
To: Arlington Zoning Board of Appeals
Fr: Stephanie Kiefer, Smolak & Vaughan, LLP
Date: November 3, 2020
Re: Thorndike Place, ZBA Docket No.

**STATEMENT OF DEMONSTRATION OF COMPLIANCE WITH ARLINGTON'S MASTER PLAN,
HOUSING PRODUCTION PLAN, AND OPEN SPACE AND RECREATION PLAN**

This memorandum is submitted on behalf of Arlington Land Realty, LLC (“ALR”) in further support of its proposed Comprehensive Permit Application pending before the Board. Within ALR’s Comprehensive Permit Application, an initial statement was provided regarding the Applicant’s proposal and its consistency with sustainable development principles, including the Project’s consistency with the Arlington Master Plan and Housing Production Plan. *See* Application, Sections I.C and IV.G. As indicated in our September 25, 2020 Supplemental Response to Completeness Review Memo and in light of the recent project design change, as presented to the Board at its October 13 public hearing, we are pleased to provide this update, identifying the relevant provisions within Arlington’s Master Plan, Housing Production Plan and Open Space and Recreation Plan and demonstrating the Project’s furtherance of such goals set out in these municipal plans.

CONSISTENCY WITH ARLINGTON’S MASTER PLAN

The 2015 Master Plan establishes a number of Key Findings, Recommendations and Goals under topical categories of land use, traffic and circulation, housing, natural resources and open space, public facilities and services. Notably, the Thorndike Place 40B project is responsive to the Town’s recommendations and otherwise advances a number of the very goals that the Town has identified within the Master Plan.

I. ALR’s Thorndike Place 40B Notably Advances Salient Affordable Housing Key Findings, Policies and Recommendations Described Within the Master Plan.

As described in the Master Plan, Key Finding 8 succinctly states although Arlington has had some success in creating affordable housing (limited to 140 units from 2000-2015), “despite efforts by the Town, the HCA and the Arlington Housing Authority (AHA), **Arlington has lost some of its traditional affordability.**” [Master Plan, p.8]. According to the Town’s website, as of 2018, the percentage of Arlington’s Subsidized Housing Inventory (“SHI”) remains stagnant at 5.6%, well below the state 10% statutory goal. According to DHCD records, as of 2020, Arlington has 1,122 SHI units. The municipal website states that in the nearly two decade period (2000-2018), Arlington has increased its percent of affordable housing by only .1%.

- **Arlington Has Lost Some its Traditional Affordability [Finding 8, Master Plan, P.8]**

The Master Plan points out the need for housing all demographics, including families, elderly and households with low and or moderate incomes. “The US Census Bureau estimates that 32% of all households in Arlington spend more than 30 percent of their gross income on housing... *Moreover, half of Arlington’s lower income homeowners are severely cost burdened, i.e., households that spend over 50 percent of their income on housing....*” [Master Plan, p.84 (emphasis supplied)]. The Master Plan also documents that 44% of Arlington renters have low or moderate incomes *and almost 80 percent are housing cost burdened.*” [*Id.* (emphasis supplied)]. Further, the Master Plan cautions that the rising housing costs in Arlington “make it more difficult to preserve the social mix that many people characterize as one of [Arlington’s] strengths.” [Master Plan., p.87].

In response to this serious deficit in affordable housing, the Thorndike Place 40B development will create 176 rental units available to families, individuals, seniors as well as individuals, including low or moderate income individuals, families and seniors. The creation of this multifamily housing project not only addresses the affordable housing need in Arlington, but it also provides greater housing choice to those individuals who either may be downsizing and/or unable to enter into the ownership housing market at this time. Moreover, 44 units at Thorndike Place will be set aside as permanently affordable to low and moderate income families. Because Thorndike Place is a 40B rental housing development, however, *all 176 units* will be counted towards Arlington’s SHI unit count. The addition of 176 units will increase the amount of Arlington’s SHI housing by close to one percent (i.e., approximately .85%). Upon certification of its Housing Production Plan, Arlington could then avail itself of a one year “safe harbor” under 760 CMR 56.03 for newly proposed 40B projects.

