Commonwealth of Massachusetts
Executive Office of Environmental Affairs ■ MEPA Office

ENF Environmental Notification Form

For Office Use Only
Executive Office of Environmental Affairs
EOEA No.: 13418
MEPA Analyst: Nick Zavolas
Phone: 617-626-1030

The information requested on this form must be completed to begin MEPA Review in accordance with the provisions of the Massachusetts Environmental Policy Act, 301 CMR 11.00.

Project Name: Town of Easton, Phase II – Comprehensive Wastewater Management Plan (CWMP)		
Street: Five sewer needs areas in Easton, MA		
Municipality: Easton, MA	Watershed: Taunton River Basin	
Universal Tranverse Mercator Coordinates: TBD	Latitude: TBD Longitude: TBD	
Estimated commencement date: TBD	Estimated completion date: TBD	
Approximate cost: $100,000,000	Status of project design: 0 %complete	
Proponent: Town of Easton		
Street: 136 Elm Street		
Municipality: Easton	State: MA	Zip Code: 02356
Name of Contact Person From Whom Copies of this ENF May Be Obtained: Kevin Eagar		
Firm/Agency: CDM	Street: 50 Hampshire Street	
Municipality: Cambridge	State: MA	Zip Code: 02139
Phone: 617-452-6324	Fax: 617-452-8324	E-mail: eagarkf@cdm.com

Does this project meet or exceed a mandatory EIR threshold (see 301 CMR 11.03)? ☒Yes ☐No

Has this project been filed with MEPA before? ☐Yes (EOEA No._____) ☒No

Has any project on this site been filed with MEPA before? ☒Yes (EOEA Nos. 13302, 13089, 12415, 11661, 11150)* ☐No

* (These EOEA nos. represent projects that potentially overlap this project; however, this can be confirmed when the project's scope is finalized; these EOEA nos. were obtained from the MEPA website.)

Is this an Expanded ENF (see 301 CMR 11.05(7)) requesting:

a Single EIR? (see 301 CMR 11.06(8))	☐Yes	☒No
a Special Review Procedure? (see 301CMR 11.09)	☐Yes	☒No
a Waiver of mandatory EIR? (see 301 CMR 11.11)	☐Yes	☒No
a Phase I Waiver? (see 301 CMR 11.11)	☐Yes	☒No

Identify any financial assistance or land transfer from an agency of the Commonwealth, including the agency name and the amount of funding or land area (in acres):___Financial agency: DEP State Revolving (SRF) Loan Fund for wastewater collection system

Are you requesting coordinated review with any other federal, state, regional, or local agency? ☐Yes(Specify_____) ☒No

List Local or Federal Permits and Approvals: Potential local or Federal permits and approvals

include: NPDES General Permit for Construction Activity and the associated Stormwater Pollution Prevention Plan (SWPPP), and street opening/closing permits. Others to be determined (TBD), depending on selected alternative(s).

Which ENF or EIR review threshold(s) does the project meet or exceed (see 301 CMR 11.03):

- ☐ Land
- ☐ Water
- ☐ Energy
- ☐ ACEC
- ☐ Rare Species
- ☒ Wastewater
- ☐ Air
- ☐ Regulations
- ☐ Wetlands, Waterways, & Tidelands
- ☐ Transportation
- ☐ Solid & Hazardous Waste
- ☐ Historical & Archaeological Resources

Summary of Project Size & Environmental Impacts	Existing	Change	Total
LAND			
Total site acreage	TBD		
New acres of land altered		37*	
Acres of impervious area	TBD	TBD	
Square feet of new bordering vegetated wetlands alteration		TBD	
Square feet of new other wetland alteration		TBD	
Acres of new non-water dependent use of tidelands or waterways		TBD	
STRUCTURES			
Gross square footage	TBD	TBD	TBD
Number of housing units	Not applicable (NA)	NA	NA
Maximum height (in feet)	NA	NA	NA
TRANSPORTATION			
Vehicle trips per day	TBD	TBD	TBD
Parking spaces	TBD	TBD	TBD
WATER/WASTEWATER			
Gallons/day (GPD) of water use	N/A	TBD	TBD
GPD water withdrawal	N/A	N/A	N/A
GPD wastewater generation/ treatment	1,013,000**	1,193,000***	1,193,000
Length of sewer mains (in miles)	0	52	52

State Permits & Approvals

- ☒ Order of Conditions
- ☐ Superseding Order of Conditions
- ☐ Chapter 91 License
- ☐ 401 Water Quality Certification
- ☐ MHD or MDC Access Permit
- ☐ Water Management Act Permit
- ☐ New Source Approval
- ☒ DEP or MWRA Sewer Connection/ Extension Permit
- ☐ Other Permits (*including Legislative Approvals*) – Specify:

Others TBD will depend on selected alternative(s).

