



## Open Space Committee

July 6, 2020

Christian Klein, Chair  
Zoning Board of Appeals  
Arlington Town Hall  
51 Grove St.  
Arlington, MA 02476

Dear Mr. Klein and Zoning Board Members,

On behalf of the Arlington Open Space Committee, I am writing to express our strong opposition to the proposed Thorndike Place project, as described in the Application for Comprehensive Permit submitted on August 31, 2016 by Arlington Land Realty, LLC for the property known locally as the Mugar land in East Arlington. We understand this project has been revived following numerous appeals and delays since 2016, and the public hearing is expected to resume at the ZBA meeting on Tuesday, July 14, 2020.

The Open Space Committee is responsible for preparing the Town's Open Space and Recreation Plan. The current edition of the plan, covering the years 2015-2022, was approved by the Massachusetts Department of Energy and Environmental Affairs, Division of Conservation Services in September 2015. Among the Plan's primary goals is:

"Goal 1. Acquire ecologically valuable undeveloped lands or ensure their protection through conservation restrictions or other means."

Throughout the Plan, references are made to this goal to protect the entire 17.7-acre Mugar parcel, not for conservation of only 11 acres that the original 2016 Thorndike Place Application suggests. It is ironic that on page 9 of that Application, the proponent actually cites the Plan, yet fails to provide the complete context of the Plan's goals and objectives.

For example, on page 5 of the 2015 Plan: "...Town Meeting voted in 2000 to approve the 1996 Plan's goal of acquiring the Mugar parcel for open space purposes ... In May 2001, Town Meeting reaffirmed its commitment to preserving the Mugar property as open space ..." On page 10: "The 17-acre Mugar property in East Arlington remains the highest priority goal for acquisition and protection as open space and floodwater storage." In spite of repeated efforts on the part of Town officials, the Arlington Land Trust and others, the Mugar family has been unwilling to pursue a serious alternative plan that would allow acquisition or conservation of the entire parcel.

A major concern about development of the Mugar site in terms of open space and natural resources is its location in a part of town that is designated and protected as wetlands and has experienced serious flooding events over recent decades. On page 10, the 2015 Plan continues:

"In 2010 FEMA released updated floodplain maps that show much of the Mugar land encumbered by several levels of flood zones, making extensive development difficult. The Arlington Redevelopment Board [ARB] voted in 2011 to formally adopt the [2007-2014] Open

Space and Recreation Plan, thereby making the Plan, including acquisition and preservation of the Mugar property, Town policy, and thus signaling the Town's discouragement of any development of the property."

The ARB subsequently adopted the 2015-2022 Plan on March 30, 2015, reinforcing the Plan's status as Town policy. Complementing the Open Space and Recreation Plan is the Town's 2015 Master Plan, which also recommends protection of the Mugar property for open space and flood management. The committee is now beginning the process of updating the Plan for 2022-2029, and the long-stated goal of conserving the entire Mugar site will continue to be a top priority.

The Open Space Committee joins many other town committees, officials, and residents in opposing the proposed Thorndike Place development. There are a host of problems associated with such a large set of structures, parking lots, and other infrastructure being located in this known wetland region. Concerns about climate change and the need to take aggressive action to increase local resiliency in order to protect vulnerable landscapes and existing residential neighborhoods from flooding and other disastrous impacts have only been exacerbated since this project was proposed in 2016.

We support the ZBA in doing everything within its authority to evaluate the extensive engineering and other technical analyses that the developers must submit as part of the comprehensive permitting process, as well as the Town's technical review of the project. We urge the ZBA to deny any waivers of local bylaws and regulations that protect wetlands and flood storage in this vulnerable region. We hope that the ZBA will subsequently deny the entire proposed Thorndike Place Application based on all available data, including the Town's policy as outlined in the 2015-2022 Open Space and Recreation Plan and the 2015 Master Plan.

Please continue to advise our committee about future steps in addressing the Thorndike Place project because we need to be actively involved in the process. Thank you for your consideration.

Sincerely,



Ann LeRoyer, Chair  
Open Space Committee

cc: Adam Chapdelaine, Town Manager  
Jennifer Raitt, Director, Department of Planning and Community Development