



TOWN OF ARLINGTON

MASSACHUSETTS

CONSERVATION COMMISSION

May 28, 2021

Zoning Board of Appeals
Town of Arlington
730 Massachusetts Avenue
Arlington, MA 02474

**RE: Thorndike Place – Application for Comprehensive Permit
Sixth Set of Comments from Conservation Commission**

Dear Chairman Klein and Members of the Board:

The Arlington Conservation Commission (ACC) provides this sixth set of comments to the ZBA in advance of its June 10, 2021, hearing on the Thorndike Place Comprehensive Permit Application revised site plan, dated May 10, 2021. The ACC is providing this comment letter to assist the ZBA as it moves forward with its review of the permit application, including review under the Town of Arlington Wetlands Protection Bylaw (the Bylaw).

The ACC notes that the revised site plan does not include updated calculations for wetland resource area and wetland buffer zone impacts. As such, the Commission's review of the revised site plan should be considered incomplete until revised calculations are submitted to the ACC. We ask the applicant to provide tables, with reference to the site plan and building components, indicating each component's impact on wetland resource areas.

Revised Building Layout and the Adjacent Upland Resource Area

The ACC understands that in the May 10, 2021, project revision, the rear of the proposed senior housing/assisted living building intrudes into the Adjacent Upland Resource Area (AURA) by approximately 15-feet (meaning it is 85 feet from wetlands). In this same area, in the prior plan iteration, a courtyard was proposed above a lower-level parking garage. The current plan proposes that living area, rather than a courtyard, will occupy space above the garage with both extending to the same 85-foot outer limit. In consideration of the woodland restoration and on-site mitigation that is proposed, the Commission is agreeable to this proposed building intrusion of 15-feet into the AURA.

Revised Duplexes and the Floodplain

The ACC notes that the front of the proposed development now includes 12 duplex homes along Dorothy Road. Two of the six duplexes are partially within the 100-year floodplain. At the ZBA's May 13,

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2021 hearing, there was some discussion and considerable comment regarding whether or not the duplexes would have basements. Given the neighborhood's concerns with flooding and location within the 100-year floodplain, the ACC would like the Applicant to consider flood resilience measures such as eliminating basements, parking, and livable space below the 100-year flood elevation, and including flood vents for enclosures at and below the base flood elevation.

The ACC notes that this recommendation is consistent with recent applications that have proposed building in the floodplain, where the proposed buildings are on a crawl space foundation with flood vents installed in the foundation walls. Incorporating flood mitigation measures into the duplexes, in addition to the compensatory storage area proposed in the southeast portion of the property, will further enhance the flood mitigation in resource areas and may help to address neighborhood concerns. The ACC also recommends that the ZBA request the Applicant to address whether further climate change resilience may be achieved by adopting this recommendation (eliminating basements and adding flood vents) for all the duplexes.

Conclusion

Consistent with our prior comments, the ACC continues to urge the ZBA not to grant any waivers requested by the Applicant from the Bylaw and the Town's Wetlands Regulations as these provide flood control, storm damage prevention, and other interests of local concern.

The ACC hopes the ZBA finds the above comments helpful in providing clarity on mitigation and conditions for the protection of wetland resource areas considering the revised site plan. Please contact us should you have questions. I and other ACC members plan on attending the ZBA's continued hearing on the Application on June 10, 2021.

Very truly yours,

Susan

Susan Chapnick, Chair
Arlington Conservation Commission