



October 21, 2015

BY ELECTRONIC MAIL:
conservation@sherbornma.org
AND BY FIRST CLASS MAIL

Sherborn Conservation Commission
Sherborn Town Hall
19 Washington Street
Sherborn, MA 01770

BY ELECTRONIC MAIL:
jeanne.guthrie@sherbornma.org
AND BY HAND

Sherborn Zoning Board of Appeals
Sherborn Town Hall
19 Washington Street
Sherborn, MA 01770

Re: The Fields at Sherborn, 247 Washington Street, Sherborn

Dear Members of the Commission and Zoning Board of Appeals:

This firm represents neighbors and abutters to the proposed 36-unit residential development located at 247 Washington Street in Sherborn (the "Project" or the "Project Site"), which is the subject of a pending Notice of Intent under the Massachusetts Wetlands Protections Act, G.L. c. 131, §40 (the "Act") before the Commission, and also a pending application before the Sherborn Zoning Board of Appeals for a comprehensive permit under General Laws Chapter 40B, Sections 20-23.

As explained in the attached letter of Patrick C. Garner, a wetland scientist and hydrologist with more than thirty years experience, we have serious concerns about the proposed Project's ability to protect the interests of the Act and of the Sherborn Wetlands Bylaw (the "Bylaw"). The Fields at Sherborn, LLC (the "Applicant") is seeking waivers from filing under the Sherborn Wetlands Bylaw, and specifically from Section 3.4 of the Sherborn Wetlands Regulations, which presumes that a 50-foot "No Alteration Zone" is necessary to protect adjacent Resource Areas.

First, the Commission should recommend that the Zoning Board deny the requested waivers, because the proposed Project presents unacceptable environmental risks to: Bordering Vegetated Wetlands ("BVW"), streams, NHESP estimated and priority habitat, and to water quality in a Zone II Wellhead Protection Area. As explained in Patrick Garner's attached letter, a portion of the Project Site falls within the Natural Heritage Endangered Species Program BioCore mapping area, which is so unusual that it is rarely encountered for a property in Massachusetts. BioMap2 identifies "areas that are most critical for ensuring the long-term persistence of rare and other native

species and their habitats, exemplary natural communities, and a diversity of ecosystems.” The entire site is also within NHESP estimated and priority habitat for the Blanding’s Turtle and the Blue-Spotted Salamander, and a Certified Vernal Pool (“CVP”) and two Potential Vernal Pools (“PVPs”) lie just to the south of the property. Given the extreme sensitivity of this particular location, the Commission would be justified in refusing to waive the 50-foot “No Alteration Zone” requirement under its local Bylaw and regulations.

Second, the proposed Project does not comply with the Stormwater Management Regulations for the reasons explained in Patrick Garner’s attached letter, summarized as follows:

1. The subsurface infiltration area outlets in a location less than 10 feet from the edge of BVW. This drainage point (within the 50-foot “No Alteration Zone”) would cause stormwater to enter an intermittent stream that flows into a designated Zone II Wellhead Protection Area, which could threaten the wellhead area.
2. The extreme precipitation runoff numbers used in the Applicant’s HydroCAD calculations are incorrect. The design engineer used 50-year old (1960’s) storm data apparently from the TP-40 atlas. Accordingly, all rainfall events used by the engineer are too low by between 5 - 16%. These differences may impact the groundwater mounding calculations, the stormwater subsurface infiltration area, as well as stormwater pipe sizing. Accordingly, all the HydroCAD stormwater calculations need to be rerun with current storm data to verify the design.
3. Overall project watershed areas appear to be underestimated, as they do not consider runoff from outside the Project property lines to the north and west. Accurate watershed areas are particularly critical for subsurface infiltration design, which the Project relies upon, as any offsite runoff entering the Project treatment stream must be accounted for in correctly sizing the infiltration area.

Finally, the Applicant should provide the Commission with an Alternatives Analysis that provides for a less dense use of the property, with more usable open space for residents. We note that although there is a NHESP-mandated 800-foot buffer on the Project Site to protect the Blue-Spotted Salamander, this buffer cannot be counted as usable open space. A copy of Mr. Garner’s resume is also attached.

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Thank you in advance for your consideration of these concerns.

Very truly yours,


Daniel C. Hill

Enc.

cc: Sherborn Board of Health
Sherborn Board of Selectmen
Ben Stevens