

Town of Sudbury

Office of Selectmen
www.sudbury.ma.us

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December 12, 2007

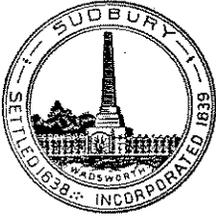
Town of Concord
Zoning Board of Appeals
141 Keyes Road
Concord, MA 01742

RE: Alexan Concord Development

Dear Board Members,

The Town of Sudbury is aware of a Comprehensive Permit application submitted by West Concord Development LLC at 48 Old Powder Mill Road. Due to this project's large size, proximity to the Sudbury town line, and its projected traffic volume added to the local streets, we would like to raise the following issues for further discussion as review of this application proceeds. It is our opinion that there is a large amount of information lacking from the application which impedes the ability to adequately review the impacts of the development on groundwater or surface water resources, area traffic and roadway safety, and the abutting property owners in Sudbury. We encourage Concord to utilize its legal remedies to hire outside consultants to review this application, particularly for traffic, environmental and design issues so that the impacts are mitigated. Sudbury requests the following information be required to be added to the application:

1. The plans submitted at a 1"=80' scale are difficult to read and do not show adequate detail. It is requested that plans at a larger scale be submitted. In addition, the Conceptual Improvement Plan for Sudbury Road should include a larger area so that the abutting towns can understand the location of the roads and the access to the project, as well as the proposed improvements, as this is not apparent from the plans submitted.
2. Second Division Brook, a perennial stream flowing from Sudbury into Concord, is located just southeast of the proposed development site. The mean annual water level, riverfront area, and associated bordering vegetated wetland should be shown on the plan and be part of the Notice of Resource Area Delineation filing with the Concord Conservation Commission.
3. No design details or calculations have been submitted for the stormwater management system. The project proposes to add 9.3 acres of impervious surface within Zone II of two public water supplies. Details are needed to determine the capacity and extent of pre-treatment of runoff.
4. Sudbury also requests additional documentation on the soils and leach field design. There is a concern for the location of the primary septic leaching field, as it is located at the top of a steep slope adjacent to a residential neighborhood in Sudbury. Use of the reserve leaching area should be investigated to avoid potential impact to these properties. At a minimum, we



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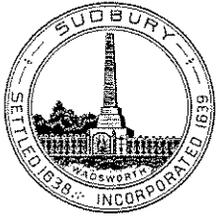
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request that mounding analyses be conducted, including confirmation that there will be no break-out into the slope. There is an additional concern for the volume of wastewater generated from the development, and the impact from nitrogen to Sudbury's Zone II. We request that documentation of DEP compliance be submitted.

5. The projected level of water usage and discharge in close proximity to the former Nuclear Metals site, a designated superfund site, is of concern. A current status of the site remediation should be submitted, with particular discussion on the potential impacts of this development on the remediation efforts.
6. The project was noticed in the Environmental Monitor on Dec. 10, 2007. Comments are due on Dec. 31, 2007. The comment time period should be extended due to the holidays to allow all of the affected municipalities an opportunity for thorough staff review and comments.
7. The traffic impact study states that 10% of the traffic from this development will enter or exit through Powder Mill Road in Sudbury. The report states that this distribution pattern is based on a review of existing travel patterns along the study area roadways during commuter peak periods. The change in land use of the site necessitates a different analysis, as the existing travel patterns assume traffic generation to the site by the employees of these scattered businesses on Sudbury Road, not on 350 housing units. It is difficult to believe that out of 350 households, many of whom will commute southeast to Boston, only 10% will utilize Powder Mill Road in Sudbury to get to Route 117—the most direct access to Route 128 from the development. The applicant's assumptions and data should be submitted for review. We also recommend Concord hire an independent traffic consultant to review the proponent's data.
8. We strongly recommend that a relocation of the main access onto Forest Ridge Road in Concord be thoroughly investigated.
9. If the access remains on Old Powder Mill Road/Sudbury Road, we request that the traffic impact report be expanded to discuss the impact of this project on the intersection of Powder Mill Road and Route 117 in Sudbury, and the possible need to mitigate this increase with traffic improvements at that intersection in Sudbury.
10. We request the Board require a walkway along the entire length of Sudbury Road/Powder Mill Road from Route 62 to Route 117 to increase pedestrian safety and provide safe recreation for the new and existing residents.
11. Sudbury's North Road Fire Station #2 may be a first respondent to calls from the residents of this development due to its proximity to the property. The concerns over the adequacy of the roads leading to the development are compounded by this issue. In addition, the existing fire fighting equipment in surrounding towns may not be able to adequately protect the buildings. The applicant should be required to provide a report addressing the height of the buildings and the ability of local fire departments to serve the development.



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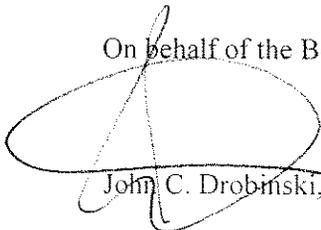
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12. We request the development include adequate screening of the proposed buildings along the residential property line adjacent to the Cranberry Circle subdivision in Sudbury. Building heights/mass should be kept to a minimum at this location to reduce the scale of the buildings, as the adjacent residential properties are located at a lower elevation than the subject parcel. Fencing and additional screening may be necessary in some areas.
13. We request that the Town of Sudbury be added to all distribution lists for this development, c/o Planning and Community Development, 278 Old Sudbury Road, Sudbury, MA 01776.

The Town of Sudbury is not opposed to this development, and fully supports the creation of affordable housing in the region. However, this must be balanced with legitimate concerns for public safety and impacts to the surrounding properties. This development far exceeds the accepted standard of 8 units/acre in suburban locations. It is our hope that the Towns of Concord and Acton, as permit granting authorities for the project, will consider the impacts to Sudbury from such a large project, and require appropriate mitigation.

Sudbury will continue to monitor this application as it proceeds through the local permitting process. If you need anything further on this topic, please contact Ms. Jody Kablack, Director of Planning and Community Development at 978-639-3387.

On behalf of the Board of Selectmen,



John C. Drobinski, Chairman

cc: . Concord Board of Selectmen
Concord Planning Board
Acton Board of Selectmen
Acton Planning Board
Acton Zoning Board of Appeals
Maynard Planning Board
Applicant
Sudbury Water District
Town of Sudbury Fire Chief
Sudbury Planning and Community Development Director
Sudbury Conservation Coordinator
Sudbury Public Works Director
Sudbury Board of Health