



## MEMORANDUM #2

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|-------|--|-----------------|--|
| TO:   | Town of Southborough<br>Zoning Board of Appeals<br>9 Cordaville Road<br>Southborough, MA 01772 | DATE:           | March 12, 2025   |
| FROM: | Lucas Environmental, LLC<br>Joseph H. Orzel, PWS, CWS<br>Christopher M. Lucas, PWS, CWS, RPSS  | PROJECT NUMBER: | 10030.382  |
|       |  | RE:             | Comprehensive Permit Review<br>250 Turnpike Road<br>Southborough, MA |

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Lucas Environmental, LLC (LE) has completed a review of new and revised materials submitted in support of a Comprehensive Permit application under M.G.L. c.40B, §21-23, and 760 CMR 56.00, and under the Massachusetts Wetlands Protection Act M.G.L. c. 131 §40 (WPA) and its implementing regulations 310 CMR 10.00 *et seq*, for a project located at 250 Turnpike Road in Southborough, Massachusetts. The project has also been reviewed with respect to the Southborough Wetlands Protection By-law (Chapter 170), and the Southborough Wetland Regulations as requested by the Town of Southborough Zoning Board of Appeals (ZBA).

### 1.0 ADDITIONAL DOCUMENTS REVIEWED

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- Document titled: *Re: Response to Comprehensive Permit Review, 250 Turnpike Road, Southborough, MA, 01772 (Map 27, Parcel 2A)*, prepared by Goddard Consulting, LLC, dated February 13, 2025.
- *Site Plan of Land at 250 Turnpike Road in Southborough, Massachusetts*, prepared by Expedited Engineering, LLC, dated May 28, 2023, and last revised January 31, 2025. Stamped by James L. Tetreault, P.E. The Plan set includes *Existing Conditions sheets E1 and E2*, prepared by Azimuth Land Design, LLC, dated April 15, 2024, and stamped by Gerry L. Holbright, P.L.S.
- *Vernal Pool Migration Study Protocol*, prepared by Goddard Consulting, LLC, dated March 3, 2025 (DRAFT).
- *Vernal Pool Migration Study Protocol*, prepared by Goddard Consulting, LLC, dated March 6, 2025 (FINAL).

### 2.0 COMMENTS & REQUESTS FOR ADDITIONAL INFORMATION

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The following are our comments and/or requests for additional information related to the project design. LE has not reviewed the stormwater management system or Stormwater Management Report as requested by the ZBA, except where it directly pertains to the WPA jurisdiction.

The original LE comments are provided in plain text, responses from Goddard Consulting, LLC (GC) are underlined, and new LE comments are provided in **bold** text. Additional materials submitted to the Hopkinton Zoning Board of Appeals during the course of the public hearing will be reviewed by LE and commented on, as needed.

*Wetland Delineation Comments per the WPA*

1. The wetland boundaries at the site have been previously confirmed through an ORAD issued by the Southborough Conservation on September 26, 2022, under MassDEP File #290-1091.

Goddard Consulting has no additional comment.

**No further comment at this time.**

2. LE notes that the ORAD established the wetland boundaries for Parcels A and B at the site. The 40B Application includes a copy of the ORAD, but also describes the wetland boundaries as being confirmed through the Order of Conditions issued under DEP File #290-1109. LE recommends that the language in the Application be revised to be consistent in describing the jurisdictional wetland boundaries as being confirmed through the ORAD, which included both Lot A and Lot B, and not the OOC, for which the approved Site Plans did not include all of the wetlands located on Lot B, which would have been confirmed through the valid ORAD at the time.

The 40B Application can be revised to describe the jurisdictional wetland boundaries as being confirmed through the ORAD and not the OOC.

**Acknowledged. The ZBA to confirm this revision is incorporated into the project.**

3. LE has previously conducted site inspections at Parcels A and B at the property on April 24, 2022 and May 18, 2022, during the course of the ANRAD review.

