



TOWN OF MILTON

TOWN OFFICE BUILDING
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MILTON, MASSACHUSETTS 02186

TEL 617-898-4800

March 5, 1998

The Honorable Trudy Coxe, Secretary
Executive Office of Environmental Affairs
MEPA Unit
100 Cambridge Street
Boston, MA 02202

RE: PROPOSED REEBOK WORLD HEADQUARTERS, CANTON, MA
E.O.E.A. NO. ENF-11280

Dear Secretary Coxe:

We, The Board of Selectmen, have reviewed the Draft Environmental Impact Report for this proposed development.

Although the proposed project is entirely in Canton, it is within 3,000 feet of Milton. There is the potential for adverse impact to roadway and utility systems unless proper mitigation methods are implemented.

1. Sewer System Impact

Milton is a member community of the MWRA, served by the South Sewer System since 1903.

The MWRA high level Sewer Trunk line (12' x 12' in cross section) runs through the Town of Milton after collecting sewage from a large number of member communities including those served by the new Neponset Valley Sewer. The MWRA has permitted these member communities to increase the sewage flow into these interceptor trunk lines without corresponding reduction in flow. Milton has aggressively pursued improvements to its sewerage system to eliminate Infiltration-Inflow and reduce the impact to the MWRA Sewers.

Milton homes, streets and land adjacent to the MWRA trunk line have been subject to increasing numbers of sewer backups these past few years. The flow in the MWRA trunk line has increased to at or near capacity even during moderate storm events preventing our gravity sewer lines from entering and resulting in the afore-mentioned sewer backups. Sewer backups into homes are a serious danger to public health. Sewage runs off into storm drains, wetlands and brooks which are tributary to the Neponset River.

Milton's sewer regulations include a requirement that applicants for new developments with proposed sewerage flows in excess of 2,000 gallons per day repair existing sections of our system to remove Infiltration-Inflow in an amount equal to twice the projected flow. As you know, "twice the projected flow", is conventionally used as the target removal flow because of the difficulty in certifying before repair and after repair flow rates because of constantly changing ground and surface water conditions. In addition, Infiltration-Inflow repairs at one location tend to create increased Infiltration-Inflow (I-I) at nearby locations in sewer system as the water table level rises when I-I is reduced.

The proposed Reebok project would increase the flow to this MWRA trunk line by 90,000 gallons per day. This is the equivalent of adding sewerage flow from approximately 272 new single-family homes.

Given Milton's documented sewage back-up problems related to the MWRA sewer interceptor, We strongly recommend that you require the developers to provide 2 for 1 Infiltration-Inflow removal in the Canton sewerage system which contributes flow to the MWRA Trunk line.

The 2 for 1 standard should be required of all developments that contribute sewage flow to the MWRA South System, including the Reebok World Headquarters in Canton

2. Traffic Impact

Rt. 138 a 2 lane (one in each direction) state highway runs through Milton residential neighborhoods for 3 miles and into Canton passing by the proposed Reebok Site. Access to the site is to be provided by 2 driveways, one of which would intersect with Route 138.

We understand that the Massachusetts Highway Department (MHD) will participate with Reebok in funding for certain off site roadway improvements that will provide increased capacity at the Route 138 at Royal Street and Blue Hill River Road Intersection approximately 600 feet from the new proposed driveway into Rt. 138. Presently, this intersection operates at level of service E to F during peak periods and conditions would worsen without the above improvements. Our concern is with the one mile section of Rt. 138 in Milton just North of the proposed intersection improvements and new driveway access. This section of Rt. 138 that includes intersections with Brush Hill Road and Neponset Valley Parkway presently accommodates 24,000 to 32,000 vehicles per day, with one of the highest percentage of large truck traffic in the state. This truck traffic comes predominantly from the Stop & Shop warehouse in nearby Boston whose trucks enter and exit Rt. 138 via the Neponset Valley Parkway intersection that is unsignalized.

Presently, the East Bound left and right turn from Neponset Valley Parkway onto Rt. 138 is at level of service E and will worsen when the capacity of the Rt. 138 - Royal Street Street - Blue Hill River Road intersection is improved to accommodate Reebok. I strongly

recommend that safety improvements including Traffic signal installation should be made at the intersection of Neponset Valley Parkway and Route 138 in conjunction with the Reebok project.

Without these improvements, the back-ups which occur now near the Reebok site will be shifted to this intersection.

Accident potential will increase as the drivers of the larger trucks from Stop and Shop attempting to enter Route 138 from Neponset Valley Parkway become impatient at the long delays and insufficient gaps in the Route 138 traffic. These safety problems exist today and will worsen with the increased traffic from Reebok and the capacity improvements.

This section of Route 138 serves the M.D.C. Blue Hills Reservation, including the Blue Hills ski area, Trailside Museum, and the Montessori School. The Fuller Trust Property on Route 138 between Neponset Valley Parkway and Brush Hill Road will have 160 units of elderly housing developed on the site over the next two years.

We request that Reebok provide design improvements to the intersection of Route 138 and Canton Avenue, Route 138 and Brush Hill Road and Route 138 and Neponset Valley Parkway.

Your consideration of these requests would be greatly appreciated.

Very truly yours,

Board of Selectmen

BOS:AMF