



May 17, 2019

BY EMAIL: purvi.patel@state.ma.us

Ms. Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on Draft Environmental Impact Report (DEIR) for development of
"The Vale", 22 Hill St., Woburn, MA (EEA No. 15923)

Dear Secretary Theoharides,

The Mystic River Watershed Association (MyRWA) is pleased to submit comments on the Draft Environmental Impact Report for The Vale, 22 Hill St., Woburn. This project will create multiple benefits to the community by remediating and redeveloping an obsolete industrial site. We commend the proponents for remediating the site, improving open space including daylighting of Sweetwater Brook and preserving Whittemore Pond. However, we feel that in order to fully realize the benefits to residents, employees, and the surrounding environment, the project needs to be a model of mixed-use development with functional green infrastructure that minimizes impervious surface and improves stormwater management to prevent harm to its residents and property from climate change-enhanced heat and flooding. The project also needs to substantially preserve the undisturbed forested areas on the site.

MyRWA was founded in 1972 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. MyRWA has active programs in water quality science, anadromous fish monitoring, park planning and advocacy, environmental education and climate resilience planning. There are several opportunities for Montvale Commons to contribute to and benefit from the natural resources in the Mystic River watershed as outlined in the comments below.

Limit on Disturbed Area

The project is described as preserving open space yet has a very large disturbed area that will destroy woodland. Section 1.5.4 states "Approximately 28-acres of undeveloped land located outside of the Project's limit of development is expected to be preserved in its current condition as undeveloped open space and natural woodland/wetland areas, as shown in Figure 1.6 and Figure 2.2. Preservation of the open space areas consisting of woodland and wetland area along the Aberjona River and within the 100-year floodplain, will help to preserve existing flood storage capacity and protect downstream communities." However, from Table 2-1 and Figure 2.2 it is apparent that the proponent is **deforesting almost 20 acres of woodland** on the site, primary in the southern part of the site. Undisturbed woodland is a valuable environmental resource that contributes habitat and much needed forest in our urban environment and its loss has a significant environmental impact. This particular parcel represents a large area of contiguous wildlife habitat that provides a corridor between Woburn and Winchester,

with connection to the Middlesex Fells Reservation. Habitat fragmentation and the lack of migration path will result in reduced wildlife populations. In addition, woodlands contribute significantly to water quality, enables groundwater recharge, and lowers summertime temperatures. There is no mitigation provided for the loss of this valuable environmental resource, reference section 10.1. **We strongly urge the Secretary to limit development in the FEIR to the Reduced Build Alternative. This alternative, shown in Figure 1.10, limits the build to the already disturbed area and preserves the vital woodland area at the southern portion of the site.** In addition, reducing the footprint of the Project will lessen the impacts related to impervious surface, stormwater, and traffic discussed below.

An additional measure to preserve part of this important wildlife corridor, minimize the impact on the river, and preserve critical wetland and flood storage areas is for the proponent to place a conservation restriction on the approximately 16 acres of undeveloped land within the site which lies in the Town of Winchester. This parcel is located just east of the Aberjona River and is located almost entirely in the 100-year floodplain. The plan shown in the DEIR does not show development on this land as part of the Project, however the proponent has stopped short of committing to the grant of a conservation restriction on the parcel. **We urge the Secretary to require a conservation restriction on this portion of the site as a mandatory mitigation measure identified in the FEIR.**

Impervious Surface

We are encouraged by the remediation and development of an underutilized property; however, we are concerned about the increase in impervious area of the site by more than 11 acres, which is an increase in the impervious area by over 50%. The amount of surface parking spots is contributing significantly to this amount of impervious surface. Impervious surface generated by parking contributes significantly to stormwater runoff which degrades water quality. The planned surface parking spaces should be reduced and could be incorporated into the proposed parking garages. The proponent has made no attempt in the DEIR to decrease the number of surface parking spaces in the Preferred Alternative compared to the ENF. **We ask that the proponent be required to significantly limit the impervious area generated by surface parking in the FEIR in order to decrease impervious surface, to lower summer temperatures and increase both stormwater infiltration and aesthetics. The Reduced Build Alternative has dramatically fewer surface parking spaces (76% reduction) and dramatically reduced total impervious area (48% reduction, resulting in 14 few acres of impervious surface, calculations from data in Table 1-3).** The Reduced Build Alternative is the only option that reduces the impervious area from the No Build Alternative, see Table 1-3.

