



May 19, 2017

Secretary Matthew Beaton
EOEEA
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: EF Education First III, FEIR, EEA # 15293

Dear Secretary Beaton:

I am writing on behalf of the Mystic River Watershed Association (MyRWA) to express our concern regarding the above-referenced sale of public land that fails to meet the intent of EOEEA's Article 97 Land Disposition Policy.

EOEEA's Land Disposition Policy requires Article 97 land taken to be replaced, resulting in no net loss of public land. In this instance, the state is selling part of the historic Charles River Reservation to a private company, EF Education First, who will use the land to build their third campus building along the Charles River. Not only is this Article 97 land not being replaced, the proposed payment to the Commonwealth is insufficient. Taxpayers are getting the lowest value appraised for the parkland being sold and EF is not providing sufficient benefit to the public at large to make up for the loss of valuable parkland protected under the state's "no net loss" policy.

As a steward of the Mystic River Reservation, our organization is concerned about the precedent that this sale agreement may set – particularly the sale of land without a transparent process that yields a full and fair market value with ample public benefits. Many of our communities, similar to those in East Cambridge and Charlestown, lack the open space and recreational amenities that are afforded to more visible, affluent communities. As development increases in these areas, we want to be sure that residents are benefitting from additional investment with increased local, public amenities. Article 97, if carried out in the way it was intended, can ensure more sustainable and livable neighborhoods that improve public and environmental health outcomes.

I appreciate your strong support of the no-net loss policy and ask that you require EF III to do much more to satisfy the policy. Just because DCR is underfunded, parklands and their users should not be short changed.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Amber Christoffersen".

Amber Christoffersen, Greenways Director
Mystic River Watershed Association

CC:
MEPA Office, Alex Strysky
DCR Commissioner Leo P. Roy
MassDEP Commissioner Martin Suuberg
Cambridge City Manager Louis DePasquale