

John Palmer
131 Parkerville Road
Southborough, MA 01772

May 20, 2025

Mr. David Williams, Chair
Southborough Zoning Board of Appeals
9 Cordaville Road
Southborough, Massachusetts 01772

by email only

Re: Public Hearing – FD 250 Turnpike LLC 40B Development – May 21, 2025

Dear Mr. Williams:

I am a direct abutter to 250 Turnpike Road. I live at 131 Parkerville Road. FD 250 Turnpike LLC is seeking a Comprehensive Permit under MGL Chapter 40B to construct a 32-unit townhouse development. While I am in support of a townhouse development in lieu of the originally proposed apartment building, I remain primarily concerned that the property in question is unsuitable for a development of this size.

As expressed in my letter dated December 16, 2024, I believe the property in question is unsuitable for development for two fundamental reasons;

- a) The **topography of the land is unsuitable** for a development of this size and scale, especially given the designated wetlands across the site
- b) The proposed development will **exacerbate an already problematic stormwater management system** across the property and across the neighborhood, all of which could likely damage my property or cause other storm water management issues within town

The peer reviews of the applicant's latest site plans have substantiated my concerns as open issues with the latest site plans. As of today, I have not seen revised site plans that address my concerns and/ or the open issues as reported in the peer review findings. Specifically;

- c) **Mass Title 5 Regulations & the Sudbury Reservoir Watershed:** Massachusetts Title 5 regulations under 310 CMR15.211 require specific setbacks of 200 feet and 100 feet from tributaries to surface water supplies and wetlands bordering tributaries thereto respectively. The 250 Turnpike project area shows on MassGIS maps as containing a "tributary to the Sudbury Reservoir" and designated wetlands across the site. As such, the site's proposed septic tanks and soil absorption systems do not appear to meet the setback requirements of Massachusetts Title 5.
- d) **Stormwater Management:** Stormwater management will pose a significant challenge given the proposed development. As one of several property owners directly downgrade from the proposed development, I have significant concerns that the proposed

development will negatively impact my property and my neighbor's properties. Furthermore, the Town should be concerned about the impact on the aforementioned tributaries to the Sudbury Reservoir and the impact on the Town's stormwater management design of the entire downgrade area (i.e., Route 9 east of 250 Turnpike, Route 9/ Parkerville Rd intersection, Route 9/ Middle Road intersections, and eventual stormwater management into the Sudbury Reservoir). The proposed stormwater management design appears problematic and inadequate in several ways.

As a means of illustrating the Stormwater Management issues given current conditions, I am including a set of slides that depict my informed understanding of the existing stormwater management across the site and across impacted neighborhoods. These slides also illustrate the extent of the current condition issues as depicted in pictures taken during a recent heavy rainstorm. I ask the ZBA to consider these issues as represented in the context of these slides.

Has the ZBA or the Southborough Board of Health requested that the applicant apply for a variance, both with the local Board of Health and Mass DEP regarding the septic system design?

It also appears that the EPA's clean water Act regulates the discharge of pollutants into U.S. waters to ensure water quality and that this site plan design will require an EPA NPDES Construction General Permit (CGP) for land disturbances over an acre. **Has the ZBA and/ or the applicant filed for an EPA DPDES CGP at the state or federal level?**

I respectfully ask the ZBA to ensure these issues are addressed through the approval process of the applicant's Comprehensive Permit.

Sincerely,

John Palmer

cc: John St. Andre (by email only)
Brian Charville (by email only)
David Ferris (by email only)

Enclosed: Illustrations of Current Condition Stormwater Management Issues