



October 27, 2023

Mr. Richard S. Novak, Chair
Sherborn Zoning Board of Appeals
Town Hall
19 Washington Street
Sherborn, MA 01770

**Re: Farm Road Homes – Comprehensive Permit
Civil Engineering Peer Review
Sherborn, Massachusetts**

Dear Mr. Novak:

Tetra Tech (TT) has reviewed specific submittal materials for the above-referenced Project to assist the Sherborn Zoning Board of Appeals (Board) in its Comprehensive Permit review of the proposed Farm Road Homes development. The following letter provides comments generated during our review of Applicant submittals and generally focus on substantive concerns that speak to issues whose eventual resolution may substantially impact Project design or could otherwise result in potentially unsafe conditions or unanticipated impacts.

The Project includes development of 32 units of housing on approximately 14 acres of land. The site is bounded by woodland to the north and east, Farm Road to the south and residential properties to the west. Wetland resource area is located on the western portion of the site and an isolated wetland located in the southeast corner of the site. Seven (7) private wells are proposed as water supply for the Project. Sanitary sewer system is proposed to route sewer flow to a proposed pump station and septic system located on the western portion of the site adjacent to the wetland resource area. The Applicant is proposing a solar array at the northern portion of the site on an existing cleared plateau to generate energy for the Project which will also be connected to the grid to supplement.

Our review is based on materials received from the Board comprising the following pertinent documents:

- A Project Narrative (Narrative) titled "Project Description – Comprehensive Permit Application, Farm Road Homes, Portion of 55-65 Farm Road, Sherborn MA."
- A plan set (Plans) titled "Comprehensive Permit Plan of Farm Road Homes at Farm Road, Sherborn, MA", dated July 6, 2023 with revisions through September 28, 2023, prepared by Creative Land & Water Engineering, LLC. (CLawe)
- A Stormwater Report titled "Flood Impact Analysis and Stormwater Management, Farm Road Homes, 65 Farm Road, Sherborn, MA", dated September 28, 2023 with revisions through October 4, 2023, prepared by CLawe.
- A MA Title V Report dated July 29, 2021 with revisions through January 20, 2022, prepared by CLawe.
- A Firetruck Turning Analysis dated July 7, 2023, prepared by Vanasse & Associates Inc. (VAI)
- A Landscape Improvement Plan, dated July 17, 2023, prepared by Ryan Associates
- A Zoning Analysis summary table.
- Request for Determination of Applicability, Preliminary Approval Request DEP letter dated August 14, 2023
- Letters and reports submitted to DEP for well determination.
- Letter to MassDEP with attachments (including Sherborn Groundwater Protection Committee) from Mr. Brian and Ms. Mary Moore dated September 27, 2023.
- Letter to ZBA Additional Comments on Farm Road Homes - Restriction and Stormwater Management Plan dated October 3, 2023.

The Plans and accompanying materials were reviewed for good engineering practice, overall site plan efficiency, stormwater, utilities, wetlands and public safety as it relates to each of the subject areas. Traffic review was completed under separate cover. Our initial comments are provided below.

SITE DESIGN

The Site Plans provide a good introduction to the scope of the Project and its various components. The following specific comments are offered to identify areas where additional information is required, or changes are requested to address questions or support further review.

