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August 17, 2020

By Electronic and First Class Mail

Ms. Chrystal Kornegay
Executive Director
MassHousing
One Beacon Street
Boston, MA 02108

Re: 1165R Massachusetts Avenue, Arlington, MA

Dear Executive Director Kornegay:

Please accept this letter of comment on behalf of the Select Board of the Town of Arlington ("Arlington") in reference to the application for project eligibility/site approval submitted to MassHousing by 1165R Mass MA Property, LLC (the "Applicant") for a development of 130 units on an approximately 2-acre parcel off of Massachusetts Ave in Arlington, Massachusetts ("Development"). The Board notes the many positives of the proposal along with several drawbacks of the project as presently designed, based upon the information provided by the Applicant including a project overview and traffic study, the application to MassHousing itself, the Board's personal knowledge of the locus, and its understanding of MassHousing's criteria for Smart Growth.

In summary, the Board is encouraged by the many ways in which the project is consistent with goals and recommendations submitted relative to the site in the Arlington Master Plan, Housing Production Plan, Open Space Plan, and the Mill Brook Corridor Report. However, the Board is particularly concerned over the loss of commercial space currently used by artists and at least one other commercial tenant. Moreover, the Board believes that the presently proposed mix of market rate and affordable units should be examined further to best capitalize on this opportunity for expanding affordable units in Arlington.

History of the Site & Prioritization for Redevelopment

The proposed site of the development hosts what were historically factory spaces along the Mill Brook throughout 19th and 20th Centuries. These factories initially harnessed the water power of the Mill Brook to produce a wide variety of goods, until the Arlington Reservoir was constructed. The most recent consistent industrial uses of the factory spaces were the production of architectural millwork up until the early 1970s. However, since said time, the property and its formerly factory-oriented spaces have been underutilized as industrial spaces. Town residents and small business have enjoyed the character of some of the factory space for purposes such as artist studios, but the site overall has long been identified as an area ripe for redevelopment.

Specifically, the 2015 Arlington Master Plan Arlington highlighted the locus as one of the areas with “opportunities to develop unique mixed use activity centers in strategic locations along its primary corridors, including Massachusetts Avenue...the Mill Brook district, and the Minuteman Bikeway.” In detailing the different stakeholders and advisors who examined Mill Brook industrial spaces, the Master Plan noted:

The revitalization of former industrial sites along the Mill Brook will have a significant and ongoing economic impact on the town. This area and the legacy it represents can provide the building blocks for new economic development in Arlington. An April 2010 study by the Mill Brook Linear Park Study Group (a subcommittee of the Arlington Open Space Committee) recognized the potential environmental, economic, flood control, recreational, historic, and transportation benefits of the Mill Brook.

Indeed, the Master Plan made clear that “[r]esuscitating some of the large sites and underutilized buildings in this area should be a high priority if Arlington wants to preserve the character of other districts.”

Similarly, the larger 16 acre-site owned by the Mirak families were identified for the type of development and long-term use proposed by the Applicant in the Town’s 2016 Arlington Housing Production Plan (“AHPP”). As stated in the AHPP:

Given land availability and physical development barriers in Arlington, the Town has worked to identify sites throughout the community where housing production may be appropriate through the addition of new land uses, allowing increased density, or other reforms. Some of these sites are vacant, while some are under-developed. In general, the Town is interested in advancing residential development in smart growth locations along commercial corridors that offer connectivity to various amenities, transit, and services.

Finally, the recently completed 2019 Mill Brook Corridor Report (as well as the Master Plan) included recommendations to increase access to the Mill Brook with publicly accessible pedestrian corridors which link the Town’s open spaces and amenities like the brook together.

By and large, the Proposal’s consistency with the aforementioned long-term planning documents and recommendations (which involved substantial public and stakeholder

engagement) are sources of confidence to this Board in what we understand to be a more general overview for the purposes of project eligibility and site approval.

On the other hand, the project as proposed primarily focuses on providing middle-income units of 80 percent AMI without providing opportunities for lower-income tenants. As set forth in the AHPP, the Town hopes to develop “diverse housing for extremely-low to middle-income households to address documented local need.” While additional units for middle income residents are certainly welcome, we hope that the Applicant can provide more opportunity for lower-income persons.

Further, while the project is consistent with many of the foregoing Town plans and goals documents, it is not entirely consistent with one of the priorities of the Arlington Arts & Culture Plan which states in relevant part:

The Town of Arlington envisions itself as a place where arts and culture thrive and become integrated into the daily life and identity of the town. Through public and private partnerships, the town is committed to expanding access to the arts and appreciation for diverse cultures; to increasing opportunities for creative engagement and expression; and to supporting the growth of creative enterprises to benefit Arlington’s residents, workers and visitors from all walks of life.