Goddard Consulting has no additional comment.

**No further comment at this time.**

4. LE has not inspected the area of the proposed 20-foot-wide water line easement located on the southern portion of the 125 Parkerville Road lot (Parcel ID: 27-0000-002-0), as this parcel was not included in the previously reviewed filings under the above noted ORAD and OOC. LE anticipates reviewing this location once a Notice of Intent is filed with the Conservation Commission for the current project; however, LE can inspect it for the ZBA review if requested.

Goddard Consulting has no additional comment.

**Comment remains.**

5. LE notes that the submitted Plans do not show the ORAD approved location of revised wetland flag B3R, but rather the original location of flag B3. Although this flag does not apparently impact the Buffer Zone in areas of proposed work, LE recommends that the Plans be revised to show the correct approved location for wetland flag B3R and associated Buffer Zones.

The plans will be revised to show the correct location for wetland flag B3R and associated Buffer Zone.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

6. LE notes that during the course of the ANRAD review, in May of 2022, evidence of breeding by wood frogs (*Rana sylvatica*) was reported within the western stormwater basin, identified by the A-series wetland flags. Therefore, although maintenance of the basin was approved by the Southborough Conservation Commission under MassDEP File #290-1109, the basin is considered jurisdictional BVW and provides Vernal Pool habitat. The adjacent upland areas also provide important upland habitat for this Vernal Pool species. This should be identified on all Site Plans.

Wetland A may provide vernal pool habitat for wood frogs during parts of the year. However, the maintenance approved under the Order of Conditions (DEP File #290-1109) issued by the Southborough Conservation Commission may make this wetland not a suitable option for these species. Wetland A is a working detention basin apart of the existing stormwater infrastructure on-site. Material can be removed from this detention basin as normal maintenance. This effectively would remove the suitable breeding habitat for vernal pool species.

Wetland A is considered a Bordering Vegetated Wetland (BVW) and has a jurisdictional 100-foot buffer zone under the Massachusetts Wetland Protection Act (WPA) and an additional 20-foot No Disturb buffer zone under the Southborough Wetland Bylaw. The WPA does not have specific performance standards for work within buffer zone. Work is not proposed to encroach within the 20-foot buffer zone of this wetland.

The plans will be updated to note Wetland A as a Potential Vernal Pool.

**Although maintenance within Wetland A was approved by the Southborough Conservation Commission under MassDEP File #290-1109, the work was conditioned to prohibit any stump and root removal and restrict work in Wetland A between March 1<sup>st</sup> and July 1<sup>st</sup> of any given year due to the presence of Vernal Pool habitat and species (Special Conditions #45 and #46). Therefore, the work was conditioned to maintain as much of the Vernal Pool habitat function as possible while allowing maintenance of stormwater functions.**

*General Comments per the WPA*

7. LE notes that the project is proposed as a single phase. Given the area of ground disturbance proposed, LE recommends that the Applicant investigate alternative phasing to minimize the area of active ground disturbance.

Multiple phases would reduce the area of active ground disturbance and significantly extend the length of the construction period for the proposed project. The prolonged disturbance in the area would more likely negatively impact the surrounding area than the area of active disturbance.

**Comment remains. The ZBA to discuss.**

8. LE notes that there are several areas of relatively steep slopes to be created adjacent to wetland areas. LE recommends additional erosion control be installed at these locations, such as a minimum size of 12 inches for the straw wattles (which are to be installed along with silt fencing) or a double row of wattles and silt fence.

Goddard Consulting agrees to add additional erosion controls to steep slopes adjacent to wetland areas.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

9. LE notes that the Erosion and Sediment Control Plan does not indicate areas where erosion control blankets are proposed. LE recommends that these areas be indicated on the Erosion Control Plan.