1. The Project roadway is approximately 750 feet in length which exceeds the maximum length allowed under local subdivision regulations (600 feet maximum). The Applicant shall coordinate with the Sherborn Fire Department to determine if the proposed roadway length poses a risk to emergency access.
2. The access driveway for Units 1 through 7 is greater than 150 feet in length and does not include a turnaround. Additionally, a solar canopy is proposed over the adjacent parking which may impede access by emergency response vehicles. The Applicant shall coordinate with the Sherborn Fire Department to determine if the proposed access driveway poses a risk to emergency access.
3. The proposed fire tank/cistern is located at the rear of the site but no method for Fire Department hydrant access is available at any other areas across the site. Typically, a dry hydrant system would be proposed throughout the development in this situation. The Applicant should provide written confirmation from the Sherborn Fire Department that this condition is acceptable. The proposed development is dense and confirming methods of fire suppression are critical to public safety.
4. The location of the fire cistern would require a pump truck to block the roadway in the event of a fire emergency at the site. We recommend the Applicant consider proposing a parking space for Fire Department use with dimensions suitable to accommodate the department's pump truck.
5. A 1:1 slope is proposed at the bottom of a proposed retaining wall west of the proposed fire cistern. This may contribute to an unsafe condition as any erosion in the 1:1 slope may compromise the wall. The Applicant should detail top and bottom of wall elevations and include a detail of the wall on the Plans.
6. A 1:1 slope is proposed upgradient of the northwest corner of the parking area at Units 1 through 7. It is unclear if this slope is contained on the subject property as it appears two iron rods were located in this area but the property line with #55 Farm Road does not appear to meet at those points. The Applicant shall clarify, through their licensed surveyor if the property limits provided are correct. Additionally, 1:1 slopes are prone to erosion and stormwater will be directed through this area.
7. The Applicant should detail utility corridors for the proposed solar arrays and the wells. We anticipate utilities will be installed in the proposed access road along the east side of the Project and the installation may be complex with the number of wells and solar arrays proposed. The Applicant should also confirm if the utility company will require utility poles (load breaks, metering, recloser, etc.) at the interconnection point. Additionally, the wattage of the proposed system should be provided to determine if a waiver is needed from local bylaw which regulates ground-mounted solar facilities.
8. Grading and drainage scope is shown on adjacent Lot 2B. The Applicant shall confirm if that property is part of the Comprehensive Permit Application. If not, that scope should be removed from the Plans or shown in some other manner to differentiate it from the portion of the site dedicated to the Comprehensive Permit Application. Written confirmation from the abutter shall also be provided to confirm their acceptance of the proposed scope on their property.
9. We recommend a fence with gate be proposed at the well/solar array access road to prevent unauthorized access. This is suggested for the protection of the residents from access to potential high voltage equipment associated with the array and protection of the wells from potential vehicular damage.
10. A retaining wall and solar arrays are proposed within the 15-foot pedestrian access easement on the east side of the Project. We recommend the Applicant provide easement documentation allowing this encroachment.

11. It is our understanding that horse stabling and/or farming once occurred at the site and several outbuildings remain in a dilapidated condition. The Applicant should clarify if they have performed any due diligence related to potential soil contamination at the site or known underground tanks.
12. A roadway profile and roadway cross-section should be included in the Plans.
13. We anticipate foundation drains will be required for each of the dwellings. Foundation drains should be provided on the Plans.
14. The Applicant should provide a stamped site survey to confirm the site was surveyed by a Massachusetts licensed professional land surveyor.
15. The entire Project scope does not appear to be included on the development overview located on the cover sheet which is missing the solar array and other at-grade items such as maintenance access ways, limit of clearing, etc.
16. The plans are very “busy” with a lot of information included on a small number of plans. We recommend sheets be added to the plans set particularly a separate Utilities Plan and Grading and Drainage Plan.
17. Plans are provided in color presumably for presentation purposes. We recommend all plans be provided in grayscale.

STORMWATER

The Project scope includes development of 32 units of housing clustered on approximately 14 acres of land. Stormwater runoff generated by the Project is proposed to discharge to traditional piped infrastructure and vegetated swales to direct runoff to four proposed infiltration basins. The Stormwater scope was reviewed against the Massachusetts Department of Environmental Protection (MA DEP) Stormwater Management Standards (Standards) and Stormwater Handbook (Handbook). The Project was also reviewed for general stormwater design elements and good engineering practice.

It is our concern that the information required to make reasonable conclusions on the viability of the proposed stormwater infrastructure is lacking and additional information is required to ensure the Project is feasible given the current development program. Furthermore, the density of the Project and site conditions/constraints provide minimal latitude for any deviations in the stormwater scope related to unforeseen site conditions.

The following comments are offered specific to the Project Stormwater design.

18. We recommend the Applicant provide the excel files for the Basin Outflow Analysis, Curve Numbers and Time of Concentration calculations as all calculations appear to have been completed on proprietary spreadsheets developed by the Applicant's engineer which is not typical in the industry and review of such is inefficient. The excel spreadsheets must be reviewed to ensure calculations and equations used are correct to ensure proper accounting of runoff. (Standard 2)
19. The Applicant shall provide the HECHMS model printout for review to ensure proper accounting of runoff. (Standard 2)
20. It appears off-site areas from the north and from Farm Road may flow into the Project area. Off-site areas should be included in the analysis, particularly since that flow will be directed to proposed stormwater best management practices (BMP's). Additional detail shall also be provided for the existing 10" corrugated metal culvert (presumably from Farm Road drainage) that discharges onto the property. This is required to ensure proper accounting of runoff in the analysis. (Standard 2)
21. The Applicant shall clarify if Lot 2B is included in this Application and whether the Applicant controls or has a written agreement with that owner to discharge stormwater runoff from the Project to that Property. Additionally, we recommend the analysis point for stormwater discharge from the Project site be the east property line of Lot 2B rather than the proposed culvert located on the west side of Lot 2B. This will ensure runoff is analyzed and mitigated prior to discharge to that lot. (Standard 2)
22. Many test pits shown on the Plans were not provided in Table D.1 in the Stormwater Report nor were logs provided in the Stormwater Report to confirm soil horizon information. The Applicant is proposing four infiltration basins dispersed throughout the site to mitigate stormwater runoff generated from the

