



Sherborn Conservation Commission
19 Washington Street
Sherborn, MA 01770

October 15, 2015

Ben Stevens
Trask Inc.
30 Turnpike Road, Suite 8
Southborough, MA 01772

**Re: Information Request regarding Wetland Impacts of The Fields at Sherborn
247A Washington Street, Sherborn**

Dear Mr. Stevens:

The Sherborn Conservation Commission has reviewed all materials provided to date by Trask, Inc. and its peer reviewers, BETA Group, Inc., for the property located at 243-247 Washington Street as it pertains to the Notice of Intent (NOI) and request for waivers of local Sherborn wetland bylaws for The Fields at Sherborn project. After reviewing the materials, the commission has identified some areas where more information is required. This request letter does not include the commission's concerns regarding stormwater, a letter outlining those concerns will be submitted to Trask, Inc. shortly.

The Commission requests that the applicant provide the information requested below in writing, and that the requested information be submitted to the Commission at least one week prior to the next public hearing (date to be determined) on this matter.

This request is due to the magnitude of buffer zone changes proposed by the project in that significantly more than half of the buffer zone area protecting the wetland resources adjacent to the proposed project will be altered.

Please find the list below, outlining our additional information needs:

1. NOI applications require a "consideration of alternative project design or location." At our August 31, 2015 meeting, the issue of alternatives was raised (e.g., moving buildings closest to the wetlands and in the buffer zone to create a wider vegetated buffer zone and lessen buffer zone alterations, particularly those within the local 50 foot No Alteration Zone). The applicant responded that such avoidance or minimization would not be considered. This was confirmed in its September 28, 2015, letter. Please provide reasons for not analyzing alternative designs or locations.

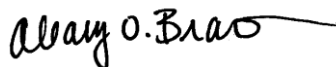
2. The applicant uses, in written and verbal form (i.e., public hearings) the terms “altered” and “degraded.” For example, the applicant has equated previously existing alterations with proposed project alterations. Please define the terms “altered” and “degraded” while addressing how these areas of the site meet the conditions outlined in 310 CMR 10.04 under the definition of “alter.” In your response, please differentiate between upland areas that are currently field versus areas in the 50-foot buffer that are predominantly under the tree canopy.
3. It is the opinion of some members of the commission and the peer reviewer’s wetland scientist, Lenore White, that the previously existing alterations to areas, such as grazing, still protect several of the interests of the WPA. Please specify how the applicant sees the proposed project alterations as similar, in terms of its effects on the interests of the WPA, with those existing.
4. In communication from the applicant on September 25, 2015, it is stated that the applicant no longer proposes mitigation in an area of wetland characterized as previously disturbed (Flag Numbers WF 19N to WF 28N). Given this reduction in mitigation area, please explain how the remaining mitigation will offset the proposed buffer zone disturbances.
5. Please provide more detail on how the plant community, specifically the understory of the southern area of the project site bordering wetlands and mature pines, was determined to be previously altered from grazing. A site visit showed what appeared to be an understory that was sparse due only to the natural effects of a mature pine canopy.
6. Citizens of the town and the former owner have suggested that there has been very little grazing from farm animals on the project site in recent years. In the applicant’s submittal on September 29 2015, farm animal waste has been specified as a previously existing pollutant whose elimination will serve the WPA interest of pollution protection. Please provide details and evidence of farm animal waste found on the site.
7. Given the proximity of some structures to the wetland resource (and the removal of buffer zone vegetation), what restrictions will be put in place to prevent herbicides, chemical fertilizers and other pollutants from entering the adjacent wetland system?
8. The applicant proposed fencing and signage to prevent buffer zone impacts associated with post-construction intrusions and further buffer zone alterations. The commission has two concerns related to fencing:
 - One concern with such measures is that the proximity of such fencing to the buildings leaves inadequate useful outdoor space for the residents. This may, in turn, increase the risk of incursions into buffer zone areas and wetland resources. Please provide some documentation of past success with such fencing and signage when there are little other recreational locations provided on such residential sites.
 - Will the fence prevent or hinder wildlife movement in any way?
9. 310 CMR 10.53 (1) allows the issuing authority to take into account buffer zone characteristics, such as steep slopes, which may increase the potential for adverse impacts on resource areas. Proposed grading up-gradient of WF 114A, behind Building F will create close to a 3:1 slope. Furthermore, grading in other buffer zone areas will also create steep slopes. How will erosion and potential sedimentation impacting the wetland system be avoided in these areas? This is an issue for both during and following construction.

