. In addition, virtually the entire run of the eastern and southern bounds of the site include parking, a high percentage of which is single-loaded.

Without commenting on whether the parking ratio is appropriate for this development, it is clear that parking is convenient to all of the homes. In addition, there are a number of parking options available to the residents. Parking is "sensitively" laid out: other than when facing a garage door or end elevations of the larger structures (where there are a limited number of units), the parking spaces are not oriented with headlights facing the dwelling units (which is often not the case in large rental developments).

While there are subsurface drainage areas indicated in the larger parking fields that may limit the ability to plant large trees, the perimeter parking lots would benefit from increased planting to cut down on the heat island effect. Additional plantings may not be necessary for buffering along the southern and eastern borders, however, additional buffering would be beneficial along the western border with the adjacent development (although this is difficult to determine without 3-dimensional imagery or a Landscape Plan).

In general, this reviewer supports the way the site is organized. However, some areas are too tightly packed. As discussed above, there are numerous walkable off-site amenities that diminish the pressure for on-site "self-sufficiency." However, the overall site plan would benefit from more breathing room between the buildings, as well as additional programmable outdoor space. Of particular concern is the spacing between the larger structures. Specifically, this reviewer recommends the following:

- Study strategies for increasing the dimensions between the three pairs of larger buildings. This could potentially be done by:
 - Eliminate building 10 entirely (the six townhouse units "orphaned" within the site area occupied by the larger structures and the clubhouse).
 - Relocate buildings 1 and 2 to fall in line with 3 and 4, roughly paralleling the lot line. Take the bend out of western-most north/south drive.
 - Shift central north/south drive towards the west

- o Move buildings 8,9,12,13, and 14 to the west to in order to increase the distance from their paired building.
- Trim back the length of building 9 on its northern end to improve the continuity of the clubhouse area green space with the new green space created with the elimination of building 10.
- Increase the size of the tot lot (it appears to be approximately the same size as the lot provided for the adjacent development which has considerably fewer units).
- Consider active programming for a new open space to the west of building 9.
- While not an open space issue, consider creation of a double separated drive entry in and out of Commerce Way (may be preferred by fire department), or perhaps better, an independent second drive at the northwest corner of the site.

In addition to the above comments regarding the amount of programmable open space on site, this reviewer is also concerned that there may not be an accessible path from the development to the public way (specifically, the area of the driveway that runs from the clubhouse down to Commerce). As there is non-trivial slope within the site generally down from east to west, the applicant should diagrammatically confirm that access to all on site common amenities are on accessible paths for all residents.

b. Function, use and adequacy of open space and landscaped areas.

Comments: See comments above relative to options for increasing the amount of programmable open space, as well as ensuring that all residents have code-compliant access to the outdoor amenities. In addition to those comments, this reviewer has a few additional questions/comments:

- Particularly because it appears that virtually all of the site will be clear cut (with the possible exception of some of the existing landscaping along Commerce), a Landscape Plan should be provided that includes all proposed new plantings as well as existing landscaping that is proposed to be preserved.
- How are mail and packages distributed to the residents?
- An area should be developed for school children to gather to wait for buses.
- There appears to be only one area designated on the civil plans for trash collection. Is this actually the case?
- Where are snow storage areas on the site?
- How wide are the proposed walkways, and what are they constructed of?
- Is there any ground-mounted mechanical equipment, and if so, where is it?
- Is there an area on the site designated for outdoor grilling/picnicking (this could be part of the program for an expanded open space to the west of building 9)?
- The rendered site plan indicates what may be patios behind each of the townhouse units. Is that what is intended, and are they fenced in?

c. Use and treatment of natural resources.

Comments: Most of any potential natural resource issues associated with this project are outside of this reviewer's expertise (for example, animal habitat, wetlands, etc.). Of note is the fact that the lot will be virtually clear cut in order to construct the development. Assuming that all environmental issues are properly addressed, care should be taken to preserve any bordering vegetation that could potentially be damaged during the construction process.

d. Building design, setbacks, massing and scale in relationship to the surrounding context and topography.

Comments: As noted above, the closest residential context of similar scale is the 240-unit developments that abuts the development to the west. With the exception of the four-story facades on the downhill sides of buildings 8, 12, and 14, The structures at The Madison are virtually the same as Mill Creek. The proposed setbacks from Commerce Way are also similar, and if the landscaping proposed within the setback is similar, the scale of the structures is reasonably well mitigated from the public realm along Commerce.

