



September 8, 2021

Carolyn Britt, Chair  
Ipswich Planning Board  
Town Hall  
Ipswich, MA 01938

*Re: 55 Waldingfield Road*

Dear Chairperson Britt and the Ipswich Planning Board,

Thank you for the opportunity to comment on the planned development at 55 Waldingfield Road. We believe with the proper conditions, this project could provide a potential model of water resources protection.

As you are aware, the proposed development is along the banks of the Ipswich River, which was recently declared [one of the country's Most Endangered Rivers](#). As such, the property is located in an area of extreme sensitivity and should be developed to not only minimize impact on the river but seek opportunities to improve current conditions. Within this context, we offer the following general planning and conceptual recommendations to protect both water quantity and quality as you develop your plans for the site:

### **Water Quantity**

The project should be designed to minimize water use to the greatest extent possible, especially non-essential uses such as outdoor water use which does not recharge the groundwater. This is particularly important now that the State's newly promulgated water withdrawal regulations prohibit any increase in municipal withdrawals from the highly stressed Ipswich River such that the Town of Ipswich will ***be required to live within its current permitted volume in perpetuity such that any new water demand in the town will need to come from existing allocations***. Moreover, because the Town obtains the majority of its water from the slightly less stressed Parker River Basin, the site should obtain the entirety of its water from the municipal supply and not take water from the Ipswich basin via a private well on the site. We offer the following specific recommendations to ensure that water use by the proposed development does not further stress the local and regional water supply:

- The project at a minimum should offset 100% of its projected water use. This can be achieved through minimization of water use within the project (e.g. ultra-efficient fixtures, minimize outdoor water use) and by the developer off-setting any use beyond that amount by working with town officials to reduce water use in other areas of town by paying into the Town's Water Use Mitigation Program (WUMP).
- The project should minimize its production of stormwater through site design (e.g. minimization of impervious areas) and infiltrate 100% of its stormwater runoff on site.
- Landscapes should be planted with drought-tolerant native species which do not require irrigation beyond the establishment phase. Automatic irrigation systems should not be allowed. These systems are guaranteed to leak over time and even in normal use will use a lot of water.

- The amount of lawn should be minimized and where required, planted with drought tolerant turf grasses such as fescues. Runoff volumes and rates should equal pre-development conditions.
- Private wells should be prohibited, due to limited availability of existing groundwater supplies, again relying on municipal water supplies and offsetting increased demand as detailed above.

## Water Quality

The most effective tool to minimize impacts on water quality and habitat is reducing proximity of development to natural areas and eliminating use of chemicals and fertilizers. We offer the specific recommendations:

- The project should adequately treat 100% of its stormwater runoff on-site.
- Landscapes should be managed organically without the use of synthetic fertilizers or pesticides.
- Use of salt and chemical deicers on the property should be prohibited in favor of sand and environmentally safe deicers.
- Development within any part of the Riverfront area should be prohibited and lawn areas currently within the area converted to natural landscapes.
- The wastewater treatment system should be the most advanced possible and be designed to remove nutrients and treat pharmaceuticals and hazardous household waste to the greatest extent possible.
- A third party should be contracted with to maintain stormwater and wastewater treatment systems in perpetuity (it is a virtual guarantee that these systems will fail in the future if managed by the owners).

While some of these measures exceed minimum regulatory requirements, they are readily achievable using Low Impact Development Standards and should be required as a general practice in environmentally sensitive areas such as these. The Ipswich River Watershed Association can advise the developer on the implementation of these measures at low cost and stand ready to assist you in any way to achieve these protections.

We also call attention to a prior commitment by a spokesperson of the project back in February, which stated their [“goal is to be tax- and water-neutral.”](#) Water-neutral growth is an achievable goal, one that supports our communities in planning for the future. These requests in their entirety have already been presented to and discussed with the project proponents, and they should be prepared to meet these conditions. By conditioning projects in this manner, the Planning Board can accelerate the Town’s adoption of water-neutral concepts across the municipality, to the benefit of both current and future residents.

In addition, we appreciate comments by Planning Board members at the previous meeting inquiring as to the possibility of including a public boat launch on the property. While promoting free, inclusive river access is an important public goal, we are not sure whether the environmental impact of constructing such a landing would be outweighed by the public benefit. We would like to be part of this discussion given our experience.

Thank you for your consideration.

Sincerely,



Wayne Castonguay  
Executive Director