

August 24, 2025

Stow Planning Board
380 Great Rd., # 206
Stow, MA 01775

Dear Planning Board,

Thank you for compiling a list of potential alternate sites for the location of Stow's MBTA 3A district. We reviewed the reasons listed for why these sites should not be chosen and have some concerns.

Our first concern is that the current chosen site, East of the Lower Village (ELV), does not have its own table for reasons why it should not have been chosen as a site. We believe it would've been appropriate to create a similar table for ELV as well, one that lists the many reasons why it is not a good candidate to satisfy the MBTA 3A law and principles. Not having this table suggests the Planning Board in its process found absolutely no reason to choose this site when in fact some of the most common reasons listed for why other sites should not be chosen apply to the ELV district as well. There are also other reasons that can be listed in this table that uniquely apply to the ELV. In fact, we think some of these other reasons are more compelling than the reasons listed for the other sites. We provide a draft table of our own below (Table 1). Not having such a table prevents a rational discussion of tradeoffs between sites.

Also, several of the reasons listed for the various sites are not binding but suggestive. Some of the reasons listed are binding, like federal, state, and local laws for instance. But if the reasons listed are suggestive and not binding, we do not think they are obstacles to choosing the site. This is especially true considering the tradeoffs between choosing a site with little human impact versus choosing a site that creates incentives for ELV residents to sell their homes, not put down long-term roots here, and leave Stow.

Most of the reasons we list in our ELV table are self-explanatory, but we will elaborate on one in narrative form in this letter, the rural nature of the district. This was a reason listed on several alternate sites for why those sites should not be chosen. This reason is based on the Open Space and Recreation Plan (OSRP). We think it is reasonable to list this for other sites but should apply to the ELV as well. Indeed, the OSRP singles out the ELV specifically and its more general priorities apply to the ELV as well.

The ELV contains several rural views and rural landmarks. Moving from east to west, we will start with Ms. Michael's property at 19 Great Rd. Her property is on top of a hill that rolls over two acres down to a pond. Over the past decade, her four grandkids grew up frolicking and hunting for Easter eggs in this field, which has lush bushes and many old trees. Ms. Monte, whose backyard abuts this field and mentioned in our previous letter to the Planning Board dated June 2, stated that her backyard is a sanctuary for her in recovering from her PTSD acquired serving in the armed forces. Ms. Michael also emphasized in the last letter that she wanted the Planning Board to keep in mind the environmental impact an MBTA 3A district would have on the ELV. Valerie even noted to Ms. Michael how much she appreciated the beautiful fauna on Ms. Michael's property.

Ms. Michael's property sits next to a farm to its west, located at 29 Great Rd. Preserving agriculture, both land and viable farms, is a top priority in the OSRP. The agricultural soil in the

ELV is specifically mentioned in the OSRP as a site to preserve. Ms. Michael's grandchildren saw their first alpacas at this farm. When Mr. Mahmood visited and stayed with Ms. Michael before he and his family moved to Stow, to his chagrin he would be awakened by the roosters on the farm. To demonstrate the natural environment and that it transcends property lines, those chickens and roosters mosey on down to Ms. Michael's backyard for an afternoon snack—to the chagrin of her dogs! This is still the case today, even though the farm has not been as active as it has been in the past, an OSRP concern. Building on this site would further diminish the agricultural nature of Stow. This area was once known as "Assabet Heights," Stow's first subdivision where cows grazed on the property; developing here would further erode this historical legacy. In addition, there is a drumlin in the ELV.

Lastly, moving to the west of the farm and up to Red Acre Road, we have more rural land. The visible marshlands on Great Road mean future developments here would need substantial setbacks, further eroding the *true* amount of land that can be built on to satisfy the MBTA 3A. (Our table describes why the Planning Board's minimalist approach can backfire.)

We round out describing the rural ELV with Mr. Martinson's property. His property is surrounded by woodlands and his yard slopes down to a substantial wetland and pond. The pond is a vernal pool that serves as a large breeding ground for all kinds of turtles, frogs and salamanders (e.g., blue-spotted salamanders—a Massachusetts endangered species). Vernal ponds are mentioned in the OSRP, and Stow laws provide more protection for them than the state. The blue-spotted salamander is also the first species listed in the table of species needing protection in the OSRP.

