



Board of Health

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MEMORANDUM

TO: Sherborn Zoning Board of Appeals
FROM: Daryl Beardsley (Chair) on behalf of the Sherborn Board of Health
DATE: February 18, 2021
RE: Comments on January 28, 2021 Responses to the Comprehensive Permit Peer Review for the Proposed Coolidge Crossing Project

This memorandum provides comments resulting from the Board of Health's (BOH) consideration of selected issues raised by the Peer Reviewer and responded to by the Project Proponent in the document indicated above.

Please note that the BOH has not had the benefit of discussion directly with the project proponents on issues relevant to public health. As the BOH has been and continues to be particularly occupied with pandemic-related activities, it would help us to be alerted to specific ZBA or other meetings on this project at which BOH involvement would be appropriate.

For numbered issues identified in the above-referenced letter and listed below, the BOH has kept the descriptions of its concerns brief for ease of review.

- **#7, #8, #9 – Utility Plans:** Compliance of spatial relationships among water lines, sewer lines, and stormwater features is important to verify for reasons of drinking water sanitation.
- **#11 – Stormwater Plan:** BOH requirements are concerned with how site changes may alter stormwater flows between the project property and neighboring properties (e.g., is run-off or run-on changed by more than +/- 10 percent).
- **#12 – Irrigation Wells:** On-site wells that are not categorized as public water supplies are regulated by the local BOH and must achieve potable water quality standards. Furthermore, and importantly, for reasons of groundwater supply sustainability, BOH regulations do not automatically permit irrigation wells.

- **#18, #20 – Stormwater Management Relative to Groundwater:** Groundwater evaluations on-site were not observed by the BOH and calculations for historic high groundwater levels have not yet been reviewed by the BOH. These assessments should be performed under BOH oversight, in accordance with standard BOH requirements. Accurate identification of historic high levels is important because any individual season's observations may not sufficiently define conditions to be encountered over the long term.

Although subsurface stormwater infiltration basins proposed for the project have the potential to enhance groundwater recharge, they may also pose risks to groundwater quality due to contaminants that may be carried by stormwaters. Thus, the construction of such basins must take into account their positioning relative to maximum high groundwater levels, soil types, and other factors.

- **#22 – Snow Management:** Arranging for on-site snow storage to the maximum extent possible is recommended for reasons of groundwater recharge.

Snow and ice management should be accompanied by controls on de-icing chemical use because such chemicals may have bearing on groundwater quality. As the project is to obtain water from a neighboring municipality's system, any negative groundwater quality or quantity impacts attributable to site management activities will not affect the operators or occupants of the project and will not be an independent motivator for protective behavior. Thus, it would be appropriate to require a written plan to minimize impacts to surface and groundwater quality, to offer protection for surrounding properties relying upon the shared groundwater resource. The plan should be reviewed periodically by Town authorities.

- **#25, #26 – Water:** If the water supply is to be provided by on-site wells, the BOH's November 6, 2017 document titled "Comments on Trask's Proposed Coolidge Street Projects" describes issues for which the BOH would have significant concerns, including:
 - the long-term sustainable yield of such wells, including their impacts to surrounding private wells;
 - a potential draw of contaminants from the General Chemical site; and
 - the resulting export of water from Sherborn via the wastewater service provided by a neighboring town's sewer system.

If a condition of approval is to be considered regarding the water supply, the BOH suggests that it explicitly references a requirement that the applicant secures an adequate *and non-Sherborn municipal* water supply *connection* to support the project.

- **#27, #28, #29 – Sewer:** Refer to comments associated with #7, #8, and #9 regarding the positioning of sewer lines, and to that pertaining to more specific qualifiers for a condition of approval similar to that indicated under #25 and #26.

The BOH is open to additional, more detailed communications on these issues.