



April 20, 2021

Mr. Richard S. Novak, Chairman
Sherborn Zoning Board of Appeals
Town Hall
19 Washington Street
Sherborn, MA 01770

Re: Wetlands Protection Recommendations
Coolidge Crossing Comprehensive Permit
84-86 Coolidge Street
Sherborn, Massachusetts

Dear Mr. Novak:

The following letter offers our opinions and recommendations to the Sherborn Zoning Board of Appeals (Board) in response to the clear and thoughtful comments expressed by the Sherborn Conservation Commission in their April 11, 2021 memorandum related to the Coolidge Crossing residential development (Project) and related correspondence including.

- February 6, 2021 "Comments on Coolidge Crossing Site Lighting Plan" submitted by Michael Lesser (Lighting Comments).
- April 11, 2021 Memo from Sherborn Conservation Commission commenting on the Project and related process (ConCom Memo).
- April 14, 2021 Smolak and Vaughan response letter (Smolak Response).
- April 14, 2021 Civil Design Group response letter (CDG Response)

The Project has requested a waiver from the Sherborn General Wetlands Bylaw (Wetlands Bylaw) in its entirety which we do not recommend granting. In our opinion, the request is overly broad and unnecessary given the Project, as currently proposed, requires only limited relief. We recommend any request for relief be specific and include a justification for granting such relief and a description of any specific mitigation offered in exchange so the Board can balance the need for affordable housing with local concerns expressed in the Wetlands Bylaw.

The Project has requested specific relief from the 50-foot No Alteration Zone (NAZ) requirement of the Sherborn Wetlands Regulations (Wetlands Regulations). Recognizing that balancing affordable housing needs with the local desire to protect wetland resources is a difficult task, we recommend the Board consider Massachusetts Wetlands Protection Act (WPA) performance standards for protection of Riverfront Area. In our judgement, Riverfront Area, like NAZ, is typically comprised of upland area adjacent to a surface water and as such can serve as a reasonable surrogate in evaluating impacts. Riverfront Area performance standards in the WPA consider Projects limiting alteration to less than 10% of total Riverfront Area as having no significant impact. We recommend the Board request the applicant provide a summary comparing Project impacts within the 50-foot "No Alteration Zone" to the 10% alteration standard for Riverfront Area to assist the Board in its evaluation.

Additional comments are provided below.

STORMWATER MANAGEMENT

The Project has worked cooperatively to minimize impacts to resource areas and their buffer zones and has demonstrated compliance with applicable sections of the Massachusetts Stormwater Handbook. The Handbook is the recognized standard for demonstrating proper stormwater design and the Project designer

(CDG) has shown a clear understanding of those requirements and ability to incorporate them into an efficient project layout and design.

- a. We support any additional measures to reduce impervious surfaces, particularly paved surfaces, including reasonable reductions to required parking space and drive aisle dimensions but generally avoid mandating pervious paving systems for high traffic paved surfaces. Any request to reduce parking space or drive aisle dimensions should come from the Project and its design team as they assume responsibility for the design.
- b. As indicated in the CDG Response, the Project meets all applicable requirements of the Stormwater Management Handbook including meeting the highest standard for water quality pre-treatment, using infiltrating stormwater basins with high pollutant removal performance, and maintaining required offsets from estimated seasonal high groundwater. In our opinion the design includes robust measures for improving stormwater quality prior to its eventual discharge to the adjacent wetlands and additional measures for water quality treatment are not warranted.
- c. Adjacent wetland hydrology is more substantively impacted by runoff from the larger Peters Hill watershed to the east and groundwater associated with Course Brook. We do not anticipate the Project will alter wetland hydrology in any significant way provided stormwater management systems are constructed and maintained as represented in the Comprehensive Permit documentation. We recommend the Board include a condition requiring the Project provide all measures described in the Long-Term Operation and Maintenance Plan included in the submittal materials.
- d. Rainwater collection is an appropriate measure for reducing potable demands and is worth considering as a potential option for offsetting non-potable water demand. However, those measures typically provide very little, if any, demonstrable benefit for managing stormwater due primarily to the large volume of water being managed during a design storm event.

WILDLIFE HABITAT IMPACTS AND MITIGATION

As noted in our earliest comment letter, the Project Site occupies a large portion of the upland area and effectively cuts off access between the wetlands flanking the site. Additionally, Coolidge Street acts as a similar barrier to the west. As such, we recommend the Project incorporate measures to accommodate smaller wildlife seeking to move between the two wetland systems. Larger wildlife is not expected to be affected as the project is relatively narrow with a traversable grade providing suitable opportunity for wetland to wetland movement for larger animals.

- a. We agree and support incorporation of additional measures for small wildlife passage. In our opinion signage alerting motorists as described in the CDG Response is unnecessary and of little benefit. We would rather see simple crossings incorporated on either side of Building 2 instead. Crossings need only extend across the paved ways and be sized to accommodate wildlife smaller than six inches.
- b. We support any effort to reduce light intensity and associated impacts. The Lighting Comments provide excellent guidance on potential ways to reduce light impacts and we suggest the Project closely review those recommendations and incorporate changes where possible. Any reduction in artificial light will benefit the resource areas and associated buffers and minimize impacts on neighbors.
- c. We support efforts that result in more robust buffer zone vegetation. The Project has identified two areas where such measures are suitable and has offered to include design of those enhancements in the Final

Plans. We recommend the Project provide a simple sketch identifying those areas and their approximate areas along with a representative plant list for reference in a permit decision.

LANDSCAPE PLAN FOR JURISDICTIONAL/BUFFER ZONE AREAS

The Applicant has provided a Landscape Plan showing location, species and size of proposed landscape plantings which show reasonable coverage and density to elevate finish of developed areas. While we agree that additional planting in the buffer zone may be beneficial, it is intended to serve a different function and details of its construction are perhaps best reviewed as part of the Notice of Intent process. Those improvements will logically be within Wetlands Protection Act jurisdiction and resolution of specific treatment is best suited to that review process provided the scope and scale of mitigation is documented in the Comprehensive Permit as described under 2c above.

- a. We recommend the Project provide a simple Buffer Zone Impact Mitigation Sketch. The sketch should identify areas where landscaping is intended specifically for the purposes of offsetting buffer zone impacts and should also include a reference plant list identifying the contemplated palette of proposed vegetation. Our expectation is that specific layout and construction details will be reviewed by the Conservation Commission under the Notice of Intent and the scope and scale of those improvements will be consistent with commitments shown on the sketch provided to the Board.
- b. See response above.
- c. See response above.

We can be available to discuss these matters in detail at the Board's next hearing if needed. If you have any questions or comments in the meantime, please feel free to contact me at (508) 786-2230 as Steve will be on paternity leave for the next several weeks.

Very truly yours,



Sean P. Reardon, P.E.
Vice President

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