

September 2, 2021

Via Email

Rick Vallarelli  
Arlington Zoning Board of Appeals  
51 Grove Street  
Arlington, MA 02476

Attn: Christian Klein, Chair

**RE: ZBA Docket #3515 /Thorndike Place, Arlington, MA**

Dear Mr. Chairman and Members of the Board:

On behalf of the Applicant, Arlington Land Realty LLC, we are providing the following consolidated response to the Department of Planning and Community Development (DPCD) comment letter, dated August 23, 2021. The Applicant is appreciative of the DPCD's letter, which provided, in a consolidated format, the feedback from the Transportation Advisory Committee, the Arlington Fire Department, the Department of Public Works as well as DPCD staff.

To assist the Zoning Board's review, we have provided the original comment from the August 23, 2021 DPCD letter in standard text followed by the Applicant's response in *italicized* text. Please note that many of these comments have also been addressed in the letter submittal prepared by BSC (Response to Town of Arlington Review), dated August 31, 2021, but is reiterated herein for a single complete response to the DPCD August 21, 2021 comment letter.

- 1. Conservation and Environmental Amenities:** Please refer to comments and recommendations from the Conservation Commission which will be sent under separate cover.

*Responses to the Conservation Commission's comments and recommendations are submitted under a separate letter.*

- 2. Circulation, Parking, Access, and Connections:** The Transportation Advisory Committee (TAC), DPCD staff, and the Arlington Fire Department provided a review of traffic and circulation including reviewing and updated Traffic Impact Assessment Study (TIAS), and provides the following comments:
  - The Applicant should add parking space length dimensions to the garage plan on page 3 of the GreenStaxx architectural plans.

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*Response: Parking space length dimensions have been added to the Garage Plan update sheet of the architectural plan set.*

*The Applicant would further direct the Board's attention to the Parking Summary found on the updated Garage Plan, which correctly identifies the total number of vehicle parking spaces (95) for the Project, consisting of 84 garage spaces and 11 surface parking spaces. The total number of handicap parking spaces is ten (10) spaces: eight (8) within the garage and (2) in the surface parking areas. An inadvertent error on the Parking Breakdown summary set forth on Sheet C-103 of the BSC plan set, mistakenly references the garage parking as 86 parking spaces, of which 2 are handicapped. As correctly stated on the Garage Plan, the garage parking is 85 spaces, of which eight (8) spaces are handicapped.*

- Bike parking is minimal, even if calculated from Arlington's previous bike parking ordinance. By the Department's calculations, two or three short-term bike racks should be located at the main entrance, and at least double the amount of long-term storage being proposed for a development of this size. Seniors also ride bicycles.

*Response: The number of enclosed bicycle parking meets or exceeds the zoning bylaw requirements as in place at the time of Applicant's 40B application. The enclosed bicycle parking shed on the north side of the Independent Living Building is 60-feet in length, and will accommodate up to 28 bicycles. The updated garage plan likewise includes a bicycle parking reserve area, which can accommodate up to eight (8) additional bikes, if the demand exists for additional bicycle parking spaces.*

*With respect to exterior bicycle racks, please refer to the updated Layout and Materials Plan, BSC Sheet C-103, as submitted on August 31, which includes two exterior bicycle racks near the entrance of the Independent Living building, which can accommodate up to six (6) bicycles apiece for a total of 12 exterior bicycle parking spaces*

- The Smolak & Vaughan narrative notes that "guests, visitors or staff will have available exterior bicycle parking with stations outside the building's main entrance," however only one bike rack is shown. The Applicant should identify the additional bike racks being proposed on the plans.

*Response: Please see the updated Layout and Materials Plan, Sheet C-103, as submitted by BSC on August 31, 2021. The plans have been updated to reflect two (2) exterior bicycle racks adjacent to the main entrance of the building. Each exterior rack can accommodate up to six (6) bicycles.*

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- The Applicant should clarify what is meant by "stations" in the Smolak & Vaughan narrative. The Department would be interested in a reintroduction of a BlueBikes station as part of TDM, but there is no reference to a station on the plans.

*Response: The term station was used to refer to an exterior stationary bike rack. At this time, there is no reintroduction of a BlueBikes location on the project site.*

- The 10 EV charging stations proposed are appreciated. The Applicant should clarify the definition of "expansion potential built-in," as it is unclear to where or what spaces the expansion would be going. Additionally, the Applicant should clarify whether other spaces going to be made "EV-ready."

