



TOWN OF WELLESLEY MASSACHUSETTS WETLANDS PROTECTION COMMITTEE  
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## Memo

**To:** Lenore Mahoney, Executive Secretary, Wellesley Zoning Board of Appeals  
**From:** Julie Meyer, Wetlands Administrator, Wetlands Protection Committee  
**cc:** Michael Zehner, Dave Hickey, Meghan Jop, Tom Harrington  
**Date:** May 30, 2018  
**Re:** ZBA 2018-25

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**Dear Lenore,**

The Wetlands Protection Committee reviewed the application submitted for the incoming 40B residential development at 135 Great Plain Avenue. The submitted plans and the accompanying presentation to ZBA on April 26, 2018 show the project is committed to avoiding impacts to jurisdictional areas under the State's Wetlands Protection Act and DEP regulations.

Members of the Wetlands Protection Committee walked the site on May 14 and requested additional information from Northfield about potential site impacts along the wetland resource area borders. The NRC office received clarification memos and updated schematic plans on May 17 that addressed these questions. As a result, the following are three requests we recommend the ZBA ask of the applicant when considering the project.

The WPC will continue to follow the ZBA review and may follow up with additional comments.

At this point, we are not recommending a peer reviewer to review the development impacts, but acknowledge that one might later be determined to be necessary to assess impacts. The project should preserve and protect public water supply and wildlife habitat and fisheries; prevent groundwater and water pollution; and control for erosion and sedimentation at all stages.

## **Requests**

### **1. Revise the waiver**

The waiver for the Town of Wellesley Wetlands Protection Bylaw for the area within the Bylaw Riverfront Area might be revised to reference specific performance standards as approximately 2% more of the site would be protected (about 10,000 sf) if the Riverfront Area Bylaw performance standards were met.

The WPC when reviewing projects under the Bylaw Riverfront Area performance standards may allow alteration of up to 5,000 square feet or 10% of the site on lots recorded on or before October 6, 1997 when at minimum, a 100-foot wide area of undisturbed vegetation along the river is maintained or extended to the maximum extent feasible to approximate a 100-foot wide corridor of natural vegetation. It is still unclear how many square feet will be maintained as open space.

Structural stormwater management measures are typically allowed within 100 feet of the river only when there is no practicable alternative in an Notice of Intent.

*"if less than 5,000 sf or 10%, if stormwater is managed according to regulatory standards, work shall not impair its capacity to provide important wildlife habitat functions... shall not impair groundwater or surface water quality by incorporating esc... other measures to attenuate non-point source pollution... shall not impair capacity to provide for recreation...."*

Replacement of trees should be conditioned and monitored post-construction.

### **2. Conduct grading with best practices to ensure sensitivity to tree survival**

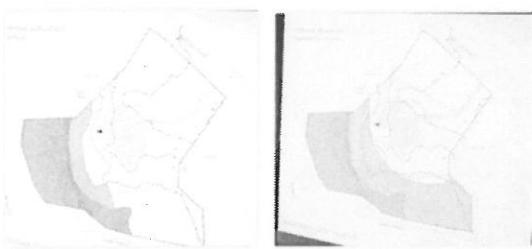
We appreciate the DPW Engineering Division review of impacts to the wetland resource areas. To their assessment, we would add that special attention needs to be paid at every stage of construction during grading, tree removal, and revegetation activities. While the project states the disturbance activities are limited to minor regrading, trees may need to be removed during or after construction. Loss of trees within the Bylaw Riverfront Area may inadvertently result in an adverse effect to the wildlife habitat represented by trees downslope from the limit of work during construction and should be minimized and mitigated for to avoid water quality impacts and reduction of wildlife habitat.

Grading to establish backyards, infiltration zones and for tree removal should be performed with the smallest and lightest equipment along the limit of work. Small equipment will disturb less soil and compress and compact less soil over tree roots. The ZBA should presume that fill over remaining tree roots at edge of LOW will lead to eventual tree failure and mitigation should these trees fail should be required as offered. During pre-construction, the project contractors might invite the Wetlands Administrator or the DPW Park & Tree Division to inspect the limit of work line and trees along the line and decide if the ESCs might be moved to better protect

certain trees, or if plywood or other materials might be placed along the edge to reduce compaction. The grading might take place in late fall/winter when soil is stiffening, and sequenced to put the sediment barriers and socks up in a way that immediately stabilizes exposed soil. If trees fail along the limit of work these trees should be replaced, as the Northland memo states.

The discharge outlet 10 -20' away from the floodplain line should be monitored for avoiding impacts to the resource including runoff, erosion, and sedimentation. An O&M plan should be developed for the landscape management company and that should include conditions that no deicing chemicals excepting calcium-based be used. Only organic slow release fertilizers should be used. The O&M Plan should prohibit any hazardous materials or liquid petroleum be used on site near any catch basin to ensure none end up in the infiltration system. All catch basins should be confirmed to be fitted with oil and grease traps (See Section VII, C of permit).

### **3. Define "Open Space"**



From the 4/26/18 ZBA PowerPoint slideshow: the left slide shows the state jurisdictional Water Resource Areas (Protected Areas). The right slide shows what the project is proposing as open space, extending into the site with a light olive color. If townhouses are to be placed in that zone, that is, if "open space" area in the light olive green includes buildings, the land around it thus may feel natural but wildlife habitat within it will be diminished. It would be helpful to understand the wildlife habitat quality of the open space that is on the site.

### **4. Condition practices that protect water quality**

On steeply sloped portions, the project should choose fast-establishing seed mixes that contain no invasive plant species. If herbicides are anticipated to establish the meadow or manage invasives, this should be established and the applicant should utilize the services of professionals with experience in meadow establishment. The project O&M plan should allow only slow-release organic fertilizers and on a schedule and rate that is followed to eliminate run-off. The project should be conditioned to ensure that no plants on the schedule are one of the prohibited plants in Massachusetts: <https://www.mass.gov/service-details/massachusetts-prohibited-plant-list>.

Lawn establishment on site has a high potential for fertilizer runoff into the infiltration system and moving across the site into the resource areas. Thus, we recommend the landscape

contractor choose low-mow or no-mow seed mix, create low-mow zones, and to maintain wide paths in all grassed zones safe for walking.

Finally, the Natural Resources Commission will be reviewing tree removal along Great Plain Avenue as street tree cutting along the right of way requires a hearing under MGL Chapter 87.

Thank you for the opportunity to provide this review. Please let us know if there are any questions or if we can provide examples of conditions that are typically used in Orders of Conditions in similarly proposed developments.

Julie Meyer

A handwritten signature in black ink that reads "Julie Meyer". The signature is fluid and cursive, with "Julie" on the top line and "Meyer" on the bottom line.

Wetlands Protection Committee