- **The Master Plan Identifies the Mugar Site As One of Two Possible Vacant Parcels Available to Address the Municipal Housing Need. [Master Plan, p.87].**

The Master Plan identifies “Issues and Opportunities” to address Arlington’s affordable housing need. In particular, the Master Plan specifically notes that Arlington generally has a lack of vacant land available for new housing construction. [Master Plan, p.87]. The Master Plan identifies two possible undeveloped areas in the town as possible housing sites: a) the Mugar site and b) a 6.4 acre site abutting Poets’ Corner. [*Id.*].¹

As to the Mugar site, the Master Plan implicitly recognizes that under the existing zoning designation (Planned Unit Development), the site is appropriate for housing, but notes that a large portion of the property is within the flood zone. [Master Plan, p.88].

In response, the Thorndike Place proposed project, as revised, is notably consistent with the Master Plan’s recognition of the Mugar site as an affordable housing site “opportunity.” In fact, since the Housing Appeal’s Committee’s favorable ruling on the GLAM challenge, which returned the ALR 40B project to the ZBA for review, the Applicant’s engineers at BSC Group have fully surveyed the property and located the current FEMA floodplain as it exists on the site.

¹ As to Poets’ Corner site, the Master Plan recognizes that its higher value may be for non-residential development given its highway proximity.

While a large floodplain area does exist on the 17+ acre site, the north/northwesterly portion of the site is completely outside of the floodplain. The large size of the Mugar site allows for both goals of the creation of affordable housing and the protection of floodplain to coexist.

The revised project design mindfully reduces the total building footprint by: a) eliminating the 6 townhouse buildings along Dorothy Road; and b) reducing the footprint of the multifamily building and shifting it to the north and west, predominantly outside the floodplain. As revised, the multifamily building presents very limited impact within the floodplain, i.e., limited portions of the easterly side of the building in two shallow fingers of floodplain. While the Master Plan has noted the lack of vacant parcels to create housing, and has expressly identified the Mugar land as one such parcel, Applicant's revised 40B project plan demonstrates the ability to both make productive use of this site for housing purposes and to otherwise leave the majority of the site undeveloped.

- **Thorndike Place Advances Two of the Four Master Plan's Housing "Goals and Policies": (a) Creating Housing Variety for a Range of Incomes, Family Size and Needs and (b) Encouragement of Sustainable Construction.**

The Master Plan identifies four "Goals and Policies" with respect to housing:

- 1) Encourage mixed use development that includes affordable housing;
- 2) Provide a variety of housing options for a range of incomes, ages, family sizes and needs;
- 3) Preserve the "streetcar suburb" character; and
- 4) Encourage sustainable construction/renovation of new and existing structures.

[Master Plan. p.10].

In response, the Thorndike Place 40B project proposal advances two of the Master Plans' stated "Goals and Policies." The proposed project advances the municipal goal of providing a variety of housing options for various sectors of the population. Also, the proposed project will advance sustainable construction and development of the site, addressing multiple municipal goals of preserving valuable floodplain and responding to the long overdue need for affordable rental housing options in Arlington.

- (i) The Thorndike Place Project Provides A Variety Of Housing Options For A Range Of Incomes, Ages, Family Sizes And Needs. [Master Plan, p.10].

Thorndike Place is proposed to consist of 176 rental units, consisting of a mix of studio, one-, two-, and three-bedroom units. The range of unit sizes will appeal to single adults, families as well as Arlington's aging population and/or empty nesters. The broad appeal of Thorndike Place is based not only on its full suite of unit sizes, but also its proximity to public transportation, to nearby shopping and to the Minuteman Bike Path and other outdoor recreation areas. The proximity to the Alewife MBTA Station allows for both working adults and retired adults an affordable housing option with nearby access to public transportation without undue reliance on automobiles. The Alewife Station serves the Red Line as well as a number of MBTA bus routes, including Route 62, Route 67, Route 76, Route 79, Route 84, Route 350 and Route

351. In addition, due to the proximity of the Minuteman Bike Path, the residents have multi-modal options, including walkable access, bicycles, subway and bus.