Because it appears that Mill Creek is elevated further above the roadway than The Madison, it is possible that the larger buildings in the interior of the site may not be visible from the street except near the entry drive. If the Board requires confirmation of what is visible from the public realm, they can request additional documentation from the applicant that includes street level perspective views from Commerce (with the exception of the drawing set cover sheet, there are no three-dimensional images included in the submitted materials).

To the east approximately a half mile away from the site are a number of significantly smaller recently developed multi-family buildings (Red Pony Path, Hayloft Lane, Weathervane Lane, Snowy Owl Lane, and Seth Sprague Drive).

A number of single-family homes are in the same neighborhood. This area is connected to the project site by a sidewalk on the south side of Commerce Way. While relatively close by, in this reviewer's opinion, the difference in scale between the structures at Mill Land and the Sprague Drive "neighborhood" does not create an issue of a bad "fit."

The proposed large buildings are adapted to the east to west grade change by introducing at-grade interior parking, storage, and resident entry floor on the downhill side (Type A), or by developing "basement" units at the downhill side, with an entry level on the uphill side (Type C). None of the large buildings appear to include elevator access, which means that Type A is a four-story walk-up, while Type C is a three-story walk-up (with an additional residential floor down one level).

Given the number of units in the large, non-townhouse structures (260), the decision to forego elevators is highly questionable. This is both a practical issue for the residents of the buildings (imagine a family with toddler, baby, groceries, etc., or aging-in-place resident) and quite possibly a building code issue as well.

Under the regulations of the Massachusetts Architectural Access Board (MAAB), a minimum of 5% of the units in the complex must conform to Group 2 requirements (generically considered "fully accessible" units). The overall unit count includes the townhouse units, even though that unit type may be exempt from conforming as Group 2. This means that 15 of the units must be made compliant.

In the current scenario, because there are no elevators, all of the accessible units must be at entry level (assuming that there is an accessible path to the building entry, access to parking, etc.). MAAB regulations, section 9.4.2 state that the accessible units must be "...proportionally distributed across the total number of units according to number of bedrooms, size, quality, price and location." It is this reviewer's opinion that the distribution by location may not allow placing all fully accessible units at the ground level.

Note that there is a MAAB exemption for the requirement for elevators in multifamily buildings if "all accessible rooms and all public use and common use spaces are at the accessible level" (28.1.f). However, it is not clear that this exemption restricts the breadth of the "distribution by location or quality" requirement. At a minimum, the applicant should request an Advisory Opinion from the MAAB to see if a variance from 9.4.2 would be required to construct the development with no elevators. A better solution, for numerous reasons, would be to include elevators in all of the large buildings.

e. Viewsheds of the project visible from the public street, public areas and from the vantage point of nearby residential neighborhoods.

Comments: As noted above, more information is required from the development team to accurately assess the visual impact of the project from the public realm, from the neighboring development, and within the project itself. While it is very similar to its neighbor, views from within the development that include the four-story facades would be useful.

There is a site section included in the submitted materials that aids in understanding the relationship of different building types within the site. Those sections could be continued towards the west to include the closest buildings on the neighboring site, as well as to the north to understand the site and new buildings' relationship to the street.

Shadow studies do not appear to have been included in the submitted materials. This is an important exhibit to assess if there is any impact to the neighbors on the west (which may be minimal), as well as within the development itself (which will be more significant).

f. Pedestrian and vehicular access and circulation; adequacy of accessibility provisions. Of particular interest are the implications of access and egress in terms of pedestrians, bicyclists and motorists. Adequacy of parking facilities.

Comments: The location of the site is pedestrian friendly, with walkways that appear to connect all nearby residential developments with each other, and to numerous public amenities. Within the site, there are walkways that connect to all of the buildings and parking areas (although as noted above, the applicant should provide evidence that all of the walkways are MAAB "accessible"). None of the site plans in the submitted materials include crosswalks, sidewalk ramps, etc. that will be necessary (particularly because of the large number of walkways that are interrupted by drives and parking spaces).

There do not appear to be any accommodations made for bicycles in the drawings, including no reference to exterior bike racks at the clubhouse or any of the individual buildings. Nor do the schematic building plans indicate any secure interior bicycle storage for residents. This could be particularly challenging for upper floor residents with bicycles if the buildings remain unelevated.

For residents who are fully car-dependent, the site has a generous number of parking spaces and options, and an entry to Route 3 is only about 1.7 miles away.

As far as other "circulation issues"/questions:

- Given the scale of the proposed development, a significant number of EV parking stations should be provided. There is no information provided as to locations and quantities. In addition to what may be proposed for current spaces, infrastructure for expansion of the number of spaces should be built into the project, including the capacity of the project's transformer(s).

g. Integration of building and site, including but not limited to preservation of existing tree cover, if any.

