
Memorandum

To: Tim Czerwienski, Town of Milton
From: Metropolitan Area Planning Council
On: Section 3A Compliance Testing
Date: 06/26/2023

Summary

The Town of Milton requested MAPC test a series of subdistricts against modified zoning that would allow the town to meet the minimum gross density of 15 dwelling units per acre.

None of the existing districts as tested through this process would comply with the unit capacity threshold of 2,461 units. The density restrictions and the acreage of the districts are the two primary limiting factors. However, it appears possible that Milton could meet its unit capacity by creating subdistricts with flexible zoning that allows for greater density per acre in the appropriate districts.

Process

We initiated this work using the following information to evaluate the proposed district(s) and zoning for 3A Compliance.

- The following subdistricts were chosen based on suggestions from the Town and include portions of the town's Business District and the B, C, and D2 Residence Districts.
 - Transit Subdistrict 3
 - Transit Subdistrict 4
 - Randolph Ave Subdistrict
 - Brush Hill Road Subdistrict
 - Granite Avenue Subdistrict
- We used the geographic boundaries of each test district based on GIS files provided by the town.
- The most recent zoning bylaw, as well as any tables or exhibits not specifically mentioned in the bylaw or code, were obtained, and examined.
- Town staff verified the assumptions on the zoning checklist.

3A Requirements for Town of Milton

The table in **Figure 1** was auto generated by the compliance model excel sheet based on the community type and size. The testing will need to comply with the minimum unit capacity, land area and percentage of district within the station area requirements as shown in.

Figure 1: Compliance Metrics from DHCD

Community	Milton
Community Category:	Rapid Transit
2020 housing units (census PL-94):	9,844
*Minimum multi-family unit capacity:	2,461
**Minimum land area:	50
***Developable station area:	404
Percent of district to be within station area:	50%

** Minimum multi-family unit capacity for most communities will be based on the 2020 housing stock and the applicable percentage for that municipality's community type. In some cases, the minimum unit capacity is derived from an extrapolation of the required minimum land area multiplied by the statutory minimum gross density of 15 dwelling units per acre. In cases where the required unit capacity from these two methods would exceed 25% of the community's housing stock, the required unit capacity has instead been capped at that 25% level.*

*** Minimum land area is 50 acres for all communities in the rapid transit, commuter rail and adjacent community types. There is no minimum land area requirement for adjacent small towns. Where 50 acres exceeds 1.5% of the developable land area in a town, a cap has been instituted that sets minimum land area to 1.5% of developable land area in the town.*

**** Developable station area is derived by taking the area of a half-mile circle around an MBTA commuter rail station, rapid transit station, or ferry terminal and removing any areas comprised of excluded land.*

Source: DHCD 3A Compliance Model

Subdistrict Boundaries

Testing was undertaken across five zoning subdistricts, Transit Subdistricts 3 & 4, the Brush Hill Rd. Subdistrict, Randolph Ave. Subdistrict, and the Granite Ave.

Subdistrict as shown in **Figure 2** GIS processing included:

1. Performing district land area related requirement checks
2. A land parcel data table that was exported and used within the compliance model excel as required by DHCD.

