

Economic Development Citizens Advisory Committee

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CBD Masterplan Comments **[DRAFT]**

On January 5, 2017, the EDCAC met to review the CBD Masterplan Draft 2016 that was prepared by MassDevelopment and its consultant team and provide comments for the Winthrop Town Council. A list of the EDCAC's comments is below. This list, while not exhaustive, offers a summary of our major areas of feedback. Regarding the process, the EDCAC feels it is important to inform Town Council that key elements of the EDCAC guidance and feedback was not included in the draft Master Plan. We are happy to discuss this in more detail at our joint EDCAC and Town Council meeting.

General Comments:

1. It is the EDCAC's hope that the Town Council can be provided with enough information, expertise, and community feedback to make the best data-driven decisions for the Town of Winthrop regarding the development of the Middle School Site on Pauline Street & the Center Business District (CBD). The MassDevelopment Master Plan (the "Master Plan") offers some of that information, and should continue to be supplemented by additional information and feedback from the EDCAC; the Transportation Committee; CBD Business Owners; local realtors; various citizens' groups; etc.
2. First and foremost, the EDCAC believes this Master Plan document needs a much stronger connection to economic development (the first mention of the words "economic development" is not until page 74), especially if this document is going to be used to seek funding to achieve its goals. While many of the strategies describe increasing patrons to the CDB and similar objectives that *imply* economic outcomes, there is no strong, introductory comment about the economic development intent underlying the entire effort. Since the EDCAC was established by the Town Council to focus on *economic development*, this was especially striking to us.
3. An Executive Summary should be prepared by MassDevelopment to be reviewed by the EDCAC and approved by Town Council, and added to the beginning of the document before it is circulated or published. The Executive Summary should state the goals and findings of the Plan, which would then be adopted by the Town Council. In addition to the goals and findings, the Executive Summary would pull together the various elements of the plan in a concise, easily understood manner, and clearly identify the next steps to be taken to begin implementation. Not having an Executive Summary is unusual, and limits the reader's ability to understand the intent of the Plan. A "Letter of Introduction" is not a substitute for the Executive Summary. If a Letter of Introduction is desired in order to convey the Town's commitment, it should be written and signed by Town Council (not Town Staff) so the document is introduced by the Town leaders to the public and to funders.

4. The Executive Summary should state that the Master Plan for the Middle School Site on Pauline Street & the CDB is a *living, evolving document* that must be revisited and edited as development opportunities arise and priorities shift. This concept should also be reinforced throughout the Plan. The renderings or visions shown and described are simply guidelines or principles to consider as projects come forward. Many of the principles and guidelines can also be used for projects in town outside of the study area.
5. The EDCAC feels strongly that the scope of this process was pre-defined too narrowly from the beginning. For example, key public parcels in the CBD were left out such as Larson Rink & Viking Gardens (Housing Authority parcel), which significantly limits the economic development potential and amenity opportunities for the Town. The EDCAC provided this feedback at every one of its meetings with the consultant group and Town staff, and also in the memorandum to Town Council, but that comment is not reflected in the document. As a partial response to this concern, we suggest that Town Council also consider a 5th scenario, which we will outline below.
6. Much of the EDCAC's work involved addressing the following questions:
 - a. Why after re-zoning the CBD has no mixed-use project been successfully executed?
 - b. How do we educate all stake holders to replace public/private perceptions with accurate data in order to make Winthrop "Development Friendly"?
 - c. How does Winthrop reverse the negative trends identified in the Collins Center Report, see Executive Summary below:

"Residential Population and Labor Force

1. Winthrop's population has declined over the past half-century at the same time the median age has risen.

2. The level of educational attainment and median household income in Winthrop are less than State averages.

3. The number of Winthrop residents in the labor force has declined over the past two decades.

4. Winthrop residents use public transportation to get to work at a much higher percentage than the State average; their transit commute times are shorter than residents of other communities.

5. Winthrop residents most commonly work in the following industry sectors: Educational Services, and Healthcare and Social Assistance; Information, Finance, Insurance, and Real Estate; and, Professional, Scientific, Management and Administration and Waste Management services.