The Erosion and Sediment Control Plan will be revised to show proposed erosion control blankets.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated in the project.**

10. The proposed erosion control blankets (Tensar North American Green SC150BN) apparently do not contain plastic netting. LE recommends that the Applicant confirm this. LE also recommends that Erosion Control Notes have language added that states any erosion control blanket used shall not contain plastic netting, in case a substitute product is proposed.

The Erosion Control Notes will be revised to include language that states any erosion control blankets shall not contain plastic netting.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

11. As the BVWs are classified as tributary to a Class A Public Water Supply and ORW, the Applicant should evaluate the Title V minimum setback requirements of 100 feet to the soil absorption system per 310 CMR 15.000.

Goddard Consulting will work with the project civil engineer to review the Title V standards setbacks.

**Comment remains. At the ZBA hearing on February 26, 2025, there was discussion regarding the status of this wetland, with the Applicant's representative stating that this wetland was isolated. For further information on this point LE notes the following.**

**During the Conservation Commission review of the ANRAD filed for the site (MassDEP File #290-1091) the wetland in question (delineated by wetland flags GCC1 through GCC20) was originally not delineated by the Applicant. Although a stream is present, the Applicant thought the stream was located upgradient of any wetland and therefore not jurisdictional under the WPA or By-law. However, upon peer review it was determined that there are wetlands bordering on this stream thereby making both the stream and the wetland jurisdictional (i.e., BVW) under the WPA and the By-law.**

**During the course of the ANRAD review, LE commented that if the Applicant wished to have all resource areas on the site delineated then the interior streams should also be delineated. However, the Applicant opted to only have the wetland boundary of these areas confirmed (see LE Review Memorandum #2 to the Southborough Conservation Commission, dated June 20, 2022).**

**The stream within this wetland is unusual in that the stream channel (as well as the wetland) disappears in the area of wetland flag GCC18. Although there is no jurisdictional wetland or stream connection downgradient of wetland "C" there evidence of a flow path was observed between wetland flag GCC18 and the downgradient wetland near wetland flag 25. It appeared that at during certain times water flows from wetland C to the downgradient wetland, but the flow path did not meet regulatory requirements to be jurisdictional. The downgradient wetland also contains an interior stream; however, it is not clear whether this downgradient wetland (flags 1 through 60) has a surface water connection via culverts to the public water supply.**

12. Per the MA Stormwater Management Standards, the *stormwater discharges to ORWs must be set back from the receiving water or wetland and receive the highest and best practical method of treatment*. Infiltration structures require a minimum setback of 50 feet. LE recommends that the 50-foot setback from wetlands be included on the Site Plans.

The Site Plans will be revised to include the 50-foot setback from wetlands.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

13. As work is proposed within close proximity to the wetlands, the Applicant should demonstrate and document that the proposed work will not alter the hydrology feeding Wetland A, to ensure that there is no adverse effect to the BVW and Vernal Pool.

The hydrology feeding Wetland A will not be altered by the proposed work.

**The Applicant's response does not contain sufficient information to support their response. LE recommends that the Applicant provide sufficient information to support their conclusion that the hydrology feeding Wetland A will not be altered.**

14. LE recommends that the Landscape Plan indicate seeding areas on the Plan and the proposed seed mix(es).

The Landscape Plan will be revised to indicate seeding areas and the proposed seed mix(es).

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

15. LE notes that no connection is indicated on the Site Plans from the sewer line to the proposed septic leach field. LE recommends this be added to the Plan.

The Site Plans will be revised to indicate the connection from the sewer line to the proposed soil absorption system.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

16. LE recommends that the top and bottom elevation of the retaining walls be identified on the Plans.

The Site Plans have been revised to identify the top and bottom elevation of the retaining walls.

**Acknowledged. No further comment at this time.**

17. The Applicant should provide further details on how the retaining walls near the wetlands will be constructed without impacts to the wetland, particularly within the limit of work/erosion controls.

The limit of work includes all the proposed retaining walls. The proposed work will occur upgradient of the wetland boundary. Erosion controls along the limit of work will ensure the wetland is protected from erosion and sedimentation-related impacts. Additionally, the limit of work demarcation will ensure no vehicles or equipment enter the wetland resource areas.