More specifically, the Arts & Culture Plan prioritizes the need for working spaces large enough for artists engaged in creative activities requiring large and/or specialized equipment. To the Board’s understanding, approximately one dozen artists currently occupy former industrial spaces which would be repurposed for residential use. This loss of creative spaces for our Artists represents a loss to the Town’s arts and culture landscape, even as the project would provide the benefits outlined above.

MassHousing's Smart Growth Criteria

Consistent with the foregoing, the Applicant’s representations and available information support a positive, but qualified view of this project on balance through the lens of MassHousing’s “Smart Growth Criteria.” At a minimum, the Board believes the materials submitted demonstrated a good-faith basis to believe the project as designed aims to:

- “Redevelop first” and “Contribute to revitalization of [the] town center”
- “Preserve and reuse” historic structures;
- “Concentrate development” and “mix uses”
- “Protect Land and Ecosystems,” including by creating open space, reducing blight, and enhancing historic and cultural landscapes to the existing neighborhood;

- “Expand housing opportunities;”
- Provide “transportation choice”;
- “Foster sustainable businesses”; and
- “Plan regionally”.

On the positive side, the project proposes to create housing while also simultaneously dramatically increasing the current site’s open space, nearly all of which is paved or otherwise develop. Moreover, historic buildings on the site are being preserved and repurposed while residents and the general public are being afforded publicly accessible access to the Mill Brook. The location of the site affords public transportation and bicycle options alongside personal automotive transportation on one of Arlington’s main thoroughfares. While the proposal does not proposed mixed-use as defined in the Zoning Bylaw, commercial space in the form of the already existing “Work Bar” is co-located within the greater complex.

On the negative side, the proposal would displace current tenants, both the aforementioned artists and a current commercial tenant, which runs counter to the goals of the Arts & Culture Plan, proposes demolition of one historic structure while preserving others,¹ and focuses its enhanced housing opportunities exclusively on middle-income rental units.

As an additional matter, as with any large-scale development, the Board holds some concern about additional traffic on Arlington roadways, but the comprehensive traffic study provided by the Applicant, the multiple modes of transport available, and the locus of the site provide the Board confidence that concerns can be address in the Comprehensive Permit process before the Zoning Board of Appeals.

Further Criteria

The Board pauses to note that the materials submitted evidence Applicant Site Control, and sound lender information with a Federal Home Loan Bank of Boston (FHLBB) member bank – Rockland Trust, as required by MassHousing-Financed and New England Fund (NEF) Rental Projects.

Further Information and Suggestions

The Select Board is mindful that Project Eligibility/Site Approval is the beginning of a process, and that should MassHousing grant eligibility, the Town’s Zoning Board of Appeals (“ZBA”) will be charged with evaluating the Applicant’s claims in greater depth in the G.L. c.

¹ To our understanding, the proposed demolition is within the jurisdiction of the Arlington Historical Commission.

40B process.² Our comments presented herein are limited to the purview of what is before us. As has been our practice, this Board respects and supports the ZBA's authority and role in detailed evaluations, including the determination of any conditions necessary to ensure Arlington's needs and interests are satisfied as allowed under the law.

In support of said goal, the Board has requested a basic overview of the proposed project to be prepared by Town consultants. The Board very much appreciates the preparedness of the Applicant to date, but also respectfully ask that the Applicant provide any supplemental information the Town's consultant identifies as useful to MassHousing's consideration and the Town's long-term evaluation of the project.

Additionally, while the Board values the Applicant's fealty to a diverse set of the Town's stated values as set forth in the Master Plan, AHPP, Open Space Plan, and Millbrook Corridor Report, the Board is hopeful that the Applicant can find the means to continue to support Arlington's arts community. The site has provided a commercially affordable creative space for many Arlington artists over many years, and this Board is grateful for the contribution the current site has made to that piece of Arlington's cultural landscape. As such, we strongly advocate for the continuation of that support in meaningful form in this project.

Conclusion

The Board is encouraged by the proposal's overall consistency with the Arlington Master Plan, Housing Production Plan, Open Space Plan, and findings of the Mill Brook Corridor Report. However, further consideration of broad spectrum housing affordability and continued support of artist creative spaces present qualifications for that view in keeping with the priorities of Arts & Culture Plan. The Board hopes that the Applicant can address such concerns relative to an otherwise promising project.

On behalf of the Select Board of the Town of Arlington, please advise me if you have any questions or would like additional support for any of the comments registered herein.

Very truly yours,

On behalf of the Arlington Select Board as
its Chair,

John Hurd

² The Board notes it continue support to make every resource required by the ZBA available.