6. By occupation, Winthrop residents most often work in Management, Business, Science, and Arts and Sales and Office.

Local Business Economy

7. *Since 1990, Winthrop has lost over 1,100 local jobs (-41%), a trend that is directly opposite other comparison waterfront communities.*

8. *Winthrop offers fewer than 0.2 jobs per resident in the labor force.*

9. *Winthrop's economy is dominated by small establishments; larger employers are scarce.*

10. *Winthrop's local economy today is most heavily comprised of jobs in the Educational and Health Services sector, Leisure and Hospitality sector, and Trade, Transportation and Utilities sector.*

11. *The amount that Winthrop residents spend on retail goods exceeds Winthrop's local retail sales by \$204 million, i.e., the equivalent of 68% of the residential community's retail spending is done out of town."*

7. Implementation of the Master Plan is one of the EDCAC's most major concerns. It is the EDCAC's opinion that a successful implementation of the Master Plan will require at least a full-time staff person to oversee and coordinate all projects within the CBD and at the middle school site with town departments and stake holders. This staff person should be hired by and report to a separate, independent body, both because the current staff has a "full plate" focusing on existing Town business, and because the type and intensity of work required to implement the Master Plan is beyond current staff experience and expertise. See page 117 of the Master Plan for a matrix of organizational characteristics, and the third appendix to the Master Plan ("Organizing for Economic Development Models and Options"), for possible ways to structure this oversight. Funding for the implementation staff person can be sought from various State programs. The EDCAC is concerned that if the task of implementing the Plan is assigned to a newly hired Town Planner that would dilute the attention such person could give to both the Master Plan and other important Town business. If, however, the quickest path to beginning implementation is to rely upon a Town Planner while a new structure and funding is being put into place, it will be critically important that the person is hired by and reports to Town Council through the TC Economic Development Committee and the EDCAC. Only very direct involvement of Town leadership will offer the focus, attention and commitment that is needed, and will provide critical confidence to the public - *particularly* to the CBD Owners, who are a primary stakeholder in maintaining and increasing Winthrop's economic strength.

With the above as context, the EDCAC offers the following comments on the written draft Master Plan document (please note that the order of these comments relates only to the order in which items appear in the document, and is not intended to suggest more or less weight to various items or elements in the Plan):

TOC

1. Strike “Letter of Introduction” in favor of Executive Summary reviewed by EDCAC & approved/adopted by Town Council.

Page 1

2. Peter Gill is no longer a member of the committee and resigned shortly after the committee was formed.
3. Robert A. Carroll, AIA LEED AP BD+C
4. “Peggy” should be changed to “Margaret”
5. Include Committee Titles (Co-Chair, Jane Chmielinski) & (Secretary, Michael Lucerto)
6. Include Town Council Economic Development Sub-Committee

Page 8,9,10

7. Add map that highlights the “Assets”. Many of them are outside of the CBD and that should be noted. They should be organized by proximity to the CBD. French Square, Larsen and Ingleside are part of and/or closer to the CBD and affect CBD development more, for example, than the library.

Page 9

8. Larsen Rink: note that the large blank facades and parking area “wall off” the CBD from the Town’s largest and most historic greenspace, Ingleside Park. This site was not included in the study, per direction of the Town Manager’s office, but does have significant development potential and the EDCAC suggested on several occasions that it be included.
9. Why have the Library, but not Town Hall? Important civic/historic building too?

Page 10

10. Housing – add more detail to this paragraph. What types of housing do we have too much of? What type of housing do we have very little of? Elaborate on the meaning of “desired demographic” (this will be critical if/as the Town seeks housing development proposals for the site). Importance of creating daily foot traffic in the CBD. Much feedback was offered on this topic by local realtors that does not seem to be included in the Plan.
11. Urban Design – Add comment... design guidelines, and enforcement of them, on such things as minimum percent of glass in facades & signage requirement are critical to making the CBD more attractive.
12. Chart for challenges and opportunity
13. Transportation – This section starts with a note about the ferry, which seems inappropriate and far overstates the importance or relevance of the ferry to the overall Winthrop transportation system (reference to the ferry here seems to be a “disconnect”, and as though it’s included for some other purpose?). The ferry is not connected to/correlated with the existing bus route and, at a minimum, the need to connect the two should be stated if including a reference to the ferry is to be meaningful in a Master Plan about the CBD. Otherwise, mentioning the ferry here is not

relevant. It is a stretch at best to be placed in this section over vehicular traffic and opportunities for other forms of transportation like car share (zipcar) or bike share (hubway) locations in town. These amenities could make the town much more attractive to young professionals, green living, and outdoor enthusiasts, and neglecting that while highlighting the ferry could make the reader question the validity of this section.

