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February 25, 2026

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**VIA EMAIL**

Claire V. Ricker, Director  
Department of Planning and Community Development  
730 Massachusetts Avenue  
Town Hall Annex  
Arlington, MA 02476

Re: Housing Corporation of Arlington, (hereinafter referred to as "HCA")  
Docket No. 3883

Dear Director Ricker:

Pursuant to the request of the Arlington Redevelopment Board (hereinafter referred to as the "Board"), I am providing this detailed letter to respond to and address the following: (a) the definition of "business services" for purpose of the bonus provision set out in Section 5.8.4 E of the Arlington Zoning Bylaw (hereinafter referred to as the "Bylaw"); (b) the facts which support HCA's request for two driveways on this site, as required by Section 6.1.10A (2)(a) and (b) of the Bylaw; (c) the street tree requirements contained in Section 6.3 of the Bylaw; (d) HCA's request for a parking reduction, pursuant to Section 6.1.5 (c) of the Bylaw; and (e) HCA's proposed revised Transportation Demand Management Plan (hereinafter referred to as the "TDMP") in support of its parking reduction request.

- Section 5.8.4 E (1) Bonus Provision in Section 5.8 of the Arlington Zoning Bylaw

HCA, by and through counsel, submitted a memorandum dated January 30, 2026, on the definition of the term "business services", contained in Section 5.8.4 E (1) of the Bylaw. One of the issues before the Board is the definition of the term "business services" for purposes of the application of the bonus provision of Section 5.8.4.

The Bylaw does not define the term business services. However, "business services" are generally defined as services that give value to both internal and external customers and services that support a company.

The company Indeed defines business services as skilled services offered to clients such as expertise or personal labor rather than physical products.

Here, HCA intends to use the ground floor space of 840 Massachusetts Avenue to provide business services not only to their residents, who are HCA clients, but also to all Arlington

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residents. The business services include, without limitation, a homeless prevention program, social service assistance, housing assistance and financial literacy classes. A description of the services is contained in the January 30, 2026 memorandum and is not restated here.

At the ARB meeting on February 2, 2026, Chairman Lau reported that Michael Cunningham, Arlington Town Counsel, concurred that what was described by HCA in the above-referenced memorandum constituted business services under this section of the Bylaw.

- Facts in support of the approval of two driveways for the property as required by Section 6.1.10 A(2)(a) and (b).

The project, which consists of several properties, 840 and 846 Massachusetts Avenue and 17 Newman Way, is one parcel. The property is located in the R-2 and R-6 zoning districts. The total square footage of the parcel is 61,185 square feet. HCA proposes actually three driveways to service this property, which will contain forty-eight (48) parking spaces. The driveways on the property are the existing driveways located on Churchill Avenue and Newman Way. Section 6.1.10A(2)(a) references a limitation of two driveways in single-family, two-family, duplex and three-family districts in the R0, R1, R2, R3 and R4 zoning districts. Newman Way is in the R-2 district. Thirteen spaces are proposed on this side of the property. Given the configuration of the buildings proposed, the thirteen spaces cannot be serviced by one drive aisle. HCA proposes a one-way driveway on Newman Way that makes more than one intersection with Newman Way.

The driveway serving the 846 Massachusetts Avenue building exits onto Churchill Avenue and is located in an R-6 zoning district. HCA suggests that this driveway is not constrained by Section 6.1.10A and is permitted by right.

HCA respectfully suggests that given the size of the property, the location of the property, the property constraints and the aesthetics, the Board can find that the proposal for two driveways on Newman Way:

1. Avoids an undue concentration of population;
2. Allows adequate provision for transportation;
3. Allows for the safety of those using the streets and sidewalks;
4. Conserves the value of the land and buildings in the vicinity;
5. Preserves Protected Trees as defined in Town Bylaws;
6. Reduces potential conflicts with pedestrians using the respective streets and sidewalks; and
7. Further Massachusetts Avenue and Newman Way which are both two-way, are near intersections which have adequate site lines. The project does not violate any

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other driveway, parking, dimensional or density requirements for the district in which the property is located.

HCA suggests that the project with the driveways as proposed is precisely the type of situation which satisfies Article 6, Subsection 6.1.10. A(2)(a) and (b).

- Street Tree Requirement Contained in Section 6.3 of the Bylaw

On February 18, 2025, Andrew Wofford, Senior Real Estate Project Manager for HCA, along with Will Smith and Jack Beresford, landscape architects with Offshoots, met with Timothy Lecuivre, the Arlington Tree Warden, concerning questions raised relative to street tree plantings.

