

Comments on Proposed Hotel/Restaurant at 1207-1211 Mass Ave, Arlington

To: Arlington Redevelopment Board and Jenny Raitt, ARB Secretary Ex Officio
From: Ann LeRoy, 12 Peirce St., Arlington, 781-646-7254, annleroy12@gmail.com, TMM Precinct 17
Date: July 18, 2019

Thank you for providing the online materials for the upcoming ARB public hearing on the proposed hotel/restaurant complex at 1207-1211 Mass. Ave. This is an interesting idea and certainly offers some economic benefits to the community, but as a long-time resident of the immediate neighborhood I also have many reservations and questions.

I am offering these comments, and some factual corrections, prior to the meeting, and plan to raise specific questions after learning more from the presentations. I trust that some of the vague and incomplete aspects of the proposal will be addressed in future meetings and written communications, and I look forward to participating in this process.

My comments generally follow the outline in Jenny Raitt's memo of July 16, 2019:

Special Permit Criteria

Docket Summary and Special Permit 1., Section 3.3.3.A

"... upon successful permitting, will combine the two properties for a unified mixed-use development."

The description of the B2 zoning district in the Zoning Bylaw (page 5-24) states:

B2: Neighborhood Business District. The Neighborhood Business District is intended for small retail and service establishments serving the needs of adjacent neighborhoods and oriented to pedestrian traffic, and mixed-use buildings. Locations are almost all along Massachusetts Avenue or Broadway. *The Town discourages uses that would detract from the district's small-scale business character or otherwise interfere with the intent of this Bylaw.*

How does this hotel proposal meet that description? It does not maintain the R1 and R2 single- and two-family character of the abutting neighborhood on Peirce St., Clark St., and Locke St. A hotel is not a demonstrated need of the neighborhood, though it may be so considered by the town in general. This project does not seem to be an example of "small-scale business character" compared to other businesses in the adjacent and nearby B2 districts. The B4 description seems to be assumed as the prevailing standard for the special permit, rather than the less-intrusive B2 description for this combined zoning district site.

This proposal does nothing to address the Town's often-stated and broadly demonstrated need for affordable housing. This is just the opposite and serves a completely different demographic.

Why are all permitting fees being waived? What is their dollar value? Is this a common practice for this type of project?

SP2. Section 3.3.3.B.

"The redevelopment of the DAV site and the adjacent outdated automotive use is desirable for the public convenience and welfare." See also Mr. Doherty's comment: "this proposed development will transform a blighted area..."

As a resident of this neighborhood block, I do not consider this area to be blighted or a public inconvenience. Several successful and long-established businesses serve the community, notably Precision Tire. It is unfortunate that the DAV building has been vacant for so long, and that the town has not maintained the landscaping in front, but I still take exception to this pejorative mischaracterization of the area as a rationale for redevelopment.

"A hotel and restaurant ... could be desirable to tour groups..."

Tour buses are never mentioned in either the proposal or in the ARB memo. How would they be dealt with? – see my related comments below about traffic and parking concerns.

SP3. Section 3.3.3.C.

"The application materials do not provide detailed information regarding the traffic impact of the new use."

This is an understatement, and thank you for raising many important questions that require additional information before any decision can be made on this project.

Clark Street a private way. What impact does that status have on this type of redevelopment, especially considering that Clark Street is proposed as the only source of ingress and egress, as you noted. How would Clark St. be adapted and improved (widened, regraded, etc.) to accommodate additional traffic? What about adding a sidewalk? There is currently only a short sidewalk on each side of the Mass Ave. end of the street. The suggestion of a "no right turn" or "left-turn only" sign for vehicles exiting the proposed parking area is a good one and should be examined to lessen negative impacts on the abutting residential streets.

Clark St. is already used as a regular cut-through street from Forest/Peirce St. to Mass Ave, especially during the morning and afternoon commutes and Ottoson Middle School drop-off periods, and during services and events at St. Athanasius Church. The entire Mass Ave. corridor from Forest Street to the Lowell Street merger and Dunkin Donuts presents dangerous traffic conditions for cars, bikes and pedestrians. Clark Street is very close to the Lowell Street merger/intersection, which is currently treated as a free-for-all, making access to Mass Ave. difficult in either direction.

