



19 February 2019

Ms. Erica Uriarte
Town Planner, Town of Bolton
Bolton Town Hall
663 Main Street
Bolton, MA 01740

**RE: Still River Commons
Chapter 40B Comprehensive Permit**

Dear Ms. Uriarte:

On behalf of Sudbury Valley Trustees (SVT), I am submitting comments on the proposed Still River Commons 40B development on Still River Road. SVT is a member-supported, 501(c)3 non-profit land trust that protects land in a region situated between Boston and Worcester, Massachusetts, and which includes Bolton.

The mission of SVT is to protect natural areas and farmland for wildlife and people in the 36 communities that surround the Sudbury, Assabet, and Concord Rivers. In 2013, SVT was accredited by the national Land Trust Accreditation Commission. In 2018, we renewed our accreditation for another five-year term.

Sudbury Valley Trustees operates on the belief that healthy, functioning ecosystems are critical to the livability of communities. We understand, too, that well-planned and appropriately located affordable housing is important to community health. Therefore, from a planning perspective, the location of the proposed Still River Commons development appears to be a particularly ill-suited site for any kind of housing development.

Others have weighed in on the myriad development challenges on the subject property and the flaws in the application, so we will limit our comments here to the ecological merits of the site. Several years ago, SVT undertook an analysis of our region's undeveloped, unprotected open space to identify the most critical properties for conservation. The analysis considered areas identified as Priority Habitat by the Natural Heritage and Endangered Species Program, BioMap2 Core Habitat and Critical Natural Landscapes, adjacency of properties to existing conservation land, UMass CAPS index of ecological integrity, and areas identified by the Nature Conservancy as being most resilient to climate change. Where some number of these attributes co-occurred, we labeled those properties as high priorities for protection. The Still River Commons property emerged as one of the highest of regional priorities.

The Still River Common property is part of an extensive complex of wetlands and protected lands that provide important ecological services. Much of the adjacent or proximate land has been protected – including land owned by the Bolton Conservation Trust, land owned by the

Harvard Conservation Trust, and the Bolton Flats Wildlife Management Area – making the site even more ecologically valuable for its context. Further, development of the site is likely to have negative impacts on those already-protected lands. The site's importance as open space is notable: the entire property is located within Core Habitat Area identified in the State's *BioMap2* inventory of biological and is designated Priority Habitat and Estimated Habitat for rare and endangered species by the Natural Heritage and Endangered Species Program.

Too often, environmentally sensitive properties are targeted for 40B development because they can be acquired at relatively low cost, and we recognize that land prices are one of the biggest barriers to affordable housing development in our region. In this case, we question whether the net gain of a very small number of affordable units is worth the impact to the site's very sensitive resources. We support the recommendations made in the October 11, 2018 Horsley Witten Group report, and the comments from the Bolton Conservation Commission dated November 11, 2018, and urge the Town of Bolton to do everything in its power to see that the natural resources of this site are adequately protected.

Sincerely,

A handwritten signature in cursive script, reading "Christa H. Collins".

Christa Collins
Director of Land Protection

cc: Bolton Conservation Commission