*Response: To clarify what is proposed, the 10 EV charging station spaces have been individually labelled on the revised Garage Plan. In addition, Applicant will provide wiring and amperage as needed to accommodate an additional 10 vehicle charging stations in the future. These additional 10 stations have been indicated on the revised Garage Plan as "EV Ready (Future)"*

- The number of car parking spaces is acceptable and is more than what is both required and recommended based on ITE data. As described above, the Department recommends adding more bicycle parking spaces given the proximity to the Bikeway and the leveraging of this resource to reduce vehicle trip estimates and proposed parking spaces.

*Response: Applicant agrees that the number of car parking spaces is adequate. As referenced above, Applicant will provide a total of 28 secured (interior) bicycle parking spaces, with a reserve bicycle parking area within the garage able to provide up to 8 additional enclosed bicycle parking spaces should additional spaces be necessary. On the exterior, the Project includes two bike racks located adjacent to the main entrance, which can accommodate a total of 12 short-term bike parking spaces.*

- The reduction in overall car trips—and all trips—is reasonable given the smaller footprint of the proposed development and the reduced number of units.

*Response: No response required.*

- The Applicant should clarify if they intend to purchase their own vehicle for jitney service or contract with a service provider.

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*Response: The operator of the Senior Living residence will own or lease the vehicle for jitney service; it does not intent to contract with a service provider.*

- The BSC's layout and materials plan is missing call-out for an accessible curb ramp for the ladder-style crosswalk that crosses the driveway to the turnaround (on the lower end of the crosswalk where it meets the other crosswalk). The Applicant should add this detail to the plan.

*Response: Please refer to the updated BSC Plans, Sheet C-103; the call out for the accessible curb ramp type "B" has been included.*

- The Department understands the concern about the applicability of commuting data to estimate vehicle trips. However, the Department supports the use of VAI's 50% reduction on journey-to-work Census data, with the understanding that the Census dataset is the best available data for calculating vehicle trips for this project.

*Response: No response required.*

- The Applicant should clarify the limits of the six-foot privacy fence near the ten-foot-wide driveways for each end duplex unit. Snow removal and ability to open car doors could be difficult with ten-foot-wide driveway due to proximity of the house and fence.

*Response: As indicated in the BSC response letter of August 31, 2021 and as shown on updated Sheet C-103, the privacy fence will turn north and end at the duplex building at each end.*

- Driveways fronting on Dorothy Rd. should utilize a two-foot diameter return stone consistent with Town requirements rather than the five-foot diameter curb stones indicated on the plans.

*Response: As indicated in the BSC response letter of August 31, 2021 and as shown on updated Sheet C-103, the driveways have been updated to utilize two-foot diameter return stone consistent with Town requirements.*

#### Service and Deliveries

- On the Modular Truck turning movement diagram from VAI (Figure MT-1), the applicant shows that a truck would need to swing into the opposite lane for 200' prior to making the turn onto Littlejohn Street. This risks a head-on collision with oncoming traffic on Lake Street, and it is unlikely that

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oncoming traffic would be clear long enough for a truck to make this maneuver.

*Response: VAI acknowledges that if modular construction is chosen, the modular delivery trucks would travel in the opposing lane of traffic for approximately 200 feet to make the turn onto Littlejohn Street. As presented in VAI Slide 3 of its March 31, 2021 presentation (a copy of which is attached hereto), the contractor will arrange for police detail on Lake Street to facilitate truck turns as well as police detail on Littlejohn Street, at Dorothy. In addition to the police detail, construction flaggers will be stationed on Littlejohn Street at the intersections with each Mott Street and Mary Street.*

- Lake Street is signed for no heavy trucking. The Department recommends that deliveries be made using smaller trucks if possible.

*Response: The operator will include within its contract with vendors that scheduled deliveries to the Independent Living residence use smaller delivery trucks. Likewise, as previously stated within the public hearings, the operator will schedule vendor deliveries during off-peak hours.*

#### Emergency Vehicle Access

- The Applicant should clarify whether a truck will be able to circle the roundabout. If not, indicate if a truck will be able to make a three-point turn and exit onto Dorothy Rd going forward or if it will need to back out.