development as well as provide groundwater recharge and water quality treatment. All Infiltration BMP's shall include at least one test pit, performed by a Massachusetts certified soil evaluator, required to determine soil type, soil profile and depth to estimated seasonal high groundwater (ESHGW), all information should be provided using test pit logs. Infiltration Basins A, B1 and C are proposed in areas mapped as HSG C and D soils which is not recommended. (Standard 3)

23. Exfiltration swales are noted for catchment areas AP-1 through AP-3 in the schematic layout of the proposed stormwater system. The Applicant shall clarify where the exfiltration swales are located within the catchment areas and provide test pit data to confirm soils and ESHGW at the BMP's. (Standard 3)
24. A portion of the entrance drive is not directed to an infiltration BMP. A Capture Area Adjustment shall be provided for this area. (Standard 3)
25. The Applicant shall provide the calculation method and calculation sheets for the determination of hydraulic conductivity used in groundwater mounding. Identify and include the test well used to determine the saturated thickness of the overburden. Field test methods for hydraulic conductivity shall be measured by the methods noted in the Handbook. Title V percolation tests shall not be used to test for saturated hydraulic conductivity in stormwater design. (Standard 3)
26. Stormwater basin elevation along with groundwater mounding should be added to (or in separate cross-sections) the cross-sections identified in Section E to demonstrate there is no breakout or interference with the groundwater mound from the septic systems. (Standard 3)
27. Appendix D of the Stormwater Report notes that an unsaturated zone is not required under an infiltration BMP. This conflicts with the MA DEP Handbook which requires a minimum two-foot separation to estimated seasonal high groundwater (ESHGW) for Infiltration BMP's. (Standard 3)
28. The Total Suspended Solids (TSS) removal worksheet for Basin A notes a water quality swale located between the proposed catch basin and the oil/grit separator. Piping is proposed between those two structures and the water quality swale should be removed from the calculation. (Standard 4)
29. The Applicant notes that 80% TSS removal is achieved at Basin B1 and B2, infiltration basins achieve 80% TSS removal only when proper pre-treatment is provided ahead of the basin. Runoff enters through a rip-rap apron then directly discharges to the basin without a forebay or any other pre-treatment BMP. The TSS removal worksheet notes presence of a grassed channel which is non-existent in the treatment train to the "B" basins. Basin C should have its own TSS removal worksheet as the treatment train design for that basin does not match the "B" basins. (Standard 4)
30. The Applicant shall confirm which Water Quality Unit or Oil/Grit Separator is being proposed and provide TSS removal efficiencies based on MA DEP Standard Method to Convert Required Water Quality Volume to a Discharge Rate for Sizing Flow Based Manufactured Proprietary Stormwater Treatment Practices. (Standard 4)
31. The Project has not yet received final determination regarding their status as a potential public water supply. Specifically, development (including stormwater mitigation) is restricted within a Zone I wellhead protection area. Project development scope and stormwater design may vary significantly from the current proposed development depending on the outcome of that determination. (Standard 6)
32. The Project appears to meet the requirements for coverage under the current US EPA NPDES General Permit for Discharges from Construction Activities (CGP). We recommend a Condition requiring the Applicant provide proof of coverage under the NPDES CGP and provide a copy of the approved Stormwater Pollution Prevention Plan (SWPPP) prior to construction. (Standard 8)
33. The Applicant should include Project schedule and phasing on the Erosion Control Plan. Additionally, stockpile areas, laydown areas, temporary sediment basins, etc. should be included on the Plans to confirm proper management of construction period stormwater runoff. (Standard 8)
34. The Applicant notes in the Stormwater Operation and Maintenance Plan (O&M Plan) that snow will be hauled off-site to the town snow dump during heavy snow events. We recommend the Applicant revise this section to include off-site removal to permitted facilities as we are unaware of any local snow disposal sites. (Standard 9)

