

March 19, 2025

Re: Zone 4 development, McLean Hospital, Case 25-03

Planning Board  
Homer Municipal Building  
19 Moore Street  
Belmont, MA 02478

Dear Members of the Planning Board,

As co-chair of the Land Management Committee for Lone Tree Hill Belmont Conservation Land (LMC), a Town of Belmont Committee created in 1999 by the Memorandum of Understanding between the Town of Belmont, McLean Hospital, I submit the following comments regarding the proposed Zone 4 development by McLean Hospital by unanimous vote on behalf of the LMC. The Land Management Committee is responsible for the care and management of the Lone Tree Hill Belmont Conservation Land (formerly known as the McLean Open Space). The southern and eastern sides of Zone 4 directly abut this Conservation Land. The LMC is comprised of eight members, four representing the town, four representing McLean Hospital. The holder of the Lone Tree Hill Conservation Restrictions is the Trustees of Reservations (The Trustees). The Land Management Committee fully supports the letter submitted to the Planning Board from The Trustees of Reservations dated February 10, 2025.

Since four members are representatives of McLean Hospital (the Applicant) it is noted here that they have reported their disclosure of conflict of interest to the Town of Belmont and to the Committee as required by G.L.C. 268A, §19 and are authorized to participate in the preparation of this letter.

Lone Tree Hill Belmont Conservation Land.

As the Planning Board is aware, the Lone Tree Hill property became Belmont conservation land pursuant to a quit claim deed from The McLean Hospital Corporation to the Inhabitants of the Town of Belmont, and Conservation Restrictions B-1 and B-2, each on file with the Middlesex County South Registry of Deeds. These conservation lands are protected in perpetuity in order to promote the public welfare by ensuring the safety of visitors, protecting the land and resident wildlife, and preserving passive recreation spaces within the Town consistent with the above-referenced documents.

Over the last 24 years, the LMC has worked in a collegial manner to fulfill its mission overseeing and managing these conservation lands. The LMC relies extensively on volunteer services and support, both from its members as well as from volunteer groups and individuals, including the New England Mountain Bike Association, the Belmont Conservation Volunteers, a Sustainable Belmont working group, Belmont Citizens Forum and the Judy Record Conservation Fund. In that regard it is important to note that McLean Hospital has been a significant contributor to these volunteer services, on many occasions utilizing workers and equipment from its Facilities Department.

## Zone 4 Proposed Development – Anticipated Impact to Lone Tree Hill

Overall, the plans as presented include key design and technical features which minimize the impact to the abutting Lone Tree Hill Belmont Conservation Land. This includes aspects of the design of the drainage system, the use of native species for plantings, and the management of the site both during construction and its long-term maintenance. On February 14, Mark Smith of the LMC and Joseph Hibbard, a Belmont resident, held a constructive meeting with Justin Mosca, Sr. Project Manager, VHB and Chris Walters, Project Manager for McLean, to discuss the plans as they were previously presented to the Planning Board. This written statement reflects some of the clarifications from that meeting as well as discussion at a recent LMC meeting on March 5.

These comments are provided in an effort to ensure the continued protection of the Lone Tree Hill Belmont Conservation Land during construction and throughout the use and management of this new development. With these purposes in mind, we have reviewed the application to the Planning Board and the stormwater management plan and offer these comments. In addition, we understand that The Trustees letter dated February 10 which was submitted to the Planning Board has been responded to by McLean with some specific commitments and recommendations and was discussed at the March 5 LMC Meeting. We look forward to further consultation with The Trustees whose interests in the Conservation Lands are directly aligned with the LMC's interests.

We understand that McLean has already made specific commitments to address two of the three points raised in The Trustees' letter: namely the removal of fill and the installation of boundary line markers for Zone 4. While some work on addressing the fill has been initiated, additional work is needed to ensure that the boundary line between the conservation land and McLean property is clearly identified and marked and that the fill and other debris on the conservation land is removed. That work is being scheduled and will be coordinated with the LMC. With respect to the boundary markers we understand that McLean has agreed to install permanent boundary markers and to clearly delineate the boundaries when construction workers are on site as set forth below.

