

October 14, 2021

Town of Milton Planning Board, with individual hard and e-mail copies to:

Denise Swenson, Chair

Richard Boehler, Secretary

Meredith Hall

Kathleen M.O'Donnell

Cheryl Tougas

Staff Contacts: Julia Getman, Allyson Quinn, and Tim Czerwienski

Town Office Building

525 Canton Avenue

Milton, MA 02186

Dear Members of the Milton Planning Board and Planning Board Staff,

We, the undersigned neighbors, continue to have concerns about the proposed site of the Goddard School at 193 Central Avenue. Please accept this as our collective response and appeal to you.

While some changes were made from the July 23, 2020 application, the overriding concern about the size and presence of the school in this residential neighborhood were not addressed. Therefore we appeal to you to insist that the Verma Holdings scale back the size of the building and the capacity of the enrollment.

Here's why:

1. **Impact on residential feel.** Simply, the building and the commercial nature of the business does not fit in. Having the former Hoosic building reconstituted kept the unobtrusive look and feel of the neighborhood. There was little neighborhood opposition. This time, Goddard has chosen to expand the building, the parking (and the parking location), the play areas and the orientation on Central Avenue. This is not what the neighbors agreed to.

The use, which is an “allowed use” in any zoning district, the building capacity, the number of students and the type of program were all satisfactorily addressed in the approved site plan application last year and none of these have changed in this plan.

The new building has a slightly larger footprint, but a smaller gross square footage of actual classroom and administrative space, than the old building. With a new building, it was possible to design the ground floor space more efficiently and eliminate any basement classroom space, which is undesired for young children.

The amount of onsite parking is larger by just one space.

The play areas to the rear are smaller than those in last year’s plan. By breaking up the two large play areas into four smaller spaces, two in the back and two on one side, the impact to the neighbors is further reduced. All play areas are monitored by staff and

activities planned so as not to be noisy.

The orientation of the building had to be changed in order to meet building setbacks and parking setbacks for a new building.

2. **Traffic.** There is no doubt that there will be an impact on the already building and dangerous traffic flow on Central Avenue. This presents multiple concerns from safety of pedestrians and bikers, to increased wait times for commuters at either end of Central, heightened noise, pollution, back-ups in front of neighboring driveways, and increased use of the Columbine side streets. Part of the residential “feel” is the quiet and peace of being able to walk on the streets with dogs and children and mingle with one’s neighbors. Goddard’s proposed enrollment capacity of 165 will not enhance this asset.
The enrollment capacity and the adequacy of the plan for providing and accessing parking from Central Avenue only, was approved last year and neither has changed.

In response to the specifics of the proposal we have the following questions and requests:

Questions

A. The furthest area on the SW corner still shows a tennis court on pp. 20 and 68, whereas grass is listed on p. 13. What is the plan for this area?

This area can potentially be used for tennis or other open play areas. Actual options and use might be limited due to installation of the storm water drainage system.

B. There will be a lot of diapers and human waste generated. The Mass Regs Dept. of Early Education and Care (606 CMR 7.00) states that “Soiled diapers must be removed from the program daily, or more frequently as necessary.” (Section 7.11, (12)(k)) How will this be dealt with appropriately? Are there precautions and/or guidance concerning public health concerns? Twice a week pick-up is not enough.

Only infant and younger toddler children are in diapers. Each diaper is individually bagged before being disposed in trash bags. These trash bags are further put in another bag before being moved to an enclosed dumpster by professional cleaner's at the end of the day. Due to the limited number of children in diapers and multiple bags they are disposed in, minimal impact is expected.

Trash removal is based on waste removal company schedule and the applicant will work with them to stay on top of potential issues. Additionally, based on first-hand experience running a similar school in Watertown for 5+ years, where the dumpster location is immediately next to a house, this has never been brought up by neighbors as an issue/concern because of disposal and removal expediency.

C. How can we be assured that there will not be building use after 6pm or on weekends? What are the consequences if that is abused?

The approved site plan is conditioned on the specifics in the application submitted. These were described as approved last year and again in this amendment application. Program hours are weekdays 7 a.m. to 6 p.m.