* 37 acres = Acreage for in-Town solutions (described below): two treatment sites @ 2 acres, each; Stonehill College subsurface discharge site @ 24 acres; and Depot Street open beds site @ 8.5 acres.
**Existing wastewater discharged to on-site septic systems.
*** Proposed wastewater collects existing and includes infiltration/inflow and discharges to new treatment system(s) in Town or to existing regional facilities.

CONSERVATION LAND: Will the project involve the conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97?

☐Yes (Specify: _____) ☐No

TBD

Will it involve the release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction?

☐Yes (Specify: _____) ☐No

TBD

RARE SPECIES: Does the project site include Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities?

☒Yes (Specify: As described in the Town of Easton, Massachusetts, Phase II – Comprehensive Wastewater Management Plan (CWMP, October 2004, attached to this ENF), the southeastern half of the Depot Street Parcel is designated as a rare species habitat. Furthermore, an October 25, 2004 letter (attached to this ENF) from the Massachusetts Division of Fisheries & Wildlife (MDFW) identifies rare species and exemplary natural communities in, and in the vicinity of the project site. ☐No

HISTORICAL /ARCHAEOLOGICAL RESOURCES: Does the project site include any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

☒Yes (Specify_____) ☐No

If yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources?

TBD: A letter (attached to this ENF) from the Massachusetts Historical Commission (MHC) indicates that the MHC is presently unable to determine what effect, if any, the proposed wastewater management project will have on historic properties and archeological sites. The MHC has requested the "opportunity to review plans showing existing and proposed conditions within the project area when these become available, as well as elevations of any buildings or pump stations ..."

☐Yes (Specify_____) ☐No

AREAS OF CRITICAL ENVIRONMENTAL CONCERN: Is the project in or adjacent to an Area of Critical Environmental Concern?

☒Yes (Specify: Easton's Five Corners sewer needs area is almost entirely located within an ACEC; a large portion of the Turnpike Street sewer needs area is located within an ACEC; the Easton Center sewer needs area's southern portion is located along the edge of an ACEC; and the Depot Street parcel (in the event of in-Town solutions being followed) is located within an ACEC.) ☐No

PROJECT DESCRIPTION: The project description should include **(a)** a description of the project site, **(b)** a description of both on-site and off-site alternatives and the impacts associated with each alternative, and **(c)** potential on-site and off-site mitigation measures for each alternative (*You may attach one additional page, if necessary.*)

Town of Easton, Massachusetts, Phase II – Comprehensive Wastewater Management Plan (October 2004) is attached to this ENF for additional details not included in the project description/summary provided below:

(a) Project Description. The Easton Wastewater Management Committee (EWMC) initiated recent planning for the town's wastewater management in 2000. Easton's wastewater management (with the exception of Stonehill College, which sends its wastewater to the Brockton Wastewater Treatment Facility) is exclusively on-site subsurface systems. Easton has abundant surface and groundwater resources. For example, Easton lies in the upper reaches of the Taunton River Basin; waterbodies account for 2% of the total land area in Easton; five major aquifers in Easton are associated with Hockomock Swamp, Queset Brook, Mulberry Brook, the Canoe River and Borderland State Park. Lastly, the town has extensive wetlands and two areas of critical environmental concern (ACEC), i.e., Hockomock Swamp and the Canoe River. U.S. Soil Conservation Service maps suggest that approximately 2/3 of the town's land area is severely limiting for septic systems. Given the abundant water resources and the soil limitations for on-site subsurface disposal in Easton, the need for properly managing wastewater is crucial.

Needs Areas. Seventeen wastewater study areas were delineated and subjected to a preliminary screening process that considered each area relative to: lot size and density of the built environment, proximity to environmental resources, suitability of soils for septic systems, and on-site systems with poor performance (defined as percent failure and percent repair). Three tiers of needs areas resulted from the screening. Tier 1 needs areas are those for which an off-site solution was found to be likely (in these areas, it was found that construction of adequate soil adsorption systems on individual properties was not feasible). The five Tier 1 needs areas are as follows in order of priority: North Easton Village, South Easton, Five Corners, Turnpike Street and Easton Center. Tier 2 needs areas are those for which an on-site solution was found to be likely (in these areas, it was found that providing updated Title 5 compliant systems in the majority of parcels in these areas for their zoned intended use was feasible). The three Tier 2 needs areas are: Old Foundry, North Washington and Hockomock. The remaining 9 study areas are where an on-site solution was considered feasible.

Wastewater Management Approaches. Four general approaches to wastewater management treatment and disposal were identified: optimization of existing facilities, use of conventional wastewater collection and treatment facilities (e.g., near-site, neighborhood, or centralized in-town wastewater facilities), use of alternative wastewater collection and treatment technologies (e.g., reuse, innovative/alternative onsite and near-site systems, alternative collection systems), and cooperation between municipalities to develop regional solutions.

