

September 28, 2012

Re: Wellesley Country Club Notice of Intent Notice 324-647

Dear Wetlands Protection Committee,

Wellesley's water, public health and overall well-being are key considerations in your decisions concerning Wellesley Country Club's proposed building project off Brookside Road in the Riverfront Area near Brookside Community Gardens.

We ask that the Committee have the Notice of Intent amended to reflect the proposed roadway, and meet the performance standards and requirements of the wetland bylaw and regulations. We do not believe it is exempt from the requirements of the bylaw and we believe the loss of a natural buffer to a roadway will have unacceptable, significant and cumulative effects upon the wetland values as described below.

We applaud the Club's proposal to build a new comfort station connected to town utilities because it will eliminate the Club's seasonal porta potties and the heavy sewerage trucks that traverse the Riverfront Area to service them.

However, the addition of a permanent roadway through the Riverfront Area (requiring its own drainage infrastructure) is an element of the project that we strongly oppose.

Adding a new roadway seems unnecessary. A Club representative stated that the comfort station could be serviced from inside the Club's property, but they would use the proposed roadway for maintenance once a week. Another Club representative stated "there are other Club needs that road needs to exist for" but did not articulate them. It was also concluded that emergency access was available without the addition of a new roadway.

We are focused on one thing and that is protecting Wellesley's wetland values under the bylaw:

Water Resources

The town states, "Riverfront Areas provide many free services to the community and to the environment. The Riverfront Area, in its natural condition, provides a natural flood storage area, slows down surface water runoff, and can limit flooding and damage caused by storm events."

- Degrading a buffer and adding another roadway to Brookside Road diminishes the Riverfront's natural condition and that could have an unacceptable, significant and cumulative effect on Wellesley's drinking water.

- Diminishing the natural condition affects six of the wetland values under the bylaw; Public or private water supply, groundwater, flood control, erosion and sedimentation control, storm damage prevention, and water pollution prevention. Drainage will need to be monitored, as well as wear on Brookside Road, an Ancient Way and Scenic Road.
- Losing a natural buffer to a roadway brings vehicles traversing the Riverfront Area, as well as parked cars. Roadways are a temptation for people in this isolated area, often attracting more vandalism, litter, dumping, and safety issues. All of the above can contribute to water pollution.
- The buffer in question is a 75-foot Limited Disturbance Zone under the bylaw. The operation of vehicles and machinery will more likely than not harm or eventually harm resource areas.

Recreation

Scenic Brookside Road is one of the most popular passive recreation areas in our town.

- People from all over town walk it, jog it, cycle it and drive it everyday.
- It serves photographers, bird watchers, stargazers, artists, poets, and more.
- It fosters community through passive recreation and seasonal clean up events.
- For many people in town, it is considered an extension of the town's trail system. Many of us travel the loop around Longfellow, the Esker, Aqueduct and Brookside Road. It's peaceful and unique.

The buffer keeps it natural and safe for the pleasure and safety of passersby. A roadway in place of a natural buffer will diminish this recreational resource and have an unacceptable, significant and cumulative effect on this unique wetland value.

Wildlife Habitat

This is our town's largest wildlife corridor and as a Natural Resources Commissioner put it, "it's the nursery for the entire town's wildlife."

- The bird song at peak times is deafening (in a wonderful way).
- The proposed site is legendary for turtle crossing activity in egg-laying season.
- There is currently a large coyote population on Club lands.
- The Club reports Rare or Endangered Species on their land.

The loss of a natural buffer and addition of a roadway will diminish and change these habitats and have a cumulative effect on their value.

Wetland Aesthetics

The degraded buffer and addition of a road, gates and other man-made elements will have an unacceptable effect on Brookside's unique historical wetland landscape and overall aesthetic. The land holds important Native American heritage that will also be devalued by the loss of a natural buffer.

Our understanding is that the presumption of significance must be overcome by a clear showing that the buffer zone does not play a role in the protection of these significant interests. We believe it plays an important role and holds great meaning.

Wellesley's Natural Resources Commission, The Charles River Watershed Association, and the Club's own Golf Course Superintendents Association of America all advocate for the establishment, preservation and widening of buffers and riparian zones for country clubs near bodies of water. This lends further support that the buffer zone is significant under the bylaw.

A Club representative commented that the Club has spent a lot of time, a lot of effort, listened to a lot of people and made great changes to their proposal. While we're thankful that most of the project is now out of wetlands jurisdiction, we remain true to our mission that each proposed disruption and permanent degradation to the Riverfront Area should be assessed on its own merits under the bylaw and not in relation to what might have been.

We sincerely appreciate your service to the town of Wellesley and all that you do for wetlands protection.