April 15, 2020

Michael Busby
Relationship Manager
MassHousing
One Beacon Street
Boston, MA 02108

Reference: 582 Blue Hill Avenue LLC
Comprehensive Permit Site Approval Application

Dear Mr. Busby:

The Milton Select Board appreciates the opportunity to comment on the Project Eligibility/Site Approval application for a proposed 120-unit apartment development at 582 Blue Hill Avenue. Since receiving notice of this and two other Site Approval applications in February, we have asked our Town boards, commissions, and staff to assist us by reviewing each project and providing advice. We also informed the public, as is customary in Milton, and received input from residents at Select Board meetings on February 26 and March 11, 2020 and through written testimony. Our letter incorporates and consolidates relevant comments provided by all of these contributors.

As a general comment, we have grave concerns about the proposed development, especially considering that the same proponent seeks to build another high-density project so close by, affecting many of the same neighborhoods. We urge MassHousing to work with us to reconceive this and other proposed Chapter 40B projects before you issue a Project Eligibility Letter (PEL) so these developments can address both the region’s need for affordable housing and legitimate concerns of the Town. The Milton Board of Appeals should not be forced to entertain a comprehensive permit application for a project as fundamentally flawed as this one. There is no way to assert, credibly, that the plans proposed by 582 Blue Hill Avenue LLC are appropriate for the site and the surrounding area. Our reasoning is explained below.

Suitability for Residential Development
760 CMR 56.04(4)(b): that the site of the proposed Project is generally appropriate for residential development, taking into consideration information provided by the municipality or other parties regarding municipal actions previously taken to meet affordable housing needs, such as inclusionary zoning, multifamily districts adopted under M.G.L. c. 40A, and overlay districts adopted under M.G.L. c. 40R (such finding, with supporting reasoning, to be set forth in reasonable detail) ...
The property is appropriate for residential development because it is zoned for residential use. However, it is not an appropriate location for the proposed density or scale of this development. The density far exceeds what is allowed under Milton’s zoning (one unit per 40,000 sq. ft.) or what should be allowed in a maturely developed single-family neighborhood. The Applicant’s original and proposed buildings are massive, bulky, tall structures with no precedents in Milton. The project would irrevocably alter the character of the neighborhood without a corresponding affordable housing benefit. The problem is not the proposed multifamily use per se. It is the adverse impact that such a large, out-of-character building will impose on the neighborhood and the historic features of the site that warrant preservation.

The Milton Historical Commission has advised us that 582 Blue Hill Avenue contains a signature residence designed by Bigelow and Wadsworth, a prominent Boston architectural firm. Henry Bigelow was a Milton resident who designed several prominent Milton homes. The landscape and gardens on the site were designed in 1925 by Ellen Biddle Shipman, one of the most important landscape architects of the early twentieth century and who has been called the Dean of American Women Landscape Architects. Shipman's archives at Cornell University include the original designs for these gardens.

No one questions that Milton needs affordable housing. Our Subsidized Housing Inventory (SHI) falls well below the 10 percent statutory minimum, and a housing crisis exists throughout the Boston Metro Area. We ask MassHousing to consider Milton’s successful efforts to date and find that while the site may be appropriate, the proposed project needs to go back to the drawing board. In our comments on the proposed “Icehouse” development at 485-487 Blue Hills Parkway, we cited numerous actions the Town has taken to increase our Subsidized Housing Inventory. To reiterate and make part of your review record for 582 Blue Hill Avenue, the Town of Milton has taken the following steps:

- Creation of the Milton Affordable Housing Trust;
- Adoption of a Master Plan that contains numerous recommendations to increase the supply of affordable housing – recommendations the Town has implemented and continues to implement;
- Adoption of a Housing Production Plan that has been approved by the Department of Housing and Community Development;
- The Planning Board’s proposed overlay district for Milton Village with incentives for affordable housing, scheduled for adoption at the May 2020 Town Meeting, building on the success Milton has enjoyed with affordable housing in other overlay districts adopted in the past five years;
- The adoption of several zoning amendments that have created affordable units eligible for the SHI:
  - The Central Avenue Planned Unit Development (PUD) District has facilitated two mixed-income developments with a combined total six affordable units;
  - An updated Cluster Bylaw that has produced two affordable units in the Milton Woods cluster;
  - The Planned Unit Town House Development bylaw, which required Woodmere at Brush Hill to provide four SHI units; and
The Great Estate PUD bylaw, which requires six affordable units in the Wolcott Woods Development (under construction).
- The Select Board’s ongoing work with the proponent of the “Icehouse” project 485-487 Blue Hills Parkway to revise his development so that it meets both affordable housing needs and the neighborhood’s needs for amenities and services; and
- The Planning Board’s hiring of a consultant to assist the Town and the residents of East Milton to design an appropriate mixed-use, mixed income overlay district for East Milton Village.

