



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

September 6, 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, we recommend that a conservation development approach be considered to protect significant open space, minimize imperviousness and stormwater impacts, and protect riparian and wetland resources. We provided you with a list of local projects and communities that have adopted such zoning standards.

We would like to commend the community for adopting a riparian and wetland set-back ordinance modeled after the Summit County ordinance. This conservation tool will benefit not only the residents of Boston Heights but all downstream communities and the Park. We appreciate this type of responsible watershed stewardship.

The plans and Planned Development Area (PDA) zoning code revisions submitted by Sam Petros/Boston Hills Property Investment LLC for this property would be detrimental to the watershed and Cuyahoga Valley National Park.

First, commercial development typically includes a much larger amount of impervious surfaces than any type of single-home residential development, due to the presence of large structures and parking areas. Such developed areas have great potential to contribute to the degradation of watershed health, especially the "big-box" type of development proposed. A change to commercial zoning as requested would likely result in imperviousness levels, as 1.5 acre residential lots are typically 10% impervious, while commercial development is 85% impervious or higher. Furthermore, continued development of this type homogenizes communities and detracts from the rural character that your community and the park value, with interrupted landscapes and additional traffic. We would encourage you to reject commercial development on the parcel.

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 specific proposal calls for 32% open space, and their PDA zoning revisions include only a 20% open space requirement. 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 zoning revision contains none of this detail and would allow for insufficient and low quality open space, defeating the purpose of the requirement.

Additionally, the development should be configured so that all lots have direct access to the common open space. Neither proposed layout (large lot or small lot) provides for equal access to the open space they propose. Instead, we see residential layouts that include many lots on the western portion being screened from direct access to the open space by other housing and great distance.

Lastly, 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. Even when assuming all open space is associated with the residential development (and not the commercial acreage), 100 units on 106 acres is approximately 30% greater than existing zoning (which would allow at most 71 units). Such a density bonus is greater than that given by other local communities that allow for conservation development. The design of this portion of the development approaches, but still misses some of the goals for conservation development.

We encourage you to follow the models of good conservation development and not permit less than 40% open space in any conservation zoning overlay, reject the typical “big box” commercial elements, 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.

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

Enclosure