*Response: Please see BSC's August 31, 2021 Response to Town Comments and Truck Turning exhibit sheets. The series of Truck Turning exhibits demonstrate an Arlington fire truck making a three point turn along the driveway leading to the main entrance of the Senior Living building. Likewise, the BSC Truck Turning exhibit sheets demonstrate an ambulance vehicle's ability to circle the roundabout.*

- The Applicant should clarify whether the access road behind the principal structure can support the weight of a fire truck and demonstrate how the turning radius of the emergency access can accommodate a large fire truck.

*Response: Please see BSC's August 31, 2021 Response to Town Comments. To reiterate BSC's response, the Truck Turning exhibit sheets demonstrate the ability of a large fire truck to traverse through the rear of the site. The access road will be a six-foot wide, porous lane with 7-feet of reinforced grass to each side. The reinforced grass will be constructed with Grasspave 2 or engineer approved equivalent. Details of provided on BSC updated plan set, Sheet C.203.*

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- Additional details regarding maintenance of the access road and path would be helpful. The emergency access path around the rear of the building is 20 feet wide, while the walking path is six feet wide. Please clarify how the emergency access road will be maintained, including whether the 20-foot path will be plowed in the winter.

*Response: Please see BSC's August 31, 2021 Response to Town Comments. To summarize BSC's response, the emergency access road will be plowed in winter to maintain access. The paved walking path and adjacent Grasspave 2 or equivalent areas are plowable surfaces.*

- The Applicant should identify the nearest hydrant and the connection to the FDC on the plans.

*Response: Please see BSC's August 31, 2021 Response to Town Comments and updated Sheet C-105 for the location of hydrants. The FDC connection location will be determined in coordination with the building fire protection system design and Fire Department review prior to issuance of building permits.*

**3. Utilities:** The Department of Public Works has the following comments:

Sewer

- Sewer service connections require a wye connection and not a saddle at the sewer main.

*Response: See updated Sheet C-105 of BSC plan set submitted on August 31, 2021 and BSC August 31, 2021 response letter. Plans have been revised to use wye connections.*

- Each sewer service shall require a cleanout located within 10ft of the foundation consistent with Town requirements.

*Response: See updated Sheet C-105 of BSC plan set submitted on August 31, 2021 and BSC August 31, 2021 response letter. Cleanouts have been added as required.*

- Oil/Gas separator location and design elevations should be included in garage utility plans.

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*Response: See BSC August 31, 2021 response letter. To reiterate BSC's response, the final oil/gas location and design elevations will be determined by the building plumbing engineer and will be included within the full building permit construction document set to be submitted for issuance of a building permit.*

- A camera inspection should be performed for the sewer and drain lines in the immediate vicinity of any proposed work. Video catalog should be maintained, and a post construction camera inspection shall be performed to ensure that work associated with the project did not negatively impact the adjacent utilities.

*Response: See BSC August 31, 2021 response letter. To reiterate BSC's written response, applicant will agree that prior to construction, a CCTV sewer pipe inspection will be performed along the 14/18' sewer main from the existing manhole located to the west of the proposed surface parking lot to the manhole located adjacent to the southwest lot corner of 56 Dorothy Road. Repair of any existing deficiencies identified as part of the pre-construction inspection will be the responsibility of the Town. Upon completion of the construction, a post-construction CCTV sewer pipe inspection will be performed through this same pipe. Based on the outcome of the post-construction inspection, should construction have resulted in damage and/or disturbance to the pipe, the pipe shall be repaired/replaced at the expense of the site contractor.*

#### Water

- All water main connections to the Town main located in Dorothy Road shall include a triple water gate configuration and utilize a Tee connection.

*Response: See BSC August 31, 2021 response letter and updated Sheet C-105. Triple water gates and tee connections have been added to the water main connections.*

- The proposed water service for the duplex units indicates a 4" DICL pipe. This configuration may be oversized for a duplex unit. A water shut off shall be located at the back side of the sidewalk for each duplex service line.