35. The proposed annual maintenance budget appears to be minimal, and we anticipate significantly higher cost to inspect and maintain the system. We recommend the Applicant re-evaluate these costs and include budget for inspection and development of reports. (Standard 9)
36. The Applicant should expand the inspection and maintenance log in the O&M Plan to ensure each structure has a separate line item for proper tracking of inspection and maintenance performed. Additionally, the proposed well/solar array access roads should be added to the O&M plan to ensure they are properly maintained. (Standard 9)
37. The Applicant is requesting a Low Impact Development (LID) credit (Credit 1) as noted in the MA DEP Stormwater Checklist included in the Stormwater Report. The Project does not meet the Standards for compliance with Credit 1 due to the following: total impervious area at the site is approximately 16.9% which exceeds the maximum 15%, protected conservation area is not proposed and rooftop area is not disconnected.
38. The proposed catch basin detail does not specify sump depth. All catch basins shall be deep sump (four-foot min.) hooded catch basins to achieve 25% TSS removal credit. (Vol. 2, Ch. 2, Pg. 2)
39. The berm elevation (218.5) for Infiltration Basin B1 is located within 10 feet of the front property line which conflicts with General Setback Requirements noted in the Handbook for Infiltration BMP's. (Vol. 1, Ch. 1, Pg. 8)
40. The Applicant is proposing use of water quality swales to assist in treatment of runoff for total suspended solids (TSS). However, the swales shown on the Plans do not appear to meet the design requirements noted in the Handbook. Specifically, water quality swales must have pretreatment in the form of sediment forebays or pea stone diaphragm/vegetated filter strip. Additionally, the swales must have a hydraulic residence time of at least 9 minutes to achieve proper treatment of the water quality volume. (Vol. 2, Ch. 2, Pg. 77)
41. Basin A is located upgradient of an approximate 30% slope. Infiltration basins shall not be located within 50 feet of a slope greater than 15%. (Vol. 2, Ch. 2, Pg. 88)
42. The Applicant is proposing to mitigate increase in runoff up to the 100-year event using infiltration basins. All infiltration basins shall be designed to include one-foot of freeboard from the design storm event. (Vol. 2, Ch. 2, Pg. 91)
43. All infiltration basins shall include monitoring wells and drawdown devices. (Vol. 2, Ch. 2, Pg. 91)
44. In prior hearings, abutters noted issues with ponding and icy conditions in Farm Road adjacent to the catch basin structures in the road south of proposed Units 1 and 2. We recommend the Applicant examine the drainage in Farm Road along the frontage of the Project and address these concerns as the Project driveway is adjacent to this area and potential for impacts to safety along Farm Road will be increased.
45. We recommend the Applicant consider relocating the proposed O&M access for Basin A to limit grading on the slope upgradient of Basin A. It appears access could be provided along the wall adjacent to Unit 18 with careful design.
46. The Applicant shall confirm if CB #12 and CB #13 are designed as overflow devices. It is unclear the intent of these structures. Additionally, the pipe from CB#10 is located along the existing stone wall and nearly coincident with the right of way line which will require removal of the wall and impacts to the right of way during construction. We recommend these areas be redesigned to ensure the existing stone wall and existing vegetation can remain.
47. The Stormwater Report contains numerous scrivener's errors and references to other projects. We recommend the Applicant complete a quality review of the Stormwater Report and other submission documents prior to future submissions to ensure the information provided is consistent with the proposed Project and organized in a manner that is easily reviewable.

EROSION AND SEDIMENTATION CONTROL

The Applicant has included provisions for erosion and sediment control as part of the Project scope. The following comments are offered specific to the Project and potential for off-site erosion during construction.

48. The Applicant should provide earthwork calculations on the Plans to assist reviewers and the public in understanding the size and scale of earthwork operations for the Project. Additionally, a Construction Management Plan is recommended to detail truck travel routes, project phasing, hours of operation, equipment laydown areas, stockpile locations, etc.
49. The proposed development is dense, and we anticipate issues maintaining post-development stormwater controls in a clean condition during construction. This is a concern particularly after the roadway has been paved and houses begin to be constructed.
50. The Applicant should provide limit of clearing and limit of work on the Plans. These limits shall be strictly adhered to unless permitted otherwise.

