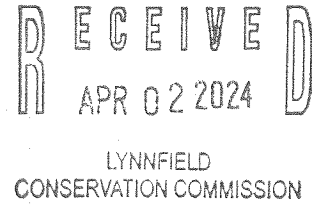




April 2, 2024

Email (ecademartori@town.lynnfield.ma.us)

Lynnfield Conservation Commission
Temporary Office Location
590 Main Street
Lynnfield, MA 01940



Re: DEP File No. 209-0677
Alternative 3R Concept Overlay
The Regency at Lynnfield Senior Housing Development
1301 Main Street (Map 13, Parcel 1000)
Lynnfield, Massachusetts

[LEC File #: TBI21-566.02]

Dear Members of the Conservation Commission:

In response to comments received from the Commission during the March 19, 2024 public hearing, our project team has performed the following:

1. Prepared an Alternative 3R Concept Overlay (Attachment A) in response to the Commission's recommendations to improve the layout to reduce impervious surface and impacts in the Buffer Zone to BVW, and avoid impacts requiring a Variance;
2. Reviewed § 320-2 for the No-Disturb and No-Build Zones and § 320-3 for the Variance provisions of the *Conservation Commission Regulations*; and
3. Met with Fire Chief Glenn Davis on March 26, 2024.

The below narrative and attached Alternative 3R Concept Overlay provide greater detail on our progress to date.

Alternative 3R Concept Overlay

The attached Alternative 3R Concept Overlay depicts the former Alternative 3 layout in red linework with the Alternative 3 roadway layout shaded in tan and the new Alternative 3R roadway layout shaded in blue for comparison. The plan also depicts reductions in grading in dark green and increases in grading in lavender.

1. The Commission requested that we evaluate rotating Roadway A2 clockwise to the southeast shifting the roadway, units, and limit of work farther away from the BVW. This change enabled The Morin-Cameron Group (MCG) to:
 - Shift Roadway A2 and the retaining wall at stations 10+00 to 11+00 completely outside of the No-Build Zone, eliminating the need for a Bylaw Variance;

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12 Resnik Road Suite 1 Plymouth, MA 02360 508.746.9491	380 Lowell Street Suite 101 Wakefield, MA 01880 781.245.2500	100 Grove Street Suite 310 Worcester, MA 01605 508.753.3077	P.O. Box 590 Rindge, NH 03461 603.899.6726	680 Warren Avenue Suite 3 East Providence, RI 02914 401.685.3109	
PLYMOUTH, MA	WAKEFIELD, MA	WORCESTER, MA	RINDGE, NH	EAST PROVIDENCE, RI	



- Shift and realign Roadway A2, the emergency access, and the limit of work (LOW) farther from the BVW, reducing impervious surface by 1,278± SF, and providing a more direct access for emergency vehicles;
 - Shift dwelling units 61-65 farther away (aqua on the Alternative 3R Concept Overlay) and the LOW farther away from the BVW; and
 - Save 7 additional trees within the Buffer Zone and reduce grading impacts within this portion of the Buffer Zone by 6,283± SF.
2. The Commission also recommended re-evaluating the Road B cul-de-sac. This recommendation enabled MCG to:
- Shorten Road B by 100 linear feet, reducing impervious surface by 2,505± SF.
 - Relocate former Unit 55 which enabled realignment of Road A2 (as described above) and eliminate the need for a Variance.

This resulted in a reduction in grading by 1,375± SF and an increase in grading by 6,124± SF, for a net increase of 4,749± SF grading within the No-Build Zone, but continues to fully protect the No-Disturb Zone and enabled MCG to avoid the need for a Variance.

These additional plan changes resulted in an overall reduction in site impacts and impervious surface when compared to the original plan and Alternative 3 as depicted in the green shaded column on the Alternative 3R Concept Overlay.

Variations

The regulations at § 320-2 A. and B. state (emphasis added):

§ 320-2 A. No-disturb zones.

“...**Except for wetlands crossings specifically permitted by the Commission** and except as otherwise specifically provided in these regulations or pursuant to a variance as set forth below, prohibited activities within the no-disturb zone include, but are not limited to, grading, landscaping, planting, harvesting, mowing, vegetation clearing, cutting, trimming, filling, depositing any materials (including yard waste and construction debris), composting, excavating, construction, fencing, and installation of roads, driveways and walkways...”

§ 320-2 B. No-build zones.

“...**Except for wetlands crossings specifically permitted by the Commission** and except as otherwise specifically provided in these regulations or pursuant to a variance as set forth below, prohibited activities within the no-build zone include, but are not limited to, construction of any structure, installation of any impervious surface, and any work requiring a building permit...”

According to § 320-2 A. and B., variations are required for work within the No-Disturbance and No-Build Zones except for wetlands crossings which can be permitted by the Commission without a Variance. As a result, the attached Alternative 3R Concept Overlay does not require issuance of any Bylaw Variations.



Our project team recognizes the need to continue collaborating with the Commission on the number, size, and location for the installation of permanent, weather-resistant No-Disturb Zone markers along the boundary of the No-Disturbance Zone.

Emergency Access

Jeff Heidelberg of Toll Brothers, Inc., Scott Cameron of MCG, and Ann Marton of LEC Environmental Consultants, Inc. met with Chief Davis on March 26, 2024 to review and discuss the various emergency access alternatives discussed with the Commission during the March 19, 2024 public hearing. Our team is in the process of more fully documenting each of these alternatives with graphics, photographs, and narratives that will be submitted no later than May 14, 2024 and presented to the Commission at the May 21, 2024 public hearing. Additionally, Chief Davis has volunteered to attend the May 21, 2024 Commission meeting to provide feedback and answer Commission questions regarding his requirement for a separate and distinct emergency access/egress from the one provided via the main entry.

Should you have any questions, please do not hesitate to contact me in our Wakefield Office at 781-245-2500 or at amarton@lecenvironmental.com.

Sincerely,

LEC Environmental Consultants, Inc.

Ann M. Marton, President

Director of Ecological Services

cc: Toll Brothers, Inc.; The Morin-Cameron Group, Inc.

Attachment A

Alternative 3R Concept Overlay
Prepared by The Morin-Cameron Group, Inc.
Dated March 28, 2024