Figure 2:Test Subdistricts

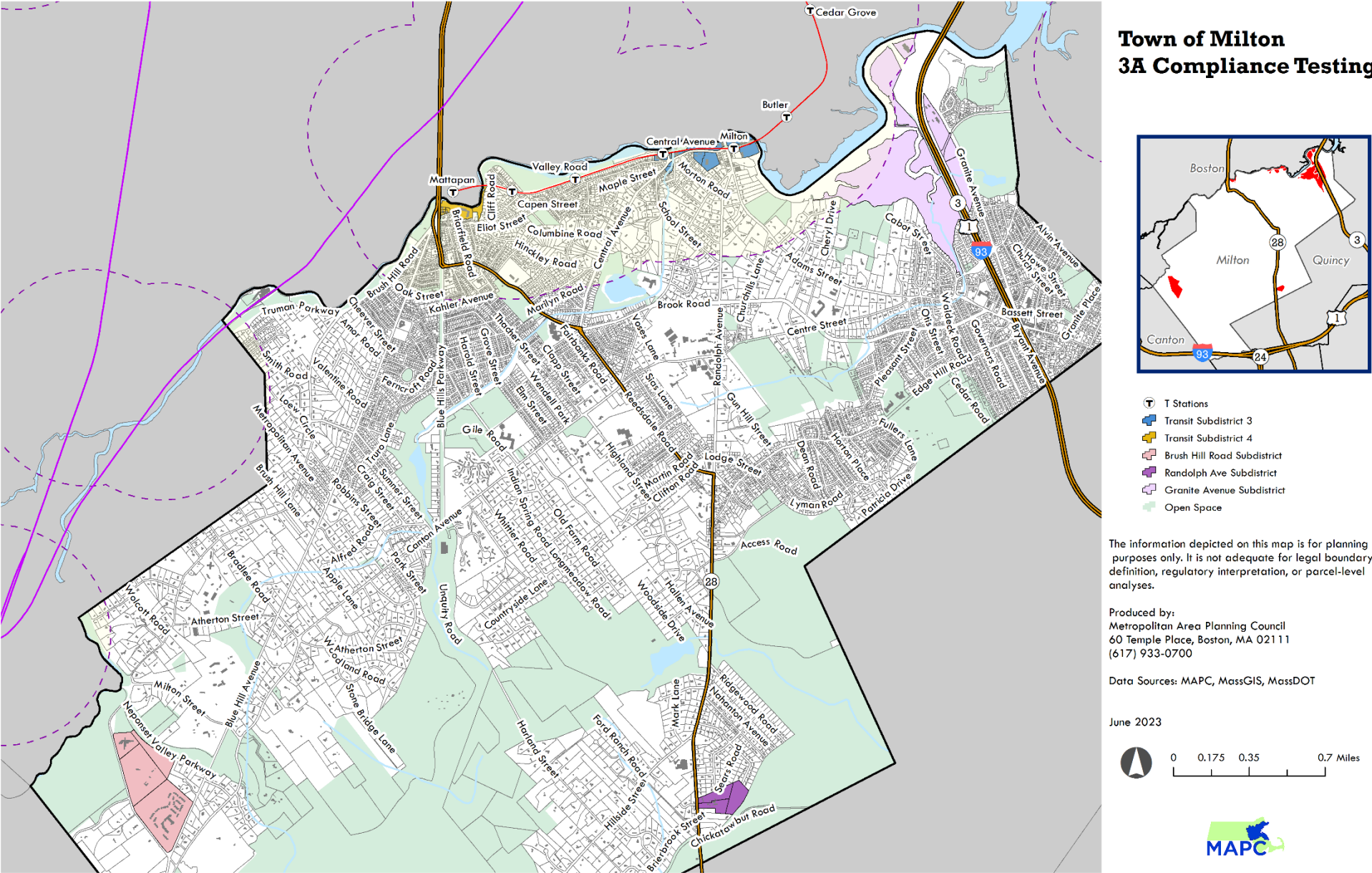


Figure 3: Requirement Checks

Requirement Checks Performed:	Result
1. Each non-contiguous area (i.e., each sub-district) of the test district must be at least five acres.	PASSED; smallest non-contiguous portion within the test districts is 6.45 acres large within the Transit Subdistrict 4.
2. At least half the district land area is contiguous. Note that two different districts or sub-districts (with different zoning parameters) are also considered contiguous if they are adjacent to each other and can contribute to the 50% requirement for contiguity.	PASSED; Granite Avenue Subdistrict (Res-C) is considered contiguous which will result in 56.5% (132.76 ac) of total land area (more than 50% of the total test area as required).
3. The total test district area should be greater than the minimum land area requirements (which are community-specific and available in the Compliance Model Excel sheet).	PASSED; test district passed this requirement as the total area of the test districts is 234.9 acres as compared to the required 50 acres.
4. For Rapid Transit and Commuter Rail community categories such as Milton, the percentage of land area within transit station areas should be greater than minimum requirements (which are community-specific and available in the Compliance Model Excel sheet). In Milton's case it is 50%.	PASSED; test districts passed this check as 25% (58.28 ac) of the district is within station area.

Figure 4 provides details on district contiguity and density deductions performed to calculate density denominators that form the basis of unit capacity calculations.

