

United States Department of the Interior

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

IN REPLY REFER TO: N1

November 17, 2005

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

Dear Mr. Codrea,

I am writing to express my concern regarding the proposed development of the Boston Hills Country Club, located at Hines Hill Road and SR 8, in the Village of Boston Heights. In the fast-developing Route 8 corridor between Cleveland and Akron, this property represents valuable publicly accessible recreational open space. I urge your community to consider protecting this open space by outright acquisition or by acquiring the development rights (conservation easement) to this property.

If this area cannot be protected as open space, I encourage you to consider Conservation Zoning Development practices. Conventional zoning spreads out development, creating surplus paved roads and sidewalks and increasing the amount of storm water runoff. Conventional zoning also does not allow for natural areas that provide stormwater recharge that improves water quality.

By adopting an overlay district that provides the option for Conservation Development Zoning, the Village of Boston Heights can preserve open space, serve as an example of Best Management Practices for stormwater management, and allow for market rate residential development. Enclosed you will find guidelines for Conservation Development Zoning, sample zoning language and a short list of relevant local Conservation Development examples that you may wish to visit.

The preliminary development plans submitted by Boston Hills Property Investment LLC for this property would be detrimental to Cuyahoga Valley National Park. Eocated in the Brandywine Creek watershed, this plan would greatly increase impervious surface area, creating additional stormwater run-off, erosion, sedimentation, stream channelization, and degrading stream habitat and biodiversity.

As your Commission requested, I have enclosed a sample analysis of how several development scenarios may affect imperviousness in Brandywine Creek watershed sub-basins. The maps comparatively depict the current watershed condition, the effects of the above mentioned development proposal, development as currently zoned (1.5 acre lots), and one Conservation Development option (modeled after Deer Creek in Richfield). The maps clearly show that the effects of development can be minimized and consolidated to achieve an overall better outcome for watershed health.

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,

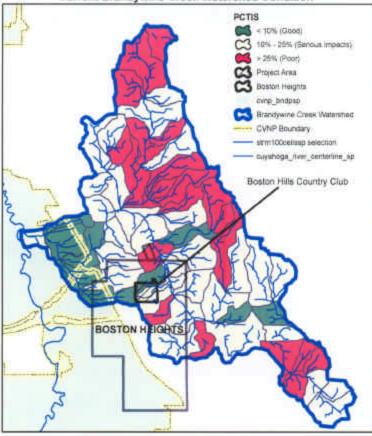
John P. Debo Jr. Superintendent

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Enclosures

Boston Hills Country Club Development: Increasing Imperviousness in Brandywine Creek

Current Brandywine Creek Watershed Condition



Brandywine Creek Watershed is impacted by 22% impervious land cover. Only 10 of the watershed subbasins remain relatively healthy(in green above). Two (2) of these healthier subbasins in the Boston Heights project area (Map A).

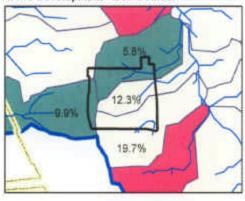
A review of possible build-out scenarios indicates that the result of the proposed development (Retail, single family, cluster, apts., roads) would degrade those healthy subbasins and move others towards poor condition (Map B).

Current zoning providing for 1.5 acre residential lots and streets spreads out the impact of development across all subbasins. This results in further degradation of most watersheds and cancels out of much of the benefits of removing golf course infrastructure (Map C).

By implementing a Conservation Development approach that preserves about 55% open space, protects sensitive areas, reduces streets, and allows for higher density in the remaining acreage, watershed impacts are minimized (Map D). Watersheds remain in similar condition to the predeveloped state. In this example, 75 lots on 60 acres located in the S portion of the area is modeled.

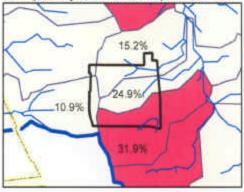
These models are based on estimated lots sizes and road layouts. They should be considered conceptual and not definitive. Many other scenarios could be modeled. We are happy to explain these models and scenarios further.

A: Pre-Development - Golf Course

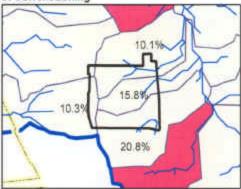


Post-Development Options

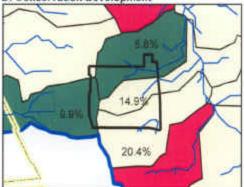
B: Proposal by Boston Hills Prop. Invest. LLC



C: Current Zoning



D: Conservation Development



Projects with a minimum of 40% open space (and an overall density of 1.2 - 2 acres/unit) Residential Conservation Developments - A List (Ohio Focus) The Countryside Program

(However, Countryside Program standards recommend higher open space percentages for projects with densities below 2 units per acre.)

