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June 14, 2022

By Electronic and First Class Mail

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

Re: 1021-1027 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 the Maggiore Company (“Applicant”) for the proposed development of approximately fifty (50) units of ownership housing and 1,000 square feet of commercial space on a one-acre parcel located at 1021-1025 Mass Ave. in Arlington, MA (the “Development”). While the plans are preliminary in nature, the Board recognizes many positives of the proposal as presently understood, based on the information provided by the Applicant in their application to MassHousing, personal knowledge of the locus, and our understanding of MassHousing’s criteria for Smart Growth.¹

The Board also received some concerns which merit further scrutiny by MassHousing and subsequently, the Arlington Zoning Board of Appeals, should project eligibility/site approval be granted. Both the assets and potential liabilities of the project as this body understands them through its cultivation of comment from Arlington officials and committees are enumerated in summary form herein. The Select Board is cognizant that many of these matters will be thoroughly scrutinized and

¹ MassHousing Smart Growth Criteria Scorecard, accessed at https://www.masshousingrental.com/portal/server.pt/document/384/smart_growth_criteria_score_card

considered by the Arlington Zoning Board of Appeals and/or the Conservation Commission, both of whom this Board anticipates will discharge their duties with great care. Nonetheless, at this early stage, the Board wishes to highlight those areas it believes merit MassHousing's attention. Additional, more detailed feedback and comment for MassHousing and the Applicant's benefit are provided attached memoranda and comments from Town staff and committees who formally provided their perspective to the Board.

Background

At the outset, the Select Board acknowledges the Applicant met previously with the Department of Planning and Community Development ("DPCD"), the Conservation Commission, and this Board over many months, offering presentations and working sessions prior to submitting the Site Approval Application. These efforts to identify and address potential issues provide this Board assurance that the Applicant is prepared to collaborate with the Town to work toward a mutually agreeable project. Moreover, particularly with respect to the Conservation Commission, the proactive engagement in working sessions provided further clarity on potentially significant issues and solutions to same well in advance of either c. 40B hearings or Conservation Commission hearings held pursuant to the Wetlands Protection Act.

Comments

Based on the aforementioned meetings, presentations, working sessions and written submissions (including the traffic study and Application to MassHousing) this Board received comments from Town staff, the Conservation Commission, and members of the Arlington Redevelopment Board on this proposal and summarizes this feedback as well as its own in the broad categories as follows:

Long Term Planning, Smart Growth, and Affordability

- The project is consistent with the Arlington Master Plan and other important Town goals, which highlights the Mass Ave corridor as a key development and redevelopment area. Specifically, the redevelopment of this project site provides the opportunity to create a mix of residential and commercial activity in a "B2" Business District, remediate and improve connections to the Mill Brook, and connect to both the Bikeway and transit options while increasing the Town's supply of affordable housing;
- The project would create ownership-oriented affordable housing consistent with Arlington's Housing Production Plan adopted recently by the Arlington Redevelopment Board ("ARB") and Select Board.²

² The Housing Production Plan is presently awaiting approval by the Department of Housing and Community Development.

- Consistent with Smart Growth Criteria, the project as designed concentrates development and mix uses, contributing to revitalization of a neighborhood, expanding housing opportunities, providing transportation choice, and planning regionally.
- Of particular note in favor of project eligibility, of the 1,301 homes on the Town's subsidized housing inventory, only 15 are ownership units. This project would create 13 affordable homeownership units—nearly doubling the Town's current number of affordable homeownership opportunities.
- Further, consistent with many of Arlington's plans and goals, the proposed project is within walking distance of transit, retail, restaurants, a grocery store, and parks and recreational locations. The variety of transportation options – walking, bicycling, and automotive – offered on a main thoroughfare is also consistent with Town and Smart Growth goals and criteria.
- With that said, Arlington is especially eager to create housing for households with extremely low and very-low incomes and/or for first-time home buyers. The Applicant could better meet these Housing Production Plan goals by deepening the level of affordability for at least half of the 13 affordable units to provide homeownership opportunities for households who make at or below 50% of area median income (AMI) and at an allowed sale price affordable to households who make at or below 50% AMI.

Site and Building Design

- Overall, based on the preliminary presentation the massing, scale, and materials shown in the Site Approval Application would create an attractive development for the Town's Brattle Square area.
- The Board also values design elements to incorporate and utilize outdoor spaces, with some suggestions for improvement by the Department of Planning and Community Development with respect to the proposed "urban garden."
- However, the project presently proposes only a small amount of commercial space. Providing additional retail space on the ground floor would be preferable in a B2 business district, especially if such space can incorporate design elements to foster potential restaurant or café uses.
- Moreover, the Board shares concerns that the plaza in front of the building should be improved with seating and amenities to better connect the commercial storefront with the sidewalk on Massachusetts Avenue in light of its location and potential commercial uses.
- The Board also echoes the Department of Planning and Community Development's accessibility concerns for some of the outdoor walkways, which should be addressed

as early as possible and may merit consultation with the Town's Disability Commission.

