



November 26, 2019

*Via Email*

Purvi Patel  
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**Re: Route 1A Recreation Facility, 0 Main Street, Walpole**

Dear Purvi:

Charles River Watershed Association (“CRWA”) submits the following comments on the Environmental Notification Form (“ENF”) and Supplemental Information for the Route 1A Recreation Facility in Walpole, Massachusetts filed with the MEPA Office on October 10, 2019. The Town of Walpole is proposing to build a new recreation facility on 66.8 acres of land that will include both synthetic and natural turf fields, parking lots, roadways, and pedestrian paths. To build this project, the Town is proposing to clear approximately 30 acres of the currently wooded site. An Environmental Impact Report (“EIR”) should be required to fully evaluate the environmental impacts of and alternatives to this project, as well as provide information about how the project will comply with the Total Maximum Daily Load (“TMDL”) for Nutrients in the Upper/Middle Charles River.

Loss of 30 acres of wooded undeveloped land is deeply concerning. Loss of trees and alterations to this natural landscape will contribute to degraded air and water quality, increases in stormwater runoff pollution and flooding, and less natural cooling capacity. Creation of nearly two new acres of impervious surface will further exacerbate many of these issues, including by increasing stormwater runoff, decreasing groundwater recharge, and increasing heat impacts. Impacts to wetland buffer zones affect wildlife habitat and hydrology and reduce natural flood storage. And all of these impacts will become more severe as climate change brings increased heavy rainfalls, more drought, and hotter temperatures. Minimizing impervious surfaces, maximizing the functioning of natural ecosystems, and increasing the use of green infrastructure can help to mitigate the effects of climate change and result in a healthier environment for athletes and the community.

We are also concerned that the project includes two synthetic turf fields because toxic PFAS chemicals have been found in artificial turf. PFAS chemicals are known to cause serious health problems, including cancer. If PFAS chemicals are present in the turf, athletes using the field will be exposed, and if PFAS chemicals enter stormwater runoff from the field, downstream communities and waters will also be at risk.

### *Trees & Vegetation*

According to the ENF, the site is currently wooded, and the Town is proposing to clear approximately 30 acres of wooded habitat. Trees and other vegetation protect air and water quality, help to control stormwater runoff and flooding, and provide natural cooling. A GIS analysis of the Charles River watershed conducted by CRWA and The Nature Conservancy (<https://maps.coastalresilience.org/massachusetts/>) indicates that parts of the site are within and adjacent to 1) areas prone to inland flooding, where conserving intact land and processes may help alleviate flooding; 2) areas that are important for drinking water supply, where conserving intact lands and ecosystem processes will improve drought resiliency; and 3) areas that are important for sustaining biodiversity, where conserving intact lands and ecosystem processes will improve resilience. This property is currently protected open space and clearing 30 acres of woods will have significant impacts on local environmental conditions.

The Town should avoid cutting down as many trees (especially mature trees) as possible. Mitigation of tree removal should be required onsite and there should be no net loss of trees from the site – any trees removed should be replaced with trees along proposed roadways and in proposed landscaped areas to help mitigate temperature impacts. Mature trees should be replaced on a 2 to 1 basis. While the benefits of new young trees will not be the same as the mature trees removed, it will be a start.

### *Impervious Surface*

In addition to clearing trees and vegetation on nearly half the site, the Town is proposing to add almost 2 acres of new impervious area. The Town should consider whether more can be done to reduce the amount of surface parking and roadway on the site and incorporate green infrastructure into parking lot and roadway design that will treat the excess stormwater generated by additional impervious surface. The ENF also does not say whether the Town has considered alternatives to impervious surfaces, which it should do.

### *Wetlands*

The Town is avoiding direct construction or filling in wetlands; however, they are proposing to construct some of the project within the 100-foot buffer zone, which will still impact the wetland areas. Wetlands protect water quality and provide vital flood storage and habitat, and buffer zones are an important way to ensure that wetlands resources are protected. The Town should ensure that any work conducted in the buffer zone does not impact wetlands on the site by taking appropriate construction control measures and directing stormwater runoff to green stormwater infrastructure treatment systems.

### *Alternatives Analysis*

Despite the significant impacts associated with clearing 30 acres of wooded habitat and creating new impervious surface, the ENF does not indicate that the Town considered any alternative locations for this project. Indeed, it appears that the only alternative the Town

considered aside from different configurations for the project on the current site was to do nothing at all. Before proceeding, the Town should consider alternatives such as redevelopment of previously developed sites in order to minimize adverse ecological impacts.

### *Stormwater Management*

The ENF does not provide adequate detail about stormwater management, stating only that stormwater will be directed and collected into area drains, catch basins, and piped into bioretention areas and infiltration basins, and that all Massachusetts stormwater requirements are being met within the project limits through low impact development and stormwater BMPs, including bioretention areas, vegetated swales, and infiltration basins. The ENF does not specifically demonstrate how compliance with the stormwater requirements will be achieved. There are specific requirements for development and redevelopment projects set forth in the Massachusetts MS4 General Permit that are not referenced in the ENF. Furthermore, the ENF does not refer to or detail how the project will comply with the TMDL for Nutrients in the Upper/Middle Charles River, finalized in 2011. Additional stormwater management plans detailing system sizing, type, and location should be provided, along with calculations showing that the project complies with the TMDL, which requires no additional inputs of phosphorus to the river and a significant reduction from existing development.

Additionally, as noted above, toxic PFAS chemicals may be present in the synthetic turf proposed to be installed on the site. If PFAS chemicals are present in the turf, they will end up in stormwater runoff, putting downstream communities and waters at risk.

Finally, the Town should consider possible impacts to the site under future climate conditions. According to the National Climate Assessment, the amount of precipitation falling in very heavy events increased by 71% in New England from 1958 to 2012. As the site is not intended for occupancy such as housing or office facilities, the Town may want to consider making the property “floodable” under extreme conditions as a means of protecting surrounding critical infrastructure.

### *Water Conservation*

We appreciate the water conservation measures the Town is planning to take, which include irrigation of only natural turf athletic fields with rain sensors and a highly efficient irrigation system and use of native grasses and trees that will not require watering in other landscaped areas. However, the ENF does not indicate what amount of water will be required to irrigate the natural turf fields, stating only that it is “TBD.” The strain on our water resources is only increasing, and we need to prepare for increased drought in the future. We therefore encourage the Town to do as much as possible to limit all irrigation.

Thank you for considering these comments, please do not hesitate to reach out with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Heather Miller". The signature is written in a cursive, flowing style.

Heather Miller, Esq.

General Counsel & Policy Director

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