

# NEPONSET RIVER WATERSHED ASSOCIATION

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December 22, 2005

Secretary Stephen R. Pritchard  
EOEA, Attn: MEPA Office  
100 Cambridge St., Suite 900  
Boston, MA 02114

RE: EOEA No. 12037

Dear Secretary Pritchard:

Although the Neponset River Watershed Association (NepRWA) is happy to see that the additional 2,975 parking spaces proposed under this Notice of Project Change would be in the form of pervious surfaces, the proposed changes also include creation of 6 acres of impervious surface. According to the Notice of Project Change, this “will be limited to improvements to the main site circulation accessways and the pedestrian corridors.” It is unclear why these areas need to be impervious and thus increase stormwater runoff and decrease groundwater recharge. There are many pervious alternatives that are commonly used on walkways (which do not require a large weight capacity), including porous asphalt, paving stones and gravel. The project applicant should be required to use one or more of these alternatives or show why they are impractical.

The revised project proposal states that “major components of the site storm water management system ... have been sized and designed to function in the event that the pervious areas become impervious as could occur under frozen conditions or future resurfacing with bituminous concrete paving.” NepRWA recommends that MEPA specifically require the applicant to file an additional Notice of Project Change before paving or otherwise rendering impervious any of the pervious surfaces described in the present Notice of Project Change.

Sincerely yours,

Steven Pearlman  
Water Resource Analyst

cc: Daniel R. Krantz, TKG LLC  
Lauren Gallagher, VHB  
Foxborough Conservation Commission

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