**LE recommends that the Applicant provide a detail on the proposed retaining walls to demonstrate that excavation for the wall footing will not require additional disturbance than indicated. LE has experience with other retaining wall projects that required greater than anticipated excavation for construction of the wall footings.**

18. Snow storage areas are not apparent on the Plans, LE recommends that these be added to the Plans.

The Site Plans will be revised to include snow storage areas.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

19. LE notes that invasive species are present on the site and recommends that the Applicant provide an Invasive Species Management Plan for the proposed project, as was required by the Conservation Commission under MassDEP File #290-1109.

An Invasive Species Management Plan (ISMP) was provided as a part of the most recent Notice of Intent (DEP File #190-1107) filing for the site filed on July 18th, 2023. Lucas reviewed the ISMP during the Notice of Intent. The issued Order of Conditions for this project lists the ISMP as an approved document. The scope of this ISMP was the area within the Conservation Commission jurisdiction. The ISMP can be updated to encompass the whole site as needed.

**LE agrees that the existing ISMP should be used as a template for an ISMP for the entire site. In addition, LE recommends the ISMP be incorporated where appropriate into the “Sequence of Installation & Construction” notes on Plan Sheet D4.**

20. LE notes that an impermeable barrier is proposed for the septic leach field. LE recommends the location of the barrier be included on the Plan.

The Plan will be revised to include the location of the impermeable barrier associated with the septic leach field.

**Acknowledged. Current Plans do not include this revision. The ZBA to confirm this revision is incorporated into the project.**

21. LE recommends that the Applicant provide information on whether an impermeable/clay barrier is needed for proposed underground utilities in areas of shallow groundwater.

Goddard Consulting will work with the project civil engineer to provide information on whether an impermeable/clay barrier is needed for proposed underground utilities in areas of shallow groundwater.

**Comment remains.**

#### *Southborough Wetlands By-law Comments*

The following are our comments with respect to the additional protections under the Southborough Wetlands Protection By-law and its implementing regulations, related to work proposed within 20 feet of wetland resource areas and additional wetland values and performance standards, if applicable.

22. The Comments provided by LE under the previous sections are also applicable under the By-law.

Goddard Consulting has no additional comment.

**No further comment at this time.**

23. LE notes that the Waiver Request states that a Notice of Intent has been filed with the Southborough Conservation Commission. As of the date of this review, LE is not aware of any NOI filing having been submitted for this project.



No Notice of Intent has been filed with the Southborough Conservation Commission for this project.

**Acknowledged. An NOI will need to be filed with the Southborough Conservation Commission.**

24. Per the Town of Southborough's ZBA Comprehensive Permit Regulations and Guidelines (CPRG), Section 4.1.12.3, the Applicant is required to assess the wildlife habitat and corridors on the site. The Environmental Analysis provided discusses this criteria; however, has no reference or discussion of the Vernal Pool or wildlife corridors/migration of Vernal Pools species on the site.

The site sits in the middle of an area surrounded by single-family homes on the east, south, and west and existing commercial developments and Route 9 (major barrier) to the north. The forested area just south of the existing parking lot may be used as a corridor for wildlife traveling east and west. Parkerville Road creates a small barrier between forested sections. Overall, wildlife that currently use this area and surrounding areas are human adapted animals that will continue to adapt and use the surrounding available habitats. The proposed project is unlikely to have a significant impact on wildlife. The proposed driveway to the building may act as a small barrier, however, most animals would be able to easily cross over it. Cape Cod style or slanted curbs could be used to further reduce any potential wildlife movement issues. A wildlife habitat evaluation will be submitted as part of the results for the Vernal Pool Migration Study.