Consistent with 40B requirements, the Project will include 25% of the project (44 units) as available to low and moderate income residents. Because the development is a rental development, the Town will be able to include all 176 units as eligible SHI units. In practical terms, the increase in affordable housing units is greater than .5% of the total housing units and will allow the Town to have its HPP certified and to avail itself of a 40B “safe harbor” under 760 CMR 56.04(4)(f).

(ii) Thorndike Place Encourages/Utilizes Sustainable Construction Practices.

Consistent with the Master Plan’s housing goal of encouraging sustainable construction, Thorndike Place promotes such a goal on multiple levels. First, Thorndike Place is sustainably planned and engineered. As stated previously, the majority of the 17+ acre site will remain open, undeveloped and will be restricted from development in the future by use of a conservation restriction or similar land conservation mechanism. Aside from the very important goal of increasing affordable housing stock and housing diversity in Arlington, the ability for the Town to secure a permanent protection for the majority of the Mugar site is significant.

Second, and with respect to the developed portion of the site, the Applicant has established a sustainable and low impact development. The revised project design keeps the amount of impervious surface largely limited to the building and the access drive and small surface parking area in the northwest corner. Further, the building construction will use modular GreenStaxx units. The modular design and building system reduces and/or repurposes construction waste, uses green materials and relies upon residential sustainable design standards (LEED) as the benchmark. Typical construction impacts are dramatically reduced through the use of the state-of-the-art modular system. Further, the proposed building proposes the use of blue roofs, i.e., water detention on the roof which decreases impacts in storm events and flooding risks. Rooftop water detention can also keep the building cooler in warmer months, reducing the need for air conditioning and thereby reducing electricity consumption.

● **Thorndike Place Builds Upon the Master Plan’s Housing Recommendations That “Arlington Plan for Affordable Housing.” [Master Plan, pp. 13, 88].**

Two of the Master Plan’s “Key Recommendations” specifically address compliance with Chapter 40B and the need to increase affordable housing consistent with a Housing Production Plan. [Master Plan, Housing Recommendations 1 and 2, p.13]. Housing Recommendation 1 is to “create an affordable housing plan.” [*Id.*]. Implicit in the creation of a housing plan, the municipality must effectuate the plan. As discussed below, Arlington had set a target of increasing affordable housing by roughly 100 units per year. Although in the years since its adoption, the Town has fallen far short of that goal, the Thorndike Place project notably advances the HPP’s goal of creating affordable housing; giving the Town greater control to plan for future housing and allowing for the Town to reach a safe harbor milestone. Housing Recommendation 2 is that the Town allocate its resources to both meet local needs and the State’s requirements under Chapter 40B. [*Id.*].

Page 88 of the Master Plan includes limited “recommendations” for the Town vis-a-vis housing and residential development. The first of those recommendations is to “plan for affordable housing.” Embedded within that recommendation of the 2015 Master Plan was for the Town to implement a Housing Production Plan (“HPP”). The following year, in late 2016, Arlington’s HPP was approved by the DHCD. Notwithstanding the existence of the HPP, on a practical level, Arlington has made extremely limited progress in advancing the creation of affordable housing in the four years since the HPP was created and the Town remains well below the state threshold of 10% affordable housing. Arlington has only 5.6% affordable housing.

In response, the Thorndike Place project advances the Master Plan’s recommendation that the Town plan for affordable housing, as it puts into effect the very goals of the HPP (discussed below). According to the DHCD’s SHI inventory of Arlington’s total 19,881 housing units, only 5.6% are SHI housing units. ALR’s 40B project proposal will increase the number of SHI units by 176 units, which is more than the number of affordable units added by the town during the period from 2000-2014. Likewise, with 176 new SHI units, Arlington could seek certification of its HPP and upon such certification, avail itself of a one year “safe harbor” during which Arlington can focus upon other project sites it desires for inclusion of additional affordable housing.

