

January 30, 2021

Dear Zoning Board of Appeals (ZBA) Members –

As a resident of the East Arlington neighborhood since 2007 and a public health professional I urge you to **VOTE NO** to the proposed Mugar development.

- The current proposal of the Mugar Development has undergone significant changes since its original 40B application approval by the Massachusetts Department of Housing and Community Development (DHCD). **Please consider alerting the DHCD of these changes and request their review and further public comment.**
 - Chapter 40B state statute is intended to enable “local Zoning Board of Appeals to approve affordable housing developments under flexible rules if at least 20-25% of the units have long-term affordability restrictions.” **I am not opposed to providing long-term affordable housing. However, the current proposed Mugar Development puts our most vulnerable populations in harm’s way by building in a floodplain**, in contrast to the Mugar family’s record of philanthropic causes.
 1. Regulations found at 760 CMR56.04(4)(b) require “that the site of the proposed Project is generally appropriate for residential development”. **The current proposal falls short of meeting this basic regulatory requirement. It is inappropriate to develop on a floodplain.**
 2. Regulations found at 760 CMR56.04(4) (c) require and, “that the conceptual project design is generally appropriate for the site on which it is located”. **The current proposal falls short of meeting this basic regulatory requirement. The project design is not appropriate for the neighborhood location.** A 4+ story, 176-unit building is not appropriate in a quiet neighborhood of single-family & two-family homes. Nor is it appropriate to design a building of this size in a floodplain, in proximity to wetlands.
- My understanding is **40B is meant to benefit disadvantaged people. However, the current proposal of the Mugar development will cause harm to a vulnerable population.**
 - Economically disadvantaged people work hard to afford cars, a significant expense. Yet at the Mugar development, **vehicles will be unsalvageable once submerged in flood waters.** Jobs are not necessarily near public transportation, thus does not reduce the necessity of vehicles used for commuting. If this development goes through as-is, **we will be knowingly causing harm.**
 - The SouthEast Courtyard labeled “Open Space/ Flood Storage” on the 2021-01-21_Revised_Plan_Sheets.pdf, I believe also causes a health hazard. The area of this part of the building is unlikely to drain properly or receive sufficient sunshine to adequately dry. **The result will be mold and fungus growth on the outside of the building.** The SouthEast Courtyard is not the only access point for water infiltration and damage. With standing water against the foundation, it’s only a matter of time before water will penetrate and impact the integrity of a building. The result will not be immediately obvious, but after time, mildew and mold will grow inside the building, further impacting the health of this vulnerable population.

- **When people live in residences that have mold, they get sick.** Mold hides in homes - on the back side of drywall, behind wallpaper or paneling, under carpet, inside walls around pipes, in roof materials, etc. Given the known flooding and stormwater management issues in the Dorothy Road area, **we should fully expect that mold will grow in a building that is built on a floodplain. We should fully expect that residents that live in a building with mold will get sick.**

For reference, typical symptoms from mold exposure include¹:

- Respiratory problems - wheezing, asthma attacks, etc
 - Nasal and sinus congestion or dry, hacking cough
 - Eye irritation - burning, watery, redness
 - Nose or throat irritation - sneezing fits, bloody noses
 - Skin irritations - rashes or hives
 - Nervous system - headaches, memory loss, mood changes
 - Aches and pains
- The Mugar Development is intentionally proposed to be built within a **currently known floodplain**. It is not a matter of *if* this development will flood, but *when* and how much **damage and devastation will be caused**.
 - The occurrence of **flooding is well-known on Dorothy Road and in the surrounding neighborhood**. The fire department has been previously called to respond to the flooding. I am concerned for the safety of any low-income or disabled residents who live at the proposed development to be risking their lives in the basement. In a flood, a **disabled resident may not be able to find safe egress**. Electric wheelchairs cannot work properly submerged in water.
 - **Water eventually weakens the foundation of any building**. Oak Tree representatives at the 1/26/21 ZBA meeting stated on numerous occasions that **building materials were not yet determined**. The long-term integrity of the building should be in question. The Mugar development via the 40B approval only guarantees low-income housing for 20-years. Without knowing the building materials being used, we should **presume that significant building damage will occur to the proposed development** requiring significant building maintenance and further impact to residents.
 - **Destruction of property and death occurs when humans build in floodplains**. Well-known examples of developments built in a floodplain are the 2017 Hurricane Harvey to Houston, Texas and 2005 Hurricane Katrina to New Orleans, Louisiana. While the Mugar development is smaller than these larger city developments, the common theme is they are built in floodplain, resulting in death and property damage. **Any floods will demand greater resources from Arlington & the surrounding town's emergency services**.
 - In addition, Arlington's stormwater and sewage systems may not be able to handle the additional groundwater infiltration. **Sewage backups into homes and streets will be unavoidable** if this development goes through without investment in Arlington's sewage and stormwater infrastructure. **Exposure to sewage is unsanitary**.

From a Social Determinants of Health perspective, it is unconscionable to house a vulnerable population in a floodplain.

Sincerely,

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¹ FEMA brochure regarding “Dealing with Mold & Mildew in Your Flood Damaged Home”
<https://www.fema.gov/pdf/rebuild/recover/fema_mold_brochure_english.pdf>