



April 7, 2017

Department of Environmental Protection
Wetlands and Waterways Program
Attn: Ivan Morales
One Winter Street
Boston, MA 02108

Subject: Comments on the Ch. 91 Application No. 17-4901, Algonquin Gas Transmission, LLC gas transmission line at Mystic Valley Parkway in Arlington, Medford and Somerville

Dear Mr. Morales:

We are writing to comment on the gas transmission line project at Mystic Valley Parkway described in the recent chapter 91 application No. 17-4901 filed by Algonquin Gas Transmission, LLC.

MyRWA Mission

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to the preservation and enhancement of the Mystic River Watershed. The mission of MyRWA is to protect and restore the Mystic River, its tributaries, and watershed lands for the benefit of present and future generations and to celebrate the value, importance, and great beauty of these natural resources. This includes working to improve the water quality in the Mystic River and all of its tributaries, and promoting public access to the Mystic River and its tributaries, especially through the formation of continuous greenways that provide recreation and transportation resources associated with the river.

Gas Transmission River Crossing Project

Our organization appreciates the need to upgrade this important and degrading infrastructure, and acknowledges that this project has been designated as a water-dependent use. We have been informed by the applicant's consultant that they are adopting a construction methodology intended to minimize impact on the Mystic River by using a directional boring technique, which we support.

Because we have not yet obtained and reviewed the technical specifications with documentation in the application our organization has been unable to undertake an appropriately thorough review to this proposal and therefore we cannot offer our support.

Serving Twenty-Two Communities

*Arlington Belmont Burlington Cambridge Charlestown Chelsea East Boston Everett Lexington Malden Medford
Melrose Reading Revere Somerville Stoneham Wakefield Watertown Wilmington Winchester Winthrop Woburn*

20 Academy Street, Suite 306 • Arlington, MA • 02476-6401 • (781) 316-3438 • www.MysticRiver.org

Instead, in these comments we reiterate the importance of adopting low impact development techniques—which the consultant for the applicant has assured us they will make use of. We note the enhanced importance of minimizing impact in the area of the project site due to the presence of critical green spaces serving environmental justice communities as part of the Mystic River Reservation, because the transmission lines will cross a water body with exceptionally poor water quality (Alewife Brook) that must be spared from further degradation, and because the transmission lines will cross a water body with excellent water quality (the fresh water Mystic) whose health must be preserved.

We specifically ask for assurance that the proposed construction will have no ecological impacts on the river, and we encourage the applicant to promote both ecological health and public access to the river by engaging with the host communities in the restoration of its banks and monitoring of its waters.

Low impact development and monitoring

The applicant has assured us in correspondence that it is possible to engineer solutions to the infrastructure problems addressed by this proposal that will have absolutely minimal or even no impact on the rivers the gas transmission line traverses. We note that other developers, including other energy companies, are executing similar projects near and across the Mystic River in this region. While each of these projects create incremental changes and impacts to the river, its shoreline, and parks around the river, we believe that if each of these projects is appropriately designed and executed successfully according to these specifications, the condition of the river will improve through this work, and we support that outcome.

However, we recognize that the actual impacts of this work cannot be predetermined purely by intelligent engineering and good intentions. In some cases, the actual impacts may not even be observed. Sediments can be displaced or added to the river, soils can be unintentionally compacted, oils can be unintentionally spilled; and we know that each of these consequences has occurred here and in other ecologically sensitive areas throughout New England.

We therefore view monitoring as an equally important aspect of the compliance of environmental regulation as project design. Thoughtful, careful, and thorough water quality monitoring can provide assurance to affected communities that the impacts of developments have truly been minimized.

MyRWA has performed and committed to widespread and substantial monitoring efforts to characterize and track the quality of water in the Mystic River and its tributaries across decades.¹ Since 2000, our Baseline monitoring program has deployed a corps of volunteers measuring bacterial levels, suspended solids, nutrient concentrations, and other features at 15 sites throughout the watershed. These data have contributed to the US Environmental Protection

¹ <https://mysticriver.org/the-work/#qualityanchor>

Agency's (EPA's) designation of the Alewife Brook with a D grade for water quality in 2016, and designation of the fresh water Mystic River with an A- grade.²

Because the proposed construction traverses both rivers, where such extremes in environmental conditions are at confluence, we believe the importance of verifying the minimization of impact is especially important.

Public access impacts

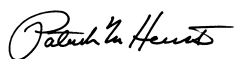
We note that the project site will traverse established portions of the greenways within the Mystic River Reservation. We further note that the project site is located within environmental justice communities, as identified by the maps produced by the Metropolitan Area Planning Council under the Mystic River Corridor Project,³ to whom these greenway features provide critical recreational and open space accommodations.

The public's access to these features must be preserved, protected, and enhanced by any development on this site. In particular, the banks of the river within the Reservation are in need of substantial restoration to promote ecological health as well as public use. Our organization has worked with and supported the Department of Conservation and Recreation in various efforts towards this goal, but additional resources are needed to complete and sustain this restoration. We encourage developers whose facilities depend on these waters to participate in and contribute to these restoration efforts.

Beyond the requirements of the Chapter 91 Waterways Regulations for water-dependent use projects, we believe it is the responsibility of corporate citizens to understand, monitor, and mitigate the long term impacts of their development. We hope that the applicant will embrace this responsibility by demonstrating to the public that its execution of this work will have minimal impacts, through dissemination of the details of its proposal, by contributing to the work of building vibrant and sustainable green spaces along the river, and by engaging in monitoring to ensure the waters of the Mystic are healthy and safe for recreation.

We thank the Department for the opportunity to comment on this important project.

On behalf of the Mystic River Watershed Association,



Patrick Herron, Executive Director

cc: Gene Crouch, Vanasse Hangen Brustlin, Inc. (VHB)
MyRWA Policy Committee

² <https://www.epa.gov/newsreleases/localized-mystic-river-report-card-shows-specific-information-about-water-quality>

³ <https://mysticriver.org/environmental-justice>