

13 Mill Road #9
Durham NH 03824

26 June 2018

Town of Durham Planning Board
Town of Durham Conservation Commission
Town Hall, Durham NH 03824

RE: Mill Plaza Redevelopment plan of May 2018

The May 2018 plans for redevelopment of the Mill Plaza mark the ninth iteration of the design. I call it "Plan 9 from Outer Space," after the appallingly awful B-movie of the same name from the 1950's. In truth, Plan 9 has some good elements but also some seriously poor elements. I compliment the Harriman design team on their work over the past four years. I think they're really trying. But their assignment has suffered under significant programmatic constraints: to provide the maximum development at the least price for the highest profit.

While Colonial Durham Associates has every right to pursue profit, and to discount steeply the comments of the public over the past four years, they do need to remain within the law. In addition to the major overall problem of how a plan that adds 333 student beds to a site that has never had any housing could possibly meet the Town's Conditional Use criteria, the most serious infraction, throughout the process, remains the infringement on the shoreland setback and wetlands setback zones, as shown on sheet C-701, Buffer Coverage Plan. The proposal shows a reduction in impervious surface within the setback zones from the existing 51,208 SF to a proposed 39,411 SF. While this is an improvement, there remains *almost an acre* of infringement on the shoreline and wetlands buffers. This is close to ten percent of the entire site.

As attorney Pollack has stated (letter 5/21/18), these will be "permanent redevelopment impacts." I encourage the Town to consider these impacts seriously, and to deny these wetlands infringements based on Town, State, and Federal statute. This major redevelopment of the ten-acre site should be beholden to current law, not that of the 1960's.

Additional comments on the May 2018 plans:

Sheet C-102 Site Plan: snow storage area is obviously inadequate. Plan states that excess snow will be hauled off site. It could happen, but my guess is that it will end up in College Brook, as in the past. Hauling snow is expensive. Who in the Town will follow up on Mill Plaza snow removal, to ensure the owners adhere to this?

Sheet C-508 Detail Sheet: The specs on proper planting are very good – up-to-date with current research on planting techniques, early establishment and long-term health. It is critical that these specs be followed: They often are ignored by landscape contractors. *Note that these details differ in several*

respects from those shown on Sheet L3.0 Planting Details. The information on Sheet C-508 is better. Either correct Sheet L3.0, or drop that info as redundant.

Sheet L2.0 Landscape Overall Plan: So-called “landscape buffer areas” are an improvement but still insufficient. Ditto, rain gardens. Green roofs are cute – better than nothing but of minimal effect. Expand all of these.

Sheet L2.1 Planting Plan: This is a great plant list for a NH landscape: Many native plants, good diversity of plants, vertical layers from groundcovers and perennials to shrubs to trees. These would make a fine addition and a good fit in a more naturalistic setting. A serious concern is that these will be planted in small spaces (essentially pots) in the middle of an asphalt desert heat island that’s salted. Site preparation will be critical. A second concern is long-term maintenance. Historically, Colonial Durham Associates has shown itself to be wholly unconcerned with plant maintenance. The current unhealthy plantings, some of which were legally forced on the owners, are grim reminders of the results of no maintenance. So kudos for the plant list. Now allow space and soil volume and provide adequate maintenance so that the plantings will thrive.

Sheet L2.2 Planting Plan: Ditto above. I believe these planting beds are all in a blasted-out zone and on ledge, plus surrounded by 3- and 4-story buildings and retaining walls. Great species selections, but monumental site prep required, and long-term maintenance. Will it happen?

Sheet L2.3 Planting Plan: Good start on a riparian buffer planting. Now extend along the whole of College Brook to Mill Road. Add layers (shrubs, perennials, groundcovers). I must add that the marsh abutting College Brook in the lower left (SW) on the Commons Condominium property was twenty years ago a rainfall-absorbing pond, silted in now by Mill Plaza sand.

Sheet L2.4 Roof Planting Plans: OK. Need to maintain.

Sheet L3.0 Planting Details: See comments above regarding Sheet C-508. The specs on Sheet L3.0 should be replaced by those on Sheet C-508. There’s also a spec on “Existing Tree Protection.” This applies only to the trees along Mill Road and the healthy trees along College Brook. The trees in the planting islands within the parking lot should all be fed through a chipper, as none are worth salvaging; also, there’s no real soil in the planting holes.

Sheet L3.1 Planting Details: What are “planting bed soil,” “horticultural subsoil,” and “lawn soil?”

That’s all for now. Thank you for your continuing work to make this a project the town can enjoy for the next fifty years.

John Hart ASLA, MLA, MS