10. Given the large septic system in proximity to wetlands, and given the preliminary analysis provided by Scott Horsley in a letter dated September 30, 2015, please provide data and analyses showing that residual nitrogen loading will not impact wetland ground water sources and affect vegetation and water quality in the wetland resource.
11. How will resource area health and function (such as plant composition) be altered as a result of changes in water supply (e.g. quantity, timing, etc.) to BVW both over the surface and via ground water because (a) post-construction the water is redirected via stormwater system over altered buffer and (b) possible ground water from septic system field in comparison to current pattern, sources and quantity in addition to the concern about groundwater quality in terms of nitrogen and various other chemicals?
12. How will the proposed project provide flood control and storm damage prevention and prevention of pollution under full build-out conditions in the areas not covered by the stormwater management system?
13. Will there be surface flow alterations due to the change in cover type and grade within the buffer zone? How will this not adversely impact the wetland resource?
14. Please explain how the proposed water supply wells that draw from the bedrock aquifers and are proposed in areas that currently drain to the north and west, to upland areas but will be discharging to the wetlands located to the east under built-out conditions, will not result in increased flooding downgradient of the site.
15. How may the change in cover type and grade within the buffer zone impact the wetland's ability to desynchronize water flow into the surrounding wetland areas on the property? How may changes impact wildlife and wetland values in the surrounding wetland areas?
16. How may the proposed changes in hydrology alter the seasonal flow of water from the intermittent stream into adjacent wetland areas? How may it impact rare species habitats in surrounding wetlands?
17. How will the each of the proposed retaining walls affect surface water flows towards and in buffer zone and resource areas and not contribute to erosion, scour and/or sedimentation in the buffer zone and wetland areas? One specific issue is the retaining wall and area up-gradient of wetland flags WF 12N and WF A154 respectively. There are issues of intercepting runoff as well as wall seepage.
18. How will the removal of a significant number of large, mature trees in and near the buffer zone impact the resource area's ability to provide wildlife habitat? While the applicant proposed plantings in the form of mitigation, the project proposed to remove between 50 and 90 mature trees.
 - How will the loss of this wildlife habitat be compensated for in that location or elsewhere?
 - Has a flora survey been conducted for the buffer zone where enhancement plantings are proposed?
 - Have any measures been taken to preserve and enhance existing and/or remaining wildlife habitat features? (e.g., preserving snags, etc.)
 - How will the change in vegetation within the buffer zone impact vegetation within the resource area?
 - How will the removal of shade trees in the buffer and their replacement by impervious surfaces impact the temperature of water flowing into the wetlands? How may this impact the habitat requirements of wetland species such as amphibians?

19. Buffer zone vegetation (including tree crown coverage) has a positive impact on the interests of wetland resources by influencing shading/sunlight, temperature, transpirational cooling, rainfall velocity, hydrology, etc. Therefore, how are the buffer zone changes not going adversely affect the resource areas?
- Are potential adverse impacts of the proposed buffer zone activity only compensated for by the proposed mitigations in other areas of the property? If so, has there been any attempt to match the proposed mitigation plantings, in terms of spacing, diversity, species selection, etc. to match the existing buffer zone vegetation composition?
 - How will the removal of the mature trees in the buffer impact the wetland's ability to hold and retain (recharge) groundwater and discharge it to the surface over a long period of time?
 - How may the removal of mature trees in the buffer impact the velocity of rainwater flowing and related possible erosion/sedimentation into the wetlands? What would be the impact for 100 year storms?
20. Have acoustic surveys been completed for The Northern Long Eared Bat, which was listed by U.S. Fish and Wildlife Service under the Interim 4(d) Rule as a threatened species in April 2015?
- Are there known hibernacula in the area?
 - Are any known roosting trees among those being removed by the project?
 - Has U.S. Fish and Wildlife been consulted in relation to the tree clearing required by the project?
21. Please provide a Wildlife Habitat Assessment (Appendices A and B along with a narrative containing applicable details) for each are of the buffer zones to be altered.

Thank you for your consideration of these matters. We look forward to reviewing your response and discussing these matters at the next scheduled public hearing. Please do not hesitate to contact me with any concerns at 508.651.7863.

Regards,



Allary Braitsch
Sherborn Conservation Administrator/Agent