



May 10, 2016

BY EMAIL: anne.canaday@state.ma.us

Anne Canaday, Environmental Analyst
Massachusetts Environmental Policy Act (MEPA) Office
Executive Office of Energy and Environmental Affairs
Commonwealth of Massachusetts
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on Environmental Notification Form (ENF) for development of 295 Canal Street a/k/a 171 Medford Street, Malden, MA (EEA No. 15505)

Dear Ms. Canaday:

Thank you for this opportunity to comment on the Environmental Notification Form (ENF) filed with Executive Office of Energy and Environmental Affairs (EOEEA) Secretary Matthew A. Beaton on April 7, 2016 by Suffolk Square Associates III Limited Partnership (the Developer) for the development of a five-story office/retail building at 295 Canal Street (also known as 171 Medford Street) in the city of Malden, on the banks of the Malden River.

By way of background, the Mystic River Watershed Association (MyRWA) is a 501(c)(3) nonprofit organization founded in 1972 by a group of concerned community residents. MyRWA's mission is to (i) protect the Mystic River Watershed, (ii) restore and maintain clean water and the natural environment in a healthy state in the Mystic basin's 22 communities, and (iii) promote responsible stewardship of our natural resources through educational initiatives in the watershed. As a small organization, MyRWA

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accomplishes its mission by forging strong links with citizens' groups, universities, businesses and government agencies.

Friends of the Malden River (FoMR) is a grassroots group of community members – most of them residents of one of the three cities (Everett, Malden and Medford) that ring the visible Malden River—who are deeply concerned about the ecological and recreational health of the river. FoMR's mission is “to promote awareness of and interest in the Malden River, improve its water quality, and increase access for public enjoyment.” Formed in 2012, the group remains committed to restoring the Malden River to, and preserving it as, a priceless community amenity and natural resource.

MyRWA and FoMR generally support the objective of reintegrating this long-abandoned industrial site into the area's economy, and we understand the reasoning behind plans to demolish the existing structure and replace it with one more suited to the current character of the neighborhood. In fact, the commercial revitalization of the area surrounding the Malden River, and the creation and expansion of public access to the river and its riparian zone, go hand in hand.

That is why we believe that the proposal to develop the 2.243-acre site at 295 Canal Street as a 65-foot-tall structure offers a singular opportunity to plan for the future of a parcel that will become an integral part of an active public resource—and not merely continue as an uninviting, underused industrial back yard. The Developer has made a good start by integrating into its plan a basic community path between its proposed (but strikingly large) parking lot and the Malden River and riverbank.

To better connect this project and this parcel to the future of the area (a future that is certain to be influenced by the construction of the Wynn casino in Everett, development of the former GE site directly to the south of this project, and expansion of the River's Edge development just across the river in Medford), we respectfully recommend that EOEEA require the Developer to include the following in its final project design:

1. Footprint and Site Design. Although the footprint of the new building itself would total about one-third of the footprint of the existing, abandoned structure, most of the remaining lot will be covered with a paved parking lot, an impervious surface. An asphalt layer of this size should not be necessary—and in any event should be landscaped (with shrubs and trees) to a far greater extent than the design drawings now provide. In addition to reducing parking lot size and increasing the available

area of public recreational space, we recommend that the Developer consider placing parking under the building. This would be a first story, if full excavation is not feasible (the ENF contends that the complexity of the site prohibits below-grade excavation (ENF, p. 3), but provides little back-up detail). Given that the new building will cover only 15 percent of the site, it is far from clear that complexities in some parts of the site would prohibit excavation of all or part of the area under the new building. And if this cannot be done, the developer, as noted, should consider raising the building, with parking serving as a cost-effective first floor. This is a particularly sound approach, given the threat of massive storm surges caused by advancing climate disruption.

2. Parking Lot Right-sizing. To help reduce the need for parking, sensibly shrink the large impervious surface proposed, and reduce the discharge of so much untreated or only partially treated stormwater into the Malden River –either directly or via the city of Malden’s stormwater system (MS4), we recommend that the Developer commit to a serious, visible effort to encourage bicycling by visitors and commuters (e.g., with an adequately sized, protected bicycle storage area and showers available to all building occupants) and create incentives for the use of small cars (e.g., preferred parking, and two to three EV charging stations).
3. Pathway Design. As noted, we appreciate that the Developer has included a public walkway along the river—although we do point out that this was called for by Special Condition 3 of Massachusetts Waterways (Ch. 91) License No. 8525, which applies to the property. That Special Condition states:

Said riverfront walkway shall be of a hard-surfaced and durable material, be wheelchair and bicycle accessible, a minimum width of ten feet clear, [and] contain benches, lighting, trash receptacles, and landscaping.