All of the intersections and traffic patterns between Forest and Lowell St. should be studied carefully in a "trip generation analysis" and a complete "Transportation Demand Management Plan." Ideas for new painted crosswalks, walk lights, center islands to lessen the crossing distance, and/or other safety measures should be taken into consideration. The two bus stops near the Appleton intersection also need to be part of the studies. I would urge that the Transportation Advisory Committee (TAC) also be involved in this analysis since it affects a fairly long section of Mass Ave. and numerous intersecting streets.

In reference to Mr. Doherty's inadequate TDM Plan, the Minuteman Bikeway cannot be "accessed by a street directly adjacent to the property (Clark St.)." Clark St. dead-ends at Mill Brook on the other side of Peirce St. and there is no bikeway entrance off Forest St. Bicyclists would have to go around a couple of blocks to either Mill Lane or Ryder St. to access the bikeway. His comments about various ridesharing, valet, and shuttle options should also be analyzed more thoroughly, as noted.

As noted, the issue of tour buses or other shuttle vehicles has not been addresses, but it needs to be if that is an intended clientele for the hotel. Where would buses park for short stops and overnight? What size buses would be allowed on Clark Street and other side streets? I'm sure there are many other questions that experienced transportation experts would want to address as well.

SP4. 3.3.3.D.

"... the ARB will need more information regarding water and sewer usage."

Yes, indeed ! Mill Brook is only a short block away from the proposed parking area, and the land slopes down to the brook. Stormwater runoff is already a problem in the area. Does the Conservation Commission have any responsibility within this site and its surroundings?

SP5. Section 3.3.3.E.

"No special regulations are applicable..."

What does this mean? What possible special regulations could be applicable? I would like some explanation or referral to appropriate regulations to review.

SP6. Section 3.3.3.F.

The proposed mixed-use structure "will not impair the integrity or character of the district or adjoining districts ..."

This seems to be a subjective opinion by non-residents of the neighborhood. The prior discussion of traffic and parking suggests that this project could significantly change the integrity and character of the R1 and R2 neighborhood on nearby Clark, Peirce and Locke Streets. Within the R2 district there are numerous single-family homes and many families with young children.

While the addition of such a redevelopment could enhance the Arlington Heights connections to the rest of town via Mass Ave, please do not overlook that this is a quiet residential enclave already surrounded by varied business and industrial uses. Any major changes in activity, such as this project proposes, certainly will affect the adjoining districts !!!

SP7. Section 3.3.3.G.

"The requested use will not, by its addition to a neighborhood, cause an excess of the use that could be detrimental to the character of said neighborhood."
I disagree. See my comments above.

Environmental Design Review Standards

1. EDR-1 Preservation of Landscape

I agree that there may be some open space benefits in this project compared to current conditions, and will look forward to seeing a complete landscape plan. I am especially concerned about the possible loss of some very large trees behind the DAV building.

2. EDR-2 Relation of the Building to the Environment

I agree that the ARB should carefully examine all of the height and massing features and impacts of the proposed new building and the landscaping within the site.

3. EDR-3 Open Space

See # EDR-1 above.

4. EDR-4 Circulation

I agree that much more information is needed about circulation on and around the project site, as outlined in Jenny's memo. Specific concerns that I share are regarding traffic impacts on Clark Street and Peirce Street, truck loading and unloading (is there a loading dock or such designated area?), time of day and length of delivery times, location and use of dumpster(s) and related waste management, and lighting impacts. I also reiterate my earlier concern about tour buses, shuttle buses, limousines, or other large capacity vehicles.

I have a question about the parking requirement table. The following is from the Zoning Bylaw, 6.1.4 Table of Off-Street Parking Regulations.

Hotel/motel	1 space per sleeping room, plus 1 space per 400 sq. ft. of public meeting area or restaurant space
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The requirement for 1 parking space per room is clear, and I don't have a problem with some reduction of that number. But why is there zero parking required in this case for the restaurant? The plans also show a lounge area in addition to the restaurant, so why is that space not included in the square footage requirement? The proposal does not indicate how many seats are accommodated in the restaurant or lounge, but presumably many users would not be guests of the hotel. Where are they supposed to park and why is that not addressed?