Stormwater Management

The stormwater management plan is described in the DEIR in section 5.5. We find the description of the plan insufficient for a project this size and request the Secretary require a more detailed Stormwater Management Plan in the EIR.

As described in section 5.5. and shown on Figure 5.5, the Project Site is anticipated to be subdivided into separate lots, which include senior housing, multi-family, townhomes, hotel, parking garage, and the commercial area. The proponent states that stormwater management alternatives will be investigated on a lot by lot basis or by phase of construction of the Project. **We feel that the separation stormwater management into separate parcels is inadequate to manage stormwater across the site. We ask the**

Secretary to require a comprehensive, integrated stormwater management plan across the project site.

Section 5.5.2 states that the Project will incorporate BMPs to address applicable MassDEP Stormwater Management Standards and provide substantial compliance as required by the City of Woburn's Municipal Code. **Since the Project Site has a substantial amount of land area in Winchester, we ask the Secretary to require compliance with the Town of Winchester's Municipal Code in addition to the City of Woburn.**

Section 5.5.2 also states that the approach to the Project design of the stormwater drainage is to enhance the existing resource areas on-site, maintain existing flow patterns, utilize low impact design methods whenever practical as well as incorporating structural BMPs where necessary. Low impact design methods should be used when they are technically feasible. Using "practicality" as a standard can result in excluding more expensive but more effective methods. **We ask the Secretary to require commitments to technically feasible LID methods and eliminate the caveat for "practical" in the FEIR.**

Section 5.5.3 outlines the compliance with DEP Stormwater Standards. We feel that the information about how the proponent will comply is insufficient and is in some cases just a restatement of the stormwater standard, ex. Standard #3, #4, and #9. **We request that the Secretary ensure more specific information about the methods for compliance with stormwater standards be included in the FEIR.**

Downstream flooding

The Aberjona River and the whole of the freshwater Mystic River Watershed is the site of significant freshwater flooding that will be exacerbated by climate change. MyRWA has concerns that the developers of this property have not fully modeled how the development will contribute to downstream flooding during expected extreme precipitation events associated with future climate scenarios.

MyRWA requests that the developer model the downstream flooding related impacts under the enhanced precipitation regime as developed by the Cities of Boston and Cambridge. The developer should be required to mitigate those future impacts.

Traffic

We are concerned that the traffic generated by the Project will increase congestion which will lead to an increase in pollutants in stormwater from roads that run into the Aberjona River and its tributaries surrounding the Project site. Firstly, we are concerned that the traffic analysis in the DEIR does not include the Park Street and Marble Street intersection. **We ask the Secretary to require the analysis of this intersection in the FEIR.**

Second, we are concerned that the proponent is not emphasizing reducing car trips as part of its traffic mitigation. Unfortunately, the project area in Woburn is underserved by public transportation. The only currently viable option for public transportation is MBTA Bus Route 354, which does not operate with midday or weekend services. The commuter rail stations are not close enough to the site to be viable options, especially for older residents and hotel and retail users. **We ask that the proponent commit to a shuttle system starting with the first phase of development, not the third as stated in the DEIR.**



Finally, we are concerned that the proposed traffic mitigation is insufficient. The DEIR provides an analysis of 21 surrounding intersections. Tables 6-10 and 6-11 show that most of those intersections are currently operating at a Level of Service (LOS) of C or less, and that conditions at many will get worse. Despite this, the applicant has only proposed mitigation at three signalized locations, all on Montvale Avenue. **We ask that the proponent be required to include additional mitigation measures at more intersections within the study area in the FEIR.** These measures could include lower cost solutions such as the retiming of existing traffic signals to optimize their performance in response to the additional traffic generated by the project.

In closing, we are encouraged to see a development that will provide benefits to the community and lead to a remediation of the existing site. If you have any questions or require additional information, please contact MyRWA at (781) 316-3438 or by emailing patrick@mysticriver.org.

Sincerely,

A handwritten signature in black ink that reads "Patrick Herron". The signature is written in a cursive, flowing style.

Patrick Herron
Executive Director