

August 7, 2022

Dear Chairman Immonen, Agent Luce and members of the Conservation Commission:

I'm writing to you regarding the two proposed senior living communities, Sheldon West and Sheldon Meadows, that are slated for public hearing this coming Thursday. Despite the scale down of the project, I remain gravely concerned about its impact on our watershed, our community and on the environment in general. Below are my concerns regarding a few topics:

INFILTRATION BASINS

1. **Infiltration basins have potential for a high rate of failure particularly if the maintenance schedule is not strictly adhered to.** In reading the initial application, it appears that the plan is to pass this off to the community's homeowners association. **The type of regular maintenance needed is expensive** and companies that will take on a small project like this are few and far between. This puts a financial burden on the seniors living there, many it would be safe to assume, will be on a fixed income. And there is no guarantee that this necessary maintenance will happen in accordance to what is required to keep them fully functioning.

2. Also, the infiltration basins are designed to maintain the minimum of 2' distance to the seasonal high water table. They are currently at the minimum or a few inches above according to the plans. The applicant stated in a meeting for Wrentham Highlands that these basins drain within 72 hours. Given that there is little to no change in the design from that project to these, I think it is safe to say that this statement is applicable for these newly proposed basins. However, it is noted in the MA Stormwater Handbook (Vol. 2 Ch 2. P. 89) that the greater the distance from the bottom of the basin to the seasonal high water table, the **LESS LIKELY the basin will fail to drain in 72 hours**. Given these basins are essentially at minimum depth, it is reasonable to conclude that they will have difficulty draining within 72 hours. **Having standing water for days on end should a basin fail to drain in 72 hours is a health hazard.**

3. In addition, **the applicant has not put forth any plans regarding proposed septic systems nor how it intends to manage water flowing on to the properties from off site.** At the recent Board of Health meeting in July, when PSC went through each line item of its peer reviews, It is quite evident that there is still a lot of information missing from the application they have put forth thus far and there is no mention of plans for septic systems. It doesn't seem possible to properly assess this application with all of the missing pieces, many of which, in my mind, are critical.

So here are my questions:

1. What happens as the water table continues to rise as it has over the years? Will the infiltration ponds continue to drain properly given they are just at or slightly over the 2' mark as indicated on the plans?

2. What is the applicant's plan for septic and for managing off site water flowing onto the properties?
3. Is it realistic to trust in a "Housing Association" to provide the proper follow up maintenance required to insure the infiltration basins are attended to on the required schedule? Who foots that bill if the HA is unable to support that need financially given the majority of their residents will most likely be on a fixed income?
4. How is the applicant going to guarantee that there is no threat to the surrounding historic homes/properties, the wetlands/aquifer, abutting farm and Pawtucket's drinking water should there be a failure of any kind on this property?

STORMWATER/BUFFER ZONES

I remain concerned that there is still construction well within the 100' buffer zone. Frankly, no work within a buffer zone should be allowed given that it is next to impossible to monitor and enforce the work. To construct what they are proposing, they are going to have to work well within the 100' buffer zone. Thus I can't help but ask "what could possibly go wrong?" Who is to say that there won't be further encroachment into the buffer zone "due to construction needs" which will serve to leave a permanent stain on our environment?

In looking at the applicant's calculations, they are always at the minimum of any continuum set forth by the stormwater guidelines. This is the case because they are trying to cram the maximum amount of units into the space and justify it with the minimum of calculations. This is not necessarily the best practice as it leaves zero margin for error. And what happens when there is an error? Weber Farms ran into a measurement 'miscalculation' and went back before the Planning Board to ask for permission to not have to redo a foundation that had been poured 5" over their "no build" line. What happens when there is an "oops" that further encroaches into the wetland buffer?

In an independent peer review conducted by Tim Power of PVI Site Design, a company myself and my fellow neighbor and abutter, Bill and Joudrie Jones hired, Mr. Power clearly states ***"It is reasonable to assume a project of this scale could alter groundwater patterns with negative impacts to existing properties."*** Because of the limited information provided by the applicant regarding stormwater runoff, drainage, septic, etc. we felt a need to hire an engineer to review the plans as they have been currently presented. I feel strongly that my home, the homes of my neighbors, and Station 2 (also an abutter) are in great jeopardy should this project be allowed to move forward despite the applicant's thin reassurances that there will be no impact on surrounding land.