WATER SUPPLY

The Plans indicate the Project will be served by 7 private water supply wells for the proposed 32 units. It is our concern that the information required to make reasonable conclusions on the viability of the proposed water supply is lacking and additional information is required to ensure the Project is feasible given the current development program. Furthermore, the density of the Project and site conditions/constraints provide minimal latitude for any deviations in the water supply scope related to unforeseen site conditions or impacts the system may have on the aquifer and abutting properties.

The following comments are offered specific to Project water supply and related analysis or lack thereof.

51. Clean potable water is perhaps the most important part of any development. In the case of Farm Road Homes, the only potential source is from the local bedrock aquifer. MA DEP has provided preliminary approval to allow this development to be considered a private supply rather than public. However, we recommend that in either case the water supply be evaluated during this initial permitting phase since well yield and water quality may have the potential to alter the Project scope based on well placement, impact and degraded water quality.
52. The ZBA requested a comparison between a public water supply (PWS) and private water supply. We are not advocating one way or the other on a MA DEP decision, however, through discussion with DEP, this type of water supply has been allowed in several developments in the state including one previously in the Town of Sherborn. A PWS is typically centralized, while a private supply in this case will be divided into individual groups. Based on the information presented below it is far more costly to operate a PWS than a private supply. In addition, water quality can change over short distances in bedrock and multiple parameters may require treatment in a centralized system.

In this case, if the MA DEP considers this a PWS it would be considered a Community supply under 310 CMR 22.00 because it would serve greater than 25 persons as their primary residence year round. This requires a higher degree of permitting and long-term operation and maintenance than a Non-Transient or Transient public water supply, both of which do not serve the same population full time. The requirements for developing a PWS can be found in the DEP Guidelines for Public Water Supplies-Chapter 4 (Guidelines).

A PWS would require:

- a) A Zone I protective radius that no activity other than passive recreation be allowed around the well head and the Zone I must be owned or controlled by the PWS. The minimum Zone I radius is 100 feet for a well that would produce 1,000 gallons per day (gpd). Typically, the Zone I for a residential development is based on Title V design flow based on the preliminary number (septic plans are not yet available) that would be for 76 bedrooms or 8,360 gpd. Using the Zone I formula from the Guidelines ($150 \times \log \text{ of pumping rate in gpd} - 350$) from a single well, the Zone I would be 238 feet or approximately 4 acres. However, it is typical to install more wells relatively close together to shrink the Zone I to a more palatable area exclusion area.

- b) For a Community supply, a back-up well is needed with the same Zone I requirements. Back-up wells are usually placed within 20 feet of the production well.
- c) A Community supply would require a 48-hour constant rate pumping test. If one well was proposed on this Project, it would be conducted at 8 gallons per minute (gpm) in order to be approved for 6 gpm. Both drawdown and recovery are measured, those measurements must meet specific requirements. This test in some cases requires the monitoring of other wells in the area to assess impact.
- d) Water quality testing requirements are attached and are referred to in the Guidelines. Prior to the test (when well is installed) basic water quality is tested along with volatile organic compounds and more recently inclusion of PFAS6 compounds (Method 537) in the testing regime.
- e) Once approved (the well yield, Zone I and any treatment needed) the PWS is overseen by a Certified Water Operator who ensures compliant operation of the PWS and performs required sampling. For a Community supply, this sampling schedule is more expensive than for other PWS types.

For a private supply, DEP has developed the Private Well Guidelines, which contains a Model Board of Health (BOH) Bylaw that can be adopted by local BOH. Review of the Sherborn BOH Bylaw for a potable water supply would indicate it is not as robust as the suggested DEP Bylaw. We anticipate the Sherborn BOH would consider these wells as semi-public. The Sherborn BOH requires a 4-hour pumping test with no drawdown measurements to show basic yield and basic water quality, along with volatile organic compounds analysis.

Based on the above analysis a site with a PWS is far more expensive for installation and long-term operation than the private supplies proposed.

- 53. We recommend the proposed wells be installed and tested for both quantity, quality and potential impact during this initial permitting phase. The wells should be installed consistent with the requirements of a Community PWS, using similar methods described above. Protective setbacks should be implemented in the design meeting a minimum of Title 5, not Zone I requirements unless required by MA DEP in their final approval.
- 54. The Applicant shall detail method for replenishing the proposed fire cistern. Additional information on its inspection and maintenance, including associated costs should be provided to ensure future homeowners are aware of the costs associated with the upkeep of the cistern.
- 55. The Applicant shall clarify unit distribution to each of the private wells (which serve multiple units each) and if the affordable units will be evenly distributed across the wells. This is required to ensure the affordable units are not disproportionately affected in the event of a well failure.
- 56. Well #6 and #7 are located adjacent to developed areas where potential exists for contamination of the wells. The Applicant shall clarify method for ensuring these wells are properly protected.