We would be pleased to work with Mr. Tamposi, just as we have continued to work with the proponent of the “Icehouse” project, to arrive at a better plan that meets his needs and the Town’s. As our Affordable Housing Trust has noted in comments we received, Milton’s recently approved Housing Production Plan supports the concept of converting large homes and developing “pocket neighborhoods” in order to create housing “in keeping with the goals and values of the Housing Production Plan, the Master Plan, and the context of each neighborhood.” The property at 582 Blue Hill Avenue is an ideal opportunity to “add affordable housing almost seamlessly into the existing neighborhood context …[the building] is spacious enough for the creation of several units within the current structure and additional appropriately scaled buildings that will reduce the need for clear-cutting and major altering of topography.” This is the kind of outcome we seek. It may not be as lucrative as the project Mr. Tamposi and his Chapter 40B consultant have in mind, but we are confident that everyone’s interests can be met with cooperative planning and realistic expectations.

Appropriateness of Conceptual Design

760 CMR 56.04(4)(c): that the conceptual project design is generally appropriate for the site on which it is located, taking into consideration factors that may include proposed use, conceptual site plan and building massing, topography, environmental resources, and integration into existing development patterns (such finding, with supporting reasoning, to be set forth in reasonable detail) ...

Neither the proposed development the Town was asked to review on February 13, 2020 nor the revision the Applicant sent on March 26, 2020 is appropriate given the considerations in 760 CMR 56.04(4)(c). Moreover, the Applicant’s plans for the site do not respond to MassHousing’s Chapter 40B Design Guidelines.

The project we were asked to review from 582 Blue Hill Avenue LLC involves construction of 120 apartments on a 3.99-acre parcel in the Residence A District. Surrounding land uses include single-family dwellings on Meetinghouse Lane and a small K-8 private school, Delphi Academy. The site is challenging because it slopes greatly from front to back. While the application describes the proposed building as 48 feet tall, in fact it will nearly 100 feet tall, including the proposed retaining walls of over 30 feet high. To construct this building, including a garage covering nearly 1 ½ acres, and regrade the site as necessary to accommodate the development, the four-acre site will have to be substantially cleared.

Knowing that the proposed height, size, and footprint of the proposed building were inappropriate for the site, the Applicant sent us a revised plan on March 26, 2020, for a building
with a modified wing design, a modest height reduction on the building wings facing Meetinghouse Lane, and the elimination of two apartments. MassHousing has not given our Town enough time for a thorough review the proponent’s revised plans. At a time when local government operations have been severely constrained by the COVID-19 pandemic, MassHousing chose to require us to review and comment on an eleventh-hour resubmission from the Applicant with no extension of time. That is plainly inappropriate.

We have done our best to review the revised plans. It seems clear to us that the Applicant’s revisions are little more than a cynical nod to the concerns of the Town and surrounding neighborhood. The project is too massive for the site and it falls far short of being integrated with existing development patterns in the neighborhood. There is no comparable project of this size in Milton outside of our business districts, and the project dwarfs even the buildings found in those locations. The Applicant cites Winter Valley, an age-restricted development located nearby, as a comparable project, yet Winter Valley is a 160-unit rental development with six low-rise buildings on 21 acres. The Applicant also cites Fuller Village as a “comparable” development, but Fuller Village is two age-restricted projects on a combined total of 60 acres with a mix of building types set back from abutting homes.

In his Site Approval application, the Applicant claims that the design is “harmonious, appropriately scaled, and nuanced façade design in keeping with surrounding architectural fabric.” However, the Milton Planning Board provided the Select Board with a design analysis of the project so that we and others could understand the true impact of the applicant’s plans on the neighborhood. The design analysis is attached to this letter as Exhibit 1. As the Planning Board’s massing study demonstrates, the design is not harmonious with anything in the neighborhood or with anything else in the Town of Milton. The revised design makes a disingenuous attempt to address the impact of the Project by moving the building back a bit, but there will still be a massive retaining wall, the lights and noise attendant to a garage entrance, and a four-story building above the garage looming over the modest neighborhood on Meetinghouse Lane.

