

TOWN OF SOUTHBOROUGH



CONSERVATION COMMISSION

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February 26, 2025

Zoning Board of Appeals
9 Cordaville Road
Southborough, MA 01772

Subject: 250 Turnpike Road Comprehensive Permit Comments, Revised Materials

Zoning Board of Appeals Members,

The Conservation office has the following comments based on the submitted revised documents including Site Plans and responses to peer review comments provided to the ZBA. Due to timing, the Conservation Commission has not discussed these comments as a Commission, so they come solely from the Conservation Agent.

1. There is still a large quantity of comments provided within the Cover Letter by Expedited Engineering, LLC dated February 12, 2025 which state items 'will' be provided or complied with and have not yet been done. As such, it is difficult to provide updated comments when site plans have not been provided that demonstrate the requested changes.
2. There are references to 'working with the Conservation Commission and the Commission's outside reviewer, Lucas Environmental, LLC.' Conservation would like to clarify that at this time, no submittals for the 40B project have been submitted to the Conservation Commission and for the purposes of the application in front of the ZBA, Lucas Environmental, LLC is the contracted reviewer for the ZBA.
 - a. While Lucas Environmental, LLC is contracted with the Conservation Commission as our standard peer reviewer and is familiar with the concerns and applicable regulations of the Commission, Conservation urges the ZBA to take Lucas' comments to the Board as required information needed for ZBA to make their determination of compliance of the project with 40B regulations.
3. There does not appear to be any change or decrease to the amount of proposed work within the 20' no disturb zone under the Southborough Wetlands Bylaw. As referenced in the previous comment letter issued by the Conservation Commission on January 7, 2025,

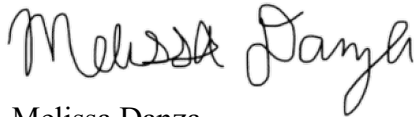
the Commission would like to state that rarely do they issue waivers to the 20' no touch for actual development purposes of lawns and structures. The Commission has allowed for work within the 20' to commence for small areas of encroachments or temporary impacts if proper mitigation is provided. Per the plans submitted to date, there is no proposed mitigation and therefore is showing a large disruption of the 20' no touch.

- a. The Commission believes, and as stated in our Bylaw and Regulations, that the 20' buffer zone is extremely important and that conversion of forested areas to maintained lawn and buildings will have a detrimental effect on adjacent wetland resource areas and habitat.
 - b. The Commission would like to note that they have previously requested and worked with applications on 40B projects for redesigns for compliance with the Bylaw, such as the Park Central application.
4. The Board may want to consider requiring Lucas Environmental to accompany the Applicant's representative during the Vernal Pool assessment to confirm findings.
5. Erosion controls behind Units 1 & 2 still appear to not be connected.
6. The new drainage manhole and connection proposed near Unit 1 is outside of the limit of work and has no erosion control protections.
7. The Engineer has responded that they have added a retaining wall adjacent to Unit 1 to mitigate the 1:1 slope. The plans only show a retaining wall adjacent to Unit 2. Please clarify.
8. Conservation recommends that snow stockpiling areas be referenced on the plans so that snow from the roadway and driveways are not pushed into adjacent wetland resources.
9. In the Goddard Consulting response letter dated February 13, 2025, the Board and Applicant should ensure that all comments referenced that state items will be included in the plans are done so accordingly, such as additional erosion controls and no plastic netting.
10. Goddard Consulting mentions the presence of an Invasive Species Management Plan (ISMP) that was provided for an application under DEP #290-1107 for 250 Turnpike. Conservation would like to clarify that the referenced application and permit is for a proposed contractor's building and is not related to the construction proposed under the Comprehensive Permit Application. An ISMP should be provided for this project as approvals under DEP #290-1107 cannot be 'extended' to provide impact to this project regardless of their status of an approved document. A separate document must be provided for submittal under the Comprehensive Permit Application.

11. Conservation recommends that the Board request further mitigation measures to make up for potential loss of wildlife habitat within the 100' Buffer Zone such as invasive management, planting of native vegetation, etc.
12. The Site Plans do not appear to contain the revision regarding meeting the MA Stormwater Management Standards regarding stormwater discharges to Outstanding Resource Waters (ORWs) and setbacks for infiltration structures.
13. Per Lucas Environmental's comment, the 50' setback from wetlands should be included on the Site Plans due to the presence of ORWs.

Conservation and the Commission look forward to reviewing revised Site Plans that include all suggested revisions. Please do not hesitate to contact the office at your earliest convenience with any questions.

Sincerely,

A handwritten signature in black ink that reads "Melissa Danza". The signature is written in a cursive, flowing style.

Melissa Danza
Conservation Agent