**LE notes that not all potential wildlife species utilizing this area are "human adapted," such as the Vernal Pool species observed utilizing Wetland A (wood frogs). LE recommends that the Applicant present sufficient information to support their claim above that the proposed project is "unlikely to have a significant impact on wildlife." LE concurs that a Wildlife Habitat Evaluation and Vernal Pool Migration Study are necessary to determine potential impacts.**

- a. Based upon the location of the Vernal Pool within Wetland A, and the extensive impacts to the 20-Foot and 100-Foot Buffer Zones, LE recommends further evaluation of the Vernal Pool in the Spring of 2025. LE understands a limited Vernal Pool assessment has been previously completed and should be further evaluated to determine if other organisms are using the Vernal Pool, in addition to wood frogs.

Goddard Consulting will conduct a migration study of the vernal pool in the Spring of 2025 to assess for potential vernal pool species.

No portion of the proposed work takes place within regulated vernal pool habitat either under the Wetland Protection Act or under the local Bylaw. Although Buffer Zone work is proposed, the work does not alter the vernal pool or potential habitat.

**LE concurs that a Migration Study of Vernal Pool organisms should be conducted this Spring. The Applicant submitted a Vernal Pool Migration Study Protocol on March 3, 2025, for review prior to beginning the study. Due to the time of year and current weather conditions, migrations are imminent, so LE and the Applicant corresponded via email on the Protocol. LE provided comments on the Protocol to Lara Davis with the ZBA on March 5, 2025. Email correspondence continued with the ZBA staff, LE, and Goddard Consulting, with a final Protocol submitted on March 6, 2025. LE has no further comments on the Protocol at this time. Per a site visit conducted by LE on March 11, 2025, the silt fence was installed around the Vernal Pool with most of the pit fall traps in place. The additional silt fence line near Wetland B was also installed with pit fall traps to be installed through March 12, 2025. LE will inspect the area again in the next one to two weeks.**

- b. LE recommends a Migration Study of potential Vernal Pool species be completed in the early spring at the onset of the breeding season in 2025. No studies of amphibian movement through the site have been provided. Therefore, it is unknown if any Vernal Pool species are potentially migrating across the project site.

Goddard Consulting will conduct a migration study of the vernal pool in the Spring of 2025 to assess for potential impacts to vernal pool species.

**See LE response above under Comment 24.a.**

- c. Following a Migration Study, LE recommends the Applicant evaluate a wildlife crossing of the proposed roadway between the two wetland areas to the east and west. This generally requires a four (4) foot crossing height for wildlife movement for optimal wildlife crossings. The Applicant should also evaluate barriers to direct wildlife to the crossing and not to the developed areas of the site.

Following the migration study, Goddard Consulting will review the results and investigate any potential barriers to vernal pool species' movement. If vernal pool species are primarily entering from the eastern portion of the site, a wildlife crossing may reduce potential impacts to wildlife migration across the site. If vernal pool species are migrating from the undisturbed forest west of the site, Cape Cod style or slanted curbs could be used to reduce any potential wildlife movement issues.

**Acknowledged. LE recommends that the results of the Migration Study be submitted to the ZBA and Conservation Commission for review.**

- d. Due to the extent of the Buffer Zone impacts on the site, and location of the Vernal Pool within Wetland A, the Applicant is required to demonstrate that there will be no adverse effect to the Vernal Pool.

According to the Wildlife Habitat Protection Guidance for Inland Wetlands document from DEP, "the standard of "no adverse effect" applies to alterations in resource areas only and not activities proposed within the buffer zone". No part of the proposed project is taking place within a potential vernal pool or associated vernal pool habitat.

**LE notes that under the By-law, wildlife habitat is a protected wetland value, and as stated in Section 1.2 of the By-law Regulations, "The purpose of the By-law is to protect the wetland water related resources *and the adjoining land areas* [emphasis added] in the Town of Southborough by controlling activities deemed by the Commission to have a significant or cumulative effect upon wetland values..." Therefore, an activity within the adjoining land area (Buffer Zone) that may impact a wetland value (such as wildlife habitat) is subject to local jurisdiction and the burden of proof is on the Applicant to demonstrate that the proposed Buffer Zone activities will not impact protected wetland values.**

- e. LE recommends that the Applicant provide a description of mitigation measures for potential loss of wildlife habitat within the 100-Foot Buffer Zone.