- **The Town Should Study and Plan for Increasing the Supply of Over-55 Active Senior Market Rate housing and Affordable/Subsidized Housing to Meet Arlington’s Population Trends.** [Master Plan, Housing Recommendation 5, p. 13].

In response, while Thorndike Place is not specifically targeted as an over-55 senior market rate housing and affordable housing development, the Project provides an attractive choice for the 55+ senior market, seeking either affordable housing and/or market rate housing. Thorndike Place provides a variety of unit sizes, studios, one-bedrooms, two-bedrooms and some three-bedrooms perfectly sized for empty-nesters and located within proximity to public transportation as well as an existing network of bike and walking paths (Minuteman Bike Path and Alewife Greenery Bike Path).

II. Master Plan Goals For Land Use Include Encouraging Development That Enhances the Quality of Arlington’s Natural Resources and Build Environment. [Master Plan, p.29].

- **“Wherever possible, Arlington should seek to direct new development to existing assets, near transit in order to reduce auto dependency and near existing services and infrastructure.”** [Master Plan, p.37].

In response, Thorndike Place is positioned to take advantage of existing assets, notably including the proximity to bus and subway service at nearby Alewife Station as well as the proximity to the Minuteman Bike Path. The ALR site is within .6 miles from the MBTA Alewife/Red Line Station. It is also within two-tenths of a mile from several fixed bus route stops (e.g. Bus lines #76, #62, #351, #67 and #84 and within four-tenths of a mile from bus stops

for the #77, #79 and #350 bus lines. Bus line #78 is one half mile from the Site). The site is uniquely located near the Town's existing bike path and near a number of public transportation options to reduce auto dependency. The site is likewise conveniently located less than a mile from nearby shopping, restaurants and services at Alewife as well as to outdoor recreation (Alewife Brook Reservation, Minuteman Bike Path, Thorndike Field).

In addition to the Project's ability to take advantage of the existing multimodal transportation network, the Developer has proposed a project which reduces the area of land development to a single multifamily building and would provide for permanent protection for over 11 acres of lands that have been identified as a priority for preservation. [Master Plan, p.44]. The 40B project strikes the appropriate balance of addressing the municipality's pressing need for affordable rental housing together with the desire to preserve those portions of the site it deems to be valuable from a natural resources perspective.

III. Arlington Master Plan Recommendations for Natural Resources and Open Space Include Pursuit of Strategies to Preserve Open Space and Manage Floodplains.

- **The Town Should Continue Pursuit of Resolution of Mugar Land, Including Partial Development of the Land.** [Master Plan, Natural Resources/Open Space Recommendation 3, p.144].

The Master Plan details limited efforts over the past 20 years to protect, at least in part, the ALR property. The private land, while a priority for the Town in terms of protection, has also been identified as viable undeveloped land for residential housing [Master Plan, p.87]. As a pragmatic approach, the Master Plan recommends specifically for the Mugar site that the Town should continue to pursue resolution of the land, "either for partial development or open space protection." [Master Plan, p. 144, Natural Resources and Open Space Recommendation 3].

In response, the Thorndike Place 40B project advances both of the alternate recommendations set out in the Master Plan. Specifically, upland portions of the site would be developed for the multifamily housing and the balance of the property (more than 11 acres) would be set aside as permanently protected open space. The thoughtful balance to achieve both the property owner's rights to make use of a portion of its land and the ability to permanently protect open space for which the Town has long-sought to protect creates a win-win scenario.

