



TOWN OF ARLINGTON  
MASSACHUSETTS

## CONSERVATION COMMISSION

Oct 9, 2020

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

**RE: Thorndike Place – Application for Comprehensive Permit  
Third Set of Comments from Conservation Commission  
Applicant’s September 28, 2020 submittals**

Dear Chairman Klein and Members of the Board:

The Arlington Conservation Commission (hereinafter “ACC”) provides this third set of comments to the ZBA, this time addressing the information Arlington Land Realty LLC (the “Applicant”) provided on September 28, 2020 to supplement its Comprehensive Permit Application, filed with the Town on or about August 31, 2016 and supplemented in March 2020 (the “Application”). The ACC provided initial comments to the ZBA on the Application by letter dated September 26, 2016 and a second set of comments on July 9, 2020 based on the March 2020 submittals.

The Supplemental Information included two documents provided by BSC Group (Applicant’s engineer):

1. Thorndike\_Sept\_2020\_Site\_Plan.pdf (attached): revised site plan
2. ZBA\_Transmittal\_2020-09-28.pdf (attached): a transmittal letter summarizing the changes in potential wetland resource area impacts in the revised site plan vs. the plan submitted in March 2020

The ACC is pleased that the revised conceptual site plan is responsive to many of our prior comments and appears to move the proposed project outside of or further from wetland resource areas, as well as removing the direct access to Route 2, which would have gone directly through Bordering Vegetated Wetlands (“BVW”). The ACC provides says this with the caveat that the boundary of BVW and other resource areas on the site have not yet been verified by the BETA Group.

The ACC's prior comments concerning the value of the wetland resources, vegetation replacement, floodplain, and stormwater impacts are not reiterated herein and are still valid.

This comment letter focuses on the September 2020 conceptual plan, which was discussed at the ACC Working Session on October 1, 2020 with the BCS Group, the BETA Group (the ZBA's peer reviewer), and members of the public.

Based on the Working Session discussion and documents, the ACC provides the following comments and recommendations.

### **Issue #1. Wetlands Delineation**

There is no current legally valid delineation under either the state Wetlands Protection Act (G.L. c.141, s. 30, the "Act") or the Town of Arlington Wetlands Protection Bylaw (Title V, Article 8, the "Bylaw") of the boundaries of the BVW and other wetland resource areas on the project site. The ACC notes that the wetlands delineation performed in January 2020 and shown on any version of project plans has not been verified by BETA Group.

- The BSC Group has acknowledged the potential limitations of accuracy of a winter wetland delineation, a limitation also previously stated by both ACC and BETA. BSC Group noted that the September 2020 plan includes, in their opinion, the most conservative depiction of the wetland delineation, using both the January 2020 delineation and prior 2009 delineation (which showed isolated wetlands).
- Field data sheets, needed for BETA Group to verify the delineation of wetland boundaries, inexplicably still have not been provided. These data sheets, once completed by the person performing the delineation will provide information on the soil, vegetation, and hydrology to support the January 2020 delineation of BVW. Field data sheets also are needed for the isolated wetlands now acknowledged and shown on the September 2020 plan.

Recommended Action: BSC Group provide as soon as possible the wetland data forms and any field notes to BETA to support the BSC's wetland boundary delineations so that BETA Group can perform their review. At the Working Session, BSC Group agreed to do so.

### **Issue #2. Floodplain & Compensatory Flood Storage**

The Applicant still has not provided sufficient information to verify the calculation of flood storage volume that will be lost under the revised project configuration, and calculation of compensatory flood storage at each elevation.

- The Revised September 2020 plan shows reduction of buildings and other structures within the floodplain compared to the March 2020 plan.
- BSC Group stated that they would not be providing the floodplain elevation calculations or calculations for compensatory storage at this time since the September 2020 revision is at a "conceptual" stage.
- Since BSC Group is not providing floodplain delineation or calculations for BETA Group to review at this time, the ACC and ZBA only have their "word" on the potential advantages of the

September 2020 revision compared to the March 2020 plan, based on the summary table in the September 2020 ZBA Transmittal letter, which shows a significant decrease of floodplain impacts from 96,824 sq ft (March 2020) to 17,237 sq ft (September 2020). However, flood storage is measured in cubic feet, not square feet.