Figure 4: District Contiguity and Density Deductions

Test Subdistrict (Existing Zoning District)	Total Acreage	Contiguity	Density Deductions (acres)	District Density Denominator* (acres)
Transit Subdistrict 3 (Res-C & Bus)	15.45	No	7.45	8
Transit Subdistrict 4 (Res-C)	6.45	No	2.29	4.16
Brush Hill Road Subdistrict (Res-D2)	66.26	No	4.71	61.55
Randolph Avenue Subdistrict (Res-B)	13.98	No	5.29	8.69
Granite Avenue Subdistrict (Res-C)	132.76	Yes	112.86	19.9
TOTAL	234.9 ac.		132.6 ac.	102.3 ac.

Zoning Checklist

Below are tables that show the inputs used for the compliance model. These inputs reflect the zoning assumptions made by the MAPC team based on our read of the zoning bylaws, and input from town staff. The tables contain key information that drives the parcel-based unit capacity calculations in the compliance model.

Additional assumptions:

- Parking input required in the model is limited to parking spaces per DU. This therefore excludes the commercial parking requirements (as would be applicable in Transit Subdistrict 3). Furthermore, DHCD notes in the compliance guide that - "the Model utilizes the parking spaces per unit requirement and treats all parking as surface parking because the market, not the zoning, typically dictates how parking is built. The Model calculates a percentage of land to be removed based on the parking requirement entered and translates that percentage of land to square feet."
- Within the checklist parameters input into the model, the sheet requires input of "Maximum Building Coverage (%)" and "Maximum Building + Parking Coverage (%)". For our testing purposes, we assumed the "Impervious Surface Percentage" and "Impervious Surface Percentage including parking" requirements in the town's bylaw as an equivalent to the building coverage ask.

ZONING INPUTS - DISTRICT 1

Transit Subdistrict 3 (Res-C & Bus)

Model Inputs for Calculating Unit Yield	Input
Minimum Lot Size	21,780
Additional Lot Square Feet per Dwelling Unit	0
Open Space %	0%
Excluded Land Counted Toward Open Space	
Parking Spaces per Dwelling Unit	1.00
Building Height	5
Maximum Lot Coverage %	70%
Floor Area Ratio	1.73
Zoning Restrictions that Cap Unit Counts	Input
Lot Area per Dwelling Unit	0
Maximum Dwelling Units per Acre	40.00
Cap on Maximum Dwelling Units per District	0.00

ZONING INPUTS - DISTRICT 2

Transit Subdistrict 4 (Res-C)

Model Inputs for Calculating Unit Yield		Input
Minimum Lot Size		21,780
Additional Lot Square Feet per Dwelling Unit		0
Open Space %		0%
Excluded Land Counted Toward Open Space		
Parking Spaces per Dwelling Unit		1.00
Building Height		5
Maximum Lot Coverage %		70%
Floor Area Ratio		1.73
Zoning Restrictions that Cap Unit Counts		Input
Lot Area per Dwelling Unit		0
Maximum Dwelling Units per Acre		40.00
Cap on Maximum Dwelling Units per District		0.00

Brush Hill Road Subdistrict
(Res-D2)**ZONING INPUTS - DISTRICT 3**

Model Inputs for Calculating Unit Yield		Input
Minimum Lot Size		217,800
Additional Lot Square Feet per Dwelling Unit		0
Open Space %		0%
Excluded Land Counted Toward Open Space		
Parking Spaces per Dwelling Unit		1.00
Building Height		5
Maximum Lot Coverage %		0%
Floor Area Ratio		0.00
Zoning Restrictions that Cap Unit Counts		Input
Lot Area per Dwelling Unit		0
Maximum Dwelling Units per Acre		20.00
Cap on Maximum Dwelling Units per District		0.00

ZONING INPUTS - DISTRICT 4

Randolph Avenue Subdistrict (Res-B)

Model Inputs for Calculating Unit Yield		Input
Minimum Lot Size		130,680
Additional Lot Square Feet per Dwelling Unit		0
Open Space %		0%
Excluded Land Counted Toward Open Space		
Parking Spaces per Dwelling Unit		1.00
Building Height		2.5
Maximum Lot Coverage %		0%
Floor Area Ratio		0.00
Zoning Restrictions that Cap Unit Counts		Input
Lot Area per Dwelling Unit		0
Maximum Dwelling Units per Acre		20.00
Cap on Maximum Dwelling Units per District		0.00

