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December 1, 2006

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Castle Hill
PROJECT MUNICIPALITY : Northbridge
PROJECT WATERSHED : Blackstone
EOEA NUMBER : 13898
PROJECT PROPONENT : Bernon Family Realty Trust
DATE NOTICED IN MONITOR : October 25, 2006

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62H) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project **does not require** the preparation of an Environmental Impact Report (EIR).

The proposed project involves construction of 75 single-family homes on an approximately 98-acre project site. The project site, Castle Hill Farm, is located within the Whitinsville Historic District. The project will result in approximately 31 acres of land alteration and 5 acres of impervious area, and demolition of State Register and National Register-listed structures. According to the Environmental Notification Form (ENF), water use for the project is estimated at 36,300 gallons per day (gpd) and wastewater generation is estimated at 33,000 gpd. The project includes construction of approximately 0.91 miles of on-site water and sewer mains and 0.32 miles of mains off-site. The proposed project will result in approximately 798 vehicle trips per day.

The project is undergoing review pursuant to Section 11.03(1)(b)(1) and (2) of the MEPA regulations because it involves alteration of 25 or more acres of land and creation of five or more acres of impervious area. The project is also under review pursuant to Section 11.03(5)(b)(3)(c) because it involves construction of ½ mile or more of new sewer mains and Section 11.03(10)(b)(1) because it will result in demolition of a historic structure located in an historic district and listed in the State Register of Historic Places. The proposed project will require a Sewer Connection/Extension Permit and a Water Supply Distribution System Modification Permit from the Department of Environmental Protection (MassDEP). The project requires an Order of Conditions from the Northbridge Conservation Commission for work in the wetlands buffer zone (and on appeal only, a Superseding Order from MassDEP) and a National Pollutant

Discharge Elimination System (NPDES) Construction Activities Permit from the U.S. Environmental Protection Agency (EPA). The proponent is not seeking financial assistance from the Commonwealth. Therefore, MEPA jurisdiction applies to those aspects of the project within the subject matter of required state permits with the potential to cause damage to the environment. In this case, MEPA jurisdiction extends to land, historic and archaeological resources, wetlands, stormwater, water supply and wastewater.

Historical and Archaeological Resources

The Massachusetts Historical Commission (MHC) has determined that the project will have an adverse effect on the Castle Hill Farm through the demolition of State Register properties and through the introduction of visual elements that alter the setting and character of the historic district. The proponent should consult with MHC to identify ways to avoid, minimize or mitigate adverse effects of the project on historic properties, including adverse visual effects to the Whitinsville Historic District and mitigation for loss of historic buildings that are in poor condition. The proponent should also consult with the Northbridge Historical Commission, which has been invited by MHC to participate in the consultation process. The MHC comment letter indicates that the maps included in the Environmental Notification Form (ENF) showing boundaries of the historic district do not match those on file with the National Register Nomination at MHC. The proponent should consult with MHC on this issue to clarify district boundaries.

As further detailed in the MHC comment letter, the project area is considered archaeologically sensitive and is likely to contain historic period archaeological resources. The proponent should conduct an intensive (locational) archaeological survey to locate and identify any significant historic or archaeological resources that may be affected, and to provide information that will support development of measures to avoid and minimize or mitigate impacts to important cultural resources. The proponent should consult with MHC and the Northbridge Historical Commission regarding the survey protocol and results, and any design changes or mitigation plans that may be required. I am requiring that the proponent provide documentation of an executed Memorandum of Understanding (MOU) with MHC prior to the issuance of any state agency permits for the project.

Water and Sewer

The proposed project will be serviced by the Northbridge Water Division public water supply system and by the municipal sewer system. MassDEP indicates that adequate water is available to supply the proposed project's water demand of 36,300 gpd. The proponent should provide additional information to MassDEP regarding the proposed sewers and the existing capacity of sewers downstream from the proposed project. As noted in the MassDEP comment letter, the Town of Northbridge is under an Administrative Consent Order (ACO) with MassDEP to correct inflow and infiltration (I/I) problems. The ACO requires removal of 4 gallons of I/I for every 1 gallon of sewage added to the system. The proponent has committed in the ENF to provide inflow/infiltration mitigation at a rate of 4:1 in accordance with the existing ACO. The proponent will need to certify to MassDEP that 132,000 gpd of I/I has been removed from the Northbridge sewer system prior to receiving a permit from MassDEP.

