



FOR THE ASSABET SUDBURY & CONCORD RIVERS

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June 25, 2018

Jonathan M. Sachs, Chair
Zoning Board of Appeals
Wayland Town Hall
41 Cochituate Road
Wayland MA 01778

Re: Cascade Wayland Comprehensive Permit Application, 113-119 Boston Post Road

Dear Chairman Sachs and members of the Board,

Thank you for the opportunity to comment on the above referenced project. OARS is the watershed protection organization for the Sudbury, Assabet and Concord Rivers (www.oars3rivers.org) and their watershed, which contains Pine Brook in Wayland. Please see our letter of Oct. 27, 2017 for a description of our program and work regarding coldwater streams.

Today, geographically-isolated populations of wild eastern brook trout continue to exist in about 10% of the subwatersheds in eastern Massachusetts. Wayland is fortunate to be home to a healthy population of wild eastern brook trout (*Salvelinus fontinalis*) in Pine Brook (SARIS ID: 8247950), which traverses the property in question. As stated in the letter to the ZBA by Brandon Faneuf of Ecosystems Solutions, Inc. (11/22/17), this particular population is unparalleled in the northeast region. The survival of these remaining populations is threatened by the pressures of development—particularly loss of vegetation, increase in impervious cover, direct stormwater runoff, and loss of recharge of rainfall to maintain stream baseflow. Federal, state and local regulations have important roles in protecting this valuable resource.

We have read and concur with the assessments of the experts who have examined the proposal and the site, e.g., Brandon Faneuf of Ecosystems Solutions, Glenn Krevosky of EBT Environmental Consultants, and Scott Horsley of Horsley Witten. These are some of the foremost experts on the topics they address. We have also read the letter from McGregor & Legere, an environmental law firm of long-term high repute. We strongly agree with the recommendation of McGregor & Legere that the Board “reject the Application and deny the Project a Comprehensive Permit . . .” Indeed the project is fatally flawed on many counts and would irreparably harm the environmental resources and clearly threaten the health and safety of the users downstream. The applicant has been given every chance to rectify this.

We also concur that: “At a minimum, the Board should deny the Applicant’s request for waivers from local wetlands bylaw and regulations, Board of Health regulations, and stormwater regulations, and

should condition an approval on compliance with all state and local laws and regulations governing wetlands, stormwater and wastewater.”

Under the multiple state environmental protection rules and health and safety rules discussed in our letter of October 27, 2017, **this project should not proceed further through the Comprehensive Permit process.** Any redesign that would adequately address these concerns would need to be so substantial that it would constitute a new project. We had hoped that a more reasonable development proposal would be forthcoming that was properly scaled to the site. This has not happened. Please don't hesitate to contact us if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Juma', with a long horizontal flourish extending to the left.

Alison Field-Juma
Executive Director

cc: Wayland Conservation Commission
Wayland Board of Health
Wayland Department of Public Works
Greater Boston Trout Unlimited
YMCA Camp Chickami
ProtectWayland