



Town of Sudbury

CONSERVATION

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Wetlands • Conservation Land Management • Land Protection • Stormwater

To: Adam Duchesneau, Director of Planning and Community Development
From: Lori Capone, Conservation Coordinator
Date: March 27, 2020
Re: Cold Brook Crossing

Thank you for the opportunity to review the proposed Cold Brook Crossing Development. I provide the following comments on wetland related elements.

The applicant had preliminarily met with the Conservation Commission on December 30, 2019 to discuss using the existing driveway for the cell tower as an emergency access roadway. I was pleased to see that this driveway is no longer being proposed, resulting in a project that no longer proposes alteration to an undeveloped Riverfront Area. The Wastewater Treatment Plant, however, is still proposed within the Commission's jurisdiction, specifically an altered Riverfront Area and 100-foot Buffer Zone. The Wetlands Protection Act exempts the construction, expansion, repair, restoration, alteration, replacement, operation, and maintenance of public or private local or regional wastewater treatment plants and their related structures, conveyance systems, and facilities, including utilities from meeting the performance standards for work in the Riverfront Area. The Sudbury Wetlands Administrative Bylaw does not provide for this exception. There also appears to be grading for this facility in the Buffer Zone which would not be exempt under this provision of the Wetlands Protection Act. Therefore, a Request for Determination of Applicability will need to be submitted for this aspect of the proposed development. There is a significant vegetated hill between this facility and the adjacent wetland resource area, therefore construction of this wastewater treatment plant should pose no negative impacts to the resource area.

The development includes the retention of 9.9 acres of land by the Conservation Commission, which land was voted into conservation at the April 7, 1998 Annual Town Meeting. The developer should work with the Conservation Commission to develop a trail connection between Cold Brook Crossing and the future Bruce Freeman Rail Trail.

Phase I of the project includes site grading, construction of the Wastewater Treatment Plant, leaching field, stormwater management system, underground infrastructures, access drive and construction of 90 residential units. The project, when completed, will result in 9.7 acres of new impervious cover. The Stormwater Management System was designed for 1.6 acres of porous pavement to be used within the development to keep the total impervious cover below 10 acres, as new impervious coverage exceeding 10 acres would trigger a mandatory Environmental Impact Report. If non-porous pavement is required during construction to provide adequate access for the Fire Department and other emergency vehicles, the SWPPP will need to provide adequate temporary stormwater management features during construction to manage any additional stormwater generated by these surfaces, until the porous pavement is installed. The project should be phased to ensure that the site does not contain more than 10 acres of impervious cover at any given time, and/or confirm with MEPA that further review is not required. As porous asphalt is proposed only in some areas, the applicant should provide information on how snow removal contractors and homeowners are going to be informed on where these surfaces are located and how they are to be managed to maintain their porosity.

Please do not hesitate to contact me with any questions.

Respectfully,

Lori Capone
Conservation Coordinator