In addition, we share these comments on the proposed McLean Hospital Zone 4 development plans:

- 1) Use of Native Plant Material. The LMC strongly supports the Applicant's selection of native plant material for use in the proposed landscape. By avoiding use of non-native species, the project reduces the risk of non-native and/or invasive species entering the Lone Tree Hill Property.
- 2) Actions Requested During Construction. Given the proximity of the edge of work to the southern property boundary which abuts the Lone Tree Hill Belmont Conservation Land we have requested, and McLean has agreed, to the following measures:
  - a. Boundary Line Survey/Limit of Work Delineation. We understand McLean will survey the boundary between Zone 4 (both southern and eastern boundaries) and the Lone Tree Hill property and clearly mark such boundaries for the duration of the construction period to ensure the Lone Tree Hill Belmont Conservation Land is not unintentionally impacted.

McLean will also identify and mark the ‘limit of work’ areas in a manner which is easily visible and understandable to those who will be working on the construction of this project and visitors to Lone Tree Hill.

- b. Encroachment of Work onto Lone Tree Hill. Should the limit of work need to extend onto the Lone Tree Hill Belmont Conservation Land property – or if impacts from construction activities inadvertently impact Lone Tree Hill property (e.g. erosion, the movement of material, water or other objects onto the protected open space) -- McLean has agreed to proactively engage the LMC in a timely manner and work with the Trustees, the LMC and/or its designees to clearly define the encroachment and define protection and/or remediation efforts to limit and repair all impacts to the protected lands.
- c. Process to Mitigate/Restore Construction Encroachment Impacts. McLean has also agreed to provide mitigation of construction encroachment impacts – if any - to the Lone Tree Hill Belmont Conservation Land and that all such mitigation measures must be approved by the LMC before any work begins. This includes approval of both the pre-impact mitigation plans, on-going maintenance requirements, and approval of the adequacy and success of the mitigation (if any) post construction.
- d. Stormwater Management. Overall, the stormwater management and drainage plans as presented show the intent to minimize and appear to minimize the possibility of new impacts to the Lone Tree Hill property. We offer a few comments to highlight for the Planning Board the areas of potential impacts to Lone Tree Hill of these plans as submitted. We note as well that in connection with our discussion with VHB and the discussions with The Trustees, McLean has presented a new plan set that incorporates the adjustments noted below and this new plan set will be included with the project plans to be submitted by McLean to the Planning Board.
- i. Change from Distributed Sheet Flow to Two-Point Source Outfalls. The plans show that there will be two stormwater outfalls which are located at the boundary of Zone 4 and the Lone Tree Hill Belmont Conservation Land. These outfalls will discharge stormwater at the property boundary and the water will immediately move onto and into the Lone Tree Hill Belmont Conservation Land.

These stormwater outfalls are shown on Drainage Plan Sheet - C301- (See Attachment 1): These two stormwater outfalls are labeled FES-1 (a 24” pipe) and FES-2 (a 15” pipe). Please note that FES-2 is shown, but not labeled, on this sheet – the outfall is located below DMH 201.

Our interest is related to the potential impacts to the Lone Tree Hill Belmont Conservation Land from the quantity and velocity of the water from these outfalls. We note that velocity control structures are shown as part of this design and that the modeled flows from these outfalls are similar – actually slightly less – than current run-off flows. That said, the flows are changing from distributed sheet flow along an extended length of the boundary line to two point-source outfalls. These outflows

include stormwater from various areas and structures throughout Zone 4 rather than only those immediately up-gradient, as is the case now.

We are interested in ensuring the proposed overall flow management and the velocity control structures – or other measures – are adequate to mitigate these volumes and velocities to prevent negative impacts to the Lone Tree Hill Belmont Conservation Land to avoid future damage to these lands, trees and other vegetation downstream and downhill from these outfalls near the adjacent road. We understand that VHB has completed further analysis and confirmed that the planned velocity controls with respect to the two point source outfalls are adequate. Further, McLean and VHB have agreed to add a level spreader at the FES-2 location to reduce discharge velocity for less frequent storm events up to and including the 100-year storm event. Our interest is ensuring the new development meets the requirements of Section 60-325, F, 4.c of the Belmont town code which states "There shall be no change to the existing conditions of abutting properties from any increase in peak flows or volumes of stormwater runoff or from erosion, silting, flooding, sedimentation or impacts to wetlands, ground water levels, or wells." In that regard, we also note that the peer review of the project's stormwater management plan is being conducted by the Town's DPW Engineering Division.

