

From: [Eric Lund](#)
To: [Karen Edwards](#); [Michael Behrendt](#)
Subject: Comment for Planning Board on 19-21 Main St.
Date: Thursday, June 2, 2022 3:44:43 PM

Dear members of the Planning Board:

The purpose of this comment is to expand on remarks made in recent comments submitted by Joshua Meyrowitz and Emily Malcolm-White on 1 June 2022 regarding the potential for increased chloride pollution from salt that would be used to treat the proposed parking lot on the subject property.

Chloride is an ion that is generally dissolved in water. As such, stormwater treatment systems are not designed to remove chloride from runoff. Thus the intentional addition of chloride to the proposed parking surface as part of salt used to melt ice and snow will result in additional pollution to Chesley Marsh and College Brook, which are downstream of the site. Chloride contamination is an important enough issue that in much of the western US, where many of my relatives live, salt is not used to treat roads because the chloride would contaminate the snowpack on which these areas rely for drinking water. Thus the potential for chloride pollution would be an external impact of the proposed development, which must be considered even though it is not explicitly listed in the ordinance.

The applicant bears the burden of proof that the external impact due to such pollution would be less than both existing uses and other uses permitted in the zone. Only a small portion of the Mill Road Plaza drains via Chesley Marsh, and the other properties that drain via the marsh are residential properties that have, at most, only the small amount of parking that would be needed to serve the residents. Thus the impact of the proposed development on chloride pollution of Chesley Marsh would be greater than the existing uses. Furthermore, salt is normally only required to treat driveways, walkways, and parking areas. In particular, no such treatment should be necessary for any building that might be built by right on the property (assuming that gutters are properly maintained) or on any landscaped areas adjacent to such a building. Therefore the impact of chloride from the proposed project would be greater than what would result from a by-right development on the site. The project therefore fails the external impact criterion for conditional use on this point, in addition to the other points that have been documented in previous projects.

In addition, if some of the snow is removed from the parking lot by using bucket loaders to throw snow over the fence, as project engineer Michael Sievert suggested for an earlier version of the project (to the best of my knowledge Mr. Sievert has neither confirmed nor denied as of this writing whether this is still the plan), such snow would likely be contaminated by oil, sand and other debris, and litter such as discarded cans and food wrappers. The stormwater treatment system can only treat water that runs off the parking lot or adjacent areas that drain toward the parking lot, so meltwater from snow thrown over the fence would also lead to contamination of Chesley Marsh from these pollution sources, and the slope would be difficult to access for the purpose of removing any litter which may end up there. Again, a by right development would include a building and adjacent landscaped areas from which snow would not need to be removed, and the meltwater would pass through the stormwater treatment system, so the external impact of the proposed parking lot again would be greater than that of a by-right development.

Thank you for your consideration.

Eric Lund
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Opinions are my own and not necessarily shared by others on Town Council.