



IPSWICH RIVER  
WATERSHED  
ASSOCIATION

*The Voice of the River*

P.O. Box 576  
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December 19, 2023

Town of Lynnfield Planning Board  
Town of Lynnfield Conservation Commission  
55 Summer Street  
Lynnfield, MA 01940  
ecademartori@town.lynnfield.ma.us

By Email: Re: The Regency at Lynnfield

To the members of the Lynnfield Planning Board and Lynnfield Conservation Commission,

Thank you for the opportunity to comment on the proposed age-restricted development, the Regency at Lynnfield, currently under discussion by the Lynnfield Planning Board and Lynnfield Conservation Commission. The Ipswich River Watershed Association is very concerned about development on this parcel due to the potential to negatively impact water quality and quantity of the Ipswich River and the Lynnfield Center Water District's public water supply sources downstream of the site. As you are aware, the site is also within the DEP Zone II protection area, as well as within the Town's Groundwater Protection District, which makes careful conditioning of the project of the utmost importance. As such, the following comments seek to minimize impacts to this extremely sensitive and locally and regionally important site.

Before offering specific comments on the potential impacts of the project, I would like to provide some additional context relative to our position. As you may know, the Ipswich River is the most flow-depleted river in Massachusetts and was recently declared one of the Ten Most Endangered Rivers in America in 2021 by American Rivers due to excessive water withdrawals and water exports outside of the basin. The safe yield of the river is exceeded according to DEP which means that no additional withdrawals can be permitted and that existing withdrawals must be reduced. In addition to water quantity, protecting water quality is equally critical. The Ipswich River is the lifeblood of the North Shore, providing drinking water to 350,000 people and businesses every day such that additional water demand or degradation of water quality in one community affects the others. It is therefore the position of the Ipswich River Watershed Association that every new development or redevelopment project in the watershed does not increase water use nor negatively impact water quality *in any amount* and ideally, such projects will contribute to improving current conditions via the pursuit of mitigation strategies during the permitting process.

Beyond water quality and quantity, the location of this project in the headwaters of Willis Brook which drains through Willis Woods before entering the Ipswich River makes it particularly important to condition it appropriately to protect the other natural and cultural resources located within this incredible area of open space. As you know, we partnered with the community to pursue the Vision for Willis Woods, and feel this project should be adequately conditioned to minimize any impact on this important public resource.

Given the context provided above, we feel that the project has the opportunity to set the standard for ecologically-minded development and be a regional example of how both water resource protection and

community growth can occur in congruence. Overall, there are three overarching concepts that we recommend be pursued in your review of the project:

- That the project does not increase existing water use over existing levels (Net Zero) which will require that water use by the development be minimized while off-setting water use by reducing use in other parts of the community.
- That the project be conditioned to require Greenscaping, which creates healthy lawns and gardens through landscaping practices that utilize native plants, smart watering techniques, and organic lawn care maintenance, as well as to minimize impacts to water quality.
- That the overall scale and scope of the development be downsized to reduce impervious surfaces and lessen impacts to natural resources on and off-site.

We offer the following specific comments:

### Water Quantity

The project should be conditioned to minimize water use to the extent possible, especially non-essential uses such as outdoor water use which does not recharge the groundwater. We offer the following specific recommendations to ensure that water use by the proposed development does not further stress the local and regional water supply:

- The project at a minimum should be required to calculate its proposed water use and offset 100% of its projected water use through minimization of its use within the project (e.g. ultra-efficient fixtures) and then the developer should be required to offset the rest by working with town officials and its partners to reduce water use in other areas of town.
- The project should minimize its production of stormwater through site design (e.g. minimization of impervious areas) and infiltrate 100% of its stormwater runoff on-site so it can recharge the groundwater. Runoff volumes and rates from the site should equal pre-development conditions and be based on the most current data for all design storms (e.g. not just the 100-year storm).
- Landscapes should be planted with drought-tolerant native species which do not require irrigation beyond the establishment phase. The amount of lawn should be minimized and where required, planted with drought tolerant turf grasses such as fescues.
- Automatic irrigation systems should not be allowed as these systems are guaranteed to leak over time and even in normal use will use a lot of water.

Stormwater runoff is guaranteed to increase with the amount of site clearing that will take place as currently proposed, and so we strongly encourage the proponent to reduce the amount of impervious area to meet the 15% standard in Lynnfield's Groundwater Protection District bylaw at a minimum. Variances to provisions such as this should not be granted given the extreme environmental sensitivity of the site.

### Water Quality

We offer the following specific recommendations to ensure that the project does not create undue impacts on the water quality.

- The project should adequately treat 100% of its stormwater runoff on-site.
- Landscapes should be managed organically without the use of synthetic fertilizers or pesticides.
- Non-pervious surfaces should be minimized and use of salt and chemical deicers should be prohibited in favor of sand and environmentally safe deicers.

- With regard to the proposed project's stormwater systems, we recommend that the proponent should be required to post a bond in an amount sufficient to pay for the regular inspection and rehabilitation of the proposed stormwater systems for the anticipated life expectancy of the facilities. This helps ensure the longevity and functionality of Best Management Practice (BMP) installations over time as it is a virtual guarantee that such systems will not be properly maintained without such a provision.

Other project specific comments

- The proposed wetland crossing for the emergency road should be eliminated as the potential public safety benefits appear minimal and not worth the major impacts to water resources and wetlands habitat. If this proves to be impossible, the road could be re-routed to the northeast edge of the property to avoid crossing through the interior of the wetland. Given the desirability of looping the municipal water line, perhaps just that could be accomplished without the road?
- As the project proposes to clear a large area of currently forested habitat, the proponent should be required to perform a Wildlife Habitat Assessment by a qualified consultant and produce and implement a comprehensive Mitigation Plan.
- The overall scale and scope of the project should be downsized to reduce the certain water and natural resource habitat impacts that likely cannot be fully mitigated.

Finally, we note that the current intermittent stream crossing under Main Street onto the west side of the golf course is not sufficient to accommodate the changes to the hydrology that will likely be proposed and is a known location for high rate of road kill for wildlife. As one potential mitigation strategy, the crossing should be improved and enlarged to meet the Massachusetts Stream Crossing Standards in order to improve water crossing, drainage, and wildlife passage.

While some of these measures exceed minimum regulatory requirements, they are readily achievable using modern Low Impact Development Standards and should be required as a general practice. The Ipswich River Watershed Association has produced a [Recipe for Water Resiliency](#) showing communities like Lynnfield how they can grow while not increasing water demand. We are also co-coordinators of the Greenscapes North Shore Coalition of which Lynnfield is a formal member which advises communities, developers and individuals on Greenscaping to achieve these recommended landscaping and water-quality-protecting measures. Our organization and our Greenscapes partners stand ready to advise the developer and/or community on the implementation of these measures at little or no cost to assist you in any way to achieve these readily achievable and increasingly mainstream protections.

Please incorporate these comments into the public record of the hearing on this matter, and please contact me if you have any questions about these comments. Thank you for your consideration.

Sincerely,



Wayne Castonguay  
Executive Director