



November 12th, 2025

Larry Cohen, Chair
Burlington Conservation Commission
Town of Burlington
29 Center Street
Burlington, MA 01803
By email: ecoleman@burlingtonma.gov

Dear Chair Cohen and Members of the Conservation Commission,

Thank you for the opportunity comment on the Notice of Intent for 114 Winn Street (DEP #122-713) for the Marshall Simonds School - Athletic Field Improvements project. We apologize for the late date of this submission but have only recently become aware of the project's status before the Commission. The Ipswich River Watershed Association (IRWA) is a local 501(c)(3) organization dedicated to protecting the Ipswich River to ensure there is enough clean water for people, fish, and wildlife, today and for the future. Given the field's proximity to Maple Meadow Brook, one of the headwater streams of the Ipswich River, and the project's location within the Riverfront Area, it is especially important to demonstrate no adverse impacts to water quality, wildlife, or surrounding natural resource areas. We offer the following recommendations for the Commission to consider:

- Synthetic, or artificial, turf is known to contain potentially harmful compounds that can break down and be released into the environment. These compounds can have negative effects on both water quality and aquatic life. We would recommend that the Commission consider condition language regarding certification through an independent lab that the artificial turf is free of PFAS and other toxic chemicals.
- We recommend that water quality testing be conducted on-site at regular intervals throughout the lifetime of the project. Testing results should be reported to the Town and the Conservation Commission to provide long-term data on water quality impacts. This data will allow the Town to track potential environmental changes and take corrective action as necessary. Pre-construction water quality testing should be conducted to establish baseline site conditions for comparison. We recommend that the Commission's peer review consider what remediation or adaptive mitigation measures could be taken, if water quality impairments are discovered during the monitoring process.
- We strongly recommend considering infill options other than crumb rubber, including more natural alternatives. According to the [Town of Arlington's Artificial Turf Study Committee Final Report](#) (April 2024), several Massachusetts towns "such as Lexington, Milton, and Malden have specified alternative infills to help mitigate chemical pollution and increased surface temperatures..."

We appreciate the applicant's redesign of the project to reduce impacts to the Riverfront Area and add stormwater elements. If you have any questions or require additional information, please contact me at (978) 412-8200 or ebcasey@ipswichriver.org.

Sincerely,


Erin Bonney Casey
Executive Director