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DEVELOPMENT IMPACT STATEMENTS

As part of an application for a Comprehensive Permit, every applicant must submit development impact statements which address various effects of a project and compare those effects to the effects of a by right development.

In this case, in the Suburban II zoning district, the comparison would be to a conventional residential subdivision. A conventional single family home subdivision on this property would propose two interlocking roadways and create up to 20 new lots. An example is shown on the attached By Right Development Plan attached to this document. Such a development would alter significantly more of the site than the proposed Rice Pond Village Comprehensive Permit development. Also, it would create roadways which the Town would be asked to accept and maintain in perpetuity.

Wetland impacts

The proposed Rice Pond Village development does not require any alteration of wetland resource areas on site. There are no priority habitats of endangered species or certified vernal pools on site that might be affected by the project. A conventional subdivision would not improve on that. A conventional subdivision might involve a wetland alteration and would likely involve more work in the buffer zone as shown on the By Right Development Plan.

The proposed Rice Pond Village development will meet or exceed all 10 of DEP's Stormwater Management standards. In particular, the project design includes infiltration of nearly all runoff from impervious surfaces, be they roofs, individual driveways or the proposed Hillcrest Circle. Infiltration of runoff from impervious surfaces will easily exceed the DEP Stormwater Management Standard of infiltrating runoff from 65% of impervious surfaces. A conventional subdivision would not improve on that.

Historic impacts

A search of the Massachusetts Historical Commission's MACRIS database shows no historic properties, structures or other resources on this site. So, the proposed Rice Pond Village development is the equivalent of any theoretical conventional subdivision in having no impact upon such resources.

Visual impacts

Another impact that a development may create is to change or significantly diminish vistas presently available to abutting properties but which a proposed development blocks. The Rice Pond Village development would not have such impacts as the abutters to the south overlook the existing unnamed pond and look up toward the ridge line of the property and that will be unchanged with this development as it would with a conventional subdivision. The abutter to the north is a railroad.

Noise impacts

Noise impacts generated during the construction process will be by typical earth moving and construction noise. These activities will be limited by Town determined work hours to not burden abutters.

Noise impacts after construction are expected to be negligible for a residential development such as this.

It may be reasonably asked whether the proposed development will alter the site in such a way that abutters would then begin to experience excessive and unreasonable noise from the railroad on the north side of the site. The proposed Rice Pond Village development will not alter the landscape such that noise from the train will be given an unimpeded path to any abutters. In fact, proposed apartment buildings and garages may absorb and reflect sound waves better than the existing vegetated landscape.

In terms of the noise produced by the trains, Federal and state transportation authorities have developed a measure called "Leq" to quantify the equivalent steady state sound level of infrequent noises such as passing trains which only go by once or twice a day. A loud noise heard twice a day is not insignificant but is more easily tolerated than a consistently generated noise such as interstate highway traffic.

For two events a day, even as loud as a 90 decibel train, the equivalent noise impact of a steady state sound level is approximately 53 decibels, which does not reach the threshold at which noise reduction measures at residential properties are typically recommended, Leq of 67 or higher.

But, even if the applicant wanted to propose a noise reduction barrier for Rice Pond Village, it would be impractical because the proposed residences will sit on a hill overlooking the railroad tracks. The first floor elevation of every proposed unit is 15 feet or more above the railroad tracks. This would be true for residences in a conventional subdivision as well.

Traffic impacts

A Traffic Impact Study was prepared for Rice Pond Village by AK Associates and updated in February 2024. This study considered the proposed development as well as expected background growth of traffic in the area and compared 2029 build and no build conditions.

This Study found that the expected traffic generation from the project will not result in any area intersections experiencing a worse Level of Service (LOS) in the morning or evening peak hours.

The Study also finds that sight distance at the proposed intersection is good and that the available data history of traffic accidents in the area does not indicate any particular problem which additional traffic would exacerbate. While a subdivision of 20 single family homes would generate less traffic, the area intersections would function similarly.

Fiscal Impacts

Benefits

The existing property consists of parcels 75, 75A, 75B, 75C and 144 shown on assessor's map 63. These parcels are being taxed this year on valuations of \$380,600, \$70,900, \$90,300, \$70,100 and \$118,500, respectively, for a total of \$730,400. So, the net tax payment to the Town of Millbury, in the present condition of the site, will be \$9,663.19.

The applicant proposes to construct three apartment buildings with 64 units each for a total of 192 units created. Assuming a valuation similar to the Cobblestone Village apartments on Howe Ave of approximately \$200,000 per unit, the total value of this development will be \$38,400,000 and, at the Town's tax rate of \$13.23 per thousand, would yield annual property tax payments to the Town of \$508,032.

There would also be additional motor vehicle excise tax payments to the Town for all the vehicles owned and operated by the new residents. The Town taxes vehicles at approximately \$25 per thousand dollars of valuation. If we assume an average of 1.5 cars per unit and make a conservative assumption of an average 4 year old car that initially sold for \$20,000, then the total receipts to the Town of these payments would be $(192 \times 1.5 \times 20 \times .25 \times 25)$ another \$36,000.

There are also sanitary sewer fees. In addition, the residents would create additional customer base for businesses in the Town of Millbury. Associated benefits to existing Town business of additional goods and fees sold to additional customers are very

difficult to quantify. We want to acknowledge that they exist but will not ascribe any value to that benefit here.

So, the ongoing tax payments to the Town of Millbury would be \$544,032.

There are also significant one time benefits to the Town in the form of various fees levied in the course of residential unit construction including building permit fees as well as sewer connection and betterment fees. These fees may be several tens of thousands of dollars total.

Costs

To estimate the cost to the Town of school age children in the Town's school system, we have to estimate the number of school age children expected to be present in the 192 units. From census and other data, we ascribe 0.03 school age children to each of the 102 one bedroom units proposed, 0.30 school age children to each of the 66 two bedroom units proposed and 0.70 to each of the 24 three bedroom units proposed. This gives us an expected total of 40 school age children.

The Johns Hopkins School of Education estimates enrollment in private schools as approximately 10% of school age children in Massachusetts and homeschooling accounting for just under 1% of school age children. We'll assume that these and other choices reduce the projected enrollment of school age children in the school system to 36 students. While the Applicant's experience at his other two apartment developments in Millbury is that these estimates of school age children have been excessive, we'll use this number.

For the ongoing fiscal year, overall expenditures in the system were \$25,098,685 for approximately 1800 students served for a per pupil average expenditure of \$13,944.

Of course, this expenditure per student is paying for equipment and facilities and administrative staff that very likely don't change with the addition of 36 students to the school system. Nor does instructional staff necessarily increase with the addition of these students to the system. Nevertheless, we'll, again, make an extremely conservative assumption and estimate that each new student will cost the school system that much additional expenditure so the expected 36 students will incur a cost to the Town of $36 \times \$13,944$ or \$501,984.

The remainder of the Town's overall budget of after subtracting what is spent on the school system pays for existing facilities and Town staff in the Police, Fire, Department of Public Works and other departments.

There's no reason to believe that the approximately 300 new residents of the Town will require additional facilities or staff in the Police or Fire Departments. In fact, new

construction of residences above the median price in Town are statistically less likely to need either department's services. And with the proposed development remaining in private control, neither plowing nor other maintenance will be done by the Department of Public Works.

In short, there's no basis to expect significant additional costs to the Town to be incurred through use of other services.

Net

So, even if extremely conservative assumptions are made in regard to school system costs, the proposed project would result in a net tax benefit to the Town of approximately \$42,048 per year. And there would be significant one time fees paid to the Town of many tens of thousands of dollars.