

RE: Application for a comprehensive permit for “Thorndike Place”

Dear Members of the Zoning Board of Appeals:

As the Zoning Board of Appeals (“ZBA”) continues its work in considering the “Thorndike Place” comprehensive permit application, we write to supplement our previous comments submitted to you in light of three developments: 1) Arlington Land Realty’s (hereinafter “The Applicant”) most recent revised proposal for a slightly smaller overall project; 2) information provided to this Board by the Arlington Land Trust; and 3) the observations and concerns of members of this Board who have been following the proceedings. In short, while the Applicant’s revised proposal addresses some discrete concerns and presents a modest reduction in the overall scale of the project, this Board does not believe these measures go nearly far enough toward relieving the many fundamental concerns we hold about this development given obvious constraints of the site and its impact on the surrounding neighborhood. As such, we continue to urge the ZBA to continue to scrutinize this application with all available tools and to consider all conditions and qualifications under which any development of this parcel would be truly feasible within the bounds of the law.

Foremost, we note that the Applicant has again updated its architectural and site plans, reducing the overall number of proposed units to 176 rental units, chiefly by eliminating their previously proposed twelve (12) Townhouse, ownership units. To our understanding, the Applicant has also modestly reduced the overall size of the proposed apartment building and moved most of its parking spaces underground in order to re-site the building further away from the delineated wetlands. While this revised plan reduces the scope of the proposed project<sup>1</sup>, the overall project remains far too large for this Board’s comfort, principally due to continued concerns about the impacts of an 176-unit building with parking in a wetlands-sensitive neighborhood prone to flooding before adding the significant development of what is now open space.

With respect to traffic, this Board recalls that in the project eligibility phase, the Applicants represented both to the Select Board and MassHousing, that their plans included off-ramp access on Route 2. However, at this juncture, it is clear that such a proposal is not now (and perhaps never was) feasible and remains absent from the application before you. Instead, nothing has been done to address the fact that every car accessing Thorndike Place will navigate two narrow residential streets – Littlejohn Street and Dorothy Road (the locus approximately 42 total two-family and single-family homes) in order to access Lake Street, one of Arlington’s busiest streets during

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<sup>1</sup> It bears noting that the piece removed from earlier proposals – 12 townhouses – removes one of the few aspects of the project consistent with the character of the neighborhood, and removes a pathway to affordable ownership in Arlington, as opposed to affordable rental units.

commuting times. While the Applicant has stressed the proximity to Alewife as a means of reducing the additional vehicular traffic on these streets, the means by which such direct access will be made available without requiring the Town to accept and maintain undevelopable portions of the so-called Mugar woods remains unclear. At this juncture, common sense informs this Board that as proposed, the increased level of traffic and the uncertainties over how access to public transport will be achieved both present serious health and safety concerns for your deliberations.

With respect to this Board's deep and persistent concerns about the impact of this project on the wetlands and therefore flooding conditions in East Arlington, we are encouraged by your refusal to waive many of the Wetlands Bylaw requirements, including flood water storage requirements. However, we remain highly skeptical of the Applicant's claims that development will not negatively impact surrounding homes and natural resources. Significantly, we recall that the Applicants had previously claimed that remediation of a berm and other conditions in the wetlands would significantly improve conditions for both the project site and the neighborhood generally, but no mention of these remedial measures has been made within their revised proposal.

Furthermore, while it is our understanding that the ZBA cannot apply standards or regulations not in place at the time of the application's filing in 2016, the concerns expressed by the Arlington Land Trust, the Conservation Commission, and members of the public, particularly with respect to expected worsening flooding conditions due to climate change are shared by this Board.<sup>2</sup> We therefore, continue to hope that you will strenuously apply all legally permitted tools to examine this revised proposal's impacts on the wetlands, habitats therein, and the surrounding area.

Finally, the Select Board must continue to stress its support for enhancing access to affordable housing. Indeed, this Board recently provided a letter of support to MassHousing for a similarly-scaled c. 40B project located off of Massachusetts Avenue. However, in contrast with the revised proposal before you, the site locus of that project *decreases* the amount of impervious surface in the area, creates more green space, has ready access to Massachusetts Avenue (and public transportation), and incorporates, rather than circumvents, many of the Town's long-term planning documents.

As with our previous comments to the ZBA, we re-affirm our respect for the authority of the ZBA, its processes, and your service in light of the difficult tasks before you. As such we submit these additional comments as an expression of our collective opinion in the interests of informing your questions, contemplation of conditions, and development of the best decision possible. We trust that you will continue to avail yourselves of all the resources needed to support your process and your eventual decision, and continue to direct Town officials, through the Town Manager, to provide whatever you need in furtherance of same as appropriate.

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<sup>2</sup> In addition to concerns over flooding of the LittleJohn and Dorothy neighborhood, the scale and locus of this proposal also raises regional environmental and traffic concerns about flooding on Rt. 2.

In conclusion, we respectfully register our continued concern that the Applicant's original, revised, and further revised submissions fail to reassure this Board that a project of this scope on such a problematic site is feasible or appropriate for Arlington. We ask you continue your efforts to enforce all applicable rules and regulations to ensure that the laudable goal of increasing access to affordable housing is consistent with the health and safety needs of the Town.

Thank you for your consideration of the above comments and your continued service to the Town.

DRAFT