Alternatives to Present Treatment Systems. Four alternatives to the existing Title 5 septic systems were evaluated: no-action (maintaining existing Title 5 systems), on-site disposal with a management program, near-site disposal with a management program, and off-site disposal with a sewer collection system. These options were considered relative to environmental impact and mitigation measures, regulatory compliance (i.e., soils suitability, seasonal high groundwater conditions, existing on-site disposal system problems and pumpouts, and required buffer zones), flexibility (i.e., capacity to facilitate future development), reliability (i.e., operation and maintenance, and life span of equipment), and cost. The alternatives evaluation found that: 1) "no-action" would provide no beneficial effects and there would be no long term solution to wastewater disposal or groundwater protection needs in Easton; 2) the on-site systems with management program alternative should be applied Town-wide; and 3) off-site systems should be used for all Tier 1 needs areas.

In-town Treatment and Disposal Sites. A desktop screening exercise was conducted of potential treatment and disposal sites for: in-town neighborhood and centralized in-town treatment facilities. The criteria considered during the desktop screening include: geology, soil conditions, upland location, existing development and site size. Of a list of 50 potential sites, 12 sites were identified and further evaluated for viability; this evaluation considered

open bed system, subsurface infiltration system, costs for each system and the following parameters: wetlands, soils, drinking water supply, sensitive habitat, park/recreation and agricultural land use, and water bodies. Five sites found to be "low potential" or "not feasible" were not carried forward to a detailed screening. Detailed screenings were conducted for Main Street, Militia Park, Town Forest, Stonehill College North/Holy Cross Fathers, Old Pond/New Pond, the Depot Street parcel, and Easton Rod & Gun Club and adjacent land. The evaluation found: Stonehill College received the best rating for serving North Easton Village. Sites to serve South Easton all received the same rating. However, given there is some economy of scale likely if both North Easton Village and South Easton are serviced by this site, Stonehill College was considered a preferred site for South Easton. The Depot Street parcel received the best rating for serving both Five Corners and Turnpike Street needs areas and also ranked well for Easton Center.

Regional Solutions. As part of a regional solutions evaluation, the status of existing treatment facilities and their ability to accept additional flows from the 5 needs areas was considered and this evaluation found that three regional solutions were feasible for further investigation: pumping North Easton Village, South Easton (in part) and Easton Center to Brockton; pumping Five Corners' needs area's waste to the Town of Mansfield; and pumping Turnpike Street and South Easton (in part) needs area's waste to Taunton via Raynham. (Pumping to the MWRA, it was found, should not be considered until all other wastewater management options had been exhausted.) Preliminary communications between Easton and surrounding towns have occurred and there will be ongoing communication with surrounding towns as part of regional solutions.

Detailed Evaluation of Alternatives. The most promising in-town and regional alternatives for Tier 1 needs areas were evaluated in terms of cost (present worth) and non-cost criteria (e.g., direct and indirect environmental impacts, likelihood of implementation from regulatory agency and public acceptance points of view, and institutional issues required to implement the proposed plan). It was found that regional solutions to wastewater management in Easton are the most cost effective, being 60% less expensive than the in-town solution for the top five needs areas in total, on a present worth basis. In addition, the environmental benefits of in-town solutions versus regional solutions were difficult to quantify – with advantages and disadvantages apparent in both solutions, and became more of a matter of opinion. Given the significant cost differences between in-town and regional solutions and the subjective environmental benefits of an in-town solution, the regional solution was recommended for Easton. However, given uncertainty of the implementability of the regional solutions (Brockton's draft NPDES permit prohibits future connections from communities not currently discharging to the facility; Mansfield's current wastewater management planning; and the hydraulic capacity available in both the Raynham and Taunton systems) – it is recommended that the alternate in-Town plan be identified and pursued if the recommended plan cannot be implemented prior to an immediate need for a solution.

(b) On-site and off-site alternatives and impacts. Sections 3.2 and 3.3.1 of the CWMP include a discussion of on-site and off-site alternatives as well as direct, indirect, adverse and beneficial environmental impacts. Section 3.4 discusses environmental impacts and mitigation measures for each of the five, Tier 1 needs areas. Section 4.4 contains an environmental evaluation of preferred groundwater disposal sites (for the in-town solutions). Section 6 evaluates in detail the in-town and regional solutions for the five, Tier 1 needs areas and this evaluation includes environmental impacts.

(c) Potential on-site and off-site mitigation measures for each alternative. Section 3.3.1.5 of the CWMP includes a discussion of mitigation measures for on-site systems and off-site with a sewer collection system.