

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

Dear Members of the Zoning Board of Appeals:

As requested, contained herein are the Select Board’s revised comments to the Zoning Board of Appeals (“ZBA”) for your consideration pursuant to G.L. c.40B, s.20 relative to the updated comprehensive permit application submitted by Arlington Land Realty, LLC (“the Applicant”) earlier this year.

As an initial matter, we note that the Applicant have primarily updated its architectural, existing conditions, and existing environmental resource plans, including revised floodplain delineations. However, other areas of the concern to this Board in terms of vetting potential impacts of the proposed project have not been updated, including any updated traffic study. We therefore reserve our rights to submit additional comments in this matter as warranted, particularly with respect to traffic studies as discussed further below.

At the outset, the Select Board notes that enhancing access to affordable housing is an important goal in Arlington, codified in the Arlington Master Plan and Housing Production Plan. This Board supports this goal by among other things, its support of affordable housing development and improvements in Community Development Block Grant distributions.

However, as the ZBA will recall, on August 18, 2015, the Select Board wrote a detailed comment letter to MassHousing urging it to deny project eligibility approval for the instant application because little information had been provided to assuage straightforward concerns about specific issues raised by this Board and the public – flooding, traffic, and ecological impacts chief among them. Although MassHousing opted to grant project eligibility to the Applicant despite such substantial concerns and objections, we continue to request the ZBA scrutinize the application strenuously based upon the same grounds this Board previously articulated. Notwithstanding the Applicants revisions to some of its submissions, our prior comments remain relevant.

More specifically, the Select Board continues to hold serious concerns about the placement of 219 dwelling units on less than 6 acres of uplands, especially given the constraints of the specific site at issue and historic flooding in East Arlington. While the BSC Group has provided some additional detail within the submitted revised plans, it remains unclear how the Applicant will dramatically increase the amount of impervious surfaces in the uplands without exacerbating flooding conditions experienced throughout East Arlington. In addition, the Board is troubled by the Applicant’s continued to request for wholesale waivers of Arlington’s Wetland Bylaw and Regulations, which if allowed could prevent consideration of important environmental issues of local concern. Accordingly, we respectfully urge the ZBA to continue to deny such requests to waive the requirements of Arlington Wetlands Bylaw and Regulations and other relevant requirements of its own Comprehensive Permit Rules and Regulations.

Similarly, Select Board and resident concerns regarding traffic remain acute. During the Project Eligibility discussions before the Select Board, the Applicants represented and referenced potential access to the site via Rt. 2 to ease strain on local roadways. However, per the revised plans the only access to the site appears to continue to be via Dorothy Road and Edith Street, two modest residential streets with approximately 33 and 9 two-family or single-family homes respectively at present. The proposed project would add nearly 300 parking spots to support its 219 residential units in the area, likely dramatically increasing the traffic load in a residential neighborhood on top of existing high traffic demands on Lake Street.

It is our understanding that the ZBA has retained the BETA Group, Inc. to serve as its peer review consultant for both of the aforementioned concerns, and we look forward to their analyses of the Applicant's submissions and examination of the concerns of this Board, other Town officials and entities and the community at-large.

As with our previous comments to the ZBA, we affirm our respect for both the authority of the ZBA and the process it must undertake. As such we submit these additional comments as an expression of our opinion as a body in the interests of informing your questions and process and supporting your 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.

In conclusion, mindful that this matter is not before the Select Board, but instead must follow the process and parameters of G.L. c. 40B, we respectfully register our continued concern that the Applicant's original and revised submissions do not satisfy common sense skepticism that a project of this scope on such a problematic site is feasible or appropriate for Arlington. We therefore chiefly urge the ZBA to continue 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.