

September 28, 2021

***VIA EMAIL AND PUBLIC COMMENT SUBMISSION PORTAL***

Massachusetts Environmental Policy Act (MEPA) Office  
Attention: Ms. Purvi Patel  
100 Cambridge Street, 9th Floor  
Boston, Massachusetts 02114

RE: EEA No. 16424 – Emblem Hyannis

Ladies and Gentlemen:

As discussed in our initial comments submitted on September 21, 2021, Save Twin Brooks, Inc. is a Massachusetts nonprofit corporation whose members seek to preserve for our community the nearly 40-acre Twin Brooks Golf Course site—the last large open greenspace in Hyannis Village. This use would implement key goals established in the Town of Barnstable’s 2018 Open Space and Recreation Plan. We therefore oppose the development of the proposed 312-unit Emblem Hyannis apartment complex on the Twin Brooks site (the “Project”), which would forever foreclose this opportunity for green recreational space in the heart of our community.

Just yesterday we received from your office for the first time two additional documents dated September 17 and 20 that the Project’s proponent recently submitted. The proponent did not provide or notify us of these additional documents. These documents total nearly 400 pages, and so we have not yet been able to digest them thoroughly. Because the deadline for further comments is today, however, we make the following observations:

**1. Alternatives Analysis—Additional Discussion**

This 3-page document unsurprisingly states that the larger the Project, the more economic it is for its proponent. The discussion simply invokes the general principle of economies of scale but includes no details of the actual economics. In particular, the document provides no financial calculations to support the conclusion that the lower-density alternatives are not economically viable. In fact, the carefully worded narrative at the top of page 2 actually states only that “these alternatives also generated less income to make the project economically viable.” That simply says the Project’s income would be lower; it does not say, much less demonstrate, that the Project would be uneconomic. A lower-density configuration may indeed be profitable, just not to the degree the proponent would like.

In addition, the traffic comparison (table on page 3) uses 1,152 net average weekday trips for the preferred alternative. This number is not the total traffic but the additional traffic under the Proponent’s draft traffic study that appeared as Appendix F to its Environmental Notification Form. One can only surmise that the figures for both the lower-and the higher-density alternatives likewise represent incremental traffic, not total. More important, as pages 6-8 of our initial comments demonstrate, this calculation both greatly *overestimates* existing traffic using the site and *underestimates* the traffic one can expect from the Project. The proponent does not provide a study calculating the figures for the lower-

and higher-density alternatives, and one can only assume they reflect the same faults found with the draft traffic analysis.

Finally, the proponent still does not discuss the alternative of preserving this site as public greenspace for the residents of the Town of Barnstable, particularly those in the nearby Environmental Justice neighborhoods. That should be the principal alternative considered.

## 2. Phase I Environmental Site Assessment

We have not had the time to review this lengthy document in any detail. We do note that the “User Questionnaire” (Appendix G) was completed by a representative of the proponent. The proponent does not yet own or operate the site, and so its representative’s answers would not be as informed or comprehensive as those of the current owner or operator of the golf course and its personnel. Although the firm preparing the report interviewed the general manager of the site (Section 6, pages 11-12), this individual manages the entire current hotel and conference center. The individual who directly manages the golf course likely would have more detailed and potentially relevant information. Inquiry only with persons of limited knowledge leads one to question the thoroughness of this report. (Failure to interview knowledgeable individuals applies not only to matters within the scope of the Phase I assessment but also to other topics noted in our initial comments, from historic traffic numbers to groundskeeping practices.)

The bulk of our environmental comments are outside the scope of this report and remain salient. For example, the report expressly states that it does *not* address agricultural chemicals such as fertilizers or pesticides (Section 2.3 on page 6, Section 7.2.2 on page 14) or asbestos (Section 1.2 on page 1, Section 7.2.5 on page 15, App. A). The report recognizes that decades of operation as a golf course may have left residues of fertilizers and pesticides in the soil. Further, as our initial comments discussed (Section 3.f on pages 5-6), asbestos-containing products (*e.g.*, tranzite) often were used in irrigation systems at golf courses of this vintage. Construction of the Project no doubt will dig into and likely remove impacted soils and underground irrigation systems that are highly likely to contain asbestos. The proponent must address this very probable situation, including by taking soil samples to determine whether chemicals and asbestos have leaked into the soil.

Save Twin Brooks continues to believe that the Project merits a much deeper review in a draft and then final Environmental Impact Report. That should include thorough analysis of conditions beneath the site, wildlife and wetlands impacts, and realistic traffic estimates.

Respectfully,

SAVE TWIN BROOKS, INC.



Karen E. “Kim” McGuire, President

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