Mr. Lecuivre has confirmed that: (a) HCA's proposed landscape plan conforms to the Town Bylaw; (b) the recommendations of HCA's landscape architect, not to plant trees under the overhead utility wires on Newman Way, is sound; (c) street trees on Newman Way would be planted on HCA's property; (d) the trees HCA proposes on its plan for planting in the courtyard and throughout the site satisfy the requirements of Section 6.3.4. E; and (d) the proposed tree species referenced on the plans were acceptable and are a good choice for the site. Though the landscape plan as submitted has been approved by the Tree Warden, HCA's architect and landscape designer are exploring whether it is feasible and possible to plant a small tree in the front yard adjacent to the bus shelter.

The Tree Warden confirmed that HCA is not required by Section 6.1.11(D) of the Bylaw to plant trees in the existing parking lot behind 846 Massachusetts Avenue.

- Parking Reduction and Transportation Department Management Plan

Section 6.1.5 permits the Board to allow a reduction of the parking space requirements for this project if: (a) the proposed parking is deemed adequate; and (b) there is a TDMP, so-called, approved by the Board.

HCA proposes the following TDMP:

1. As detailed in the revised plans, HCA will provide two charging stations for electric bicycles and scooters.

2. This affordable community/project is serviced by the Route 77 bus, which runs from Arlington Heights down Massachusetts Avenue to Harvard Station. This bus line runs on a frequent basis seven (7) days a week. Approximately a quarter mile away is the Route 67 bus stop

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with service to Alewife Station and Turkey Hill *via* Arlington Center. Though the Route 77 bus qualifies as an acceptable TDMP measure, the Route 67 bus does not constitute an acceptable TDMP transportation route. However, HCA references it since it provides residents additional transportation options. As the ARB is aware, this affordable community/project is also accessible by the Minuteman Bike Path.

3. HCA staff will assist residents in preparing and submitting applications to the MBTA Reduced Fair Program.
4. HCA will display an MBTA transit schedule with live updates on a large screen.
5. HCA will also provide a bicycle repair station in the indoor bike parking room of Building One (proposed construction) to be constructed on Massachusetts Avenue.

HCA seeks a reduction of the required parking from eighty-eight (88) spaces to forty-eight (48) spaces or a reduction of 45%.

Further, in support of its request, HCA states that: (a) there is ample bicycle routes, including the neighboring bike path near the property; and (b) the centralized location of the property makes it a walkable location.

Further, information obtained by HCA for its other multi-site affordable communities, set forth below, substantiates the reduction requested pursuant to Section 6.1.5 C.

Address	Development	Total Units	Total Parking Spaces	Total parking Stickers Issued As of Feb 2026*	Ratio: Parking Spaces to Units	Usage Ratio: Stickers to Units	Ratio: Stickers to Parking Spaces
117 Broadway, 112-114 Lowell	Downing Square Broadway initiative	48	35 <sup>1</sup>	23	73%	48%	66%
252-260 Mass Ave	Capital Square	32	26	16	81%	50%	62%
Scattered Site Properties with Parking Lots <sup>2</sup>	Burton/Orchard/ Mass Ave & Forest Peirce*	28	22	15	79%	54%	68%
<b>Total/Average</b>		<b>108</b>	<b>83</b>	<b>54</b>	<b>77%</b>	<b>50%</b>	<b>65%</b>

<sup>1</sup> 35 is the number of HCA residential parking spaces. One space is designated for use by Arlington Eats.

<sup>2</sup> Scattered site data is as of 2024.

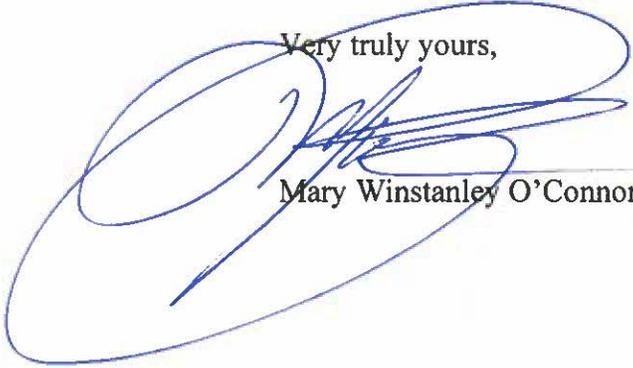
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Please let me know if you or the Board require any additional information. As always, thank you, your department and the Board for its consideration.

Kindest personal regards.

Very truly yours,



Mary Winstanley O'Connor

MWO/lm