



COMMONWEALTH OF MASSACHUSETTS

TOWN OF MILTON  
PLANNING BOARD

June 10, 2013

Gregory P. Watson, Manager  
Comprehensive Permit Programs  
Massachusetts Housing Finance Agency  
One Beacon St.  
Boston, MA 02108

Re: Application for Project Eligibility  
Proposed Residential Development  
1259, 1375 & 1383 Brush Hill Road – Milton, MA  
Milton Mews Venture LLC, Applicant

Dear Mr. Watson:

The Planning Board of Milton is the Site Plan Approval authority pursuant to Section VIII.D of the Zoning Bylaw. It has looked at the Milton Mews proposal from its perspective as the site plan approval authority. Pursuant to 760 CMR 56.04(3) the Milton Planning Board submits the following comments and concludes that Mass Housing should not approve the above-referenced application for project eligibility at this time.

(1) The Environmental Consequences of the Project. The Conservation Commission hasn't been able to weigh in fully because of unresolved issues on which it must make future determinations. The Conservation Commission's determinations on these environmental issues will have a direct bearing on the issue whether the environmental effect of the project is sufficiently negative to warrant disapproval of the application. However, there are a number of obvious environmental issues which warrant a finding that it will have such an effect.

The site is part of an Area of Critical Environmental Concern. It is largely comprised of old-growth forest. It necessarily is the habitat of numerous species and provides the first line of upland as one emerges from the Fowl Meadow wetland. Snapping and Blanding's turtles and other wetland dwellers seek such upland when they spawn. This contiguous upland is a vital part of the Fowl Meadow and necessary for it to remain a dynamic wetland system. When she designated the ACEC in 1992, Secretary Tierney made particular mention of the importance the Northern area of the ACEC. This area includes both wetlands and contiguous upland.

There is a stream cutting through the project site. The stream originates on Blue Hill. There are also numerous springs feeding an underground watershed from the Blue Hill to the Fowl Meadow. The stream and underground watershed provide significant amounts of clean water helping keep the Fowl Meadow healthy and alive.

The developer proposes to clear cut the old-growth forest and to bulldoze a new landscape to provide buildings with 276 apartments and wide areas of roadway and parking. These buildings and hardscape would be situated as close to the wetlands as possible and would destroy the natural upland zone bordering these wetlands and would disrupt the water flow to the Fowl Meadow. The adverse environmental consequences of such destruction within the ACEC would be significant.

(2) Traffic. Numerous problems have been identified by existing traffic studies (such as the three studies identified in the letter from the Board of Selectmen to you). Brush Hill Road (from which the proposed project draws access) was built as a country lane without sidewalks. It is a designated scenic road (G.L.c.40 sec.15C). In recent years it has been modestly improved. Unfortunately, it has become a heavily used cut-through for commuter traffic from Readville to Route 138 and thence to Route 128 (I-93). Route 138 is also the principal commuter route from Mattapan to Route 128, and as a consequence traffic during rush hours is often at a near standstill on Route 138 and backed up on Brush Hill Road. In the other direction on Brush Hill Road is its intersection with Neponset Valley Parkway (a DCR roadway). This intersection has been studied and restudied and identified as substandard, but changes have not been made.

A comprehensive traffic study will be needed to identify possible engineering solutions to the various traffic issues. However, there is enough known information to conclude that there currently is not enough roadway for the traffic which uses it. The project would add significant traffic at the most congested times and would cause unacceptable traffic consequences. It seems very doubtful that these traffic issues, involving state, DCR and local roads can be remediated by the developer, but without remediation the project would simply add significant traffic to an already unacceptable situation.

Fuller Village, which is across the street from the proposed development, is largely a self-contained community. Most residents are retired, and many need not leave except for outside medical appointments and the like. Fuller Village's traffic generation at rush hours is very low. The residents of Milton Mews appear likely to travel at rush hour periods, and their overall traffic generation is likely to be significantly higher.

With respect to traffic and the safety of pedestrians and bicyclists, it would be worthwhile to point out that, even if sidewalks and bike paths were proposed as part of the project, in the winter plowed snow would render them unusable. As it is, without sidewalks, very few people walk Brush Hill Road. In the winter with snow piled high on both sides of the road, to walk the roadway would be foolhardy.

The Selectmen have pointed out that there are already "immense demands" on the police and fire departments. Perhaps increased staffing would be advisable, but unless the project's increased tax revenues would exceed the cost of town services necessitated by the development, increased staffing seems unlikely since the Town is already at its levy limit. A

municipal fiscal impact study will be necessary to determine the likely fiscal consequences of the project on the Town's finances.

The Milton Fire Department currently has three active engines and a ladder truck. The police station and central fire station with the ladder truck are miles away from the site of the proposed development. The single engine company at the Atherton Street station is closest to the site but already is the busiest company in Town, handling calls from Curry College and Fuller Village. The needs of a 276-unit apartment complex with numerous 4 and 5 story buildings on a 1,750 driveway would cause fire protection services in the area to become very stretched and possibly inadequate.

(3) Wetlands. The project currently has a 25 foot zone of nondisturbance on the borders of wetlands. 25 feet is not a sufficient buffer and building right to the edge of the 25-foot buffer will inevitably result in degradation of the wetlands. In the proposal large buildings and parking areas are sited to be as close to the wetlands as possible. With 500 or so residents engaging in outside activities the adjacent wetlands are sure to be degraded. In addition runoff from the roadways and parking lots, containing salt and possibly oil, is inevitable. Fertilizer runoff from green areas is also likely.

