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By Millbury Planning Department at 8:26 am, Jan 08, 2024



**271 Oak Street, Uxbridge, MA 01569**  
**508-865-3586      ted.beauvais@thebrwa.org      www.thebrwa.org**

RE: 40b Comprehensive Permit for 17 Rice Road, Millbury

Kenneth Perro, Chairman  
Board of Appeals  
127 Elm Street  
Millbury, MA 01527

January 7, 2024

Dear Mr. Perro:

The Blackstone River Watershed Association (BRWA) has been asked to review and comment on the 40b comprehensive permit for 17 Rice Road, Millbury currently under your review. As you may know, this project is within the Blackstone watershed area. The BRWA was established in 1969 and has since played an instrumental role in cleaning up what was described as an “industrial river” in the 19th and 20th centuries. Through the efforts of many organizations, like the BRWA, the health of the Blackstone River system has continued to improve dramatically. However, the River is still threatened by industrial and the increasingly residential developments within the Blackstone River Watershed area.

The BRWA’s mission is to engage, educate and advocate for improved water quality in the Blackstone River watershed. The BRWA understands development for housing is important and necessary for the growth of a community. However, it is important that every effort is made to ensure that the ecological resources are protected to ensure the quality of the water and the wetlands are not adversely impacted by any development project.

Please consider the following aspects and recommendations in your review process under the 40b comprehensive permitting guidelines:

- BRWA suggests careful review and understanding of the ecological impacts associated with the development and execution of the developers plans.
- BRWA is concerned with development impacts to the existing wetlands, ponds, and habitats due to the significant large size of this proposed development.



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- Due to the recent erosion and sedimentation related to the construction of a solar farm near Manchaug Pond following major rain events, we encourage extra diligence in the design, construction, maintenance and monitoring of all erosion and sediment control practices. It is not sufficient to describe these practices in the written plans, there needs to be strong enforcement, with penalties if needed, to ensure that the practices actually work and result in the desired outcome – minimization of erosion and sedimentation as a result of this project. Lessons learned from the Manchaug Pond catastrophe should be reviewed and better control measures should be implemented to help avoid another similar event in this Rice Road development project.
- The pond on the downhill side and adjacent to the Rice Road development project is of great concern. Changes in drainage and containment measures within the developer's design plan may have significant impact on maintaining the existing ecosystem in and around this pond. This pond feeds directly into the Blackstone River and any negative changes to water quality may have significant impact to this pond and surrounding area. Through a BRWA sponsored (20 year +) Water Quality Monitoring program and other supporting projects, there have been positive changes in the Blackstone River Watershed. Negative change here will have a direct impact on habitat, vegetation, and water quality.
- If this project is approved, the BRWA encourages frequent on-site monitoring during and after completion of this development to ensure the design and systems are working efficiently and properly as planned. This is especially important during and after rainstorm events.

Thank you for your consideration.

Sincerely,

*/s/ Theodore Beauvais*

Theodore Beauvais  
BRWA President