The Thorndike Place 40B Project proposal directly provides a viable strategy to allow the municipality the ability to ensure that open spaces are preserved and floodplains managed. The project is ideally located to allow the residents convenient access to the nearby Minuteman Bikeway as well as to the Alewife Brook Reservation, Thorndike Field and the Alewife MTBA Station, all of which are easily accessible by foot or bike. The proposed project also limits the project size and allows for the overwhelming majority of the site to be preserved as open space. As recommended by the Master Plan, the partial development of the site allows the property owner the ability to make use of its land while also preserving the more environmentally sensitive lands in perpetuity.

- **The Master Plan’s Recommendation for Sustainable Planning and Engineering Approaches is Reflected in ALR’s 40B Proposed Affordable Housing. [Master Plan, p. 144, Natural Resources and Open Space Recommendation 5]**

In response, the revised project design for Thorndike Place is premised upon minimizing impact to natural resource areas, such as floodplain and wetlands buffer, and providing quality housing that relies upon a minimal development footprint. The proposed density of Thorndike Place is such that less than a third of the total land area will be developed and the remaining two-thirds can remain as protected open space. Aside from the very important goal of increasing affordable housing stock and housing diversity in Arlington, the ability for the Town to secure a permanent protection for the majority of the Mugar site is significant.

With respect to the developed portion of the site, the amount of impervious surface is largely limited to the building and the access drive and small surface parking area. Plantings to the rear of the developed portion of the site will be vegetated with native vegetation to provide an aesthetically pleasing transition to the wetland resource area and buffer thereto in the southern portion of the site. The building construction will use modular GreenStaxx units. The modular design and building system reduces and/or repurposes construction waste, uses green materials and relies upon residential sustainable design standards as the benchmark. Typical construction impacts are dramatically reduced through the use of the state-of-the art modular system. Further, the proposed building proposes the use of blue roofing, i.e., water detention on the roof which decreases impacts in storm events and flooding risks. Blue roof design can also keep the building cooler in warmer months, reducing the need for air conditioning and thereby reducing electricity consumption.

- **The Master Plan’s Recommendation 7 for Natural Resources and Open Space Suggests the Town Consider Measures to Encourage Development Projects That Respect and Enhance Adjacent Open Space and Natural Areas. [Master Plan, p.145].**

The Master Plan recognizes that recent development projects, such as the former Symmes hospital site, resulted in protection of woodlands and new public parks, demonstrating that economic development “can go hand in hand with natural resource protections.” [Master Plan, p.145.]

In response, ALR’s Thorndike Place similarly presents an ability for creation of affordable housing on a portion of the ALR site, with the balance of the site to be protected in perpetuity consistent with the recommendation of encouraging development that respects and enhances adjacent open spaces. Once again, the Master Plan recognizes that achievement of its multiple objectives are not exclusive of one another. The Thorndike Place proposal similarly is designed to achieve smart housing, that is transit-oriented, available to tenants of varying economic levels, ages and needs and to also provide the much-desired permanent protection on the majority of the ALR property. The Applicant’s proposal advances the Town’s recognized principle that development and natural resource protection can go hand in hand.

CONSISTENCY WITH ARLINGTON'S HOUSING PRODUCTION PLAN

In late 2016, the Town of Arlington received approval on its Housing Production Plan (HPP) from the Department of Housing and Community Development (DHCD), as effective October 6, 2016². Despite its adoption of the HPP, since 2016 the Town has not notably advanced affordable housing production in accordance with the HPP's announced objectives³.

As stated in Table 16 of the HPP, Arlington's Affordable Housing Production Goals involve an additional 100 SHI state-certified units for each year from 2016-2021. At the time of the adoption of the HPP, Arlington SHI inventory was 1,121 units (5.64%). As noted on the Town's website, the Town's affordable housing stock currently represents 5.6% of total housing units.

