



Sept 14 2012

Wellesley Wetlands Protection Committee
Attn: Diane
525 Washington Street
Wellesley, MA 02482

**Subject: Wellesley Country Club
Comfort Station, DEP File #324-647**

Dear Committee Members:

These comments are a follow up to last night's public hearing for the WCC proposed comfort station. As noted at that time, I represent the Friends of Brookside. During that meeting I emphasized to the Committee that all *infrastructure* work connected to the comfort station takes place in Riverfront Area (RA), and that RA is a protected resource area. I noted that the Committee's focus should be on (1) avoiding all impacts to this area, and if that is impossible (2) ensuring that the applicant minimize proposed work to the maximum extent practicable. This is not only my advice, but a mandate of the Wetland Protection Act (WPA).

I further noted that the Alternatives Analysis (AA) had to be updated to reflect the revised proposal. Relying on a two-year old analysis when substantial changes have effected the proposal is not appropriate, *nor is doing so in compliance with the WPA*. The purpose of an AA is to examine whether there are access and utility alternatives, which in this case are critical. The required AA should address at a minimum the following questions:

- Can access to service the comfort station be provided without driving from Brookside Road through the RA?
- Can utilities, particularly the proposed sewer force line, be run through the town community gardens parcel, thus not impacting Brookside?
- Can the comfort station itself be sited in an alternate location?
- Given the WCC statements last night that they viewed the access through the RA as being for purposes *in addition* to servicing the comfort station, can access for those purposes occur elsewhere? What are those additional access uses?
- Can all infrastructure within the RA be absolutely minimized within the 100-foot Inner Riparian Zone?

I noted that the drainage basin at the termination of the drainage swale was set within the 100-foot Inner Riparian Zone, and that its placement there was not justified by topography. I noted that it could

be easily shifted westerly and out of the 100-foot Inner Riparian Zone. Doing so would not entail cutting further trees, nor would it require unusual or additional grading.

The mandate to minimize all RA impacts should dictate that the roadway through the RA be grassed, not graveled. A common best management practice in similar situations is to design a minimum width road (eight-foot) that is underlain with stone dust, crushed stone or other compacted, semi-permeable material, then covered with 6-8-inches of loam and seeded. Such construction would decrease storm runoff, while still providing a suitable bed for emergency vehicles, if ever required. In reality, as discussed last night, emergency vehicles would not drive off Brookside in any event, so the "roadway," if allowed needs to only be of minimal size. Another persuasive reason to minimize the road: Eliminating the gravel cover would decrease storm runoff, allowing the drainage swale and basin to either be eliminated entirely or decreased in length and overall size.

Final Comments

The "Wet Mix" proposed for the swale is not appropriate and will not survive. This is not a matter of opinion. I spend a vast amount of my professional time on wetland restorations. Wet Mix is used to restore BVW and isolated wetlands where ground water is seasonally within 12-14-inches of the surface. The swale will be saturated only during periods of moderate to strong precipitation. New England Wetland Plants supplies more appropriate mixes that will actually stabilize the swale and provide good ground cover--and that are far less expensive.

On a similar note, I strongly advise the WCC not to use the proposed wildflower mix. I have designed and monitored numerous projects that had a wildflower component. My experience is that wildflowers flourish for the first year, but later require yearly harrowing and re-seeding to maintain the wildflower component. Such proposals always sound attractive, but in reality the area will not grow as intended after the second season.

Conclusion

The NOI is incomplete without a new AA. As noted above, an AA is not discretionary. The WPA requires a full AA for the proposed project, and failure to provide a robust example for the current proposal will leave the project vulnerable to appeal. Second, if an AA substantially justifies the current proposal, the Committee must ensure that the approved project has absolutely minimized all impacts within the RA.

Very truly yours,

A handwritten signature in black ink that reads "Patrick Garner". The signature is written in a cursive, slightly slanted style.

Patrick Garner

Wetland Scientist & Hydrologist