By Fax and Mail

July 25, 2005

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

Attn: Briony Angus, MEPA Unit

Re: Draft Environmental Impact Report, Eaglebrook Village, Wrentham, MA, EOEA No. 13472

Dear Secretary Pritchard:

The Charles River Watershed Association (CRWA) submits the following comments on the Draft Environmental Impact Report (DEIR) for the above-referenced project. This project exceeds MEPA review thresholds for land, wastewater and transportation. The project will alter 99 acres of this 150-acre site, create 41 acres of new imperviousness, and generate 75,610 gallons of wastewater per day. The project proposes over 1700 new parking spaces.

Alternatives Analysis

The only alternative analyzed in the DEIR is shown in Figure 4 as the "full build alternative." Contrary to your ENF Certificate, a comprehensive alternatives analysis was not performed, nor was "a reduced build alternative that could result in the creation of less impervious surface" evaluated. This should be required in the FEIR.

We note that Roads A and B appear merely to mirror the zoning districts rather than to give consideration to the natural topography and hydrology. Site grading should be discussed in the FEIR and layouts for the roads and the commercial area that accords with the site's topography should also be discussed.

The central commercial area could be much more compact, rather than ringing a multi-acre parking lot. If structured parking ancillary to the businesses is not allowed in the commercial district as the proponent asserts, then subsurface parking beneath the

buildings should be evaluated in the FEIR to reduce the amount of imperviousness.[1] The area where the indoor recreational facilities are proposed on the western side of the site could also be made more compact by grouping the buildings and eliminating some of the roadways. This would result in a large undisturbed open space around the wetland that would link the 18 acres of open space that will be deeded to the Conservation Commission with this area of the site. Gravel lots could also be used instead of pavement at the indoor recreational facilities to further reduce the site's imperviousness and the FEIR should discuss this. It is also not clear why the two warehouse units in this area have separate roadways when they could be consolidated.

The DEIR has not investigated all feasible methods for avoiding, reducing or minimizing impacts to land.

We also note that this project is a lost opportunity for true mixed-use development. Rather, uses are segregated by zoning districts, making a village type setting impossible to achieve. While we understand that current zoning prevents residential in the commercial district, just as the proponent is seeking a zoning change that will allow for commercial recreational development on the western part of the site, so too it would have been preferable for the proponent to have sought a change that would have allowed residential in the commercial district. This would have ensured a much more pedestrian friendly landscape. As now configured it seems likely to us that residents will use their cars to access retail services on the site.

Stormwater Management

There is real opportunity here to design this site using low impact development (LID) techniques. Proper site design in combination with many landscaping and infiltration techniques distributed throughout the project can cumulatively improve stormwater management cost-effectively. A suite of tools should be evaluated including: preservation of the site's natural features to the greatest extent possible; planting native vegetation in buffer strips and rain gardens (small planted depressions that can trap and filter runoff); using vegetated areas to slow runoff; and using alternative street design, narrower roads and omission of curbs to reduce impervious surfaces, to name some of the techniques that could be used here. Common LID practices are use of rain gardens and bioretention; rooftop gardens; sidewalk storage; vegetated swales, buffers, and strips; tree preservation; roof leader disconnection; rain barrels and cisterns; permeable pavers and pollution prevention and good housekeeping.

Although a stormwater plan is contained in Appendix C of the DEIR, it falls short of being an adequate stormwater management plan. While the internal roads will be conveyed to the Town, it is not clear from the plan what entity will be responsible for ongoing operation and maintenance (O&M) of structural stormwater BMPs. This should

[1] At a minimum, improved parking lot design should be discussed in the FEIR using low impact development techniques. These could include end-of-island bioretention cells; bioretention swales around the parking perimeter; permeable paving; bioretention strips between parking stalls; and a small retention pond to supplement storage and pollutant removal.

be clarified in the FEIR. The FEIR should explain the statement in the stormwater management plan that if lots are sold off to individuals, each owner will be responsible for general maintenance of the particular component that exists on their property. Owners' responsibilities for stormwater maintenance should be spelled out in deed restrictions as should the statement that individual owners will be responsible for their lot soil stabilization and for "unnecessary runoff into wetlands and roadways." It is also not clear from the plan who will be responsible for swales, detention/retention basin and stormceptor O&M.

Wastewater

Given that the project is in a Zone II of the water supply wells, nitrogen loading poses serious risks. The proponent should provide specifications for the Amphidrome system in the FEIR and compare it to other available systems for efficient nutrient removal. A vegetative management plan, including an Integrated Pest Management Plan, to minimize leaching of nutrients from the site, to eliminate the use of herbicides, fungicides, pesticides and fertilizers, and to maximize the use of native vegetation, should be required for inclusion in the FEIR.

Water Supply

Integral to the wastewater issues and associated nitrogen loading concerns is water supply. We disagree with the proponent's characterization of the project's water use as "nominal." DEIR at 6-1. While the project has committed not to install inground sprinklers, it will still use a substantial quantity of water. As we noted in our comments on the ENF, Wrentham's Water Management Act permit is undergoing five-year review and based on DEP's 2005 Order to Complete to the Town, it is expected that DEP will cap Wrentham's authorized withdrawal volume from the Charles River basin at 1.05 mgd (the Town's average water use over last 3 yrs). The Town will also be subject to the performance standards of 65 gallons per person per day, 10% or less unaccounted for water, and a seasonal cap on water use based on a summer to winter use ratio.

The proponent states that it will formalize an agreement with the Wrentham Water Department that addresses per capita water use, water conservation and mitigation measures. This agreement should be included in the FEIR. We note that Table 6-2 is based on 75 gallons per person in the age restricted housing and 110 gallons per bedroom in the single family and general use housing. The proponent should commit to using low flow toilets throughout the project. Water conservation will reduce total wastewater flows.

The playing fields that will be turf grass should be identified in the FEIR, as should the total amount of turf throughout the project. Because of potential local impacts on water resources, the location of an irrigation well should be identified and the amount of the anticipated withdrawal. Any irrigation well installed should be equipped with a meter to measure actual withdrawals.

Transportation Demand Management

Effective transportation demand management (TDM) measures are important for this project, which will generate over 6,000 vehicle trips per day. A number of intersections will be Level of Service (LOS) F, although according to the DEIR, this will happen regardless of whether the project is built. The proponent's efforts to work with the town on elderly transportation, as it agreed to do in response to EOTC's comment letter on the ENF should be discussed in the FEIR. Shuttle service to and from the Franklin commuter rail during peak a.m. and p.m. commuter hours should also be explored in the FEIR. Bicycle lanes should be considered throughout the project to promote bicycle use both into and within the project area. The proponent has committed to an onsite transportation coordinator. Carpooling is an effective TDM and it should commit to an aggressive program to encourage ridesharing by residents and by project businesses whose employees are commuting to work. It should report annually to the Town on its TDM measures.

To reduce offsite trips, development of retail services should keep pace with residential development.

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

Very truly yours,

Margaret Van Deusen
Deputy Director

cc: Laura Rome, Epsilon Associates
Wrentham Conservation Commission
Wrentham Planning Board
Wrentham Zoning Board of Appeals