There will be annual graduation or other infrequent celebratory events which will be held for short durations. Administrators or staff may be in the building after 6 p.m. or on weekdays but no programmatic use of the building is planned after closing time or on weekends at this time.

D. The placement of the fire hydrant, mailbox and bus stop on Central Ave. was not addressed. How will they be affected, if at all?

Hydrant locations are determined by the Fire Department. Bus stop locations are determined by the MBTA. School bus stop locations are determined by the public-school administration.

There is adequate on-site parking provided for this school in order to keep additional parked cars off the street and facilitate the usual flow of traffic.

If the bus stop is improperly located with regards to the parking access, the

applicant, and the Town will work with the MBTA for a suitable relocation of the bus stop. If this reference is to a school bus stop, the applicant, the town and the School Department will work on a suitable relocation if one is necessary.

Not sure what mailbox is referenced or why there would be an issue with a mailbox since the entrance and exit are on this site's frontage.

E. Are there any mitigation measures such as access to playground(s) for the neighborhood families?

This question was asked last year. The playground facilities are not open to the public. The problem is one of security for the children during the school day, and maintaining the security of the site at night, to prevent groups congregating, vandalism, unauthorized activities that sometimes may occur in public park facilities.

Further, the site will have a 24-hour security system to monitor and prevent unauthorized access to the premises.

Requests

F. The proposal states that "The average enrollment after two years is expected to be around 100 – 120 children." If that is the case, why not build a school to accommodate up to 120 children, not 165? **We request** a smaller building footprint (equivalent or less than the Hoosic), and program capacity.

The program capacity was approved last year and enables flexibility in student enrollment and type of program including part-time care, all of which are vital for a successful center. Based on 5+ years of experience running another center, actual enrollments have always been lower than capacity.

G. The parking spaces total 31, yet the regulation is 3 per 2 classrooms, or 16.5. Why, then have 31? **We request** that the number of parking spaces be reduced.

Based on experience with many other Goddard schools, like Milton, this is lower than the 35 spaces recommended by corporate and minimum in running an efficient center and minimizing traffic impact.

The amount of parking is what is required to keep cars from parking on the street, and to ensure safe loading and unloading of children each day. Adequate parking protects the neighborhood as well as ensuring the safety of the children. Significant effort was put in designing and adding new landscaping to mask the parking lot visibility to address previous feedback.

H. It is very hard to discern lighting from the application. **We request** that we see a model of the lighting and the radius of the motion detectors.

The photometric plan which is page 10 of the Site Plan can be enlarged electronically and can be shown enlarged, at the hearing.

If you look at page 10 of the site plan, the photometric plan, on your computer, you can enlarge it multiple times until it is quite legible. Each light fixture location is identified by a code corresponding to the list of types of lighting in the table on that page. The amount of light cast is shown on that page as well.

You can then go to Exhibit L where have provided a picture of each type of light and a description of the specifications for each type of light.

- I. While any new building will be more efficient than the Hoosic, why not set an example for the town and install solar panels with a goal of net zero energy use? **We request** you consider this cost and energy saving addition.

The new building is being designed to be as energy efficient as possible. Installation of solar panels was reviewed during the design phase, however, based on shade cast by trees and potential location of solar panels, installation would not be practical.

Infrastructure flexibility will be accounted for in the design for potential future installation provided this does not impact building operations, existing landscaping/trees and budget.

- J. The offer to study traffic after six months makes no sense without a baseline to compare it to. **We request** a traffic study before construction begins with potential future study for traffic calming, reduction in the speed limit, traffic guards and/or restriction of side streets as cut throughs.

We have already provided a baseline of studies of trip generation throughout a typical day at the Goddard schools. The applicant will provide real-time data after the school is opened at least six months to compare to these projections.

- K. The outside playgrounds on the southwest corner (63'X45' and 63'X 50') are described as having artificial turf (p.14). We were shocked to see this. Artificial turf contains known PFAS, or forever chemicals that accumulate in the body. Children are particularly vulnerable. See article (one of many). "The Environmental Protection Agency acknowledged that synthetic turf contains toxic chemicals, some of which are known to cause cancer." The Village School in Milton Hill has a backyard play space that is certified as a "backyard habitat" by the National Wildlife Federation. **We request** you do the same.