SEPTIC SYSTEM

The Plans indicate the Project will be served by a centralized Septic System with upstream pump station and sanitary sewer infrastructure to collect sewerage generated from the Project. The following comments are offered specific to Project septic design and related analysis or lack thereof.

- 57. The Applicant shall confirm use of the USGS Winchendon overburden well in the Frimpter calculation. The Winchendon well is located over 50 miles to the northeast and in a different drainage basin. We recommend the Applicant consider using the nearby Norfolk or Dover wells or a combination of both. (it is understood that the nearby wells are located in sand and gravel but receive similar rainfall.)
- 58. The Project is subject to nitrogen aggregation/loading under the Guidelines for Title 5 Aggregation of Flows and Nitrogen Loading 310 CMR 15.216. The septic system design flow is greater than 2,000 gallons per day and "(2) areas of residential new construction, as defined in Title 5, where both on-site systems and on-site drinking water supply wells are proposed (310 CMR 15.214(2)). These areas are the so-called private well areas." Based on this, the Applicant should perform the hydrogeologic assessment required to determine nitrogen loading and then calculate the nitrogen load and propose treatment if warranted.

59. No information was provided on method of installation or boring logs for the wells listed in the soil tables.
60. The ZBA requested information related to resident comments heard in the October 4, 2023 meeting related to depth to bedrock and affects from any blasting at the Project site. In order to understand the affects of the Project on the surrounding areas, the Applicant should develop a geologic cross-section(s) that would show depth to bedrock, soil type, foundation elevations and seasonal high groundwater across the site. This will allow visual evaluation for the ZBA and the public for review.

WETLANDS

Areas jurisdictional to the Massachusetts Wetlands Protection Act (WPA) are located on-site which include resource area to the west of the site and potential Isolated Land Subject to Flooding (ILSF) located at the southeast corner of the site. The following comments are offered specific to the Project's potential impact on wetland resources.

61. The Project includes development within area jurisdictional to the Massachusetts WPA and therefore we anticipate the Project will require permitting through the Sherborn Conservation Commission once a final plan is developed for the Project.
62. Farm Road Pond may meet the characteristics of ILSF as pond volume (based on topography) appears to exceed 1/4 acre-foot and to an average depth greater than 6-inches. However, additional information is required to determine if the watershed produces the required 1/4 acre-foot of stormwater volume in the one-year storm event. Additionally, historical aerial imagery (Google Earth, April 2005 Aerial) shows the extents of the pond approximately 90 feet from the east edge of the existing gravel site road which appears to differ from that provided on the Plans. We recommend the Applicant show the farthest known extent of the pond on the Plans and provide documentation used to determine the extents for review.
63. Farm Road Pond is mapped as a potential vernal pool in MassGIS (as shown on MassMapper). The Applicant should provide documentation whether any studies have been performed to rule out existence of a vernal pool at that location. If no studies have been performed, we recommend this be completed prior to issuance of a Comprehensive Permit for the Project since presence of a vernal pool may alter Project scope.
64. The proposed septic system is located upgradient of an approximate 20% slope and within the 100-foot buffer to the adjacent wetland to the west of the site. The Applicant shall provide documentation that septic effluent will not breakout of the slope and flow to the wetland.
65. The Applicant is reducing runoff and volume to the Farm Road Pond area in all storm events analyzed. The Applicant shall provide documentation that reduction in runoff to the area will not negatively impact private water supply, ground water supply, pollution prevention and wildlife habitat.
66. Filling is proposed adjacent to the pond and potentially within a revised limit of the potential ILSF. We recommend the Applicant provide analysis that flooding extents as a result of the proposed development will not impact abutting properties.

These comments are offered as guides for use during the Town's review and additional comments are likely to be generated during the course of review. The Applicant shall be advised that any absence of comment shall not relieve him/her of the responsibility to comply with all applicable local, state and federal regulations for the Project. If you have any questions or comments, please feel free to contact us at (508) 786-2200.

Very truly yours,



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