



## United States Department of the Interior

NATIONAL PARK SERVICE  
Cuyahoga Valley National Park  
15610 Vaughn Road  
Brecksville, Ohio 44141-3097

IN REPLY REFER TO:

N16

February 23, 2006

Mr. John Codrea  
Chair, Planning Commission  
Village of Boston Heights  
454 E. Boston Mills Road  
Boston Heights, Ohio 44236

Dear Mr. Codrea,

The National Park Service has reviewed the latest proposal and proposed zoning revisions for the proposed development of the Boston Hills Country Club property at Hines Hill Road and SR 8. As we have indicated in earlier communications, this area would ideally be preserved in an undeveloped state through the local designation of a park or the donation of a conservation easement. Should the site be developed, recall that we recommended that a conservation development approach be considered to protect significant open space, minimize stormwater impacts, and protect riparian and wetland resources.

The final plans and Planned Development Area (PDA) zoning code revisions submitted by Boston Hills Property Investment LLC for this property would be detrimental to the watershed and Cuyahoga Valley National Park. While they have improved upon their initial submissions, they still have failed to develop a good conservation development proposal for the site.

Their current proposal and zoning revisions fail to protect enough open space and includes densities that are out of line with typical Conservation Development recommendations. Their golf course proposal has 30% open space and would triple your current zoning density for the lot. Their PDA zoning revisions include only a 20% open space requirement and permits densities that can approach 10 times that of current zoning (e.g. 35% town homes, 65% cluster homes at proposed densities =615 units on 100 acres, as opposed to 66 units under current zoning). This PDA could be applied elsewhere in your community so must be reviewed in that context.

A good conservation development zoning revision would provide for a 40-50% open space requirement and include significant details on what constitutes open space. The code usually excludes certain low grade areas from the open space calculation (e.g., rights-of ways, narrow buffer strips, steep slopes) and sets up specific requirements for how open space is to be allocated on the landscape (e.g., large contiguous blocks). The proposed zoning revision contains none of this detail and would allow for insufficient and low quality open space, defeating the purpose of the requirement.

Additionally, conservation development aims to be density neutral. The same number of units as currently zoned would be consolidated onto a smaller portion of the total development area, resulting in smaller lots, but the same number of units. However, some communities provide a small (10-25%) density bonus for these developments.

Some communities around the National Park have incorporated good conservation zoning solutions into their zoning codes. I have enclosed a summary table of zoning for the 15 communities surrounding the National Park to illustrate this point.

Eight of the fifteen communities offer some type of conservation development options in their zoning codes. Open space requirements for rural residential and conservation districts that are near the national park are typically 40-50%. Only some higher density residential zones (R2, R3) and two communities (Brecksville and Bedford) provide for less open space in their codes. Note that only two of the eight communities provide density bonuses, and they are only 10-25% bonuses.

We encourage you to follow the models of good conservation development and not permit less than 40% open space in any conservation zoning overlay, and be careful about granting significant density bonuses. Both the specific proposal for the golf course property and the proposed PDA zoning revisions significantly miss the mark for good conservation development. We urge the Planning Commission to reject these proposals.

Additionally, I would like to offer my support of your community's interest in adopting a Riparian and Wetland Setback Ordinance following the model ordinance of Summit County. This is a major step forward in protecting our common water resources.

Thank you for the opportunity to comment on the proposal, and your consideration of enclosed materials. If you have any questions or need additional information, please contact Ecologist Kevin Skerl at (330) 650-5071 ext 4.

Sincerely,

John P. Debo Jr.  
Superintendent

Enclosures