

From: [Eric Lund](#)
To: [Karen Edwards](#); [Michael Behrendt](#)
Subject: Comment on 19-21 Mill Road application
Date: Thursday, February 17, 2022 5:21:58 PM

Dear members of the Planning Board:

I have reviewed the most recent plan set for the proposed parking facility behind 19-21 Mill Road, and in my opinion, the latest iteration of this project still fails to meet several of the conditional use criteria, as follows:

1. Site suitability. The present site condition includes a steep slope, an environmental constraint specifically called out in item c of this criterion. The plans call for a large quantity of fill in an attempt to mitigate the constraint, but the quantity of fill required is so large that it likely violates the town's site plan regulations regarding excessive amounts of fill.
2. External impacts. Although there is a parking lot behind the adjacent Community Church property, the Community Church parking lot is at a significantly lower elevation, being approximately level with the rear entrance to the Community Church, which is about 1.5 floors below the level of Main Street. The proposed parking lot would begin at an elevation similar to the level of Main Street, and include lighting poles that would extend 16 feet above the parking surface. The location of the proposed lot is also much closer to abutting properties along Chesley Drive and Smith Park Lane, and significantly closer to other locations in the Faculty neighborhood. Therefore, the proposed use would have substantially greater impacts in terms of noise, dust (from salt or sand used to treat the parking surface in winter) and exterior lighting and glare on these properties than the Community Church parking lot does. In addition, because of the slope of the lot and the requirement in the Church Hill district that parking be located behind buildings, any parking associated with building(s) whose construction would be allowed by right would be at the level of the rear entrance (as is the case with the Community Church), which would be at a substantially lower elevation than the proposed parking lot, and the impact of projected noise and glare on the neighborhood would therefore likely be significantly less than the proposed parking facility.
3. Character of the site development. The proposed development consists entirely of off-street parking, and the ordinance includes screening of such parking in its non-exhaustive list of design issues that must be considered to ensure that external impacts are adequately mitigated. The current design includes a guard rail along the south side of the parking lot, which does not fully block the glare of headlights pointed toward the Faculty neighborhood. The plans also call for the construction of a fence along the east side of the parking lot, in order to mitigate impacts on abutters. This project cannot comply with the plain language of this criterion if this fence is not constructed.
4. Character of the buildings and structures. The southern end of the parking lot would be supported by a slope with a height of up to 18 feet. The result would be something comparable to a freeway bridge abutment, which is clearly out of scale for the neighborhood.
5. Preservation of natural, cultural, historic, and scenic resources. Construction of this parking lot would destroy approximately half of an urban forest, the other half of which would be destroyed if the pending Mill Road Plaza project is approved and constructed. Urban forests are a critical component for carbon sequestration and reducing heat island effects, both of which will become increasingly important with the changing climate. For an overview of these issues see the article by Peterson et al. in the June 2021 issue of EOS (<https://eos.org/wp-content/uploads/2021/05/JUN21.pdf>, beginning on page 20).
6. Impact on property values. A reasonable person would expect the replacement of an urban forest with a parking lot to reduce the values of adjacent single-family homes on Chesley Drive and Smith Park Lane. The ordinance places the burden of proof on the applicants to demonstrate that their proposed project will not cause or contribute to a decline in the property values of these adjacent properties, and to date the applicants have shown no such evidence.

For these reasons, the proposal does not satisfy the criteria for conditional use, and therefore the Planning Board should reject the application.

Eric Lund
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