If MassHousing required a similar massing study from developers seeking Site Approval, you would have much better information to judge the appropriateness of a project’s conceptual design. The Planning Board’s work documents how woefully out-of-character the proposed project is in terms of the existing development patterns in the neighborhood.

**Application Errors**

Town boards and staff have identified numerous errors in the Site Approval Application. They are listed below.

- The application states that the Project is located on one of the Town’s “rare oversized lots.” We note that 3.99 acres is not over-sized. Those lot dimensions are not rare in Milton and not in this neighborhood.

- The application states that the Project is “walkable” to one of the amenities listed on MassHousing’s form: a school, which happens to be Delphi Academy. To be clear, Delphi Academy is a private K-8 school. The site is not “walkable” to any public school, any public amenity, any services, or any retail establishments.
• The application states that the Project is reusing existing sites, structures and infrastructure. In fact, the site will be cleared. The Applicant plans to demolish and destroy the historic gardens. There is virtually no useable open space on the site.

• The application states that there are no easements that impact the Project. However, there is an existing sewer line easement to Meetinghouse Lane and shared drains connecting to Delphi Academy.

• The application claims that the proposed project will “concentrate development and mix uses.” However, the Applicant proposes to tear down the existing building and destroy the historic gardens. Most of the site will be covered by a massive building, driveways, and parking lots with limited open space for residents.

Other Concerns
Several of the comments we received are more appropriate to address in the permitting process if this development ever reaches that point. Still, we want to call your attention to concerns that should be considered under the Project Eligibility criteria in 760 CMR 56.00 et seq., MassHousing’s Chapter 40B Design Guidelines, or the Commonwealth’s Sustainable Development Principles.

• Blue Hill Avenue is a pedestrian nightmare. There are no sidewalks on this heavily traveled roadway, which makes the site a very poor location for a school bus stop.

• Residents of the surrounding neighborhoods and Town staff have all raised significant concerns about the capacity of Blue Hill Avenue to accommodate traffic generated by the proposed development, and in particular, the potential for traffic conflicts with residential uses in the existing neighborhoods. We realize that if this project goes forward, the Applicant will be required to provide a Traffic Impact Assessment (TIA) for the Board of Appeals and that the Board may retain peer review services to review the TIA at the Applicant’s expense. However, MassHousing should review the site carefully for public safety hazards that cannot be solved with mitigation.

• There are no public transportation options for residents of this development because the site lies too far from bus and transit lines. There are no services nearby, so the residents will have to rely on vehicle trips to meet their needs for goods and services.

• The proposed development does not “promote clean energy” or use sustainable resources. The Applicant makes no attempt to describe any effort at energy conservation, clean power or to reduce gas emissions and consumption of fossil fuels. The only mention of anything relating to sustainability in the Site Approval Application is that the Applicant will install Energy Star appliances.

• The plans indicate a six-inch water connection to a six-inch main on the near side of Blue Hill Avenue. However, the service should be connected to the 12-inch main on the far side of Blue Hill Avenue. This needs to be corrected before the proponent applies to the Board of
Appeals and should be required by MassHousing as a condition of approval, if you decide to issue a PEL.

If you have any questions or need additional information from the Select Board, please don’t hesitate to contact our Town Administrator, Michael Dennehy, at (617) 898-4800.

Sincerely,

Michael F. Zullas, Chair

Melinda A. Collins, Vice Chair

Anthony J. Farrington, Secretary

Kathleen M. Conlon

Richard G. Wells, Jr.
Properties 1, 3, and 4 are located in the Business zoning district within mixed-use overlay districts.

Property 2 is located in a RC single family zoning district, though it has been multi-family residential use since 1964.

All properties are within close proximity to the Mattapan trolley, Neponset Trail, waterfront, parks, supermarket, pharmacies, restaurants, hair salons, coffee shops, dry cleaners, and more.
### Existing Multi-Family Compared to 40B Proposals

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<th>Units/Acre</th>
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*Mixed-Use PUD
MULTI-FAMILY COMPARED TO 40B PROPOSALS

582 Blue Hill Avenue
RA zoning district
3.99 acres
150,300 sf
120 units
5 stories + retaining walls
180 parking spaces

88 Wharf Street
Business + mixed-use overlay district
2.72 acres
164,760 sf
73 units + commercial
6 stories
133 parking spaces
582 BLUE HILL AVENUE 40B PROPOSAL