- Possible areas of the site for 2:1 compensatory flood storage (as required by the Bylaw and Climate Change Resilience standards) discussed included the northwest optional parking area on the revised September 2020 plan (if not required by ZBA for surface parking) and potential locations within the Adjacent Upland Resource Areas (“AURA”) within the floodplain, in consideration of wildlife habitat and vegetation evaluations (see below) and the potential for opportunities for floodplain restoration.

Recommended Action: ACC recommends that the ZBA require 2:1 Compensatory Flood Storage, consider the northwest surface parking area as a potential location for compensatory flood storage as it is outside of the AURA, require a wildlife habitat evaluation and vegetation evaluation to determine other potential areas for compensatory flood storage on-site, and require floodplain delineation and supporting information be provided to for BETA Group to verify floodplain delineations, flood storage volume lost, and compensatory flood storage prior to the close of the ZBA’s hearing.

### **Issue #3. Stormwater Management**

The ACC cannot determine whether the September 2020 revision meets the Stormwater Management Standards because the Applicant still has not submitted the necessary detailed stormwater management analysis that includes results of computer modeling using HydroCAD software.

- BSC Group stated that they would not be providing the stormwater calculations at this time since the September 2020 revision is at a “conceptual” stage.

Recommended Action: ACC recommends that the ZBA require stormwater calculations for BETA Group verification prior to the close of the permit hearing.

### **Issue #4. Evaluation of Wildlife Habitat & Vegetation**

Plant size, abundance, and variety are generally proportional to habitat value; thus, large wooded areas with a variety of native trees and understory plants are of greatest habitat value. Wildlife habitat is significant to the interest of the Bylaw and vegetated resource areas, including isolated wetlands, are protected resources with protected buffer areas (the AURA).

- As a follow-on to evaluation of potential locations for 2:1 compensatory flood storage on-site, the wildlife habitat and vegetation need to be evaluated to understand the functions and values in the resource areas. With this information, BETA Group and ACC can evaluate the potential locations for least impact to the functions and values of the resource areas and/or opportunities for restoration coincident with siting compensatory flood storage within resource areas.

Recommended Action: ACC recommends that the ZBA require a wildlife habitat evaluation and vegetation evaluation to provide a better understanding of the potential loss of habitat within isolated wetlands and AURA zones and to help inform BETA Group’s review of compensatory flood storage locations and opportunities for floodplain restoration.

We hope the ZBA finds the above comments helpful. Please contact us should you have questions. I and other ACC members plan on attending the ZBA's hearing on the Application on October 13, 2020.

Very truly yours,

*Susan*

Susan Chapnick, Chair  
Arlington Conservation Commission

Enclosures:

Thorndike\_Sept\_2020\_Site\_Plan.pdf

ZBA\_Transmittal\_2020-09-28.pdf



PROFESSIONAL ENGINEER \_\_\_\_\_ DATE \_\_\_\_\_

### THORNDIKE PLACE

DOROTHY ROAD  
IN  
ARLINGTON  
MASSACHUSETTS  
(MIDDLESEX COUNTY)

### OVERALL SITE PLAN

MARCH 13, 2020

REVISIONS:

NO.	DATE	DESC.
1	9/18/20	NEW BUILDING FOOTPRINT

PREPARED FOR:  
ARLINGTON LAND REALTY, LLC  
84 SHERMAN STREET, 2ND FLOOR  
CAMBRIDGE, MA 02140

**BSC GROUP**  
803 Summer Street  
Boston, Massachusetts  
02127  
617 896 4300

© 2020 BSC Group, Inc.  
SCALE: 1" = 60'  
0 25 50 100 FEET

FILE: 2340700\C\1\2340700-SP  
DWG.: \_\_\_\_\_  
JOB. NO: 23407.00 SHEET C-101

ISSUED FOR PERMITTING  
NOT FOR CONSTRUCTION

**Sent Via Email**

September 28, 2020

Tel: 617-896-4300

[www.bscgroup.com](http://www.bscgroup.com)