Several mitigation measures may be incorporated into the project to reduce the potential loss of wildlife habitat. Invasive species will be removed as a part of the ISMP approved through the issuance of the Order of Conditions (DEP File # 190-1107). The ISMP can be expanded to encompass the entirety of the site if deemed appropriate by the Southborough Zoning Board of Appeals.



Native vegetation can be planted in place of the invasive species to provide shelter, food, and pollinator habitat for wildlife. Nest boxes can be placed along the tree lines to provide opportunities for cavity-nesting passerine birds and bats. Woody debris can be scattered within wetland resource areas and adjacent uplands to increase forest floor structural diversity and create microhabitats for ground dwelling fossorial species.

**Acknowledged. LE recommends that the Applicant provide a Habitat Mitigation Plan based on the results of the Habitat Evaluation and Vernal Pool Migration Study.**

25. LE recommends that the Applicant provide calculation of the proposed areas of disturbance within the 100-Foot Buffer Zone and within the By-law 20-Foot No Work Zone.

The proposed project will result in approximately 61,124.08 sf of disturbance within the 100-foot Buffer Zone. Of the proposed Buffer Zone disturbance, approximately 6,987.23 sf of the area of disturbance is within the 20-foot No Work Zone.

**LE notes that this is a significant area of disturbance proposed within both the 100-Foot Buffer Zone and the By-law 20-Foot No Work Zone. The Applicant should also provide the total area of the site in the 100-Foot Buffer Zone and within the By-law 20-Foot No Work Zone to review the percentage of the areas being impacted. LE recommends that the Applicant investigate additional alternatives to reduce the proposed disturbance within the 20-Foot No Work Zone.**

26. Per the By-law, the Conservation Commission presumes “*all activities that involve removal of vegetation (except routine lawn and garden maintenance), grading, filling, excavation, erection of permanent structures, application of inorganic fertilizers (excluding lime and other soil treatments approved by the Commission) or application of pesticides whose labels indicate they are toxic to aquatic organisms, is presumed to alter the adjacent resource areas.*” The Applicant seeks a Waiver from the Wetlands By-law for work proposed within 20 feet of wetlands. The By-law establishes performance standards for work within 20 feet of a wetland.

LE also notes that the Conservation Commission has the authority to consider a wider undisturbed buffer to ensure the protection of wetland resource areas under the By-law.

Based upon the proposed work and location of the Vernal Pool, LE recommends the ZBA request that the Applicant evaluate alternatives for the proposed work in the 20-Foot No Work Zone associated with the grading, retaining walls, and townhouses to reduce impacts, particularly in areas proximal to Wetland A, which has been found to provide Vernal Pool habitat. Currently, Units 2 and 29-32 are proposed in the 20-Foot No Work Zone, and Unit 20 requires work within 20 feet of the wetland.

The most recent submittal is the alternative design for the project. The project was reduced in scale from a 56-unit apartment building with large parking areas to 32 condominium units with individual driveway or garage parking. This alternative to the originally proposed project will result in less impervious surfaces proposed. Retaining walls associated with Units 20 and 29 will prevent any further encroachment towards the wetland within the 20-foot buffer zone.

The project is not proposed to be within 20-feet of Wetland A. The project will not directly impact the potential vernal pool or habitat. Stormwater collected from the condos and the proposed access drive is not proposing to discharge water towards Wetland A. No further alternative analysis is required for work within buffer zone under the WPA.

