

August 9, 2022

Dear Heather,

The Durham Conservation Commission met on Monday, August 8, 2022, to review and discuss the proposal to develop a parking lot at 19-21 Main Street. This project does not fall within either the Wetland Conservation Overlay District or Shoreline Protection Overlay District, which would trigger a statutory requirement for the Commission to provide input to the Planning Board. However, the Commission takes the initiative to comment on matters before the Town when it deems the environmental aspects of the project are significant. Following substantial public input and consideration by the Commission at our meeting on July 25, 2022, we determined that the environmental implications of this project warrant our input. We did not aim to develop a final position in support of or opposition to the project because that determination requires weighing a number of environmental and other factors, the latter of which are not in our purview but rather the responsibility of the Planning Board.

With that context in mind, by a 3-0 vote (with one recusal, one abstention, and two absences, although one absentee had joined most of the discussion and offered valuable input before leaving), we agreed on the following consensus points:

The project will have significant and detrimental impacts that should be considered very seriously. Although all development projects that come before the Commission represent some degree of environmental impact, the magnitude in this case is much more than most. The site represents a unique area of healthy forest that is within the downtown district and the College Brook and Lower Oyster River watersheds. It provides aesthetic, habitat, and carbon sequestration benefits that will be lost. At the same time, it will facilitate more driving rather than alternative modes of transportation, increasing carbon emissions and congestion. These outcomes are inconsistent with the Town's Master Plan, Town Council goals, and other policies focused on resilience and environmental stewardship.

If the project is to proceed, we were encouraged to see the improvements that it will make to stormwater management and an existing sewer line that is in disrepair. The drainage plan includes state-of-the-art systems that are expected to capture and treat all run-off on the site, as well as most snow melt from the four storage areas. The sewer line connects to several nearby houses and its repair will contain wastewater much more effectively than at present.

Nevertheless, we urge inclusion of environmental management best practices in all aspects of construction and ongoing maintenance. This includes use of materials that help to reduce nitrogen pollution, purposeful planting of native vegetation to recover some of the lost ecological functions, an effective snow removal plan, and more. We recognize that many of these aspects are included in the development plan at present and have been raised in Planning Board discussions to date. We reiterate that in recommending how the project should proceed if it is approved, we are not recommending that it should be approved.

Thank you for considering our input. Should you have any questions about these comments or other matters related to the project, please do not hesitate to reach out.

Sincerely,



Jake Kritzer
Chair, Durham Conservation Commission
(617) 869-1336
jake.kritzer@gmail.com