- Finally, the Board shares Town staff concerns about the sufficiency of storage, recycling, and refuse areas necessary for serving fifty households on a main thoroughfare.

Stormwater, Conservation, and Environmental Impacts

- Chief among the Board's concerns is the effective management of stormwater and conservation impacts of the proposed project, sited within the outer 100- to 200-foot Riverfront Area to the Mill Brook and which will require a building partially in a resource area.
- The Select Board shares concern about the removal of 22 trees on site, but recognizes the substantial and earnest mitigation plan at the site to create and "urban park" in the rear of the site with native plantings which received positive feedback from the Conservation Commission.³ As noted by the Conservation Commission, the biomass of the proposed park will constitute an improvement over the invasive-dominated site today even after removal of trees.
- Further, the Board is pleased that the urban park area would enhance wildlife corridors and improves the connection to the Mill Brook.
- In order to best orient the project for future consideration, the Board concurs with recommendations that:
 - Design changes evaluate whether the large sycamore tree may be preserved or incorporated into the project design;
 - Partnering with the Millbrook Condominium Association should be pursued to restore the first 50 feet of riverfront (owned by said association);
 - An appropriate degree of 21E environmental testing be performed to ensure the urban park is free from contaminants and suitable for the compelling native plantings proposal; and
 - Some accommodation be afforded for public access to the urban park, rather than a strictly private park space.
- With respect to Stormwater, the Board respectfully submits that additional data gathering is necessary in order to develop reliable runoff calculations, as outlined by both the Conservation Commission and Town Engineer, Mr. Wayne Chouinard (attached).

³ The Board notes the Conservation Commission assessment that the current condition of the site, which includes debris and material fill and is dominated by invasive flora and Norway Maples, is not well suited for the Town's climate resiliency goals.

- Finally, this Board continues to share the community’s commitment to enhancing energy efficiency and climate resiliency and urges the Applicant to consider pursuit of LEED Certification at a minimum, and providing air source heat pumps and rooftop solar alongside the encourage “green roof” design elements.

Traffic and Public Safety

- The Board values the quality traffic and public safety analysis provided, but urges the Applicant and MassHousing to further consider the questions and recommendations of the Department of Planning and Community Development with respect to service ratings, anticipated traffic generation and the impact on signaled intersections and the Highland Fire Station.
- Additional detail with respect to meeting transportation and parking needs are necessary, especially given that the Applicant will likely require waivers from Arlington parking requirements and the Town’s emphasis on transportation load-shifts. The Board anticipates that needs could be met given the locus of the project on Massachusetts Avenue and proximity to the Minuteman Bikeway. However, further commitment to exactly how the project could not only support, but foster multi-modal transportation is essential to the long-term success of this type of development in Arlington.
- Similarly, especially given the loss of trees noted above, a commitment to planting and maintaining street trees or trees in the front yard setback would improve pedestrian safety and reduce heat island effects.
- Finally, the Board reiterates that while the plans at this stage appear to meet ADA requirements, more detailed plans for sidewalks, ramps and pedestrian accommodations should be provided. This Board’s commentary is contingent on the expectation that ADA requirements are met. The Applicant may wish to confer with the Disability Commission in the near future.

Water, Sewer, and Utilities

With respect to water, sewer, and public utilities, the Board refers MassHousing and the Applicant to the detailed comments provided in the attached letter from the Department of Public Works.

Conclusion

In summary, while additional details regarding the site, building design, utilities, environmental remediation and impacts, and traffic and public safety will be discussed should this project advance to a comprehensive permit application, the project in its early stages is consistent with the goals and recommendations of the Arlington Master Plan, Housing Production Plan, Open Space and Recreation Plan, and the Mill Brook Corridor Report.

This Board will support the Zoning Board of Appeals and the Conservation Commission with whatever resources necessary to fully and fairly evaluate the proposal. We appreciate the dedication of such boards and commissions and Town staff to work with the Applicant on ways to maximize housing affordability and increased vitality of our business districts while also promoting essential environmental policies and goals.

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,

A handwritten signature in black ink, appearing to read "LD". The letters are stylized and connected, with a horizontal line above the "D".

Lenard Diggins