Within the HPP's comprehensive needs assessment, the Town found that:

- a) More than one out of every four households in Arlington (25%) have low incomes (Executive Summary, p.5⁴);
- b) Very few rental units on the market are available to lower income households (Executive Summary, p.6); and
- c) A need for updated housing as one out of every two homes in Arlington was constructed prior to 1939 (Executive Summary, p.6). As noted, such older homes lack heat and energy efficiency, may not be in compliance with current health, safety and building codes, and may otherwise contained lead based paint or other environmental hazards. Id.

Likewise, the need for apartment housing was also highlighted; in the period from 2000-2014, the Town of Arlington experienced approximately 1,460 rental unit conversions to condominiums, thereby depleting the supply of rental housing. Id.

Arlington's HPP sets out the very serious nature of its affordable housing need. Between the period of 1997 to 2016, the amount of affordable housing had only increased 1.21% (from 4.43% to 5.64%). The majority of the increase appears to have occurred between 1997 and 2000; according to the Town's website, in the period from 2000-2014, affordable housing only increased by .1%. Likewise, since the DHCD's approval of Arlington's HPP, there has been notably little progress in increasing the supply of affordable housing in Arlington.

² The HPP postdates the Applicant's Comprehensive Permit Application.

³ In fact, the Town may have decreased the number of affordable units since the time of ALR's 40B Application filed on September 1, 2016.

⁴ As described within the Affordable Housing "Key Findings", at Page 31 of the HPP, the percentage of low income households is even higher, noting that one-third of Arlington households are low income, with rates especially high among elderly unrelated households. The same "Key Findings" concludes that more than one-third of all households are "cost burdened," meaning that those households pay more than 30% of annual income toward housing.

The HPP identifies the following housing “priorities” over the five years (2016-2021):

- *Expand housing supply* – the tight housing market/demand for housing results in increases in rents and sale prices, further adversely impacting low to moderate income persons. [HPP, p.56]. According to MAPC projections through 2020, several hundred additional units could be added to the housing supply to meet demand/prevent inflated sales/rental prices. *Id.*
- *Diversify the housing supply* – The senior housing population is expected to grow, requiring housing that is in proximity to services, physically accessible and convenient to needs. [HPP . 56]. According to the HPP, while the number of affordable units is slightly over 1,000 units, there are more than 5,000 potentially eligible households, many of which are elderly. *Id.* Smaller households and senior households need smaller units so they are not over-housed, which in turn creates maintenance and cost challenges. *Id.* Also, more than one-third of Arlington households are cost burdened, indicating the need for more housing at multiple price points. *Id.*
- *Update Existing Housing Stock* – one out of every two units were constructed prior to 1939. [HPP, p.56]. Of the rental housing, from 2000-2014, 1,460 rental units were converted to condominiums, resulting in a deficit of rental units and driving up of prices for rental units. *Id.*

In response, the Thorndike Place’s Multifamily Housing proposal affirmatively addresses Arlington’s prioritized needs as described within the HPP.

- a) Thorndike Place will expand housing supply: the total project is 176 units of which 25% (44 units) will remain in perpetuity for lease to low to moderate income households.⁵ As part of the 40B requirements, a fair housing and marketing plan will be in place and eligible tenants are required to confirm their income eligibility on an annual basis. The monitoring of affordability likewise addresses another issue described in the Master Plan, i.e., that there is “mismatch” in existing housing whereby persons with higher incomes are living in housing that is affordable to low and moderate income persons. Here, the programmatic controls required by a 40B project, ensure that the affordable units are inhabited by persons with the qualifying income (80% AMI).
- b) Thorndike Place will diversify the housing stock. Based on the findings of the HPP, there is a very real need for i) rental housing; ii) senior housing/empty nester housing; iii) transit-oriented housing. ALR’s 40B project directly responds to each of these current shortcomings in Arlington housing supply. The proposed building is considered mid-rise (3-4 floors), and has elevator access, making it an ideal housing choice for older or mobility impaired residents. The older rental housing stock in Arlington largely prevents seniors from living in anything other than a ground floor unit. Also, while it is expected that the residents will rely on public transportation for most purposes, to the extent that residents will use cars, the majority of the parking is

⁵ Arlington’s HPP notes that of its affordable housing units, 254 (slightly less than 20% of current affordable housing) could expire by 2059 (and some much sooner). HPP, p.65.

