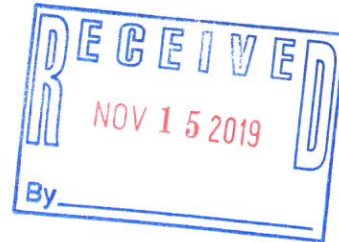


WILLIAM DeLUCA, Chair
JAMES CANNING, Vice-Chair
WILLIAM BACIS GARTH SCHWELLENBACH
STEPHANIE CLYMER NEVA TOLOPKO
TOM DENNIS

ANNE CAPRA, Conservation Administrator/Planner

November 14, 2019

Mark Cavannaugh, Chair
Planning Board
Town of South Hadley
116 Main Street
South Hadley, MA 01075



Reference: North Pole Estates Definitive Subdivision Plan

Dear Mr. Cavannaugh:

The Conservation Commission has reviewed the plans and supporting materials submitted by Chicopee Concrete Services for the North Pole Estates Definitive Subdivision Plan and Stormwater Management Permit on Hadley Street. It is our understanding based on our review of these materials that the proposed residential subdivision consists of an initial nine lots with four as single-family home building lots, and an eventual build out of 67 to 72 lots through subsequent phases. The current plan under review for permitting is only considered to be Phase I consisting of the nine lots and associated grading, roadway, and stormwater infrastructure to service only these lots. Lots #4 and #5 of the proposed nine lot subdivision have wetland resource areas under the jurisdiction of the Massachusetts Wetlands Protection Act MGL c. 131, sec. 40 and the South Hadley Wetlands Bylaw Chapter 240. Wetland delineations on these lots were affirmed by the Conservation Commission through Positive Determinations issued on July 18, 2019 and April 18, 2018.

The northern limit of the currently proposed Phase I work (grading associated with the stormwater basin) is over 600' away from the outer edge of the 100-foot Buffer Zone. Therefore, the proposed nine lot subdivision will not require a permit from the Conservation Commission. If future phases of the project are submitted for Definitive Plan approval, and any work is proposed on Lots #4 or #5, either a Notice of Intent or Request for Determination of Applicability will need to be filed depending on the scope and proximity of the work to jurisdictional resource areas. Additionally, on any future lots created through subdivision approval that have jurisdictional resource areas on them, the Commission will require a Notice of Intent be filed for the construction of a single-family home and associated site work.

Because the protection of groundwater and the protection of public water supplies are two of the interests of the Massachusetts Wetlands Protection Act and the South Hadley Wetlands Bylaw, the Conservation Commission is submitting the following comments for your consideration given the location of the site within the Zone II of the Dry Brook Well. The Commission is very pleased that the project will undergo technical peer review for each component of the project. The submitted materials raised several questions, particularly through omissions and/or deficiencies in the content submitted as follows:

1. Although the Definitive Subdivision Plan is for a nine lot subdivision with four single-family homes, the supporting documents consistently refer to full subdivision buildout of up to 72 lots. If this is to be the standard for the supporting materials, the site plans should provide detailed design for a development of that scale.
2. The proposed grading appears to capitalize on maximum excavation of sand and gravel to achieve the current proposed road alignment and site layout. Are there alternatives for road design and site layout for the phase I development that would result in less sand and gravel being removed from the site?
3. The *Hydrogeologic Assessment Study* does not assess the effect of removing the proposed amount of soil and gravel on aquifer recharge. This would seem to be a critical consideration for assessing the proposed roadway grade and other site grading.
4. The grading plan for lots #2 and #3 is not complete along the outer edge. Given the steep embankment in that area, it seems that the proposed grading should be carried beyond the lot lines to assess feasibility of the proposed design.
5. The construction impacts were not assessed, particularly in the Traffic Impact Study. A member of the Commission estimates that for the stated excavation of 437,500 cu.yds. of material to be removed for Phase I, ~26,000 truckloads will be needed. Such impacts should be given close inspection and would seem to necessitate an alternative analysis for the removal of this amount of material.
6. How are the impacts from residential landscape fertilizers incorporated into the assessment of the project's impact on groundwater quality?

The Commission greatly appreciates the opportunity to offer these questions and comments. We would appreciate being able to comment on revised plans and supporting documentation as they are submitted. We are also interested in attending future site visits and any inter-board meetings that may occur during the project review process.

Sincerely,

Tom R. Dennis
Tom R. Dennis

James Canning
JAMES CANNING

Neva Tolopko
Neva Tolopko

William Bacis
William Bacis

Bill DeLuca
Bill DeLuca

cc: Richard Harris, Planning Director, Town of South Hadley