Page 11

14. Infrastructure – Add – As well as address immediate business needs. It is the committee’s understanding that new development(s) has/have been delayed due to insufficient water and sewer infrastructure in the CBD. CBD Business owners have said loud and clear that the water and sewer is not adequate. The current engineering study is to determine what is in the ground now (just for water and sewer, but we will need to take a closer look at other utilities), and what would be needed for a build-out under the fairly recently increased CBD zoning, but the engineering analysis *does not* connect with the overall master plan build out, as the EDCAC understands it (density needs to match and include middle school site, housing authority etc.). Since the infrastructure section is key to getting State funding for the Town of Winthrop (i.e. MassWorks funds), this section should be much expanded to describe in more detail why infrastructure improvements are needed. Additionally, the EDCAC suggests that Town Council engage a different, third party engineer to perform a peer review of the current engineering analysis because this is so critical to correcting deficiencies that burden CBD businesses. The third party engineer should also provide an expanded analysis detailing what is needed to accommodate development at the middle school and other sites that are outside of the current engineering study boundaries.

15. Climate Change – Provide reference to FEMA, MEMA or EPA guidelines/best practices. Note grants available to support resilience in MA: Coastal Resilience Grant Program

<http://www.mass.gov/eea/agencies/czm/program-areas/stormsmart-coasts/grants/>

Community Clean Energy Resiliency Initiative

<http://www.mass.gov/eea/energy-utilities-clean-tech/renewable-energy/resiliency/resiliency-initiative.html>

16. Add another item to the “Challenge” Section: Marketing/Branding of Winthrop. How do we let people know we are here? How do we attract them here? With the intense pressures on rents and housing prices in Boston Winthrop should be routinely seen as a great alternative for people looking for reasonably priced housing, but it is not. We should be actively marketing the Town and its many assets (beachfront location; new high school and athletic facilities; etc.). See the following link for Boston Globe article that notes Revere, Everett, Lynn, and Medford, among others, as good alternatives to high-priced Boston housing but does not mention Winthrop: https://www.bostonglobe.com/magazine/2016/04/12/top-spots-live-boston-area-communities-where-home-market-soaring/xDbJJ1kYFQFKvVCbQEcmjK/story.html?s_campaign=bdc:article:stub).

17. The Community Visioning Process should be an appendix and not in the body of the master plan. Public comment should be vetted, backed by factual information, and analyzed.

Page 13

18. Please note that the presentation includes key findings from the Collins report on retail leakage, population age, and population density. All findings indicated negative trend when compared to similar nearby communities. **Referred to on page 5 with the Collins report.**

Page 15

19. Add “enforce existing bylaws (i.e. signage)” under “improve appearance - short term”
20. Add “provide more consistent maintenance of sidewalks & trash removal” under “improve appearance - short term”
21. Add “reevaluate parking duration & signage” under Enhance Access and Convenience – short term”

Page 18

22. Where did this come from? “Limited number of bedrooms to not burden schools” and “Don’t need auditorium (3 comments)” and “Turnover of single family homes occurring and potential need for new school”. Should they be put into some context?? (This seems like classic NIMBY.)

Page 19

23. Please rewrite comments to more clearly express intent. Organize. (Parking, zoning, infrastructure, French square, etc.)

Page 25

24. How are empty parcels considered “utilized”? We understand that properties have been assigned “utilized” or “underutilized” designations based upon Assessor’ valuations but believe Figure 12 is very misleading. EDCAC provided comment on this earlier, and recommends that this Figure be eliminated from the Master Plan.

Page 28

25. Define emerald necklace as Jamaica Way, Commonwealth Ave, Public Garden and Boston Common.

Page 30

26. Figure 22 Transition to the CBD (Edit)

Page 31

27. “Transportation and Connectivity” Section should be expanded in consultation with the Winthrop Transportation Committee, given the importance of transportation to the growth of Winthrop. Also, this is not the most current ferry schedule. The ferry is now shared with Quincy and makes trip to the harbor islands. The ferry is also seasonal, running from May to October, in addition to being infrequent and cost is also a factor in its challenge to be successful. If the ferry

is to be discussed in the CBD/Middle School Master Plan, these issues and challenges should be noted and solutions proposed (for example, in 2016, a twenty (20) round-trip pass to Boston was \$290 or \$14.50 per trip, and the Town should seek assistance from the MBTA as other waterfront communities do (such as Hingham).

