

## **Riverfront Area Impacts and Waiver Request**

Pursuant to the Town of Burlington Wetlands Protection Bylaw, intermittent streams are afforded the same level of protection as perennial streams, resulting in a 200-foot Riverfront Area (RFA). Portions of the proposed Marshall Simonds School Athletic Field Improvements are located within this locally protected Riverfront Area.

The total Riverfront Area on the project site is approximately 153,859 square feet (3.53 acres). The proposed work within this area is limited to previously disturbed lawn and landscaped areas associated with the existing school grounds. The majority of the on-site Riverfront Area will remain undisturbed and vegetated, continuing to provide its natural buffer, infiltration, and habitat functions.

The proposed work includes 9,465 square feet of new impervious surface associated with ADA-compliant walkways and 44,650 square feet of synthetic turf field area, for a total of approximately 54,115 square feet (1.24 acres) of disturbance within the 200-foot Riverfront Area. Of this total, approximately 2,999 square feet of impervious area and 10,254 square feet of synthetic turf (a combined 13,253 square feet) are located within the inner 100 feet of the Riverfront Area. The remaining 40,862 square feet of proposed work is located within the outer 100–200-foot Riverfront zone.

The project has been carefully designed to avoid alteration of the streambank, Bordering Vegetated Wetland, or existing natural vegetation to the maximum extent practicable. All work within the Riverfront Area consists of pervious or infiltrating surfaces, including the synthetic turf system and bioretention rain garden, and replaces previously compacted and managed lawn areas.

The proposed stormwater management system provides a net environmental benefit by substantially improving runoff treatment, infiltration, and groundwater recharge within the Riverfront Area. Runoff from impervious and turf surfaces is captured and infiltrated through the engineered turf base, conveyed to a bioretention rain garden for additional treatment, and then discharged through the existing storm drain infrastructure with no untreated or direct discharge to the stream or adjacent wetlands. The system achieves enhanced ( $\geq 90\%$ ) TSS removal consistent with the requirements for Outstanding Resource Waters and complies fully with the Massachusetts Stormwater Standards.

Because the proposed work results in improved water quality, increased infiltration, and long-term stabilization of previously disturbed areas while maintaining or enhancing protection of the Riverfront Area, the applicant respectfully requests a waiver from the Town of Burlington Wetlands Protection Bylaw's 200-foot Riverfront restriction. The project meets the intent and performance standards of 310 CMR 10.58(4) and provides equal or greater protection of the Riverfront Area and the downgradient Outstanding Resource Waters.