7-29-02

Open Space is defined as all land that is not public or private road right-of-way, private lots, and multi-family or condominium landscaped living area.

This is a working document; information is based on interviews with the parties concerned. Some categories have not been verified for accuracy by The Countryside Program. Please notify The Countryside Program regarding additions and/or corrections.

Signifies that a map analysis of the open space has been done on the project.
 Open space acres and percentages reflect the open space analysis.

Project: Name/Location	Construction Status	Acres	Acres Open Space	Lot Size Range	Lot Price X1000	Dwelling Units No./Type	Cost/Unit Range x1000	Overall Density units/acre acres/unit	Comments	Resources
*Wakefield Run Hinckley Twp. Medina Co., Ohio Dir: Corner of Broadview and Boston Rds.	7/02	325	211 (65%)	%-1a	06-09\$	86 SF, 77 SF cluster	SF; SF; \$190-220 SF cluster	2.0	East Branch of Rocky River protected under casement (175 acres or 150 acres?) holders: HOA, Township, Medina Metroparks has Sewer/water	Petros Homes/Dev. Sam Petros: 440-546-9000
*Deer Creek Richfield Twp. Summit Co., Ohio Dir: Townsend Rd., W. onto Deer Creek	Complete 2000	162	91.2 (56%)	1/2. 3/4a	\$75-90	78 SF	Start @ \$250	0.5	Wastewater treatment: lagoon/spray irrigation. Possibility of 80 more acres added to project. Changed to city sewer with annexation 2001! Traits	Darryl Seibert/Dev. James Milliken/Landowner
Woods at Wulamo Franklin Twp., Wayne Co., Ohio Dir: E, on S.R. 250, S. on Oil City Rd.	complete	150	70 (46%)	1/3-ta ?	\$22-45	73 LT	\$200-450	2.1	Four mi. from downtown Wooster, Ohio. Septic leach fields located in open space, "village" govt/community code. Private roads	Brenda and Milce Schreiner Original developer 330-264-4500 Randall ArendyPlanner Jim Cutler/Architect
Paw Paw Lake South Russell Geauga Co., Ohio Dir: Rt. 306, E. onto Paw Paw Lake Dr.	1920-30's? started as cottages	88	40 (47%	al .		40 SF	\$120-270	2.1	Early Planned community around common recreation area at 15a. lake.	Wade Macellrath/Dev Gus Stern/Pres., Paw Paw Lake Homeowners association 440-338-5750

The Countryside Program
Residential Conservation Developments – A List (Ohio Focus)
Projects with a minimum of 40% open space
7-29-02

Project: Name/Location	Construction Status	Acres Total	Acres Open Space	Lot Size Range	Price Range x1000	Dwelling Units No./Type	Cost/Unit Range x1000	Overall Density units/acre acres/unit	Comments	Resources
*Thombury Solon Cuyahoga Co., Ohio Dir. Bainbridge Rd., E. of Liberty. S. onto Dorset Lane	Phase I Initiated 1997	II.	123.4 (40%)	1/4 - Ia	\$80-110	250 total; 189 SF (61 SF detach, cluster)	\$275-450	0.8	Required 700+ variances for approval. Used constraint map & yield plan in planning process. Developer conducted economic study, projected costs/compared with conventional development. Conservation easement on wetlands. Adjacent to city park & golf course. Boardwalk/asphalt trail Sewer/water.	Forest City Land Group/Dev, Don Bohning & Assoc./Planner-Engineer
*Whitetail Run East Parcel South Russell Geauga Co., Ohio Dir. Rt. 306, W. onto Manorbrook Dr.	Current as of 11/99	\$	34 (69%	SF 1-1.7a; SF cluster/ foot- print		93 total: 49 SF; 44 SF cluster	\$250-400	0.8	Attached housing mixed with SF; 9 SF lots subject to 40' stream easement Phases on this table do not include first SF phase (36 units) or Manorbrook condominium development.	Snavely/Dev. Land Design Consultants Inc./ Planner-Eng. Jim Pegararo Sr. 440-255- 8463
Laurel Springs Bainbridge Twp. Geauga Co., Ohio Dir. Rt. 306, W. onto Bainbrook Dr.	1993	268	116 (43%)	1/2 a.	\$7.8	208 SF	250-400	0.8		Larry Blond/Dev. Craig Cawrsc/Land Planner Kocinski, Smith & Nejedlik Inc/Economic Case study