See feedback from supplier of artificial turf, "X-Grass": They reviewed the article and spoke with several manufacturing and industry experts. They assure us that the somewhat vague information in the article does not apply to the Milton school installation. One of the most important points is there is much reference to rubber infill crumb as a component. The supplier does not use rubber crumb infill in any playground installations and have not done so in over a decade of installing XGrass at multiple Goddard Schools. There has never been an instance in which rubber infill crumb rubber was utilized. They use a non-toxic, antimicrobial coated infill for all Goddard School applications.

Further, use of artificial turf is a great option towards conservation of natural resources and reduction of greenhouse gases. The surface conserves water since it is not live grass. It also

reduces the output of carbon dioxide and other harmful gases generated by combustion engines used to trim and maintain live lawns, and fertilizers and pesticides are not needed.

As far as using PFAS in the fibers, the supplier has provided the statement below for reference. XGrass has utilized synthetic turf fiber from Tencate, Inc to manufacture turf products for many years. Tencate has notified customers that the fibers they produce used to manufacture synthetic turf do not contain any PFAS. Furthermore, TenCate products fully comply with California Prop 65 and European REACH standards which are the highest environmental standards in the world.



To: Whom It May Concern

Re: PFAS News Article

In the Boston Globe dated October 19, 2019 and The Intercept dated October 8, 2019 there was an article which raised questions regarding the potential presence of poly and perfluorinated alkyl substances (typically referred to collectively as PFAS) in synthetic turf. XGrass has utilized synthetic turf fiber from Tencate, Inc to manufacture turf products for many years. Tencate has notified customers that the fibers they produce used to manufacture synthetic turf do not contain any PFAS as reported in the Boston Globe.

Furthermore, TenCate products fully comply with California Prop 65 and European REACH standards which are the highest environmental standards in the world. XGrass is pleased to partner with a fiber supplier that complies with the highest environmental standards.

Upon request a brief memorandum can be provided published by Weston and Sampson, a well-known environmental consulting firm, that sheds more light on the emerging science of PFAS and specifically gives further insight to the recent highly speculative reporting on synthetic turf.

Thank you,
XGrass Executive Team

This article and a couple others popped up a couple years ago and the industry as well as XGrass and their suppliers had a direct response to it. Essentially, there is no way to know what turf testing was referenced in the article and if the testing was scientifically sound, but the article does reference athletic fields, specifically; the product used for Goddard schools is not an athletic product.

- L. The construction plan suggests hours of construction Monday - Saturday. **We request** that in respect to the neighbors and the community that no work happens on Saturdays.

We thank you for your attention to this matter. We all choose to live here for a reason and we want to see our quality of life maintained. Once this building is constructed, we have every reason to be concerned that it could be repurposed for another commercial use. As such, the building should be smaller with as much outdoor green space as possible preserved.

The proposed hours of construction are somewhat less than allowed by the General Bylaws of the Town and protective provisions are included in the construction plans. Saturday construction is usual with this sort of project, in order to complete it in as short a time as possible, and end the disruption to the neighborhood of construction activity.

Jenny and Helen Russell, 190 Central Ave.

Barbara and George MacLaughlin, 200 Central Ave.

Ron and Kelly Sia, 236 Central Ave.

Daniel Muzquiz and Lanphier Tran, 173 Central Ave.

Amy Kotowski and Diarmaid McGregor, 216 Central Ave.

Lolly Delli-Bovi and William Zucker, 8 Ruggles Lane

Greg Denny/Beverly Ross Denny, 107 Columbine Road

Elizabeth and Bill Atwood, 88 Columbine Road

Michael and Arlene Bernardi, 72 Columbine Road

Cynthia Chappell Deal, 64 Columbine Rd.

Shirley Leung and Paul Lim, 23 Lancaster Lane

Bee Chaffers and Amir Darvish, 8 Lancaster Lane

Kathleen Kechejian, 127 Allerton Road

Janice and Doug Hannah, 119 Allerton Road

Michael Chinman, 433 Elliott Street

Fahti Kechejian, 286 Adams Street