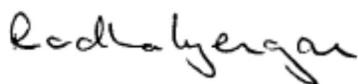
- ii. Adequate Erosion Control for the Area of the Service Road in eastern Zone 4 During Construction – (Attachment 2 - Sheet C501– Erosion Control Plan). Currently there is a partly paved, loosely defined service road and corridor along the northeast and east side of Zone 4 connecting to Zone 5 in the vicinity of Wyman House. It appears that the corridor is currently used for McLean's service vehicle traffic, vehicle parking, storage containers, dumpsters, and bulk site refuse disposal/storage. We understand that this area is most likely to be used as a parking area for workers on site – but were informed that no final decisions have been made. There is the possibility this area could be used for other purposes, such as staging or storing of materials, or other activities and uses. McLean and VHB have made certain recommendations to address erosion in this area and we support those proposed improvements .
- iii. Planned Swale East Side of Parking Garage. The submitted plans include a proposed swale along the east side of the parking garage that will result in additional concentrated channel flow of storm runoff at the elevation 190 low point mentioned above. The swale grading shown on Attachment 1 – Drainage Plan, Sheet C301, does not indicate a constructable or stable swale. The nearest proposed catch basin (CB-211) to this flow is not situated to accept water from the swale, nor is CB-211 able to collect any water since its proposed rim elevation is higher than the surrounding grades indicated on C301 Grading and Drainage Plan. We understand from our meeting the rim elevation indicated in the plan is not correct and will be adjusted. McLean and VHB have developed revised plans to address this issue and we support the intent of the proposed revisions.

- iv. Existing Coal Road Erosion – The road known as The Coal Road serves as a Fire Road Access for Lone Tree Hill, McLean Hospital, Belmont Day School and many residential structures abutting Lone Tree Hill. It is also a principal recreational trail from Pleasant Street uphill through the Eastern Woods of Lone Tree Hill. Currently, stormwater runoff from parts of Zone 5 and the east side of Zone 4 exits Zone 4 at a low point noted above – that flows directly onto the Coal Road. (See Attachment 2 - Erosion Control Plan, Sheet 501). The situation has existed for many years in which the concentrated runoff from Zone 4 flows onto the Lone Tree Hill Belmont Conservation Land and contributes to erosion of the Coal Road, including periodically creating deep gullies in the roadbed after major storm events. The erosion is from stormwater originating from existing conditions in Zone 4 or uphill of Zone 4. Remedial efforts by LMC volunteers have redirected some runoff, but have not eliminated erosion on the Coal Road, and have inadvertently caused erosion in the woodlands adjacent to the Coal Road.

LMC and McLean Hospital are aware of this issue and have collectively worked to improve the Coal Road conditions and mitigate/ limit the causes of the erosion. We recognize, and appreciate, that our partner on the LMC, McLean Hospital, over the years and under the direction of the LMC, has periodically made repairs to the Coal Road and taken measures to limit and redirect the storm flows responsible for the erosion. McLean has recently discussed plans to address this issue with both The Trustees and the LMC. The LMC supports these proposed plans as described at our March 5 LMC meeting. We note that the drainage pathways and the slope of the land as a result of past filling activities on both LTH and McLean Lands in this area will likely need to be revisited and revised should future development occur in Zone 4 outside of the current development footprint.

The Land Management Committee looks forward to continuing our positive 25 + year partnership with The Trustees and our neighbor McLean Hospital to ensure that Lone Tree Hill Belmont Conservation Land is protected for generations to come. We thank the Belmont Planning Board for your consideration of these comments. If the Planning Board and/or Planning Department staff have questions related to these comments, we would welcome the chance to discuss them and provide any additional information that may be helpful.

Sincerely,



Radha Iyengar  
LMC, co-chair

cc: Wayne Chouinard, Assistant Town Engineer

# **ATTACHMENT 1**



# **ATTACHMENT 2**

