Dear Board Members:

The Cambridge Water Department (CWD) appreciates the opportunity to comment on the draft conditions proposed by ARCADIS, the peer review engineer retained by the Town of Weston, pertaining to the proposed remediation of lead and arsenic in the top 6” of soil at the Modera Weston site. The project site is located within the City of Cambridge surface water supply watershed. Runoff from the site drains to tributaries of Stony Brook and eventually into the Stony Brook Reservoir, a primary drinking water supply for the City of Cambridge. Therefore, proper management of exposed and contaminated soils is essential in protecting the water supply resource. CWD has reviewed the following documents:

- ARCADIS memoranda dated December 2, 2019, January 27, 2020 and February 27, 2020; and
- GZA memoranda and sampling results dated (January 22, 2020 and February 20, 2020)

Based on the sampling results discussed in the December and January memoranda referenced above, the former orchard and barn areas of the project site have varying levels of arsenic and lead in the top 6” of the soil due to historic pesticide use and lead paint. The applicant, Weston BPR LLC c/o Mill Creek Residential, plans to remediate the soil either by removing the contaminated soil or by using appropriate cover on-site. In its February 20, 2020 memorandum, GZA, a consultant retained by the applicant, proposed a framework for a prospective soil management and remediation plan. The memorandum explains that a final plan is anticipated to be provided at least three weeks before the start of construction.

Cc: Cambridge Water Board
    Sam Corda, CWD, Managing Director
    David Kaplan, CWD, Watershed Manager
To ensure proper management of the proposed soil during construction and remediation, ARCADIS drafted a list of potential conditions to include in a Comprehensive Permit (see ARCADIS February 27, 2020 memorandum). Given the sensitive location of the subject project, CWD urges the Weston Zoning Board of Appeals (ZBA) to adopt all conditions proposed by ARCADIS in any comprehensive permit that may be issued for the project. In addition, CWD requests that the ZBA add CWD to the paragraphs 2.1, 2.4 and 2.5 of the Communication Plan section of ARCADIS’ draft conditions. Regular communication during the remediation and construction process will help CWD monitor the project site and ensure the protection of the City's drinking water supply. CWD contact information for ARCADIS’ proposed Communication Plan is provided below:

Attn: Jamie O’Connell  
Cambridge Water Department  
250 Fresh Pond Parkway  
Cambridge, MA 02138

joconnell@cambridgema.gov  
(617) 349-4781

Sincerely,

Jamie O’Connell, Watershed Protection Supervisor, CWD  
joconnell@cambridgema.gov  
617-349-4781

Cc: Cambridge Water Board  
Sam Corda, CWD, Managing Director  
David Kaplan, CWD, Watershed Manager