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28. Add the Form + Place 2015 study as appendix, but use this as reference for pro/con's.
29. ADD: Other means of zoning are being looked at including a "strong suggestion" from the EDCAC for Winthrop to pursue creating a Chapter 40R district to re-zone the middle school site. This was discussed several times during EDCAC meetings with the consultant group and with Town staff as a key element of making the middle school site "development ready", but is not included as such in the Master Plan at all. This seems to be a real shortcoming of the Plan and it misses a significant opportunity. By creating a Chapter 40R district the Town can get immediate payments from the Commonwealth, and can also get payments for actual burdens placed on the school system by future development. Furthermore, putting Chapter 40R zoning in place would be one of the greatest ways to attract development interest in this site. ***Must bring Zoning to the front for the MassWorks grant. **Zoning, implementation, and economic development** ARE the three pillars of that application. Very disappointing that 40R is not even mentioned in this document after the EDCAC discussed this option so extensively.

Page 33

30. The Parking and Connectivity Analysis should definitely be treated as an appendix to the Master Plan, rather than as part of the Plan text itself. This is a key and well-done analysis but it is much more appropriate for the Executive Summary of the analysis to be included in the Plan narrative, with the full 25 page analysis moved to the appendices section. Also the gap between public perception and reality of the parking situation in the CBD, as validated by the results of the study, should be highlighted in many areas of the Master Plan and used to provide actual information and data in the pros/cons of the middle school scheme options.

Page 68

31. Add commentary that while changes to the gymnasium space may not technically trigger the threshold for 100% accessibility upgrades, the intended use (i.e. Community Center) may make accessibility a priority. Is it Form + Place's interpretation that a change from Public Middle School to Public Community Center would not be a change in use? Please comment. Addressed in the appendix chapter 34 report?
32. A 1995 study said the Gym should come down. Numbers to bring the building up to code are from the 1995 study that should be updated to present day value. ***WOULD BE \$3 MILLION IN PRESENT DAY DOLLARS according to a quick GOOGLE search.

Page 69

33. In the introduction include that "A 5th scenario was also discussed to maximize the potential of the middle school site by including the Larson Rink in the study area. This scenario would focus on building a new state-of-the-art rink to benefit the residents of Winthrop *before* the existing rink would be eligible to be taken down, so the Town would never be without a public rink. By

considering this option the total land area and the natural grade changes of the overall site could be used in the most beneficial way to maximize benefits to the residents of Winthrop.” (If necessary, there could be a comment stating that while the Larsen Rink property was not included in the formal scope of the consultant’s work, given the critical nature of exploring all options to increase economic development opportunities and to identify the “highest and best” use for the site, this alternative should be actively explored.)

As a general comment on the Schemes, the EDCAC felt that many of the Pros and Cons noted in the 4 schemes were at times inconsistent among the schemes; were presented without being accompanied by appropriate professional analysis; and seemed occasionally editorial in nature. This was unexpected, and does not form the basis for an objective, thoughtful analysis. One example of this is where possible pressure on traffic and/or possible pressure on the school system is identified as a “con”, but no analysis is shown to merit that comment. At a minimum, rather than assuming those were real issues and treated as a “con”, the consultants should identify those as areas for further study (evidence of other similar development efforts that addressed these concerns in a favorable way could also be identified). Additionally, parking in the CBD was described in some areas of the Master Plan as a problem or issue, but the results of the “Parking and Connectivity Analysis”, which provided clear evidence to the contrary, was not noted at the same time to offset that issue.

The EDCAC attempts to note some of the inconsistencies or issues in the Pros/Cons section below, but with the limited time we had to review this together it is not complete or exhaustive. We strongly believe that the Pros/Cons section should be looked at much more thoroughly as it is the absolute underpinning of the conclusions and final option that will be adopted by the Town Council and, therefore, it is important that the Master Plan can be defended in this area. Otherwise it will appear random, and will be susceptible to criticism. The EDCAC comments below are meant to be helpful and constructive to avoid that eventuality.

On all of the Schemes, please identify the component parts of each (“X” number of units; “Y” square feet of gym; “Z” square feet of retail; etc.) in bold text at the beginning of each one. It is too difficult to read that information in the small Program Summary boxes, and it was not consistently presented in the Scheme narratives, which made it challenging to easily compare the alternatives.