Wetlands and Open Space

The project site includes approximately 12.4 acres of wetlands resource areas. The project as proposed in the ENF will not result in any impacts to wetland resource areas. Potential buffer zone impacts will be identified in a Notice of Intent (NOI) that the proponent will file with the Northbridge Conservation Commission. As noted in the ENF, the proponent considered various site plan layouts to limit resource area impacts, and avoid sensitive areas and steep slopes. As described in the ENF, the proposed Flexible Development Plan alternative will result in less impervious area and land alteration, and more open space, compared with the conventional subdivision plan alternative. The proponent has committed to providing 49 acres of open space, of which approximately 35 acres will be permanently protected under a deed restriction or Conservation Restriction. The site abuts open space in the Town of Uxbridge ("Hundred Acre Lot"), private open space in Northbridge (the Whitinsville Country Club) and municipal open space in Northbridge. The project has been designed to facilitate trail connections with adjacent public open space parcels, and to incorporate portions of the old stone wall system on the property as part of walking trails and conservation land boundaries. An existing stand of pine trees on site will also be retained and protected as part of the project's open space.

Stormwater

The ENF indicates that the proposed project will fully comply with the MassDEP Stormwater Management Policy, including the requirement for 80% removal of total suspended solids (TSS). The ENF also states that infiltration trenches and dual infiltration sedimentation basins will provide for groundwater recharge, that there will be no discharge of untreated stormwater to wetlands, and that erosion and sedimentation controls will be implemented throughout construction. The proponent should ensure that mechanisms are in place for effective long-term operation and maintenance of the stormwater system.

Construction

The comment letter from MassDEP identified a number of concerns relating to the project's construction phase. These include potential dust, odor and noise impacts, and asbestos-containing material (ACM) in buildings proposed for demolition. I refer the proponent to the MassDEP comment letter and the regulations referenced. The proponent should ensure that the project is implemented in accordance with the MassDEP Air Pollution Control Regulations, and that measures are implemented to avoid and minimize construction-related impacts as further detailed in the MassDEP comment letter.

Sustainable Design

I encourage the proponent to integrate Low Impact Development (LID) techniques in site design and storm water management plans. LID techniques incorporate stormwater best management practices (BMPs) and can reduce impacts to land and water resources by conserving natural systems and hydrologic functions. The primary tools of LID are landscaping features and naturally vegetated areas, which encourage detention, infiltration and filtration of

stormwater on-site. Other tools include water conservation and use of pervious surfaces. Clustering of buildings is an example of how LID can preserve open space and minimize land disturbance. LID can also protect natural resources by incorporating wetlands, stream buffers, and mature forests as project design features. For more information on LID, visit <http://www.mass.gov/envir/lid/>. Other LID resources include the national LID manual (Low Impact Development Design Strategies: An Integrated Design Approach), which can be found on the EPA website at: <http://www.epa.gov/owow/nps/lid/>.

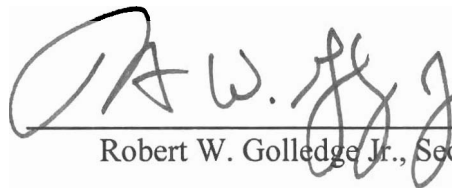
I encourage the proponent to consider high-performance/green building and other sustainable design measures to avoid and minimize environmental impacts. Such measures may include:

- EnergyStar Certification and Leadership in Energy and Environmental Design (LEED) Certification for Homes;
- water conservation and reuse of wastewater and stormwater;
- use of renewable energy;
- ecological landscaping;
- optimization of natural day lighting, passive solar gain, and natural cooling;
- an annual audit program for energy and water use, and waste generation;
- energy-efficient Heating, Ventilation and Air Conditioning (HVAC), lighting systems, and appliances, and use of solar preheating of makeup air;
- use of building supplies and materials that are non-toxic, made from recycled materials, and made with low embodied energy;
- incorporation of an easily accessible and user-friendly recycling system infrastructure into building design; and
- implementation of a solid waste minimization and recycling plan.

Based on review of the ENF and comments received, and consultation with public agencies, I have determined that the ENF has sufficiently defined the nature and general elements of the project, including its potential impacts. I am satisfied that any remaining issues (including measures to avoid, minimize or mitigate impacts to cultural resources) can be addressed during the state and local permit and review process. The project as proposed in the ENF requires no further review under MEPA.

December 1, 2006

DATE



Robert W. Golledge Jr., Secretary

Comments Received

11/03/06 Massachusetts Historical Commission
 11/20/06 Department of Environmental Protection, Central Regional Office

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