As I shared in a previous letter, my home rests on a fieldstone foundation for it was built in 1850 (it is also registered with the Wrentham Historical Commission). Many of the homes in Sheldonville do as well. I am gravely concerned that over time, the addition of more water to my property will cause the integrity of our foundations, and therefore our homes, to be compromised. There is also an outbuilding on my property that sits on a slab foundation. Increased saturation of the land will impact this structure as well. I can say that my neighbors share the same concern, many of whom have water that already runs directly through their foundations.

As we all know, there is what happens on paper and what happens in real life. Norwood Hospital flooded out in an instant, something no engineer could have predicted. North Attleboro (please see the letter from Bill and Becca Zitomer) is in a mess with a brand new apartment building. All the math checked out, yet residents near that project are continually underwater every time it rains. There are many more examples of engineering feats that looked good on paper and passed computer simulations but nothing makes up for the might and unpredictability of Mother Nature. And due to global warming, we are rocketing down a path of environmental degradation at an unprecedented pace. To not only put this many homes in a wetland but to also have to drastically reshape the topography to make it “work” at its **BARE MINIMUM** so as to maximize profit is irresponsible and shortsighted on the part of the applicant. These projects jeopardize our neighborhood, our community, surrounding communities and our natural resources.

According to the Town’s *General Bylaw § 375-8 Wetlands Protection (Burden of Proof)*. “*The applicant shall have the burden of proving by a preponderance of the credible evidence that the work proposed in the permit application will not have unacceptable significant or cumulative effect upon the interests protected by this bylaw.*” Frankly, we have yet to see any evidence that these projects will not have unacceptable significant or cumulative effects on our neighborhood.

In this same vein, part of the regulations of the Conservation Commission require the applicant to “*describe measures to protect proposed structures and minimize damage to structures due to the impacts of climate change (8.1.C.4).*” I do hope that the Commission requires the applicant to submit this documentation. Given that each property is topographically unique, I strongly recommend requiring two separate submissions.

SNOW REMOVAL

I find the snow removal plan outlined by the applicant to be inadequate and problematic. First of all, even though they say there will be signs posted for “no snow dumping”, who is to say those directives will be followed. Given the possibility of having weekly Nor’Easters (2015) or major blizzards back to back we just recently experienced in 2022, at some point, there is simply going to be no place to put the snow other than into the designated “no snow dumping” areas. And, not for nothing, are plowing companies truly going to

follow that directive? Plow drivers are on a timeline and most have been plowing for long hours. Frankly, they are going to dump the snow where it is easiest for the plow to maneuver and the most convenient so they can be on their way to the next neighborhood.

Secondly, If I were a homeowner in that development, and the only place allowed to dump snow was on my lawn between my home and the house next to me (which is only a distance of about 15 feet), I would be irate. When the mounds of snow melt, where is that water going to go, besides under the foundation? Where are the chemicals going to go from road treatment, besides into the ground? From a homeowner's perspective, the end result will be the need for more fertilizer and other chemicals to bring it back to green again thus adding even more phosphates and other toxic materials than would be typical for lawn maintenance to the environment therefore increasing the likelihood of it leaking into the water table. How is this environmentally sound?

CONCLUSION

Despite the applicant labeling this as a "unique concept", there is nothing unique about these proposals. These projects are subdivisions masquerading as SLCs. They are nothing more than shared backyards with a ring road and what is being labeled "passive recreation" is essentially a walk around the block. It is no different than the neighborhood I grew up in.

The applicant has taken the SLC bylaw and twisted its intent to suit their needs. When all of this is over and homes are built, they will dissolve the LLC and wipe their hands clean of the issues that will arise, and the taxpayers will be faced with another Madison Street scenario or worse.

It is my hope that when voting time comes, the irreparable damage that this project has the potential to do not only to Sheldonville and West Wrentham but also to the rest of the town and the water supply of over 100,000 customers in the city of Pawtucket will be taken into serious consideration.

I urge the Commission to take its time to gather all the information needed to make an informed decision and to not be pressured by those who wish to fast track this application. There is an inordinate amount of missing information and lack of documentation flagged by BTI and PSC. Therefore I respectfully urge the Commission to require that the applicant submit a complete application, including detailed septic plans as well as a detailed plan to manage off site water that empties onto the properties, before allowing the applicant to continue this process any further.

Thank you as always for considering my letter. I am greatly appreciative of the Commission's time and energy spent to review what neighbors and others have supplied. I can also appreciate what an immense task it is to stay up on all of the documentation submitted thus far and am thankful for your attention to that as well.

Sincerely,

Janet Sozio
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