



February 3, 2025

To Members of the Conservation Commission:

After the October 24<sup>th</sup> hearing, GZA was expected to address questions and concerns raised by Scott Horsley and Mike Mobile. To our knowledge, no response was provided. Instead, the hearing process has been delayed over two months while BSC completely redesigns their stormwater mitigation plan, which was previously presented as FINAL.

As noted in our letter dated November 17th (see attached), BSC's seasonal high groundwater data is underestimated. This data is being used in their redesign to avoid a groundwater mounding analysis of the stormwater infiltration system.

The core issue remains that GZA is working with inaccurate information. We strongly urge the Conservation Commission to give serious consideration to the data from the Town wells, as it directly contradicts the Applicant's findings. Relying on the Applicant's flawed data could result in a development that poses a significant risk to the health and safety of our neighborhood and community.

Thank you on Behalf of the Coalition to Save the Mugar Wetlands,

Jeanette Cummings, 32 Dorothy Rd.  
Julie DiBiase, 29 Littlejohn St.

Cc: James Feeney, Arlington Town Manager  
David Morgan, Environmental Planner/Conservation Agent  
Arlington Select Board  
Arlington Land Trust



November 17, 2024

To Members of the Conservation Commission:

It is our understanding that the hearing scheduled for November 7<sup>th</sup> was continued due to outstanding comments from the peer reviewer, and BSC once again needing to amend their plans. While we acknowledge GZA needing to respond to questions raised by Scott Horsley and Mike Mobile at the October 24<sup>th</sup> hearing, BSC delivered their revised stormwater mitigation plan as their FINAL plan. BSC represented their numbers as reliable, their design as functional and in compliance. At that time, it was clear that Attorney Keifer anticipated to close the hearings that evening.

One would expect BSC to stand by their design and not have to revise it further! However, the continued questioning of the validity of BSC's data by ALT's experts raises significant concerns. As issues arise, there's never any certainty on BSC's part. It appears that BSC is repeatedly adjusting their data and numbers in an attempt to make this project work, rather than presenting a consistent and reliable analysis.

In particular, BSC's groundwater data is problematic and, in our view, erroneous. This is evident when compared with data from the Town's digitally monitored wells installed March 18, 2024. Even after missing several significant rainstorms, the Town's wells recorded water levels exceeding a 4-foot depth, while BSC has repeatedly asserted that the high-water table limit is 4 feet. This discrepancy calls into question the accuracy of the data BSC has used in its design and analysis.

The specific issues identified include:

- **BSC's Wells Installation Timing:** BSC's wells were installed *after* the peak of seasonal high groundwater, meaning they may not have captured the highest groundwater levels of the season.
- **Lack of Continuous Monitoring:** Unlike the Town's wells, which were continuously monitored, BSC's wells only recorded readings at specific points in time, failing to capture fluctuations that could be critical to understanding seasonal changes in groundwater levels.
- **Underestimation of Seasonal High Groundwater Levels:** The data from BSC's wells appears to have underestimated the seasonal high groundwater levels, which are essential for designing effective stormwater mitigation and ensuring the project's long-term viability.
- **Contradictory Data from Town Wells:** The Town's wells have shown that groundwater levels were on the decline at the time of BSC's well installation, which further questions the validity of BSC's conclusions.

Given these points, our position remains that the data provided by BSC is inaccurate and misleading. As a result, the proposed Thorndike Place development, based on this faulty data, poses a significant risk to the well-being of our neighborhood and our community. If there is any uncertainty or lack of confidence in the data and design, it is impossible to justify approval of this project, *with or without* conditions. Therefore, we respectfully urge the board to deny this project.

Thank you on Behalf of the Coalition to Save the Mugar Wetlands

Cc: James Feeney, Arlington Town Manager  
David Morgan, Environmental Planner/Conservation Agent  
Arlington Select Board  
Arlington Land Trust