As stated under Section 3.2.3. General Performance Standards of the Town of Southborough Wetlands By-law Regulations, *“the Commission may allow work within 20 ft. of a resource area if the applicant demonstrates:*

- (1) Alternatives have been considered and in the judgment of the Commission no practical alternative is available;*
- (2) Project scope and design minimize work in close proximity to resource areas;*
- (3) Site conditions (including but not limited to slope, soil type and hydrology) will allow prevention of wetland damage from such work; and*
- (4) Such work will not lead to encroachment on the resource area after completion of the project.”*

**LE recommends that the Applicant demonstrate that no practical alternative is viable that could reduce the amount of work proposed within the 20-Foot No Work Zone.**

27. The Waiver Request seeks a Waiver as to the use of native species, stating that the Applicant proposes plantings that are not native, but better suited for the proposed development. As general policy, the Southborough Conservation Commission and MassDEP require planting native, non-cultivar species within the 100-Foot Buffer Zone. LE notes that the list of plants provided on the Landscape Plan includes several species that are considered non-native in eastern Massachusetts on the Go Botany website but considered native in eastern Massachusetts on the USDA Plants Database website. None of the plants included on the Landscape Plan are considered invasive; however, LE recommends that the Applicant verify that only native straight species are proposed within the 100-Foot Buffer Zone.

According to Go Botany, the only proposed species considered non-native to Massachusetts are Washington Hawthorn, White Spruce, Eastern Arborvitae, and Common Ninebark. Three Washington Hawthorn plantings are proposed adjacent to Unit 22, outside the 100-foot Buffer Zone. Of the eight proposed White Spruce plantings, only one individual is located partially within the 100-foot Buffer Zone. Of the 45 proposed Eastern Arborvitae plantings, only six individuals are located within the 100-foot Buffer Zone. All four of the proposed Common Ninebark plantings are not within the 100-foot Buffer Zone. Overall, the majority of the proposed plant species are native to Massachusetts. Of the four non-native species, only seven non-native plantings of the 230 total plantings are within the 100-foot Buffer Zone.

**In addition to the plant species described in the above Goddard response, two additional proposed species are listed by Go Botany as non-native to Massachusetts, Golden St. Johnswort (*Hypericum frondosum*) and Bushy St. Johnswort (*Hypericum densiflorum*). However, both of these species are considered native in Massachusetts based on the USDA Plants Database. It is good practice to avoid the use of non-native plantings. The ZBA to discuss. In addition, it appears that only straight species are proposed within the 100-Foot Buffer Zone based on the project Landscape Plan.**

28. Per the Town of Southborough’s ZBA CPRG, Section 4.1.12.7, the Applicant is required to assess impacts from road salt and fertilizer loading. The Environmental Analysis provided discusses this criteria; however, has no reference or discussion of the use of road salt or fertilizer. As work is located in close proximity to a Vernal Pool, this should be further evaluated.

No roadways are proposed in close proximity to the potential vernal pool, or Wetland A. Road salt is not expected to enter the potential vernal pool habitat. In order to prevent any harm to the potential vernal pool, an eco-friendly fertilizer and road salt may be used on the property.

**LE notes that the Applicant is required to assess impacts from road salt and fertilizer loading to all the wetland areas, not just Wetland A. As noted previously, LE recommends that the Plans be revised to include proposed snow storage areas. LE recommends that the use of fertilizers be excluded within 20 feet of wetlands and conditioned within the 100-Foot Buffer Zone.**

- 29. LE notes that on Detail Sheet 01 it is stated that there are no mapped Vernal Pools at the site. While it is correct that there are no *mapped* Vernal Pools, the Conservation Commission has determined that Wetland A contains a Vernal Pool. LE recommends that the language of the note be revised to indicate this.**

- 30. LE notes that the Pollution Prevention Plan on Sheet D4 describes the use of “hay/straw mulch”. LE recommends that this be revised to state straw mulch only to avoid any confusion.**

*The comments provided above are based on the plans, documentation, and supporting information received at the time of this review. Any revision to the plans, documentation, and supporting information will require additional review. LE has no further comments as this time.*