



BOARD OF DIRECTORS

November 29, 2011

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Richard K. Sullivan, Jr., Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St., Suite 900  
Boston MA 02114

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Lincoln

Attn. MEPA Unit, Nicholas Zavalas

Romaine Randall  
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Dear Secretary Sullivan,

Re: EEA #14818; Environmental Notification Form  
The Residences at Johnson Farm, Sudbury, MA

Dick Lawrence  
Clerk  
Hudson

Thank you for the opportunity to comment on the Environmental Notification Form for The Residences at Johnson Farm, 189 Landham Road, Sudbury, MA. Due to our mission to protect the Assabet, Sudbury and Concord rivers, our comments focus on the plan's impact on the water resources of the Sudbury river watershed, and in particular on the Hop Brook subwatershed. OARS has over 900 members in the Concord (SuAsCo) watershed; to learn more about our work please go to our website:

[www.oars3rivers.org](http://www.oars3rivers.org). The proposed project is in close proximity to Hop Brook, an important tributary to the Sudbury River which discharges to the segment of the Sudbury which is a federally-designated Wild & Scenic river. The water quality of Hop Brook is severely impaired by nutrients as is the Sudbury River itself. (303d List 2008, Cat. 5 requiring a TMDL).

Don Burn  
Westborough

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Paul Goldman  
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An Environmental Impact Report should be required for the above project due to several areas where further information is needed to assess and mitigate impacts to these important water resources, as follows.

Pam Rockwell  
Concord

**1. Wastewater.** The ENF states that the project will generate 19,360 gpd of wastewater and that a small wastewater treatment facility will be constructed to serve the development. There is no information regarding what type of facility, whether a surface discharge or groundwater discharge. In either case, the significant amount of wastewater generated by the proposed 120 housing units so close to wetland and surface water resources deserves closer examination. This may in turn affect the number of units that can be accommodated on this site.

Laura Rome  
Maynard

Peter Shanahan  
Acton

David Williams  
Marlborough

**2. Alteration of Bordering Vegetated Wetland and Riverfront Area.** The proposed project will alter a significant wetland and riverfront area. The consultant to the Sudbury Conservation Commission (Schofield Brothers letter of 11/14/11) raised several concerns regarding the design of the proposed mitigation by a wetlands replication area., particularly a net loss of flood storage and that the replication area links two wetlands at different elevations. Flooding is a serious problem in the Sudbury watershed and flood storage capacity must be retained.

**3. Stormwater.** The project proposes to manage stormwater from impervious surfaces through using porous pavement. Since these systems require specific long-term maintenance, the proponent should provide commitment to an Operations and Maintenance Plan which includes vacuum street sweeping at a frequency supported by the UNH Stormwater Center or other reputable authority, and a commitment to repair and replace the pavement with new porous pavement as needed. Since the site plan has no provision for alternative stormwater management systems, it is important that the system installed will perform as expected over the long term and provide both the stormwater recharge and pollutant attenuation that is expected. It is not clear how runoff from roofs will be handled.

This is a very dense development in an ecologically valuable and fragile area. There are alternatives which allow for development of the eastern portion of the site and avoid all wetlands and riverfront disruption which should be more fully assessed. While we support many facets of the proposed project, such as cluster development, the use of low-impact stormwater management techniques, and the adherence to the state's stream crossing standards, there are too many unanswered questions to allow a proper assessment of the project's environmental impacts. For this reason we request that a full Environmental Impact Report be prepared.

Please don't hesitate to contact me at the address above if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Juma', with a large, sweeping flourish extending to the right.

Alison Field-Juma  
Executive Director

Cc: Town of Sudbury, Conservation Commission  
Sudbury Valley Trustees  
Sudbury-Assabet-Concord Wild & Scenic River Stewardship Council