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Scenario 1

Cons

34. Cons: Why would the Plan not account for the initial capital improvements required to make the office lease code compliant? ~\$2 million in today’s dollars would almost certainly cause the property to lose revenue for the foreseeable future.
35. Cons: Using construction cost estimates from 1995 that are *twenty years old* is not defensible and would most certainly and appropriately be questioned by anyone reading the Master Plan.

This can discredit the analysis entirely. When updated to today's costs and added together, the outcomes reported in some of the schemes change significantly. The costs shown are very low once escalated to update the 1995 costs, and this needs to be corrected in all of the schemes.

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36. Edit the sentence "The returns for this project are already narrow; if the community were to layer in additional requests of the developer (e.g. construction of an indoor community pool), it is possible that a developer would walk away from the project altogether., that the profit margin may be too low to generate developer interest." And add something like "and that is beyond the scope of this Master Plan to determine more precisely what a motivated developer may or may not offer."

Scenario 2

Pros

37. Pro for all scenarios should be tax revenue (x dollars) and sale proceeds.
38. Feedback for consultants: Development Program to be bulleted out (not just in the photo...too small to read, as noted above.)
39. Clarify demo costs v purchasing costs. Are demo costs assumed to be paid by the developer and the purchase price shown *after* those costs? That is, is the price for an "as-is" sale?

Cons

40. Con: Again 1995 number needs to change and current figures must be used.
41. Con: Insurance figures must be given as a cost (all carrying costs of the gym, and costs to renovate, need to be shown as a con).
42. Con: Dev v Community need for X...
43. Con: Final con should also be on scenario 1 as well.

Scenario 3

Pros

44. Again bullet out graphic for Development Program
45. Add tax revenue
46. Why affordable? Question for the consultants (20% I believe we are exempt)...where did that come from? Should be on all schemes? Affordable? Public? Or Micro-Unit for first time home buyer/young professional?
47. Gym is both pro and con---serves some community needs but not all the community needs expressed by the community organizations and individuals looking for space at the visioning sessions and who attended the EDCAC meetings.
48. "\$3.5 million could be used for gym improvements" ...Why is it earmarked for the gym improvements? This may not be the best use of the funds and it's odd that the consultants are telling (ultimately the Council) how to spend the earnings from the sale of the property. The analysis should be more objective, with the tax revenue and likely sale proceeds from each scenario simply identified for the town Council to decide how to spend. There is no compelling reason that, for example, this revenue would be used on gym repairs rather than on other

improvements called for in the Master Plan (such as CBD sidewalk or infrastructure improvements, etc.).

49. Amphitheater can be added to any one of these scenarios, but was only draw into Scenario 3.

Cons

50. Keeping in the gym is both a pro and a con. Saving the old gym when it could be replaced with a new facility to serve multiple community needs limits it's uses to mainly athletics.

51. Traffic is a goal not a con...it should be removed as a con. The idea of developing the site is to generate *more* traffic (pedestrian and otherwise) to support the CBD businesses. It is common and usual for a traffic study to be done and a traffic management plan created to address any possible traffic issue, but that is not stated. Additionally, while traffic is noted throughout as a "con" without further analysis, it is not noted that when the school was in active use it generated far more peak hour traffic than would be the case with the added housing.

52. Add "Not using the site's maximum potential for development"

53. Lose control of site – why is this a "con"? Additionally, while loss of the auditorium (and in Scenario 4 of the auditorium and gym) is stated as a "con", there is no discussion of a more formal review of the other existing auditorium and gym spaces in Town to determine need more precisely.

54. Missed opportunity to redevelop auditorium

55. Traffic study is needed to see impact...see comment above

56. Again, need note the cost to the town to operate the gym.

Page 77

57. Conclusion: how did the consultant's arrive at the conclusion that this scheme is "an appropriate balance of new development and tax revenue for the Town"?

58. Where did the statement "most appropriate redevelopment scenario given the current market conditions" come from? Specifically, to what does "current market conditions" refer? The real estate market is extremely hot in greater Boston and experts say supply will not catch up with demand until 2030, so the EDCAC is confused about why the Master Plan seems to imply that there is not more of a market. Please explain this conclusion.

