



## TOWN OF ARLINGTON

730 Massachusetts Ave.  
Arlington, MA 02476  
781-316-3012

### ARLINGTON CONSERVATION COMMISSION

May 20, 2022

Kelly Lynema, AICP  
Assistant Director  
Department of Planning and Community Development  
730 Massachusetts Avenue  
Arlington, MA 02476

RE: 1021-1025 Massachusetts Ave, Arlington MA  
Comprehensive Permit Site Approval Application

Dear Ms. Lynema,

The Conservation Commission provides this comment letter and information regarding the proposed development at 1021-1025 Massachusetts Avenue for Maggiore Company's (the Applicant) proposed 50-unit multi-family homeownership development on 1.08 acres of land in Arlington (the "Project"). The Commission hopes this letter assists the Town in formulating its comments to MassHousing on the Comprehensive Permit Site Approval Application (the "Application").<sup>1</sup>

Maggiore submitted its Application to MassHousing to receive Site Approval (also called Project Eligibility Approval) under the Commonwealth's comprehensive permit statute, G.L. c. 40B. As you know, Site Approval is required before Maggiore can file a Comprehensive Permit Application with the Arlington Zoning Board of Appeals (ZBA). One of the criteria for MassHousing's approval is that "the conceptual project design is generally appropriate for the site on which it is located, taking into consideration factors that may include .... topography, [and] environmental resources, ..." 760CMR 56.04(4)(c).

The Conservation Commission takes no position as to whether the Project is "generally appropriate" for the Property. After a Comprehensive Permit Application is filed with the ZBA, the Conservation Commission will evaluate whether the Project complies with standards in the State's Wetlands Protection Act and the Arlington Bylaw for Wetlands Protection and its regulations.

#### **Environmental Resource Area**

The resource area present on the property is the 200-foot riverfront to Mill Brook. The Project includes work within the outer 100-200 foot Riverfront Area.

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<sup>1</sup> The Commission reviewed the 196 page comprehensive permit site approval application submitted to the Select Board and Town Manager Adam Chapdelaine, prepared by Maggiore, dated May 2022. The Commission also held two Working Sessions earlier this year and a separate meeting with Environmental Planner/Conservation Agent David Morgan and Assistant Commissioner Cathy Garnett about project updates to the proposed urban park summarized at the Commission's May 19, 2022 meeting.

**Proposed Project Impacts to Resource Area**

The Conservation Commission notes that the Project proposes the following impacts within the outer 100-foot Riverfront Area: construction of a building partly within the resource area; removal of 22 trees; and creation of an urban park with native plantings.

**Conservation Commission Comments on Proposed Plan**

The Conservation Commission appreciates that the Applicant has proposed a robust native planting plan within the 100-200 foot riverfront, that includes a diversity of plantings and increase in vegetative biomass greater than the sum of the trees being removed. This type of planting should generate more biodiversity and be more climate resilient than the mainly Norway maple tree monoculture and invasive vegetation that are present on the site currently. In addition, this urban park area enhances connectivity of wildlife corridors and patches along Mill Brook.

The Commission has several concerns with the Project as proposed.

- The area proposed for the urban park currently appears to have construction debris and fill. The Commission is concerned that these conditions get cleaned up and that the fill is tested for contaminants and soil suitability for the native plantings.
- The Project proposes a private urban park. The Commission would like the park to be an example of native urban revegetation; as such, we request that signage about the park be posted and some access to the public provided.
- Since there are a substantial number of invasive plants in the area proposed for the urban park, a robust invasive management plan would need to be developed and implemented. We recommend, for the success of the native plantings, that such a plan be required in perpetuity.
- The Commission had recommended to the Applicant to reach out to the neighboring Millbrook Condominium association to find out if they could get an agreement to do restoration closer to Mill Brook – within the first 50 feet of riverfront (owned by the condo association). Such restoration would be more advantageous to resource area improvements. We have not learned of the outcome of this request.

Please contact the Conservation Commission should you have questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Susan Chapnick", written over a horizontal line.

Susan Chapnick, Chair  
Arlington Conservation Commission  
[s.chapnick@comcast.net](mailto:s.chapnick@comcast.net)