The Fowl Meadow is the area's principal wetland. It is more than a "local wetland" and has been designated as part of a National Environmental Study Area. Canton draws much of its drinking water from the large Fowl Meadow aquifer. In the 60s the construction of Interstate 95 was stopped at Route 128 in no small part due to the major environmental damage its construction would have caused to the Fowl Meadow. Since that time state agencies have been solicitous in not taking measures which would adversely affect this natural resource. The proposed project would have a significant adverse effect. It is much too close to the wetland. It covers too much land with impervious surfaces. See the comment above regarding the environmental importance of having natural upland contiguous to this wetland.

(4) Topography. With respect to topography, the proposed clear-cutting should not occur. Many significant trees should be preserved and the natural topography should be preserved insofar as possible. The development should be designed to respect and take advantage of the topography and natural features, and any topography changes should be carefully considered. Major bulldozing simply to enable easy development should be avoided.

(5) Archeology. Reasonably possible archeological issues are another reason why clear-cutting and bulldozing are not acceptable. There is a reasonable likelihood (determined from the fact that there are nearby significant archeological dig sites) that the project site contains items of archeological importance. In view of this likelihood, the developer needs to perform due diligence in showing that there are not likely to be any significant archeological consequences.

(6) Design. The project does not appear to have been designed for its site. The design is unacceptable. The project is too big and much too close to the wetlands. The typology of the

proposed buildings is not consistent with other buildings in the area. Except for Fuller Village, the surrounding buildings are single-family homes.

The proposed project has too many apartments squeezed into a limited area. Because space is so limited, inappropriate 4 and 5 story buildings are proposed. The most recent apartment development anywhere near the area is Blue Hill Commons at the corner of Royall Street and Route 138 in Canton - the buildings at Blue Hill Commons are 3 stories as are the buildings across Brush Hill Road at Fuller Village. Three stories should be the maximum for this area. The visual appearance of 4 and 5 story buildings would degrade views from the Fowl Meadow and neighboring properties. The extra stories would discourage walk-ups and create an inappropriate urban context for what should be just the opposite. In addition, the long distance to the central fire station (and the Town's sole ladder truck) and the long private driveway definitely contraindicate use of tall buildings.

The quantity and position of the wetlands in relation to the proposed buildings do not allow for adequate parking or usable open space for the residents. There is very little interior green space to provide amenity or recreational opportunity. There are no recreational facilities appropriate for children. There is an obvious need for a children's playground. Although applicant has proposed a "clubhouse", it would be a 6000 square foot commercial building barely set back from Brush Hill Road. Such a commercial building in a residential area could not be authorized by a comprehensive permit without local support. The developer has not shown any local support for this commercial use, and it is clear to the Planning Board that there is none.

This would not be a pedestrian friendly development. Residents will be forced to use cars to get to work, go shopping, and seek entertainment or recreation. All households will own at least one car, and most will own two. Adequate parking is a necessity, but it is not provided in the current plan.

The application suggests that the project should be considered a "transit oriented development" due to the presence of a commuter rail station in Readville (Hyde Park). While the straight-line distance from the site of the proposed project to Readville station may be about a mile, the actual distance to be walked would be about a mile and a half (the distance from Readville Station to the Hemenway Drive/Brush Hill Road intersection is 1.2 miles and the length of the proposed driveway is an additional 1/3 mile). It can be reasonably anticipated that few residents will take this long walk to commuter rail on a regular basis.

A transit-oriented development usually requires housing, commercial space, services and job opportunities to be in close proximity to public transportation. While "close proximity" is a somewhat flexible concept, a distance of more than 1/2 mile usually does not qualify as "close." Here the housing not only is far separated from any commercial space, services and job opportunities but also the distance to public transportation is too far. Foot traffic would be perilous because of the absence of sidewalks on Brush Hill Road. There are no safe pedestrian

or bicycle routes. In no way can the proposed project be considered a "transit oriented development."

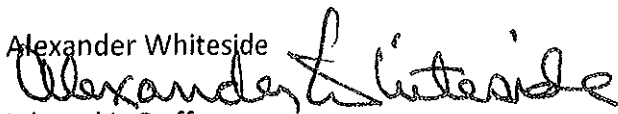
Since parking for the residents, service providers and guests must of necessity be provided on site (there is no off-site parking), adequate parking must be provided. Without adequate parking fire lanes will be blocked and the few green areas compromised by parked vehicles. The parking proposed (1.6 spaces per unit) is extremely inadequate. At a minimum there should be one parking space per bedroom in the development. Such a number of spaces would be minimally adequate to accommodate residents, service providers and guests.

The parking currently proposed would not be adequate even under good conditions. However, when it snows, numerous spaces would be lost to piles of plowed snow. The proposed plan makes no provision for plowed snow. It has to be piled up somewhere, and the snow can't be deposited in wetland areas. Unless it were to be trucked away, areas of the parking lots would need to be used for snow storage. The more snow, the fewer available parking spaces. This would not be an acceptable result.

For the foregoing reasons and the reasons expressed in the Selectmen's letter and the residents' letter, the Milton Planning Board concludes that Mass Housing should determine that the project is not eligible at this time.

Respectfully submitted:

Alexander Whiteside



Edward L. Duffy

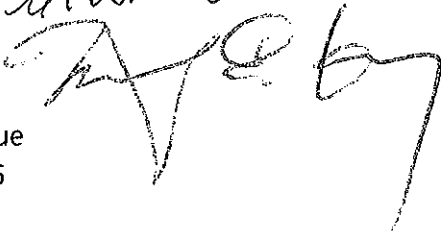


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