

## TOWN OF WAYLAND

41 COCHITUATE ROAD
WAYLAND, MASSACHUSETTS 01778

## **MEMO**

DATE:

September 11, 2018

TO:

The Zoning Board of Appeals

FROM:

Julia Junghanns, Director of Public Health

Linda Hansen, Conservation Administrator

RE:

Cascade Wayland - Ch40B development-hydrogeologic report and peer reviews

We would like to express our continued concerns regarding the affordable housing project proposed at 113-115 Boston Post Road. Attached is a peer review of the Hydrogeologic report from Nover-Armstrong Associates jointly funded by Board of Health and Conservation. Their comments reinforce the recent peer review by TetraTech and the independent consultant review of the hydrogeo report for this project.

One of the largest concerns is the impact of this development on the coldwater stream. Due to the environmental sensitivity of the brook there is a need for further study on surface/groundwater interaction. The soil testing on this property shows areas of ledge and we have concerns for ledge/bedrock and the potential for untreated wastewater to infiltrate through bedrock and into the coldwater stream (especially given the large flows proposed). We understand that groundwater flow is east to west driven by bedrock and ledge on the property warranting a ledge study. These deficiencies need to be investigated to determine potential impacts on the stream from nutrient loading, that require investigation into groundwater flow, subsurface conditions, interaction between the brook and groundwater, groundwater monitoring/temperature, monitoring of the Brook using gauges/piezometers, water quality impacts, collecting further Pinebrook and Groundwater data. In addition, the thermal and water quality impacts of stormwater runoff to the stream need to quantified. As currently designed, the stormwater management is substantially undersized, allowing stormwater runoff from greater than 2-year storms to flow to the stream untreated. The presence of ledge/bedrock at the site could exasperate the impacts by limiting the amount of onsite stormwater infiltration and cause potential flooding. Impacts from the anticipated stormwater infiltration system need to be addressed in the hydrogeologic report.

As outlined repeatedly in the peer review and independent review, there are many questions that were asked by the peer reviewer TetraTech and were not answered or were answered by stating that further work "can be performed under future BOH (septic) or DEP (groundwater discharge permit submittals)." This is not acceptable or helpful to address our concerns related to this development and we feel the information is pertinent to your decision and further study should be requested from the applicant. The applicant has stated that they feel it is beyond the agreed-upon scope of work for this project but we do not agree. A project of this magnitude served by a septic system and/or treatment plant in an environmentally sensitive area requires an evaluation of the potential impacts of the development on the stream, the relationship of groundwater to stream flow, the presence of ledge/bedrock on site, and incorporation of stormwater runoff in the groundwater mounding analysis before a decision can be rendered.

As a reminder the Board of Health voted on April 11, 2018 recommending that the ZBA not grant the requested BoH waivers for this project. Additionally, the applicant has indicated that they have an updated waiver list, however, as of today's date a new waiver list not been provided.

Before a decision is made, we encourage the Zoning Board to request that further studies be conducted by the applicant to determine if there will be an impact on the brook and what type of treatment would be needed to preserve the habitat and water quality of the Brook.