



# Sustainability Commission

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Applicant Response 6/5/23

## Letter to Groton Zoning Board of Appeals regarding Groton Farms (500 Main Street) Comprehensive Permit Application

Date: May 17, 2023

To: Groton Zoning Board of Appeals

Dear Zoning Board of Appeals Members,

We are generally supportive of the proposed Groton Farms 40B development application. We applaud the applicant's plans to use all-electric heat pump technology for heating and cooling to move away from dependence on fossil fuels, the reduction by more than 33% of impervious surfaces on the site to greatly reduce stormwater runoff and aid in the recharge of the aquifer, the adherence to Dark Sky-compliant lighting to limit outdoor light pollution the planned deployment of multiple EV car chargers on the property and in garages to facilitate the sustainable transition in automobiles, and for the use of so many native plantings and grasses on their extensive planned planting list.

However, after reviewing the applicant's proposed plans, the Groton Sustainability Commission has identified a brief list of suggested conditions that we believe should be considered as the application moves forward, as follow:

- Make every attempt to keep larger trees currently existing on site

*Applicant: The Applicants team has identified and evaluated the health of existing trees along the existing entry drive (note: our evaluation as landscape architects was limited to a visual survey of the condition of the trees.) We have identified those trees on the plans to remain in place. It should be noted that all efforts were made throughout our design process to preserve significant existing trees. For example, a grouping of trees on the western edge of the site was preserved, especially due to their proximity to wetland resource areas.*

- Make use of rainwater harvesting for use in irrigation and/or creation of rain gardens

*Applicant: The Applicant proposes a well (or series of wells as needed) to provide a water source for landscape irrigation. This system will be designed in accordance with EPA's WaterSense program. Certain areas of the site will not require landscape irrigation. Because of this approach, we propose that stormwater harvesting is not necessary.*

*Additionally, the impervious surfaces at the site are being reduced significantly as compared to the existing site conditions. Further, the buildings have been designed without gutters due to the proposed height of the roofs. All apartment buildings have been designed with drip line recharge systems to infiltrate the roof runoff which will add to the recharge of the groundwater.*

*Decentralized approaches to stormwater management, such as rain gardens, were considered during the planning of the project. In this case, the creation of a wet basin, reduction in the impervious areas of site and the maintenance concerns associated with the upkeep of rain gardens contributed to the decision not to include them in the final design.*

- Further look to minimize impervious surfaces

*Applicant: We will explore additional options to minimize impervious surfaces.*

- Refer to and use the Commonwealth's list of plantings to avoid invasive species. We strongly recommend referring to the recent letter submitted to the ZBA by the Invasive Species Commission for review of the more problematic plantings in the applicant's plan, as well as suggested alternative native plantings.

*Applicant: There will be no plantings that are considered invasive per Massachusetts Prohibit Plant List. See response to Invasive Species Commission for additional information.*

- Plant wildflower and native grass meadows

*Applicant: Final plans submitted to the Building Department will depict certain areas with meadow plantings. It should also be noted that native seed mixes and plantings will be utilized in the stormwater infiltration areas which will provide benefit wildlife and pollinators.*

- Solar hot water heating for residential units; can also heat swimming pool with excess solar energy

*Applicant: Following a discussion with Groton Electric Light Department (GELD) on May 31st, we have determined that solar energy use at the site does not provide enough benefit to warrant the cost of installation and is not being considered currently.*

- Use motion sensors and auto-dimming on any security lights to further minimize light pollution

*Applicant: Final plans submitted to the Building Department will outline efforts to minimize light pollution. Developer will also be utilizing LED light sources and many fixtures will be shielded to reduce light trespass and will be Dark Sky compliant.*

- Minimize the use of plastics in construction materials

*Applicant: The Developer will use quality materials but will not agree to restrictive language in the Comprehensive Permit on any material type. The Developer will make every attempt to utilize environmentally friendly construction materials while complying with state code.*

- Minimize the storage of on-site chemicals

*Applicant: Prior to occupancy of the project, an SWPPP will be created that will define, as per DEP/EPA regulations, the storage of chemicals used to operate the project. Onsite storage of chemicals will be centralized at the maintenance shed or in the pool storage area and will be stored and monitored as per the regulations.*

- Consider the use of onsite compost for household kitchen scraps and yard waste

*Applicant: Composting at the level required to support 200 units would require significant space, time and ongoing maintenance and monitoring. A large compost station would additionally cause odor and potentially attract pests. The Developer will focus on more manageable waste control by educating residents on effective recycling practices.*

- Manage dog waste to avoid water contamination (e.g., using appropriate signage, etc.)

*Applicant: Dog waste stations with baggies and trash bins will be sited at appropriate intervals throughout the site and will be emptied at regular intervals. Tenant leases will include language that provides rules and regulations for pet owners. Additional signage will be posted. Final plans submitted to the Building Department will provide signage details.*

Once again, we appreciate the excellent work done by the applicant to address sustainability issues thus far in their application and look forward to their continued positive direction along those lines in the project. We urge the ZBA to please consider these as potential conditions on

the Groton Farms project as the application to the Town moves forward. Thank you for considering this request. Please contact us if you have any questions.

Respectfully submitted,

Andrew H. ScoY - Commission Member, on behalf of the Groton Sustainability Commission