Christian Klein, Chair  
Arlington Zoning Board of Appeals  
51 Grove Street  
Arlington, MA 02476

RE: Thorndike Place  
Revised Development Program

Chairman Klein:

Representatives from the Board of Appeals, the Department of Planning and Community Development, the Legal Department, and the Applicant for Thorndike Place met via conference call on Friday, September 11, 2020. Based on wetland resource area comments received from the Town's peer-review engineers, BETA Group, and the Conservation Commission, the Applicant is proposing to revise the site plan to avoid or minimize wetland resource area impacts under both the Wetlands Protection Act and the Arlington Wetlands Protection Bylaw and implementing regulations. On the call, it was agreed to have the Applicant's engineer provide a revised site plan with information comparing the changes in potential wetland resource area impacts from the site plan submitted in March 2020 to the revised site plan dated September 28, 2020. It was also agreed that the revised site plan would be discussed during a working session before the Conservation Commission's October 1 meeting.

Attached, please find two colored site plans. The first is the site plan submitted in March 2000 and presented at the August 25 ZBA hearing. The second site plan presents the applicant's proposed changes to the development program. In the revised plan, the proposed townhomes have been eliminated, the footprint of the multi-family building has been modified and the overall development footprint has been reduced. The revised site plan greatly reduces floodplain impacts, removes the buildings entirely from the 25-foot No Disturb Zone and 100-foot Buffer/AURA, and minimal site improvements are proposed within the 100-foot Buffer/AURA.

Below is a comparison of the of the potential wetland resource area impacts between the original and revised site plans. The applicant has developed a revised site plan striving to avoid or minimize impacts. As shown in the tables below, potential impacts have been significantly reduced with the revised plan.

Engineers

Environmental  
Scientists

Custom Software  
Developers

Landscape  
Architects

Planners

Surveyors



**Original Site Plan – March 2020**

<b>Resource Area</b>	<b>Building (SF)</b>	<b>Pavement (SF)</b>	<b>Other (SF)</b>	<b>Total (SF)</b>
<b>Floodplain (WPA and local)</b>	14,468	45,892	36,464	96,824
<b>Isolated Wetland (local)</b>	0	193	50	243
<b>Bordering Vegetated Wetland (BVW) (WPA and local)</b>	0	0	0	0
<b>25' No Disturb Zone – Isolated (local)</b>	593	4,454	1,561	6,608
<b>25' No Disturb Zone – BVW (WPA and local)</b>	0	0	0	0
<b>100' Buffer/AURA - Isolated (local)</b>	10,488	19,218	9,102	38,808
<b>100' Buffer/AURA - BVW (WPA and local)</b>	11,011	0	0	11,011

**Revised Site Plan – September 28, 2020**

<b>Resource Area</b>	<b>Building (SF)</b>	<b>Pavement (SF)</b>	<b>Other (SF)</b>	<b>Total (SF)</b>
<b>Floodplain (WPA and local)</b>	5,457	439	11,341	17,237
<b>Isolated Wetland (local)</b>	0	0	0	0
<b>Bordering Vegetated Wetland (BVW) (WPA and local)</b>	0	0	0	0
<b>25' No Disturb Zone – Isolated (local)</b>	0	0	0	0
<b>25' No Disturb Zone – BVW (WPA and local)</b>	0	0	0	0
<b>100' Buffer/AURA - Isolated (local)</b>				
<b>100' Buffer/AURA - BVW (WPA and local)</b>	0	477	726	1,203



We look forward to discussing the revised plan with the Conservation Commission and BETA at the working session on October 1.

Please me call at 781-710-7280 or email me at [jhession@bscgroup.com](mailto:jhession@bscgroup.com) if you have any questions or require additional information.

Very truly yours,

BSC Group, Inc.

John Hession, P.E.  
Director of Land Development

cc: zba@town.arlington.ma.us  
Richard Vallarelli, ZBA  
Emily Sullivan, Conservation  
Susan Chapnick, Conservation Commission  
Jenny Raitt, Planning and Community Development  
Marta Nover, BETA  
Stephanie Kiefer, Smolak & Vaughan  
Gwen Noyes and Arthur Klipfel, Arlington Land Realty