*Response: See BSC August 31, 2021 response letter and updated Sheet C-105. To summarize BSC's response, final sizing of water connections will be performed at the time of construction set drawings submitted as part of building permit issuance; the updated plans have been revised to utilize a 2" copper service with a plan notation that final service size to be verified on construction plans.*

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- It is recommended the 8” water line be looped between the two connections to Dorothy Road to improve water quality and redundancy and feed the proposed fire hydrants with 6” lines.

*Response: See BSC August 31, 2021 response letter and updated Sheet C-105. The two 8” water lines have been looped as recommended in the Town Comment Letter.*

**4. Stormwater:** The Department of Public Works has the following comments:

- Each infiltration system should include an accessible observation port at grade and monitor pipe extending to the bottom of stone elevation for inspection purposes.

*Response: See BSC August 31, 2021 response letter and updated Sheet C-203. Sheet C-203 has been updated with a note added to the details, requiring access ports for each system and where those ports are to be located.*

- All Area drains and catch basins shall have suitably sized sumps to capture and remove sediment.

*Response: See BSC August 31, 2021 response letter and updated Sheet C-202. Area drains and catch basins include appropriately sized sumps.*

- The Estimated Seasonal High Groundwater Elevation should be utilized for the design of each infiltration system and building foundation. No building floors shall be installed within the ESHGW level. Subsurface infiltration systems shall maintain a minimum 2ft offset for the ESHGW and as needed include groundwater mounding calculations. Proposed elevations should be indicated for each basement floor, garage floor and infiltration system.

*Response: See BSC August 31, 2021 response letter and updated Sheet C-104. To summarize BSC’s response, all infiltration basins include a minimum of 2-feet of separation to estimated seasonal high ground water; groundwater mounding calculations are included within the Stormwater Report. Infiltration system elevations are identified on Sheet C-104.*

**5. Design:** The Department has the following comments:

- Consideration should be given to the color schemes of the main building and townhomes. For the main building, the Applicant should consider incorporating accent colors to denote where the main entrances are located. Additional color or material variation to highlight key locations of building interest and introduce more variation in the façade, such as by altering the



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color or material of the vertical elements leading up to the peaked roof elements, could improve the current institutional aesthetic of the building. For the townhomes, providing variation in the color of the individual townhomes should be considered to better incorporate the structures into the surrounding neighborhood.

*Response: The overall design intent for the project is to present the Townhomes along Dorothy Rd with a residential vocabulary that is in scale with adjacent duplexes. These buildings will use various sidings with accented colors and trims to complement the streetscape of the surrounding neighborhood. Please see the revised North Elevation (Dorothy Road) for further information and detail.*

*The architectural design for the main building has been revised to incorporate additional vertical areas of accent siding leading up to the peaked roof elements which complement the Townhomes and break up the various building facades. Accent sidings are used sparingly in other areas of primary function such as at the main entrance, which is marked by accent siding and a canopy overhang with modest signage Please see the revised exterior elevations for the main building and an enlarged elevation of the main entrance for further information and detail on color schemes, color accent and materials.*

- Additional renderings, particularly of the access and entry at the main building, would be helpful in conducting this review.

*Response: GreenStaxx and Bruce Hamilton Architects have prepared updated 2D architectural colored exterior elevations for the main building including an enlarged elevation of the main entrance as referenced in our comment above. As the comment for additional renderings was first made on August 23, Applicant has requested its rendering vendor to additionally prepare supplemental 3D renderings, which will be provided for further informational purposes at the August 9 hearing.*

- The ZBA should request a lighting plan and a landscaping plan for the full development. The Dorothy Street rendering and elevations suggest an intent to plant a hedge wall around the sides and front of the townhomes, which walls them off from the surrounding neighborhood. Alternative landscape treatments should be considered for the townhomes to improve their interface with the surrounding properties.

*Response: Landscaping and proposed site lighting locations are depicted on the updated BSC plan set submitted on August 31, 2021. The hedge wall*

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*referenced has been eliminated and the front yards of the townhouses will be lawn with foundation plantings and pin oaks. Please see Sheet L-100*

- Tree plantings are recommended to be provided along Dorothy Road to support local environmental sustainability and resiliency goals. It is recommended to provide tree plantings within the front setback, rather than in the grass strip to allow for better root development and tree health. Any tree location and/or species proposed within the public right of way shall be reviewed and approved by the Arlington Tree Warden.

