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October 26, 2002

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS
ON THE
NOTICE OF PROJECT CHANGE

PROJECT NAME : Proposed "Self-Storage" Facility/Residences at Lower Mills
PROJECT MUNICIPALITY : Milton
PROJECT WATERSHED : Neponset River
EOEA NUMBER : 12887
PROJECT PROPONENT : STF Enterprises, Inc. for Extra Space Development, LLC
DATE NOTICED IN MONITOR : September 26, 2006

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project change **does not require** the preparation of an Environmental Impact Report (EIR).

This project, if properly designed, constructed and managed, will be consistent with the Commonwealth's Smart Growth Principles (and the Neponset River Estuary ACEC Resource Management Plan) because it consists of compact development within an area targeted for growth and in close proximity to transit and other non-vehicular access. It will restore deteriorating historic buildings and provide affordable housing stock while improving stormwater management and providing public access and open space.

Project Description

The project consists of the redevelopment of an underutilized industrial site at 2 Adams Street in Milton. The 4.6 acre site includes a 30,082 square foot (sf) self-storage facility (Buildings A and B) that is being expanded and two vacant historic buildings (Buildings C and D). The site is bounded by Adams Street to the west, the Neponset River to the north and east

and the Lower Neponset River Trail to the south. The Trail is a multi-use path owned and operated by the Department of Conservation and Recreation (DCR). Access to the site is located on Adams Street approximately 60 feet south of the Adams Street Bridge. The topography of the site varies and includes a large mass of ledge in the middle of the site that extends approximately 180 feet along the Neponset River. The site is located within the Neponset River Area of Critical Environmental Concern (ACEC) and adjacent to habitat used for spawning rainbow smelt and blueback herring. The site is located within the Dorchester/Milton Lower Mills Industrial District Historic District and the existing buildings are listed on the State and National Register of Historic Places Inventory.

The original project, which is under construction and scheduled to be completed in late 2006, consists of a 6,795 sf expansion of the storage facility (Building A and Building B). A passageway that connects the two buildings is being demolished and replaced with an addition to create one building of uniform character (Building E). A new office area is being created by reconstructing a portion of the western building with a slightly smaller footprint. In addition, an existing parking lot and gravel access road are being resurfaced and a new stormwater management system is being installed.

The project change consists of the renovation of the two historical buildings founded partially within the Neponset River (Building C and D) and construction of a fifth building (Building F) along Adams Street. The vacant mill buildings will be fully restored to provide seven condominium units (three units within Building C and four units within Building D). Building F will include commercial and residential uses and will extend five stories above the grade of Adams Street (with two levels of parking located beneath the grade of Adams Street). It will include a restaurant and retail space on the first floor and twelve townhouse units on the second through fifth floor.

Potential environmental impacts are associated with the alteration of approximately 2.5 acres of land, alteration of approximately .1 acres of tidelands, generation of 377 average daily vehicle trips (adt), water demand of 10,288 gallons per day (gpd) and generation of 10,288 gpd of wastewater. The project will result in a net reduction in impervious surfaces of approximately .12 acres.

Jurisdiction

The project is undergoing MEPA review pursuant to 301 CMR 11.03 (11)(b) because it requires a state permit and is located within an ACEC. The original project required review by the Massachusetts Historical Commission (MHC) and an Order of Conditions from the Milton Conservation Commission. The project change will require a Chapter 91 license from the Department of Environmental Protection (DEP) and review by MHC. In addition, it will require an amended Order of Conditions. The project may be subject to federal consistency review by Coastal Zone Management (CZM). The proponent is not seeking financial assistance from the Commonwealth. Therefore, MEPA jurisdiction applies to those aspects of the project within the subject matter of required permits with the potential to cause Damage to the Environment. These include tidelands, wetlands and water quality.

Tidelands and Public Access

The property includes a prominent Milton Lower Mills historic site and has the potential to provide a significant connection to the natural environment of the Neponset River and to the Neponset River Trail. Because the project proposes private, nonwater-dependent uses on flowed tidelands within an ACEC, it will require variances to the Chapter 91 regulations. These include:

- the performance standard prohibiting nonwater-dependent facilities of private tenancy (FPT) on pile-supported structures on flowed tideland (310 CMR 9.51 (3)(b));
- the categorical restriction on private, pile-supported nonwater-dependent structures below the high water mark (310 CMR 9.32(1)(a)(4) and 310 CMR 3.51 (3)(b));
- the categorical restriction on private structures below the high water mark within an ACEC (310 CMR 9.32(1)(e)).

