

By Fax and Mail

March 29, 2005

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

Attn: William Gage, MEPA Unit

**Re: *Environmental Notification Form, Fairfield Green at Dedham,  
Dedham, MA, EOE No. 13465***

Dear Secretary Herzfelder:

The Charles River Watershed Association (CRWA) submits the following comments on the Environmental Notification Form (ENF) for the above-referenced project. Although a mandatory EIR is not required for the project, for the reasons discussed below, we believe a single EIR should be scoped for water, wastewater, stormwater and transportation issues.

From a water budget perspective, the Town of Dedham is in a large water deficit and its infrastructure is causing massive dewatering of the area. This is because it exports its wastewater out of basin to the MWRA Deer Island plant, 75% of this “wastewater” is inflow and infiltration (I/I), or stormwater and clean groundwater that enters the pipes locally, and its municipal stormdrain system carries off stormwater before it can infiltrate into the ground. Dedham also has a high degree of imperviousness that impairs aquifer recharge. This engineered water cycle results in water shortages and not surprisingly, the Dedham Westwood Water District (DWWD), which withdraws water from both the Charles and Neponset basins pursuant to a registration and permit from the Department of Environmental Protection (DEP), is experiencing difficulty in meeting peak summer demand. DWWD’s proposal to import MWRA water is currently undergoing MEPA review.

The ENF does not discuss the DWWD’s capacity to provide potable water for the project, particularly in the summer months. We note that there are a number of projects in various stages of planning in Dedham that will require significant volumes of potable water. The EIR should focus on summertime potable water demand and the DWWD’s ability to meet this demand during peak use without the use of MWRA water. DWWD is

developing a conservation fee program for new development to offset the increased demand on the public water supply system. This fee, which is separate from the access fee required for new water users, will as we understand it be used to reduce water demand by financing water conservation measures, such as the installation of low flow toilets in older homes and subsidizing front loading washing machines and other state-of-the-art low flow devices. We think the fee could also be used to enhance off-site stormwater infiltration and aquifer recharge. The proponent should report on its discussions with DWWD and commit to participation in the water conservation fee program in the EIR. It should also commit to developing a water conservation program for residents, as well installation of low water use dishwashers and washing machines.

Because it has difficulty meeting seasonal demand, DWWD has not allowed projects to use the public water supply for irrigation. The EIR should discuss the irrigation needs of the project and how it plans to meet it. The project should commit to the collection of roof top rainwater in cisterns for storage and use to meet its outdoor irrigation needs. Xeriscaping and drought tolerant grasses should be used throughout the project to reduce, or even eliminate, the need for irrigation water.

Given Dedham's high I/I rate, the EIR should also discuss the proponent's participation in the town's I/I removal program.

The use of low impact development technologies, *e.g.*, raingardens, grass swales and bioretention basins, for integrating stormwater management into the project's design should be explored in the EIR. The proponent states in the ENF that it will comply with DEP Stormwater Policy. We believe that the project should adopt BMPs that will promote stormwater recharge and/or reduce runoff.

The proponent's commitment to transportation demand management (TDM) measures should be explicit in the EIR. In the ENF the proponent states that it will work with the MBTA and the town "to review options for improved access to the train station." The proponent should report on those discussions in the EIR.

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: Dedham Zoning Board of Appeals  
Nan Crossland, Dedham Westwood Water District