Comments: As has been discussed above, the large building types are designed in a way to adapt to the existing grades of the site. This helps to cut down on the amount of overall earthwork that must happen. However, at the same time, the entire site must be cleared to proceed with the work. The best case for integration of the project into the nearby existing neighborhood is through successful preservation of existing bordering vegetation, the provision of new screening vegetation at the western and northern borders, and generous landscaping within the development.

Application materials also state that the townhouse buildings will follow the natural site grading. However, because there are not individual building elevations provided, it is not possible to determine compliance with this goal (all submitted elevations depict a townhouse structure sitting on flat site).

h. Exterior materials.

Comments: Building elevations have not been annotated to indicate material selections. This must be provided by the applicant.

i. Energy efficiency.

Comments: Submitted materials are not adequately developed at this point to determine the degree to which the development may commit to sustainable features that exceed what the Massachusetts Stretch Building Code requires. There is a comment in the materials that "The project will incorporate air sealing strategies to compartmentalize units and reduce air infiltration."

It is not clear what type of mechanical systems are intended. There is a reference to "per-unit electricity and natural gas billing", but the utility plan does not include connections to gas lines (nor does it include fire-protection lines to all buildings). Detailed sample unit plans include a space for an air handling unit, but we do not know where the mechanical equipment is. More information should be provided by the applicant, particularly if there is ground-mounted equipment proposed, basements required, etc.).

Current plans do not indicate areas of PV or solar hot water panels on the proposed sloped roofs.

j. Exterior lighting.

Comments: The application materials do not include a site lighting plan. This should be provided.

k. Proposed landscape elements, planting materials, and planting design.

Comments: There is no Landscape Plan included in the applicant's submission. If the rendered site plan is any indication of intent, this reviewer believes that it would be beneficial to provide more large-scale landscaping within the parking lots. This could potentially be accomplished by introducing some compact spaces.

l. Feasibility of incorporating environmental and energy performance standards in the design, construction and operation of the buildings.

Comments: There are a multitude of third party environmental and energy performance standards that are more rigorous than the building code minimum, including LEED, Energy Star, Passive House, and Enterprise Green. Because Marshfield is a Stretch Code community, as that code continues to evolve, the base line for energy efficiency will be higher than non-adopting communities.

m. Any other design-related comments/questions/considerations identified by this peer reviewer, ZBA, or town staff.

- Car sharing spaces (ZIP Car, etc.) should be considered.
- Site plans should be improved to include drive aisle, and parking space dimensions, proposed curbing pavement markings, accessible parking and ramps at sidewalks.
- Given the scale and intensity of site coverage, provide a preliminary construction management plan that minimizes impact to the community.
- What is the status of review of the project by the Fire and Police Departments?
- Universal Design features should be integrated into the project plans.
- Provide drawings of the clubhouse building, including detail related to the programming of the interior common spaces.
- Landscape Plan (when submitted) should include any proposed fencing within or on the perimeter of the site.
- Applicant should provide a cut and fill analysis.
- Provide a trash management plan. Vehicle Movement Plans should include maneuvering of trash trucks at pick-up locations.
- Are the sidewalks within the development proposed to be asphaltic or cement concrete?
- Where are proposed transformer locations?
- Has a geo-technical report been completed?
- Is a radon mitigation system included in the design/pricing of the buildings?
- Has the Applicant considered the option of an improved connection to the existing fire protection trail running along the eastern and southern property line of the site?

n. Techniques to mitigate visual and other impacts.

Comments: Pending receipt and review of additional documentation from the development team (including 3-dimensional images, Landscape Plan and Planting Schedule, and Lighting Plan) this reviewer believes that there is a good chance that the development will have minimal visual impact on the nearby neighborhood. This letter's primary focus for improvements to the development is the enhancement of on-site amenities for the benefit of the residents.

Impact on public services, traffic, wildlife, wetlands, etc. are outside the expertise of this reviewer.

6. Participate in meeting(s) with municipal staff and the developer team ("working sessions"), to address to the ZBA's charge(s) to the developer. No working session has occurred at this point, nor has one been scheduled.

In the briefest of summaries, this reviewer believes that this site is well-suited for a 40B development. Compared with many other largely motor-dependent sites, this one benefits from numerous nearby, walkable off-site amenities, as well as other attractive residential developments. If it is possible to increase the scale and connectivity of the on-site green spaces, the experience of the residents will be significantly enhanced.

I'm looking forward to discussing my thoughts about this development at tomorrow night's ZBA hearing.

Sincerely,
DAVIS SQUARE ARCHITECTS, INC



Clifford Boehmer AIA
Principal