



Jones River Watershed Association

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Help us help the

12 September 2002

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Jay Wickersham, EOE No. 12868
251 Causeway Street, Suite 900
Boston, MA 02114

Re: Plymouth Gateway, Commerce Way, Plymouth

Dear Secretary Durand:

The Jones River Watershed Association [JRWA] has reviewed the ENF noted above for the Plymouth Gateway project as published on-line at the MEPA website as well as the locus and existing conditions figures that were provided by facsimile from Epsilon following our request on September 10th.

The project locus is shown to fall just outside the surface watershed of the Jones River basin, in the Taunton River basin and overlying the Plymouth Carver Sole Source Aquifer. It is likely that groundwater on-site is a source of recharge to the nearby kettle hole ponds and municipal wells in the Jones River basin, in addition to wells in the town of Plymouth and important Taunton basin resources. Little Smelt Pond, Smelt Pond and Smelt Brook are Jones River resources that may be affected by activities proposed on the Plymouth Gateway project site. In addition, both the town of Kingston Grassy Hole well and the proposed I-86 well zones of contribution appear to underlie the project area. Furthermore, Muddy Pond in Kingston, the home of globally rare endangered species in the adjacent Taunton River watershed, is near to the project site and could be significantly affected by changes in groundwater recharge or water withdrawals.

The ENF appears to suggest that an additional 35 acres of raw, forested land will be cleared for the project in addition to the approximate 80 acres already cleared by the sand and gravel removal operation. It is not clear if sand and gravel removal will continue beyond the project site effectively expanding the area of land that will be altered in the immediate area. The gravel removal operation already operates a 1MGD water well on or adjacent to the site.

Nearby municipal, state and private non-profit open space resources include land owned by Plymouth, the Boy Scouts, Sisters of Divine Providence, Wildlands Trust of Southeastern Massachusetts and Chapter 61 forest lands. Furthermore, the Town of Kingston Conservation Commission and Open Space Committee have expended considerable energies mitigating the negative impacts of the route 44 construction and were successful in requiring a pedestrian underpass to connect open space lands on both sides of the new highway. In addition to protection of water supplies, buffering to these open and conservation lands and

continuation of open space corridors should be a consideration in any significant development in this region.

For these reasons, the JRWA seeks a high level of environmental review and the development of an Environmental Impact Report for the project that at least includes a discussion of the following:

- Examination of the direction of groundwater flow under full pumping and non pumping conditions in order to understand the potential impacts from the project site and to design protective development and mitigation strategies;
- Design plans which minimize creation of impervious surface;
- Discussion and review of a high level of treatment and infiltration of stormwater;
- Separation for infiltration of “clean” stormwater (i.e. rooftop) from polluted stormwater which should receive advanced treatment;
- Use restrictions on development such that no hazardous materials or industries may be developed on site. For instance there should be no gas stations or hazardous materials processing, etc.
- A discussion of the termination or fate of the existing site uses and site build-out. Will gravel removing and processing continue? What about blacktop processing? Will the existing one million gallon/day well be abandoned?
- Discuss the landscape design to minimize the requirement for irrigation water and need for the new proposed 21,000 gallon per day well; well location and potential impact on local resources;
- Discuss comprehensive approach to minimize adverse impacts and maximize recharge to the aquifer;
- Discuss the traffic control and mitigation strategies that will be adopted to protect local and regional water and air quality, and open space interests;
- Discuss the relationship of this project design and the Route 44 project design.

The JRWA is concerned that the expansion of impervious surface and intensity of development in the area will cause a downward spiral in the quantity and quality of the water resources near to and at the site and negatively impact on the habitat and open land resources. We recommend that the applicant provide an open space set aside as mitigation and provide a public access link to other open space resources. We ask that the Secretary require an Environmental Impact Report to address the issues outlined above.

Respectfully,

Pine duBois
Executive Director
Kingston Open Space Committee chair

Attachment: GIS water resources section snap

c: George Zoto; Mettie Whipple; TNC; Town of Kingston Water Dept., Town Planner; Epsilon