



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Eastern Massachusetts National Wildlife Refuge Complex
73 Weir Hill Road
Sudbury, MA 01776-1420



May 15, 2007

Ms. Nancy White
Mass Department of Environmental Protection
Northeast Regional Office
205B Lowell Street
Wilmington, MA 01887

Dear Ms. White:

It has come to my attention that an appeal has been filed to the Massachusetts Department of Environmental Protection of the Wayland Conservation Commission's Order of Conditions 322-661 for the installation of a synthetic, crumb-rubber tire infill turf field at the Wayland High School. The U.S. Fish and Wildlife Service (Service) is an abutter to the Wayland High School. The land owned by the Service is known as the Great Meadows National Wildlife Refuge. I am the manager of the refuge, which is part of the Eastern Massachusetts National Wildlife Refuge Complex, and represent the government on this issue.

I attended a meeting of the Wayland Conservation Commission in September 2006 about this project. The primary concerns raised by residents at that meeting were the toxicity of leachate from the crumb-rubber tire infill and the concomitant impact on the drinking wells for the Town of Wayland from the discharge of leachate and runoff. It is my understanding that the Town of Wayland has required the drainage for the field (and the fieldhouse) to be relocated to another portion of the school property. As the adjacent landowner, I have concerns about potential impacts of the drainage on the land and water resources of the Great Meadows NWR and the Sudbury River.

It will not be acceptable to have any runoff from this project affect refuge lands. The Service will not grant a drainage easement for this project – it is neither an appropriate use of the refuge and it likely is not a compatible use of the refuge. I respectfully request that that applicant provide documentation depicting the extent of flow from the drainage outfall location, including during peak rainfall events. This should include calculations of how the drainage will be affected when the Sudbury River is at flood stage, which generally occurs once or twice a year. This calculation of flow should be provided on a map which indicates the location of the refuge boundary.

It would be preferable for the applicant to design a retention system on the high school property so that concerns about drainage and flooding can be eliminated.

Additionally, the ten citizen appeal raised a number of questions about the toxicity of the leachate that I believe should be answered. In particular, a complete pollution elimination system should be required if



questions raised in the appeal cannot be satisfactorily answered. The location of the adjacent Great Meadows National Wildlife Refuge and the National Wild and Scenic Sudbury River dictate substantial thought, analysis and accurate information before a decision can properly be made as to the environmental efficacy of this project.

Feel free to call me at 978-443-4661 x 11 if you have any questions.

Sincerely,

Elizabeth A. Herland
Refuge Complex Manager