

By Fax and Mail

March 30, 2005

Secretary Ellen Roy Herzfelder
Executive Office of Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Briony Angus, MEPA Unit

**Re: *Environmental Notification Form, Eaglebrook Village, Wrentham, MA,
EOEA No. 13472***

Dear Secretary Herzfelder:

The Charles River Watershed Association (CRWA) submits the following comments on the Environmental Notification Form (ENF) for the above-referenced project. This project exceeds MEPA review thresholds for land, wastewater and transportation. The project will alter 96 acres of this 150-acre site, create 31.86 acres of new imperviousness, and generate 72,000 gallons of wastewater per day. The project proposes 6-11 acres of buildings, 1853 new parking spaces and 32 roadways and paved areas. The proposed project requires a number of state permits, as well as an NPDES Construction permit.

While a mixed use project with a 40B housing component (104 residential units on 63 acres) and commercial/retail uses, including a commercial recreational facility, it is not located near transit facilities and will be heavily automobile-dependent. Close to 6500 vehicle trips per day are projected. The draft environmental impact report (DEIR) should be scoped for water and wastewater issues, stormwater, wetlands and transportation. Alternatives to the proposed project should be analyzed, including greater density of the housing, with clustering of units and elimination of the single-family residences.

Phasing:

The phasing of the project should be discussed in the DEIR. Retail services should be developed in conjunction with the residential component in order to reduce vehicle trips. The DEIR should discuss infrastructure development sequencing of the project's wastewater and stormwater drainage infrastructure.

Water and Wastewater:

Potable water will be provided by municipal water supply. The DEIR should discuss how the determination of 71,936 gallons per day was derived and the breakdown for

planned uses. It should also discuss the ability of the municipal supply to meet this demand. The Town of Wrentham's water withdrawal permit is undergoing five-year review this spring and will be significantly revised pursuant to the Department of Environmental Protection's new Water Management Act Policy (April 2004). The DEIR should discuss conservation measures that will be employed to keep the project's residential water use below 65 gallons per capita per day in keeping with DEP's new policy.

We also note that according to correspondence from DEP to the Town concerning the five-year review of its WMA permit, the Town's summer water use is quite high and it will be required to reduce that use. It should also analyze the irrigation demand of the project's components and commit to minimizing lawn area and using drought tolerant grasses and xeriscaping throughout the project to reduce irrigation demand. The proponent should commit to complying with the Massachusetts Water Resources Commission's *Guide to Lawn and Landscape Water Conservation* (2002) and it should also commit to harvesting rooftop runoff for its irrigation needs. The proponent should also consider the use of artificial turf for some, or all, of the commercial playing fields. While artificial turf provides somewhat lower wildlife and biological diversity values, and can in some cases increase heating, it requires no irrigation, pesticides, herbicides or fungicides, and it facilitates stormwater recharge.

The proposed wastewater systems should be discussed and the locations of the systems identified. According to the ENF there will be two soil absorption systems and septic systems. The commercial component of the project will require a groundwater discharge permit. The DEIR should also analyze the feasibility of water reuse.

Stormwater:

The project's 35 acres of imperviousness present stormwater management challenges. According to the ENF, the project will comply with DEP's Stormwater Management Policy. Reducing runoff and recharge of stormwater should be goals for this project. The proponent should commit to using low impact development techniques in the project's design. As seen in Figure 3 of the ENF all of the parking is proposed to be surface parking. The DEIR should discuss how the number of parking spaces was determined and if this differs from local zoning requirements. The proponent should be encouraged to create structured parking in the central western section where office, restaurant and service uses are proposed to reduce the amount of imperviousness and the amount of contaminated runoff.

The DEIR should present drainage calculations, pre and post construction runoff rates flows and a detailed description of the proposed BMPs, including a discussion of the alternatives considered along with their impacts. Compliance with DEP's Stormwater Management Policy performance standards should also be discussed. The DEIR should include a site plan that shows where these stormwater structures will be located. The DEIR should also include the stormwater management plan and operation and maintenance of BMPs that includes internal roadway sweeping, catch basin cleaning and snow removal.

Wetlands and Habitat

According to the ENF, there is one federal isolated wetland on the site that will be altered. The DEIR should discuss the mitigation for this. It should also analyze impacts from habitat fragmentation in the project area and adjoining areas

Transportation:

The DEIR should discuss the basis for the number of vehicle trips per day in the ENF. It should also fully assess the project's impacts on traffic and air quality and identify appropriate mitigation. A full discussion of public transit, bicycle and pedestrian options should also be discussed. Transportation demand management measures should be fully analyzed and required for this project. Retail services, such as a convenience store, ATM and dry cleaning, which will reduce the number of offsite vehicle trips should be included in the project.

Mitigation Measures:

The DEIR should contain a discussion of mitigation measures for the project and the timetable for implementation of these measures.

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 Planning Board