



Charles River Watershed Association

BY FAX AND MAIL

January 9, 2006

Stephen R. Pritchard, Secretary
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Deirdre Buckley, MEPA Unit

Re: ENF South Natick Hills, Natick MA, EOE # 13699

Dear Secretary Pritchard:

The Charles River Watershed Association (CRWA) has reviewed the Environmental Notification Form (ENF) for the above referenced project, South Natick Hills, by South Natick Hills, LLC. This project is proposed for an undeveloped 52 acre site in Natick, and will result in the alteration of 22.6 acres, including 9 acres of new impervious area.

The scope and potential environmental impacts of this project are large, and are of particular importance given the geography and hydrology of the site and its location in the Charles River watershed. There is not sufficient information provided in the ENF to determine whether all impacts from this project have been avoided, minimized and mitigated, and **we therefore request that you require the preparation of an Environmental Impact Report (EIR)**. Although the proposed project falls just below the thresholds for a mandatory EIR, MEPA jurisdiction in this situation is broad because the proponent may be seeking approval from the Housing Board of Appeals if the Comprehensive Permit is appealed.¹

In order to allow full public review of potential environmental impacts, the scope of the EIR should include a detailed alternatives analysis for the site, thorough analysis of the hydrologic impacts of the proposed project, documentation of the proposed stormwater management plan (both conventional and Low Impact Development, or LID,

¹ In the December 16, 2005 Certificate on the EENF for Cedar Ridge Estates (MEPA # 13666), for example, the Secretary affirmed that in such projects, "MEPA jurisdiction is broad and extends to all aspects of the project that may have significant environmental impacts."

techniques), including a maintenance plan; an assessment of the opportunities and alternatives for maximizing groundwater recharge while still protecting groundwater quality, especially in the aquifer protection area on the site; documentation of the assertion that there is sufficient water supply and wastewater capacity for this project; an assessment of the feasibility of providing on-site wastewater treatment to avoid increasing the interbasin transfer of water from Natick's groundwater supplies to Deer Island via MWRA's sewer system; opportunities for Transportation Demand Management (TDM); and the feasibility of including green building design techniques in the development.

Stormwater and Hydrologic Changes

Any new development that will alter land, increase imperviousness and reduce vegetative cover has the potential to create significant environmental degradation. The site of this proposed project makes these potential impacts particularly important for a number of reasons. The site is located in the headwater area of Indian Brook, which flows south into Little Farm Pond in Sherborn and then east back into Natick, where it flows through Broadmoor Wildlife Sanctuary and into the Charles River. Changes in land use, hydrology and vegetation in headwater areas must be managed with particular care to ensure that downstream resources are not impacted. This is especially true in Indian Brook, a subwatershed with significant wetland resources, rare species habitat, and extensive medium to high yield aquifer areas. Its location in the central portion of the Charles River watershed, an area under hydrologic stress² and water quality impairments,³ makes attention to hydrologic alteration critical.

The ENF contains scant information about the potential impacts to the site's hydrology, despite the need for extensive grading and clearing. The ENF documents the proposed stormwater management plan poorly, and provides no detail about the pervious pavement that is proposed to improve recharge and decrease imperviousness. There is no indication of how maintenance will be performed, nor who will be responsible for maintenance. There is no site-specific information about soil types, and thus no way to assess whether the pervious pavement is feasible as designed. It is unclear what other stormwater management or LID approaches may have been considered. On a site such as this one, simply meeting the standards in DEP's Stormwater Management Policy may not be sufficient to avoid impacting protected wetland resources, to protect aquifer resources, to prevent downstream flooding and to protect water quality.

Groundwater Losses and Recharge

Natick, which uses local groundwater for public water supplies but discharges wastewater to the MWRA sewer system, is a significant exporter of water, and is thus in

² This portion of the Charles is classified as under "medium" stress by the Massachusetts Water Resources Authority.

³ This portion of the Charles is listed on the Massachusetts Integrated List of Waters (the 303d list) as a category 5 water, and is listed specifically for nutrients, organic enrichment/low dissolved oxygen, pathogens and turbidity, all pollutants that can be related to stormwater pollution.

“water deficit.” Natick’s Elm Bank wells, on the Charles River in Dover, have a direct and significant impact on the Charles River. As in all new development in Natick, this project should identify and implement all feasible measures for conserving water on-site and minimizing non-essential outdoor water use, and should examine the opportunities for mitigating the impacts of its water use. In addition to using low flow toilets and other conservation measures in construction, the proponent should investigate options for capturing rooftop runoff for homeowners to use for irrigation, as well as commit to landscaping in public rights of way that does not require watering through the use of drought tolerant trees, shrubs and grasses in the project area. Of special importance is the need to maximize recharge, which DEP recognizes as a high priority for medium and highly stressed basins.

With the increasing availability and variety of small scale “package” wastewater treatment plants, CRWA believes one important alternative that needs to be considered for this site is on-site wastewater treatment with a groundwater discharge. The costs and benefits of such a system should be thoroughly evaluated before a determination is made that discharging wastewater into the municipal system and thus out to Deer Island is the best alternative.

Other

This project presents an opportunity to incorporate “green design” elements in all aspects of the project. Many green design elements are cost effective, and will not in fact add to the cost of developing even low income housing. Measures that will reduce water and energy use, wastewater generation, use of raw materials, stormwater runoff, and solid waste should be explored and fully discussed in an EIR.

Use of herbicides and pesticides should be minimized since all site runoff flows into sensitive wetland resources that include rare and endangered species habitat, and then into Indian Brook. The proponent should develop a public education program to encourage residents to conserve water, protect and maintain BMPs, and protect sensitive wetland areas.

The proponent should also examine the opportunities to reduce traffic generation from this project. The residences will generally be located beyond accepted walking distances from public transportation and shopping areas. The proponent should work with the town to identify opportunities to provide bus or shuttle service during peak commuter hours. Opportunities to improve bicycle transportation should also be considered.

Finally, CRWA is concerned about disturbance in this area resulting in an increase of invasive species. A monitoring program should be included with a vegetation management plan to reduce the possibility of expanding invasive species in this environmentally sensitive area.

We appreciate the opportunity to provide comment. Please feel free to contact me should you have any questions.

Sincerely,

Kate Bowditch
Director of Projects

cc: Natick Conservation Commission
Natick Planning Board