



CITY OF CAMBRIDGE
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Weston Conservation Commission
Weston Town Hall
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October 15, 2019

***Notice of Intent Application Submitted by
Weston BPR LLC for
Proposed Modera Weston Residential Development Project
at 0, 751, and 756 Boston Post Road***

Dear Commission Members:

The Cambridge Water Department (CWD) appreciates the opportunity to comment on the Notice of Intent Application Submitted by Weston BPR LLC concerning a proposed 180-unit Modera Weston residential complex. The project site is located within the surface water supply watershed for the City of Cambridge. Runoff from the site flows into Cherry Brook, a tributary of Stony Brook which feeds Stony Brook Reservoir, a primary drinking water supply for the City of Cambridge. CWD reviewed the Notice of Intent Application, dated September 24, 2019, the Notice of Intent plan set, dated September 23, 2019, and the Modera Weston Stormwater Report, also dated September 23, 2019.

The site is primarily forested with wetlands and also currently contains single family dwellings, driveways and walkways, barns, and remnant structures. While the proposed project will be a mix of new development and redevelopment, the applicant plans to fully meet all 10 Massachusetts Stormwater Management Standards. Water quality treatment for the new proposed paved areas will meet the 80 percent TSS removal requirement using deep sump hooded catch basins, proprietary water quality units, and subsurface infiltration systems. Stormwater from pavement will receive 44 percent TSS removal prior to infiltration as required by Stormwater Management Standard 4. The water quality treatment volume was calculated for the first inch of water, the volume required for projects located near or in Outstanding Resource Waters, such as tributaries to water supplies. The peak runoff volumes will also be reduced compared to existing conditions for every storm event through the 100-year storm as required by Stormwater Management Standard 2.

Cc: Cambridge Water Board
Sam Corda, CWD, Managing Director
David Kaplan, CWD, Watershed Manager

Stormwater Management Standard 6 requires that projects located in or near Outstanding Resource Waters adopt low salt practices. This is especially important in the Cambridge watershed, where reservoir sodium and chloride levels are elevated. To minimize sodium and chloride pollution from the site, CWD requests that the Long-Term Operation and Maintenance (O&M) plan define a low salt deicing strategy. CWD recommends using a sand/salt mix of 80 percent sand to 20 percent salt mix along with frequent winter street sweeping. CWD requests that this low salt restriction be included in the Order of Conditions in perpetuity unless a new strategy is approved by the Conservation Commission with consultation with CWD.

The O&M plan is also missing maintenance instructions for the stormwater best management practices (BMPs) proposed for the site. CWD requests that the applicant develop inspection, cleaning, and other maintenance schedules for the proposed stormwater infrastructure and include the information in the O&M plan. CWD also requests that the applicant include in the O&M plan information on pool maintenance detailing how pool water will be discharged into the environment at the end of the season and what, if any, treatment will be provided to the pool water prior to discharge. Given the proximity to resource areas, CWD requests that the applicant update the O&M plan to restrict or minimize herbicide and pesticide use on site. Fertilizer use should also be limited and follow the 330 CMR 31.05 regulations for "Requirements for the Application of Nutrients to Land Not Used for Agricultural Purposes." Finally, CWD requests that the applicant add CWD to the list of entities eligible to request maintenance records and inspect the site for compliance with the O&M plan.

During the construction phase, the primary form of sedimentation control proposed for the site perimeter appears to be a silt fence. CWD requests that the applicant use a compost filter sock instead. CWD believes that a compost filter sock is likely to provide better containment of sediment from the site.

The project proposes a new wastewater treatment plant and groundwater discharge system to manage sewage from the site. The project appears to meet the setback requirements for new sewer and septic infrastructure in surface water supply watersheds as defined in 310 CMR 15.00 and 310 CMR 22.20B. However, CWD requests that the applicant submit a plan showing the location of the sewer infrastructure and soil absorption system in relation to the Zone A to confirm that the infrastructure meets the required setbacks.

Provided that the abovementioned comments pertaining to the deicing strategy, O&M plan, and proposed sedimentation control material are addressed, CWD believes that the project will be sufficiently protective of water quality.

Sincerely,



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David Kaplan, CWD, Watershed Manager