I see the asterisk "First 3,000 sf of non-residential space in mixed use projects is exempt" but I still wonder why the entire first floor of the proposed building is not included as "non-residential space." It must be more than 3,000 sf if the restaurant alone is 2,568 sf.

I agree, as noted for this entire section of EDR on circulation, that "The ARB should request additional information."

5. EDR-5 Surface Water Drainage

I agree that the applicant "must submit an engineered site plan showing surface water drainage systems and a stormwater management plan..." As noted above, this site slopes down into the back yards on Peirce St. and further toward Mill Brook. Several large trees are located behind the DAV building (northeast corner of the property), and any plan for removing them or other nearby trees must be documented, as well as a replacement and remediation plan. Their removal could affect erosion and drainage problems for the abutting houses.

6. EDR-6 Utilities Service

I agree that "the ARB will want to understand that the services carried on these poles will not be overloaded."

7. EDR-7 Advertising Features

I agree that any "condition of a decision by the ARB should include a requirement that the final signage be reviewed for compliance."

8. EDR-8 Special Features

I agree that many features noted in this section should be addressed with more detailed explanations and specific implementation measures. These concerns include noise-producing machinery, service and loading areas, air conditioning, truck idling, solid waste removal (dumpsters), etc.

9. EDR-9 Safety

I agree with the need to address questions raised about personal safety in and around the proposed building and parking areas, and about the location and types of lighting to ensure safety while not unduly intruding on neighboring homes on Clark and Peirce Streets.

10. EDR-10 Heritage

While the current buildings on the proposed redevelopment site are not designated as historic, several significant buildings in the neighborhood are listed in the Arlington Historical Commission Inventory: 1210 Mass Ave (The Children's Room in an old Victorian house, 1880), 11-13 Lowell Street (the former Benjamin Locke Store from 1816, now residences), 23-25 Clark Street (two-family house, c. 1919), 11-13 Peirce St. (now a four-unit residence, Housing Corporation of Arlington, 1919) and several residential buildings from 1180 through 1218 Mass Ave, all within the Forest to Lowell St. corridor across Mass Ave from the proposed site. However, the current building at 1218-1222 Mass Ave. was built in 1986, replacing an historic house from 1898, so the inventory is incorrect and needs to be updated. Likewise, the current buildings at 1180-1184 are replacements that should be deleted from the AHC inventory.

The 11-13 Lowell and 11-13 Peirce Street buildings and 1180, 1188 and 1218 Mass Ave are also listed in the state MACRIS historic inventory. Again, 1180 and 1218 should be deleted since they are new structures. The Lowell Street property (1816) is also listed on the National Register of Historic Places. The historic Old Schwamb Mill is also in the immediate vicinity, at 17 Mill Lane, and is listed on all three inventories.

The recently completed Historic Preservation Survey Master Plan recommends that the following buildings on Mass Ave. be added to the AHC Inventory: 1189-1195 (the B2 commercial Locke Place). Most of the one- and two-family houses on Peirce, Clark and Locke Streets date from the early 1900s, although they have received no historic designations. They do, however, constitute a contiguous historic neighborhood.

11. EDR-11 Microclimate

The proposed changes do not appear to significantly affect the immediate microclimate, however, the height of the new building may create shadows on adjacent residences, and the proximity of Mill Brook should raise questions about additional stormwater inputs and flooding impacts.

12. EDR-12 Sustainable Building and Site Design

I agree that additional information is needed regarding the LEED checklist and related sustainability guidelines.

Conditions

I appreciate the ARB's ongoing oversight of this proposed project as outlined in this section of Jenny's memo.

Hotel Management

I do not know if the ARB, Select Board, Board of Health, or another entity has responsibility for this aspect of the project, but I would like to know more about the proposed hotel manager or a management company. Is the hotel to be operated by a local on-site manager, or will it be sold off to a national or international chain in the near future? What guarantees does the town have for management and oversight? Concerns have been raised about past abuses at Homewood Suites regarding prostitution and drug dealing, as well as other "non-traditional" uses of hotel rooms. Neighbors want assurances that any business that might be operated at this location will be safe, legal and appropriate to its surroundings in a residential part of town.