Several reasonable improvements would turn this into a first-class amenity better integrated into the growing public greenway along the Malden River.

First, to be consistent with the existing and planned area network of multi-use pathways and with Special Condition 3, the pathway along the river to the west of the building and parking lot should be paved. Although the paved area of the parking lot is too large, the paved area of the pathway is too small –currently, in fact, it is zero. This would make for a more useful and safe pathway for strollers, walkers

and cyclists, and it would better integrate with pathway plans farther south and at other points around the Malden River.

Second, again to remain consistent with Condition 3, we recommend that the development include appropriate landscaping along the path, including native plants that are ecologically suited to the riverbank. Possibilities abound, but one could start by looking here: <http://newp.com>. Along the same lines, EOEEA should require the Developer to furnish additional detail sufficient to demonstrate that it will be able to meet the requirements of Special Condition 3 (e.g., benches, lighting, trash receptacles and landscaping). Finally, we note that the ten-foot walkway width is a minimum. With a bit more attention, this area could become an attractive parklet, enhancing this section of the river, the value of the property, and the employment experience of those working at 295 Canal Street.

Finally, we urge the Developer to include a crosswalk and ADA-approved ramp that would connect the existing east-west spur trail, which runs from the riverbank to Canal Street between the Cambridge Health Alliance at 195 Canal Street and the property at 295 Canal Street. This would connect the Northern Strand Trail – cited as an important amenity by the Developer’s own affiliate (see Combined Properties’ “Project Spotlight” listing at www.combinedproperties.com/295-canal-st/) (“The Northern Strand Bike Trail connecting Everett to the beaches in Revere and Nahant runs through Malden. The Everett and Malden portions of the trail were just paved and are open for travelers which run adjacent to the project.”) – to the proposed office and retail development at 295 Canal Street. In this regard, we urge the Developer to install two new granite pillars at the entrance to the walkway on Medford Street at the southwest corner of the site, and leave the existing pillars at the southern end of 195 Canal Street.

4. Stormwater Management. The existing onsite closed drainage system was designed and installed circa 1977. More investigation is needed regarding the depth of the Light Non-aqueous Phase Liquid (LNAPL) found on site, as well as a mitigation strategy. Although we concur with the decision not to include any best management practices (BMPs) for groundwater recharge, alternative BMPs that do not encourage infiltration, but that do address stormwater runoff quality, are recommended. The ENF states that “[o]ther portions [of the site] will continue to flow directly into the Malden River as sheet runoff over vegetated surfaces...” (ENF, p. 6). These areas, particularly the paved portions, should be identified and treated using low-impact development (LID) techniques, as well as appropriate operation

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and maintenance (O&M) protocols. The Developer should provide details on how O&M of the proprietary water quality units will be documented and tracked.

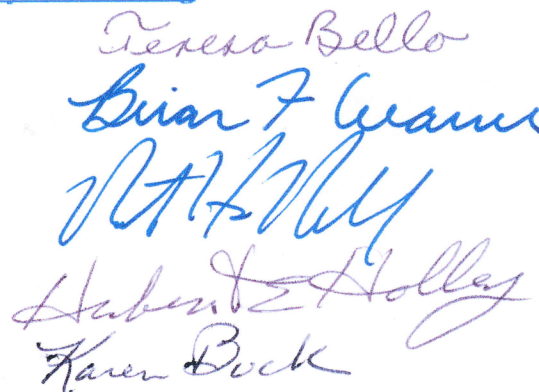
In closing, we appreciate the work that the Developer has done to reconvert this site, after nearly two decades, into a useful member of the community. We believe that, with a modicum of additional thought and planning, this project can become an excellent neighbor in a neighborhood that will soon become a destination for residents seeking quiet enjoyment and low-key recreation.

Thank you for this opportunity to comment on this Environmental Notification Form. If you have any questions or require additional information please contact MyRWA or FoMR at (781) 316-3438 or by emailing EK@mysticriver.org.

Sincerely,



Ek Ong Kar Singh Khalsa,
Executive Director
Mystic River Watershed Association



Teresa Bello
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Friends of the Malden River

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State Rep. Paul J. Donato
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