

To: The Arlington Redevelopment Board  
Re: 259 Broadway  
Date: January 12, 2026

We are a group of neighbors on Palmer St. and Broadway in Arlington, abutters and neighbors of 259 Broadway. We write to the Board as supporters of housing growth who nevertheless think that the 259 Broadway proposal needs significant revision to bring it within the letter and spirit of the Arlington Zoning Bylaw and the MBTA Communities Act.

We note first that notice of the character of this proposal was not available until about a week before the ARB hearing date. For those of us with no experience in the local development process, the proposal came as a surprise, which has meant a real scramble to understand it and respond adequately. We are still scrambling and look forward to more opportunities for input to help improve the proposal after we have learned more.

We have a number of questions and areas of concern, but most of them center on the fit of the building for this neighborhood in terms of size (and aesthetic fit), including importantly the near-certainty that the building would add a large number of cars to the neighborhood. According to the state's Executive Office of Housing (EOHLC), a core principle of development under the MBTA Communities Act is that "The Multi-family zoning districts required by M.G.L. c. 40A, § 3A should encourage the development of Multi-family housing projects of a scale, density and aesthetic that are compatible with existing surrounding uses . . ." And, according to Arlington's own Environmental Review standard, "Proposed development shall be related harmoniously to the terrain and to the use, scale, and architecture of existing buildings in the vicinity that have functional or visual relationship to the proposed buildings." We take these to be familiar and uncontroversial principles, even when pursuing the worthwhile goal of increasing the number of housing units in the neighborhood.

Here, the proposal asks for a "bonus" fifth story and the elimination of the normal setback requirement. The fifth floor would raise the height of the building to 61 feet, approaching twice the height of any other building in the immediate vicinity, and without any setback to moderate the effect of the height. Within this somewhat daunting building (for its surroundings), there would be 14 apartments, 12 of them one-bedroom apartments. We would welcome more neighbors, and this building would not at all be the first apartment building in the area. But it would stand out for its height, its jarring aesthetics, and the number of cars it would put on our small, local streets.

A somewhat smaller building can be built that will better meet the foundational principles and written rules of zoning and development in Arlington, as well as those of the MBTA Communities Act. We ask the Board to consider seriously the following specific ways in which we believe the current proposal not only violates general principles of fit with existing uses but also, in at least one respect, violates specific zoning rules.

1. The proposal seeks a bonus floor and elimination of setback requirements on the basis of its inclusion of **commercial space on the ground floor**. But we believe that the commercial space does not reach the required threshold of 60% of the area of the ground floor. The proposal excludes from the ground-floor denominator that part of the building's footprint that the developer allocates to non-enclosed, accessory parking. But the point of the bonus is to incentivize provision of useful commercial space, space that evidently developers prefer not to provide in a

residential development. Necessarily, the rules use a somewhat arbitrary calculation to determine how much space is enough in exchange for getting a fifth floor. We should not allow developers to game that calculation by excluding any open-air facilities that they include in the ground floor. That would incentivize more parking, for example, rather than the commercial space that the bonus rules seek to encourage.

Not only that, but if developers can easily game the commercial space rule, they will have no incentive to seek a bonus floor through the alternative of increasing the proportion of affordable units in the building. For example, this developer proposes only two affordable units, the minimum, while seeking the commercial space bonus with two very small storefronts that will greatly limit the types of businesses that might move in. If they are rightly prevented from satisfying the commercial space requirement in this compromised way, then they would have to meaningfully increase the proportion of affordable units if they wanted to qualify for the bonus fifth story.

(Note that there is a wholly separate section of the Zoning Bylaw that excludes open-air space when calculating the Gross Floor Area of an entire project. But that rule serves an entirely different policy in an entirely different context. It has nothing to do with effectively incentivizing provision of commercial space in residential buildings. Nor does the bonus floor rule in the MBMH district borrow the term of art “gross floor area” but only uses its own language of “ground floor at street level.”)

**2. The building presumptively requires 14 off-street parking spaces**, but it only provides five, and plans to charge at least \$175 per month for those spaces. This prohibitive cost may inadvertently result in more daytime and overnight on-street parking. Despite the efforts to incentivize the use of bikes and public transportation, which we enthusiastically support, the reality is that most residents will need (or at least insist on) at least one car, adding a substantial number of cars to an already barely tenable situation.

A request for fewer spaces goes to the discretion of the ARB, which can and should assess the particular parking situation of the project’s locale. On the Broadway side of 259 Broadway, the building pushes up hard against the zone where parking meters begin, as a response to the growing parking congestion as you approach the center of town. Around the corner, Palmer St. is a narrow street of houses on very tight lots, many of them two-family houses, generally with single-width driveways. The stretch of curb between 259 Broadway’s driveway on Palmer and the stop sign at the corner is already a no-parking zone. Several Palmer St. residents have purchased annual overnight parking permits because their buildings lack off-street parking, so the few available on-street parking spots at the Broadway end of Palmer St. are already allocated.

During the day, it is often impossible to have two-way traffic for the length of the street, forcing passing cars to pull over and squeeze past each other. Although residents try to make space for Tuesday garbage trucks, for example, the street remains a tight-fit obstacle course for garbage trucks, delivery vehicles, and especially firetrucks. In fact, we just recently had an experience with firetrucks struggling to respond to a serious fire in the middle of the block. All of this has been exacerbated by construction vehicles’ almost constant presence on the street for years, associated with a slow-moving mid-block construction project, the two years (or so) of work on the water main that travels under Palmer St, the usual round of renovations and servicing, and now the year of construction that was started-then-stopped, and must be completed, at 259 Broadway.

Also on the subject of cars, **the Broadway at Palmer St. intersection sees several accidents per year** due to poor sight lines from Palmer onto Broadway, and if 259 Broadway is

constructed with zero setback, visibility west on Broadway will further decrease, potentially leading to a further increase in accidents.

**3. The sheer height of the proposed building will deprive some neighbors of substantial sunlight.** Certainly, the most immediate abutters and neighbors will see gardens and yards thrown into the shade for most of the day, potentially requiring substantial reconfiguration and substantial lessening of enjoyment of their properties. Moreover, at least one abutter on Broadway had already been researching and shopping for solar panels but would suddenly lack the necessary sun exposure to make that work. The same is likely true for a number of houses on Palmer St. and on Broadway, though the precise extent of the effect is unclear to us at this point. A four-story or three-story building would seem to be vastly better on these counts.

4. Finally, we note that the proposal is wholly inconsistent with **the explicit, statutory principle of the MBTA Communities Act that the multi-family housing it promotes be suitable for families with children.** We recognize that, under an interpretation by the EOHLC, that language serves as a restriction only on municipalities' zoning rules, not on developers' plans. But the spirit of the law would caution municipal authorities like the ARB to exercise their limited power to discourage projects, like this one, that are dominated by one-bedroom apartments, which are manifestly unsuitable for families with children (notwithstanding that there are many families in this world that are compelled to make the best of such housing). Were Arlington to find itself approving one project after another that was not reasonably suitable for families with children, we would be violating the spirit of the law.

For all these reasons, we hope that the proposal for 259 Broadway will not be approved as is or at its current size. We hope to be helpful collaborators in moving towards a proposal that increases the number of units that have existed on that lot for many years but creatively calibrates that increase and shapes the new building in a way that honors the legitimate needs of the neighborhood, the important policies of the Zoning Bylaw, and the legitimate desire of the developer to earn a profit that will make the project attractive to them.

Sincerely,

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