*Response: Tree plantings along Dorothy Road are depicted on the updated BSC plan set submitted on August 31, 2021. The tree plantings are proposed within the grass strip due to the existing 10-foot-wide sewer easement adjacent to the Dorothy Road property line. Green Pillar Pin Oaks are proposed along Dorothy Road. Please see Sheet L-100*

- The Applicant should provide a signage plan for the main structure.

*Response: Please refer to sheet C-103 for signage locations including those proposed on the main building. Please refer to the Exterior Elevations and enlarged Main Entrance Elevation of the main building for additional information on design intent for signage. Final signage design shall be submitted by a Signage Vendor.*

**6. Affordable Housing:** The Department has the following comments:

- The Town's 2016 Housing Production Plan (HPP) outlines affordable housing needs. Senior housing is one of the recommendations for implementation in the HPP, which recommends that to meet the needs of the senior population, the Town should support the development of accessible units, assisted living facilities, and independent living facilities for people at all income levels.<sup>1</sup>

*Response: The project proposal advances the recommendations of the 2016 HPP; the proposed project will provide 124 units of senior housing to both persons of low-to-moderate income (25% of units) as well as market rate units.*

- Per the Town's Inclusionary Zoning requirements, the Department recommends that the Applicant clearly show that the affordable apartments and townhomes are dispersed throughout the development and comparable to market rate units in terms of quality and character, room size, and external appearance. Parking for affordable units should also be comparable in location and appearance to parking for market rate units.

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<sup>1</sup> 2016 Housing Production Plan, Strategy 8, page 64.

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*Response: The location plan for affordable units is submitted to the Subsidizing Agency for its review and approval of the Affirmative Fair Housing and Marketing Plan. Approval of the unit location plan is not within the review and approval role of a zoning board. For informational purposes, included within the updates to the architectural materials, Applicant has submitted a proposed location plan for each the affordable townhouse units (3 units) and the affordable IL apartment units (31 units).*

*Each the townhouse units and the apartment units are indistinguishable from market-rate units as viewed from the exterior, as required by the DHCD 40B Guidelines. Interiors of the apartment units will likewise be identical to one another; room sizes of market rate rental units and affordable rental units will be consistent as sized for each bedroom-sized unit. Certain interior finishes within the for-sale townhouse units may vary from unit to unit, as determined by contractor and purchasers. All units will be of good and quality construction. Parking for the affordable units and the market rate units are identical.*

- Additionally, the Town's Inclusionary Zoning requires that 15% of the number of units be affordable to households making at or below 70% of the area median income (AMI). The Department recommends requiring that the first 15% of the developer's required affordable units be compliant with this requirement, and the remaining 10% be affordable to households earning at or below 80% AMI.

*Response: The requirements for the affordability of the affordable units is the responsibility of the Subsidizing Agency; a zoning board cannot condition the affordability of the units as it would encroach upon the authority of the Subsidizing Agency.*

- Although the Department of Housing and Community Development allows for municipalities to dedicate up to 70% of affordable housing units in a development for local preference, the Fair Housing Action Plan recommends that the Town lower the percentage of what is required for local preference. The plan states, "by preferencing existing residents who are disproportionately not members of protected classes, the local preference policy could exacerbate existing patterns of segregation."<sup>2</sup> Therefore, the Town should consider lowering any local preference requirement in the Decision.

*Response: The Board's conditioning of a project to allow for a local preference has a maximum of 70% of the affordable units. The Board may*

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<sup>2</sup> Fair Housing Action Plan, pg 13, pp 58-59, 72, 105. Available at <https://www.arlingtonma.gov/home/showpublisheddocument/57214/637641171662530000>

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*seek to express a different percentage of the affordable units be subject to a local preference. Per the DHCD Chapter 40B Guidelines, should a Board seek to condition an approval to allow for a local preference, the local preference is subject to the Subsidizing Agency's approval. The Board is to provide the developer supporting information within three months of the issuance of the Comprehensive Decision.*

The Applicant thanks the Town staff for the summary comments and looks forward to discussing the same with the Board at the public hearing on September 9, 2021.

Sincerely,



Stephanie A. Kiefer

Encl. (Construction Routing Plan, Sheet 3 of VAI March 30, 2021 presentation)

cc: Paul Haverty, Esq.  
Jenny Raitt, Director of Planning and Community Development

# Construction Routing