The Certificate on the ENF identified public access as a priority for review of redevelopment plans. Previous and current comments from DEP, DCR, CZM and the Neponset River Watershed Association highlight the importance of public access at this site. Standards for a variance from the Chapter 91 Program include a requirement that the proponent demonstrate how the project minimizes interference with the public interests in waterways and propose measures designed to compensate the public for detriments to these interests. As a result, the proponent has proposed the following measures to support public access in and around the site and mitigate impacts:

- creation of a small park adjacent to the multi-use path in the southeast corner of the site;
- direct public access from Adams Street through the parking lot to the multi-use path;
- grant of a conservation restriction over .62 acres including the rocky knoll outcropping;
- Re-decking of the footbridge (located between the two mill buildings) to the midpoint of the river and construction of a deck over the open portion of the concrete sluiceway;
- enhancements to water quality and protection of the fish spawning area adjacent to the site entrance through improvements in site drainage, a decrease in impervious surfaces adjacent to the River, and the removal of invasive species from the existing retaining wall; and
- restoration and re-use of historic buildings to avoid their deterioration.

In general, commentors are supportive of allowing the project to proceed to permitting without additional MEPA review. Comments identify additional information requirements and issues that should be addressed in more detail during state and local permitting. DEP comments indicate that the proponent should include in its application a fully developed alternatives analysis and identification of the existing and historic Mean High Water (MHW) and Mean Low Water (MLW) lines to determine the extent of filled tidelands. Several comment letters, including the letter from DEP, indicate that additional information on proposed mitigation should be provided including identification of the location and design of access to the DCR multi-use path, landscape and park design plans, details on the conservation restriction (including identification of holder of the restriction) and a commitment to and designs for signage.

To ensure that the public interest in the design and review of this project is fully supported, the proponent should expand on the distribution and notification requirements of the Chapter 91 Program by providing a copy of the Chapter 91 application and variance request to each of the commentors on the NPC and ensure they are notified of associated public hearings.

Stormwater Management

The project will result in a small net decrease of impervious surfaces. The NPC indicates that the existing stormwater management system will be used to collect and treat stormwater on the site. Some commentors have recommended the inclusion of low impact development (LID) techniques (such as vegetated berms, rain gardens, a fully planted buffer to the Neponset River and use of porous pavement) to minimize impacts from stormwater and to promote recharge. These measures could provide additional protection of water quality and habitat within the Neponset River. The stormwater management system will be reviewed in more detail during permitting. I encourage the proponent, DEP and the Milton Conservation Commission to consider these comments during permitting.

Historic Resources

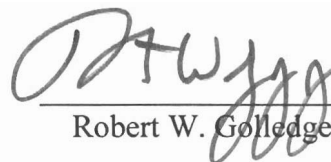
Comments from MHC request more information from the proponent to determine what effect the proposed project will have on historic properties, indicate that the proponent should consider alternative roof dormer designs and suggest the proponent consult with the Milton Historical Commission. The proponent has provided additional information to MHC in a letter dated October 11, 2006 and indicated that it is consulting with the Milton Historical Commission and exploring appropriate dormer designs.

Findings

Based on a review of the information provided in the ENF and consultation with relevant public agencies, I find that the ENF contains sufficient information to understand the impacts of the project, to demonstrate that adequate mitigation is being developed to address project impacts and to demonstrate that the impacts of the project do not warrant the preparation of an EIR. Outstanding issues can be addressed during local and state permitting. No further MEPA review is required at this time.

October 26, 2006

Date



Robert W. Golledge, Jr.

Comments received:

10/16/06	Department of Environmental Protection (MassDEP)
10/16/06	Department of Conservation and Recreation (DCR) Commission
10/19/06	Division of Marine Fisheries
9/26/06	Massachusetts Historical Commission
10/4/06	Town of Milton/Planning Board
10/16/06	Neponset River Watershed Association

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