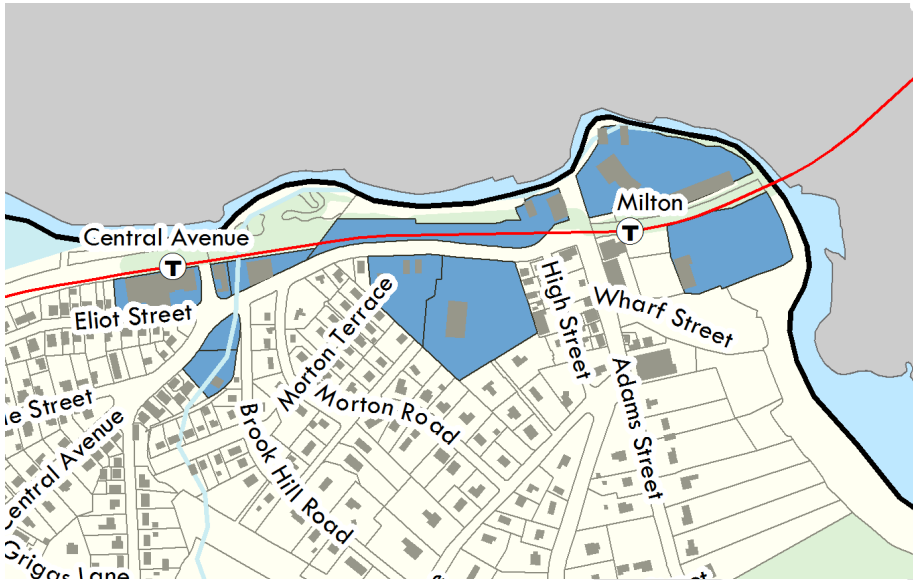
ZONING INPUTS - DISTRICT 5

Granite Avenue Subdistrict (Res-C)

Model Inputs for Calculating Unit Yield		Input
Minimum Lot Size		0
Additional Lot Square Feet per Dwelling Unit		0
Open Space %		0%
Excluded Land Counted Toward Open Space		
Parking Spaces per Dwelling Unit		1.00
Building Height		6
Maximum Lot Coverage %		0%
Floor Area Ratio		1.50
Zoning Restrictions that Cap Unit Counts		Input
Lot Area per Dwelling Unit		0
Maximum Dwelling Units per Acre		0.00
Cap on Maximum Dwelling Units per District		0.00

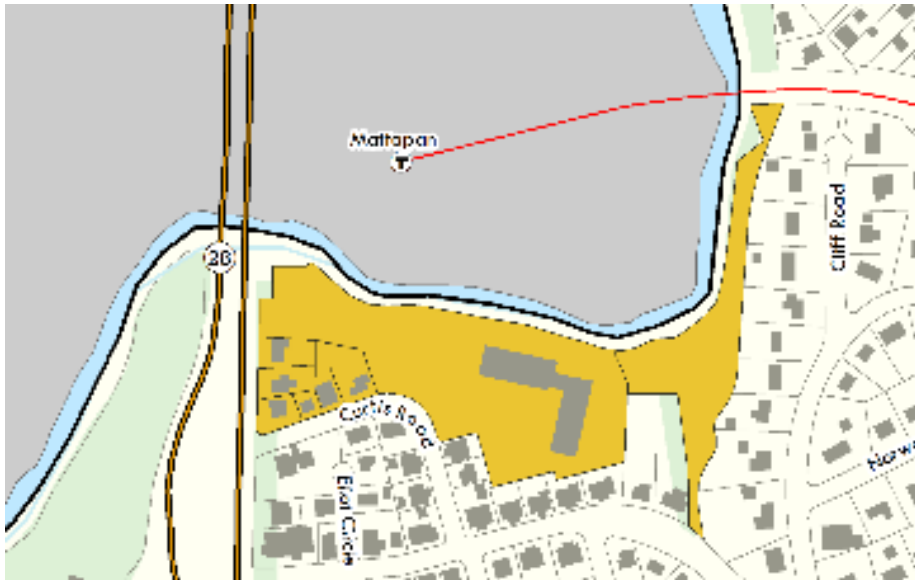
Model Outputs

The tables below provide the model output for each subdistrict. This data is based on detailed land records and parcel information imported from GIS, along with zoning parameters inputted into the compliance model.