- in below-ground parking, which ensures that older residents can access their vehicles in winter months without walking distances across icy surfaces and /or have cars needlessly idling for long period to melt snow on windows.
- c) Unlike the older housing stock (which is stated to represent more than ½ of the housing), Thorndike Place will be constructed with weather-tight construction, energy efficient appliances and finishes, safe interior finishes (i.e., no asbestos), and with thoughtful amenities, such as internal bike parking, outdoor community grilling and terrace space, onsite management and a community room.

The Thorndike Place 40B project will advance not only the amount of affordable and market rate rental housing options in Arlington, by 176 units, but it will also provide Arlington with recent progress toward meeting its HPP’s affordable housing goals and therefore allow it to avail itself of a safe harbor under Chapter 40B in the immediate future. While the Town has adopted an HPP, the Town has not over the past four (4) years advanced its goals and objectives. Because the Thorndike Project is a rental development, the entire unit count (176 units) will be counted as SHI units. Once certified by DHCD, the Town will be able to avail itself of the safe harbor under 40B.

**HPP Goal 1 – Produce More, Diverse Housing to Address Documented Local Need.
[HPP, p.57]**

Response: With respect to certain goals set out in the HPP, the Town’s first identified goal is for Arlington to “produce more, diverse housing for extremely-low to middle income households. The Table 16 affordable housing goals propose an annual increase of 100 units for each year until 2021. Within the HAC litigation, the Town reported only 1,061 SHI units in 2018, which would mean a decrease of affordable units from 2016. Assuming the Town’s representations to have been correct, Arlington is well below its annual production goals. Under the HPP, Arlington should have 1,525 SHI housing units by 2020.

Unlike a series of small, two to four-unit rental projects, the Thorndike Place proposal not only would provide 176 eligible SHI units for the Town to make progress on the statutory 10% affordable housing goal, but it also directly provides for the type of diversity in housing that is sought by the Town. Thorndike Place presents an opportunity for seniors, smaller families, single-member households and low to moderate income as well as mixed income individuals and families to reside with close proximity to public transportation, services, amenities and to remain connected to other Arlington’s neighborhoods via the bike path.

HPP Goal 3 – Integrate Affordable Units In a Broader Range of Housing Types Into the Fabric of Arlington’s Existing Neighborhoods Through Redevelopment of Certain Underutilized Properties and Reuse of Existing Buildings. [HPP. p.58].

The HPP notes that mixed income development should not be confined to commercial centers, but should also be distributed throughout town to support socioeconomic diversity of Arlington’s neighborhoods.

Response: Thorndike Place presents a unique opportunity to create such desired socioeconomic diversity in East Arlington, in a traditionally residential neighborhood. While the proposal does not seek to reuse existing buildings, ALR’s proposal will breathe life into land that, while possessing some natural resource value, has been misused and underused over the years. By developing a portion of the site for a dynamic multifamily development, affordable units will be integrated into this neighborhood as well as the Thorndike Place community. As the number of affordable units (44) within the project will remain a constant, all units will be developed to the same standards and there is no artificial distinction between housing quality for the various socioeconomic residents. Similarly, the proposal to incorporate open space restrictions on the undeveloped areas of the property will cement the status of that portion of the property as protected open space.

HPP Goal 4 – Foster an Aging Supporting Community Via Housing Choices That Enable Older Adults to Thrive in Arlington as They Age.

Response: Thorndike Place provides Arlington’s senior population a choice of living accommodations to be responsive to smaller household size. Given the proximity of public transport (subway and bus), services and amenities are easily accessible without reliance on driving. Long-term Arlington residents can remain members of the community, without staying in a home that has outgrown the seniors’ living needs and/or income.

