



Charles River Watershed Association

BY FAX AND MAIL

May 16, 2007

Ian A. Bowles, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Aisling Eglington, MEPA Unit

Re: *Environmental Notification Form, Daniels Village, Medway, MA, EOE # 14008*

Dear Secretary Bowles:

The Charles River Watershed Association (CRWA) submits the following comments on the Environmental Notification Form (ENF) for the above-referenced project. Although the project does not exceed a mandatory Environmental Impact Report (EIR) threshold, CRWA believes that an EIR should be required because the project fails to avoid, minimize or mitigate damage to the environment.

The project is surrounded on three sides by wetlands and Chicken Brook, a tributary to the Charles River, runs along and through the western portion of the site. The drainage area for Chicken Brook is fairly small and the brook is relatively flashy. Chicken Brook experiences very low flows in the summer months and, based on CRWA's monitoring data, is impaired for nutrients and temperature. A stream, labeled as intermittent in the U.S. Geological Survey database in GIS, bisects the site and is clearly seen in the attached aerial GIS map. CRWA has no information on whether this is in fact a perennial stream. The upper Charles watershed is classified as medium stress by the Water Resources Commission; however, this section of the watershed should more properly be classified as high stress.

The proposed adult retirement community calls for 33 single family residents and 47 "multi units" with four parking spaces per unit and an additional 30 visitor parking spaces. Alternative site layouts as well as reduced parking should be analyzed. A more compact layout would provide more continuous open space, and eliminate the cul-de-sacs and roadways with single family residences that ring the project site and add to the site's imperviousness. There will be 8.5 acres of new imperviousness and the project will alter almost 19 acres.

A critical component of this project should be to reduce stormwater runoff and associated pollutants while maximizing groundwater recharge. The proponent should commit to meeting the Department of Environmental Protection's updated stormwater management policy, now out for public comment, which emphasizes low impact development (LID) and maximizing recharge. This project should use LID techniques to the greatest extent possible, including reducing imperviousness, green roof technology, rain gardens, biofiltration and increased vegetation on-site. It should also minimize impacts in the riverfront area. The use of pesticides, herbicides and fertilizers should be avoided.

Medway's Water Management Act permit requires the Town to reduce water use to 65 gallons per capita per day. The proponent should commit to minimizing, or better yet, eliminating lawn areas and using drought tolerant grasses and xeriscaping throughout the project to reduce irrigation demand and pollutant runoff. Drip irrigation only as opposed to in-ground sprinklers should be used. The project should also commit to harvesting rooftop runoff for its irrigation needs. Low water use appliances—dishwashers and front end washing machines should be installed in units, both to conserve water and to reduce wastewater flows.

Please feel free to call me if you have any questions at 781-788-0007 ext. 234.

Sincerely,

Margaret Van Deusen
Deputy Director and General Counsel

cc: Medway Planning Board
Medway Conservation Commission
Walter Lewinski, GLM Engineering
James Williamson, Barberry Homes