District 1 Transit Subdistrict 3 Summary Calculations

Metric	Number	Metric	Number	% of Total
District Acreage Denominator	8	Non-Conforming Parcels	2	20.0%
Total Parcels	10	Units within Half-Mile of Transit	597	100.0%
Parcel Acreage	15	Total Excluded Land	114,747	17.0%
Total Built Square Feet	1,148,650	Open Space Removed/Set Aside	249,365	37.0%
Multi-family Unit Capacity	597	Total Parking Area	187,961	27.9%
DU/AC	74.6	Units Forgone due to Unit Cap in Zoning	0.00	0.0%



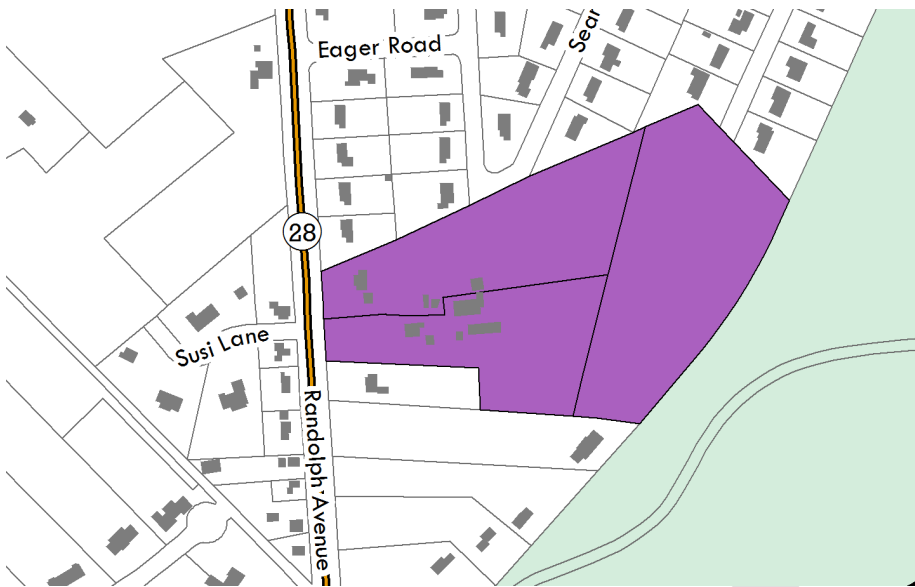
District 2 Transit Subdistrict 4 Summary Calculations

Metric	Number	Metric	Number	% of Total
District Acreage Denominator	4	Non-Conforming Parcels	6	75.0%
Total Parcels	8	Units within Half-Mile of Transit	161	100.0%
Parcel Acreage	6	Total Excluded Land	111,341	39.6%
Total Built Square Feet	282,504	Open Space Removed/Set Aside	167,602	59.6%
Multi-family Unit Capacity	161	Total Parking Area	46,228	16.4%
DU/AC	38.7	Units Forgone due to Unit Cap in Zoning	0.00	0.0%



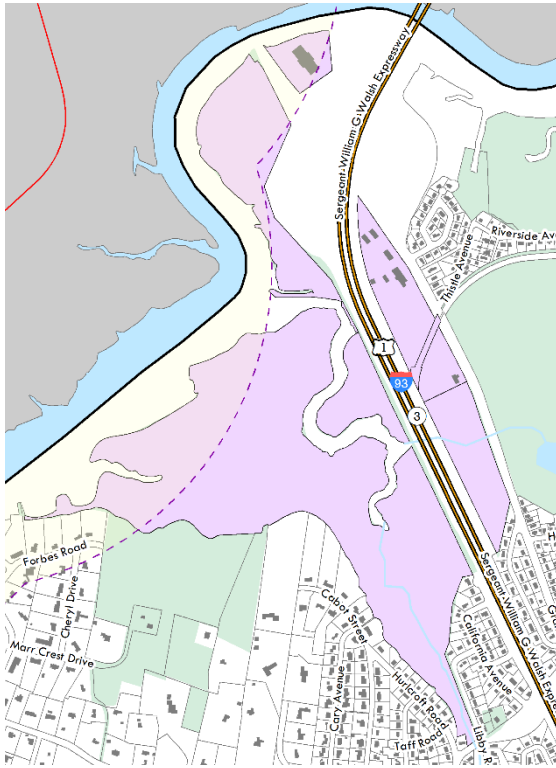
District 3 Brush Hill Road Subdistrict Summary Calculations