The pond on Mr. Martinson's property also constitutes the headwaters of a stream that flows under 117 and eventually to the Assabet River. Further, this property is in the middle of a significant wildlife corridor which extends west from the ELV cemetery all the way to Maynard's 45.6 acre "Summer Hill Conservation Area." In fact, the entire ELV area is within this important corridor. Deer, turkeys, coyotes, bobcats and other animals frequently traverse this corridor. Allowing the kind of dense development currently proposed in the ELV would not only threaten this habitat (and ecosystem) but would also force these creatures to find more circuitous and dangerous travel routes. Most people have no idea that this large tract of rural land and animal habitat exists between Route 117 and Pompositticut Street. The town should protect it.

In addition to the types of reasons listed in the tables you provided us, and that we include below, we also added reasons describing the process. Because people are involved, several best practices and guidelines have been developed to ensure a fair and equitable planning process. Some of these have even been developed by Stow's Planning Board. We think it is important to highlight where these guidelines have been ignored during the process of choosing the ELV site without telling the residents of the ELV until the choice was made. Violations of these guidelines speaks to good governance and legitimacy in local government institutions.

Table 1: Reasons Why East of the Lower Village Should Not Have Been Chosen

Rationale against	Further elaboration
Located on a LOCAL road with existing significant traffic problems. Concern for impact on Red Acre Rd.\Pompositticut St.	We have raised this issue several times by pointing out how dangerous it already is to turn on Great Rd. from driveways in the ELV.

intersection and White Pond Rd. intersection.	We have also pointed out how dangerous it is to walk on either side of Great Rd. And how dangerous it is to cross the street to get our mail. There should be serious concerns about locating a development here for traffic concerns. When we raised this concern, we were told that a traffic study would have to be done after the site was chosen, but it is also a concern for six of the alternate sites, without any traffic studies.
Several OSRP preservation preferences are in the ELV, such as: • Scenic views • Agricultural heritage • Agricultural soils • Viable farming • Vernal pools • Endangered species • A drumlin	Also note the narrative account above of the rural and environmental nature of this location listed above, which the OSRP acknowledges.
The State will frown upon minimalism.	The Planning Board is keen on meeting the minimal requirements to satisfy the MBTA 3A Law. The rationale is that the Planning Board wants to minimize growth since there are other residential developments in the works, and hence they want to take an "incremental" approach to development with the 3A Law. The assumption is that by allowing residents to sell at their will, changes in this zone will be slow and gradual. We think it is likely that the State in its next phase will look to see how much development is occurring in 3A zones. Much is riding on this law, and it is controversial. The State will want to show that it is successful and has had a positive impact. There will most likely be incentives tied to actual compliance, and not minimalism.

	Further, an incremental and gradual approach will not lead to the perceived economic benefits in the ELV 3A Zone as imagined, or will, but only incrementally and gradually.
Town of Stow Planning Board Community Engagement Guidelines and Resources were not followed, specifically: • The 2nd Step of the 5-Step Community Engagement was not followed: Identify and define a list of stakeholders • Authentically representing all voices in the community; • Ensuring voices that have historically been left out of community decision making are not only included, but able to feel empowered to participate in the visioning, planning, and monitoring of the work in an authentic way; • Building trust across communities;	Residents of the ELV were notified of the decision that their residences would be included in the new MBTA 3A Zone <i>after</i> the decision was made. The process started long before that and did include engagement with <i>some</i> Stow residents— but none of the most impacted who live in the impacted district. When the final list of three districts was chosen, the Planning Board could have reached out to the residents of those districts. This would seem to violate a very basic principle and best practice in urban planning: including relevant stakeholders in the decision-making process.
The Planning Board's mission is to "preserve and enhance the integrity of Stow's character through the use of these regulatory tools [such as land regulation], while safeguarding property owners' rights."	The basic mission of the Planning Board is challenged when sites are chosen with existing residents where there is much more land available for development.
Not living up to the MetroCommon 2050 by MAPC, such as: • Partnerships with relevant stakeholders • Utilizing data-driven and evidence-based decision-making processes • Lack of dynamic and representative government	We have spoken to the first and third bullet here already. Not considering factors why the ELV should not be chosen is not using all the data that is available and amounts to a process that was predetermined.

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