In summary, Arlington’s HPP was intended to address the outstanding needs of the community concerning housing supply and demand, the lack of housing options for persons, especially those who are income burdened and the need to prevent a decline in Arlington’s historic tradition of being a diverse community and open to all socioeconomic parts of society. Thorndike Place addresses those very needs and provides rental housing options that, to date, have been largely lacking in Arlington.

**CONSISTENCY WITH ARLINGTON’S OPEN SPACE AND RECREATION PLAN
(2015-2022)**

Arlington’s open spaces and recreational facilities are set out in the Open Space and Recreation Plan (“OSRP”).[OSRP, p.72]. The OSRP recognizes that since 2007, the “most significant changes” in open space acreage since 2007 have arisen in relation to the protections on privately held lands: the former Symmes Hospital site and Elizabeth Island. *Id.* At Symmes, 8.5 acres of the 18-acre site are protected as park and/or woodland under conservation restrictions; the land is owned by the development company⁶.

While the Mugar Site is identified within the OSRP as an “Open Space and Recreational Facility,” the property is not currently owned by the Town, nor does the Town hold any conservation restriction on the property. [See OSRP, p.72]. The OSRP also notes that the Town

⁶ Within that proposal, the developer obtained approval for 164 rental units and 12 condominiums (Arlington 360). Despite the number of allowable units, the Town only obtained 26 affordable units and less than half of the site was protected. The 2-acre Elizabeth Island is protected and owned by the Arlington Land Trust.

has not been able to identify a viable path to preserve any portion of the Mugar site, including a prior town vote to acquire the land. OSRP, p. 89].

THE THORNDIKE PLACE PROPOSAL ADVANCES OSRP GOALS. [OSRP, pp.122-123]

As stated within the OSRP's Goals and Objectives [OSRP, pp122-123], the first stated goal is to acquire ecologically valuable land or ensure protection through conservation restrictions or other means. ALR's 40B proposal includes protecting a portion of its lands via a conservation restriction or similar mechanism. The Town could achieve desired protection over the designated area without otherwise outright purchasing the land and instead, use municipal staff and funding resources to otherwise achieve OSRP goals and objectives.

The OSRP's third goal is to coordinate and strengthen local and regional planning and management of open spaces with various Town Departments. [OSRP, p.123]. Here too, the ZBA in working with ALR can forge a path to address Arlington's outstanding housing needs (affordable housing/diversity of housing choices/transit-oriented housing/low impact housing) while simultaneously advancing the Town's Open Space priorities. As noted, Arlington has sought a path for the protection of the floodplain and natural resources at the Mugar site for well over twenty years; the ALR 40B project responsibly identifies upland development and protection for the more sensitive areas of the site.

Response: ALR's Thorndike Place proposal provides a path to advance Arlington's desire to formalize protection on the majority of the site to ensure that the vast majority of wetland resource areas and floodplain on the site remain protected open space. Not only would such protections ensure that no future development on the protected lands occur, but it would also allow the Town to serve as a steward of such restricted area.

THE THORNDIKE PLACE PROPOSAL IS CONSISTENT WITH THE OSRP ACTION PLAN/OPEN SPACE AND RECREATIONAL PRIORITIES. [OSRP, pp.124-225].

The OSRP prioritizes protection of ecologically valuable land "such as the Mugar property... that could be lost as open space." [OSRP, p.124].

Response: While the Mugar property is casually referenced as ecologically valuable land, the real context is that the floodplain and wetland resource areas are desired for protection. The upland portions of the site, to the north and northwest of the site are not floodplain and instead are currently overgrown areas tucked adjacent to a densely developed residential area. That portion of the Mugar site to the north and northwest can be developed, as proposed by Applicant, to blend into the residential neighborhood. The majority of the site, to the east and southeast, abutting Route 2, can properly be protected. The Applicant, the Town and its community can work together toward a path to steward the undeveloped lands, as such stewardship models may exist with other protected areas, such as the private lands at the former Symmes Hospital.