Metric	Number	Metric	Number	% of Total
District Acreage Denominator	62	Non-Conforming Parcels	0	0.0%
Total Parcels	3	Units within Half-Mile of Transit	0	0.0%
Parcel Acreage	66	Total Excluded Land	206,647	7.2%
Total Built Square Feet	5,781,896	Open Space Removed/Set Aside	783,936	27.2%
Multi-family Unit Capacity	1,324	Total Parking Area	946,128	32.8%
DU/AC	21.5	Units Forgone due to Unit Cap in Zoning	0.00	0.0%



District 4 Randolph Avenue Subdistrict Summary Calculations

Metric	Number	Metric	Number	% of Total
District Acreage Denominator	9	Non-Conforming Parcels	0	0.0%
Total Parcels	3	Units within Half-Mile of Transit	0	0.0%
Parcel Acreage	14	Total Excluded Land	32,733	5.4%
Total Built Square Feet	625,125	Open Space Removed/Set Aside	154,575	25.4%
Multi-family Unit Capacity	280	Total Parking Area	204,586	33.6%
DU/AC	32.2	Units Forgone due to Unit Cap in Zoning	0.00	0.0%



District 5 Granite Avenue Subdistrict Summary Calculations

Metric	Number	Metric	Number	% of Total
District Acreage Denominator	20	Non-Conforming Parcels	0	0.0%
Total Parcels	5	Units within Half-Mile of Transit	248	51.3%
Parcel Acreage	133	Total Excluded Land	5,511,310	95.3%
Total Built Square Feet	685,440	Open Space Removed/Set Aside	6,667,923	115.3%
Multi-family Unit Capacity	483	Total Parking Area	93,469	1.6%
DU/AC	24.3	Units Forgone due to Unit Cap in Zoning	0.00	0.0%

Figure 5 provides a comparison of unit capacity based on zoning constraints and compliance model across the five subdistricts.

Figure 5: Checking Key Compliance Criteria

Test Subdistrict <i>(Existing Zoning District)</i>	Modeled Multifamily Unit Capacity	District Size <i>(acres)</i>	District Density Denominator* <i>(acres)</i>	Modeled District Density
Transit Subdistrict 3 <i>(Res-C & Bus)</i>	597 units	15.5 acres	8 ac.	74.6 Units/Acre = 597 Units/8 Acres
Transit Subdistrict 4 <i>(Res-C)</i>	161 units	6.5 ac.	4.2 ac.	38.7 Units/Acre = 161 Units/4.2 Acres
Brush Hill Road Subdistrict <i>(Res-D2)</i>	1,324 units	66.3 ac.	61.6 ac.	21.5 Units/Acre = 1,324 Units/61.6 Acres
Randolph Avenue Subdistrict <i>(Res-B)</i>	280 units	14 ac.	8.7 ac.	32.2 Units/Acre = 280 Units/8.7 Acres
Granite Avenue Subdistrict <i>(Res-C)</i>	483 units	132.8 ac.	19.9 ac.	24.3 Units/Acre = 483 Units/19.9 Acres
TOTAL	2,845 units	234.9 ac.	102.3 ac.	23.8 Units/Acre = 2,433 Units/102.3 Acres
Complaint ?	YES. Minimum 2,461 units required.	YES. Minimum 50 acres required	N/A	YES. Minimum 15 Units/Acre required.

* "District Density Denominator" is the district size MINUS any areas containing: wetlands, water bodies, Title V setbacks, Surface Water Protection Zone A, and Wellhead Protection Zone 1.

Town of Milton

3A Compliance Testing



- T Stations
- Transit Subdistrict 3
- Transit Subdistrict 4
- Brush Hill Road Subdistrict
- Randolph Ave Subdistrict
- Granite Avenue Subdistrict
- Open Space

The information depicted on this map is for planning purposes only. It is not adequate for legal boundary definition, regulatory interpretation, or parcel-level analyses.

Produced by:
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Data Sources: MAPC, MassGIS, MassDOT

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