59. Eliminate the "Conclusion" for each scheme. The purpose of the study is to present information and facts and, based upon that, it is the Town Council's role to draw conclusions. Stating conclusions in the document also risks appearing more editorial than objective, especially in light of limited analysis in some areas (the Master Plan is not meant to answer everything but, rather, to provide as much information as possible and to state intent and be indicative). Rather than making conclusions, it would be more helpful for the Master Plan to simply include a chart or matrix of the pros and cons of each scenario.

Scenario 4

60. Again needs to be bulleted for the development plan. How many units...what kind. Etc

61. "Largest scenario" comment should be changed to read it is the "largest of all the development scenarios that was studied". There are certainly larger schemes, they were just not included in the Master Plan review.

62. Confirm value to include demolition costs (included or not in that price tag)

Pros

63. Tax revenue should be a pro
64. Can someone ask the assessor what the taxes would be? The EDCAC thought it seems very low on all scenarios.
65. "Of the options studied": scheme 4 offers.....(should be added)
66. Tax revenue can go to anything
67. "of all the schemes studied"...created most density
68. ***Bullet point 3 "Scheme 4 provides the most residential density (again of those options studied); it goes to the greatest lengths to achieve the community's goal of establishing a critical mass of residential development through a diversity of typologies. Many in the community expressed the need for the housing product a development of this scale would create (e.g. market rate housing for young professionals and retirees). It also offers the opportunity to create a "signature building" in Winthrop, similar to 1 North of Boston in Chelsea, the Batch Yard in Everett, or Boston East in East Boston."...most important bullet point in the whole document:
69. "The addition of a 12,000 SF Community Center could be developed to accommodate a number of uses, as opposed to an auditorium or gymnasium that have more predefined uses."
70. Number 68 & 69 above are the most important statements in this document as it has been written thus far, and should be reinforced.

Cons:

71. First con makes no sense....strike it, as the whole point of this process was trying to find a way to increase density and traffic in the CBD since there was not enough vehicular/pedestrian traffic in the center to support the businesses there or to invite further business growth. Furthermore, if 96 units of housing makes the area too dense, then there is no reason to look into adding mixed use in the rest of the CBD, as is now allowed under the revised CBD zoning, as this implies we have reached capacity. This comment is entirely contrary to the whole CBD part of the Master Plan, which calls for more development there.
72. 2nd Con Strike it-again. Why would the Town save it for future development if the opportunity to develop it all at once came along? Additionally, exchanging the management of most of the site and turning it into tax revenue through private development is, the EDCAC believes, a pro not a con (less financial & human capital invested from the town, and more revenue provided to Winthrop).
73. 3rd Con: A more formal study of public space is need for this statement to hold up. It isn't clear that this can be asserted without more hard information on availability and regular usage of all similar Town spaces. Additionally, as pointed out in the pro's above, a brand new community center could accommodate a number of uses as opposed to the auditorium & gymnasium having narrow uses.
74. 4th Con: Edit as 46 should read 96. Also, how did we end up at 96-two bedrooms when throughout this process we have identified other types of housing stock (such as studios and one bedroom condos) which are highly limited in town but are needed in order to attract young professionals and serve as an alternative for our aging community members who would like to downsize? Lastly, with regard to pressure on the school system 1) It is likely that these types of housing units would not attract a significant number of school age children to every grade but,

rather, they would be spread among the entire school system population. More importantly, studies have been done on school impact that should be sited here if this is to be included as a “con”, and 2) this issue is directly addressed if a Chapter 40R zoning district is created (mentioned previously), where the town can get relief for school age children added to the system who move into a development within this zone.

75. The EDCAC proposes that a Con be added to all 4 scenarios being the exclusion of Larson Rink from the development scope, which passes up a chance at maximizing the site to its fullest potential, while also providing the community with a new rink worthy of Winthrop’s history on the ice.
76. 5th Con should be struck because: 1) we do not believe \$100,000 in added annual tax revenue is not “substantially more revenue” for Winthrop’s uses (and it may be higher, once confirmed by the Assessor’s office); and 2) The comment “For the proposed scale of Scheme 4’s development” implies that a larger development is not more beneficial.
77. Again, as noted above, strike the conclusion for all four scenarios and replace it with a chart to compare project goals, proc and cons evenly.

Implementation

(EDCAC needs add its comments here for the Implementation section, but are happy to start this conversation at our joint meeting.)

[end of comments]