



October 3, 2018

BY EMAIL: alex.strysky@state.ma.us

Alex Strysky, 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
Mystic Village, 278-326 Mystic Ave., Medford, MA (EEA No. 15910)

Dear Mr. Strysky:

The Mystic River Watershed Association (MyRWA) is pleased to submit comments on the Environmental Notification Form for the Mystic Village project, 278-326 Mystic Ave., Medford. We believe that this project could benefit the community by redeveloping underutilized properties. However, we feel that in order to fully realize the benefits to residents and the surrounding environment, the project needs to be a model of transit-oriented development with functional and beautiful green infrastructure that improves stormwater management and prevents harm to its residents and property from climate change-enhanced heat and flooding.

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. We recently launched the Mystic Greenways Initiative, a multi-year, multi-stakeholder effort to renew and stimulate more active use in waterfront lands. There are several opportunities for Mystic Village to advance and benefit from this initiative, as outlined in the comments below.

Connectivity

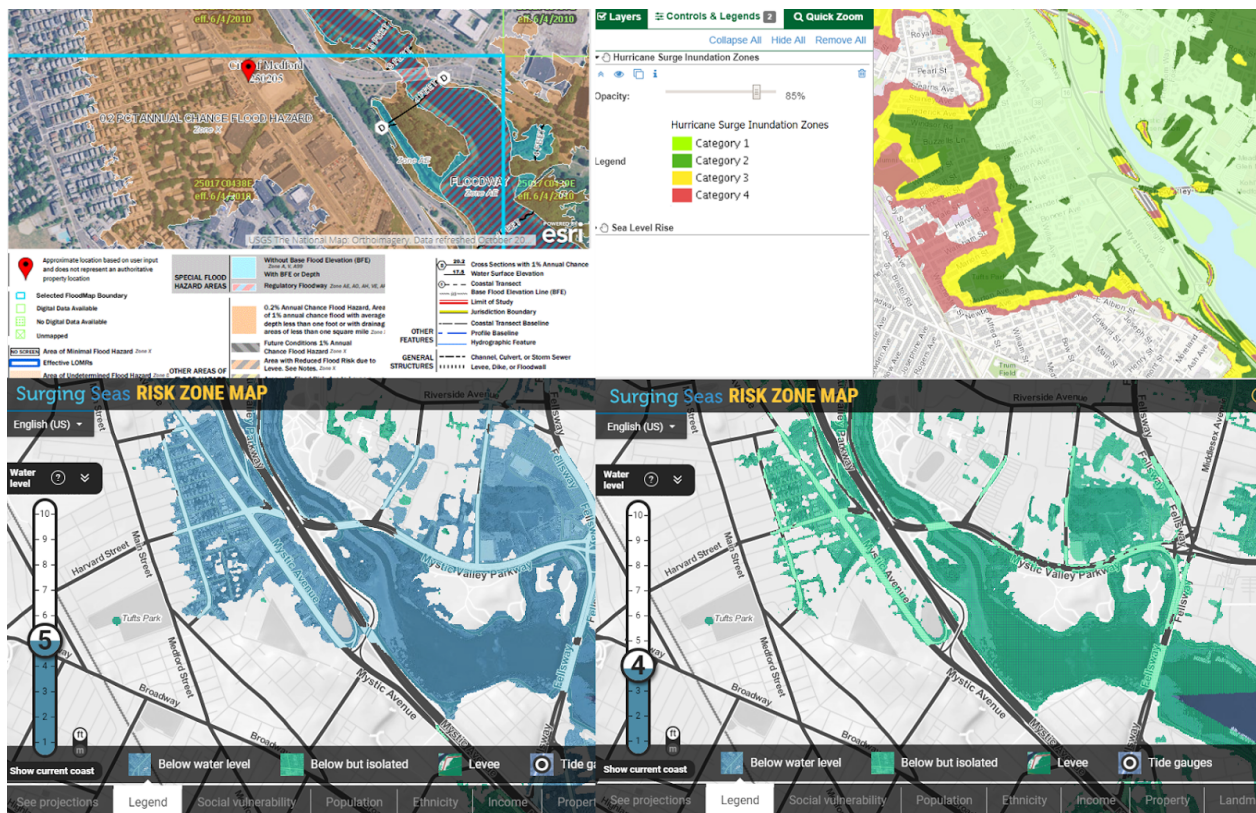
The site is well located for providing access to the waterfront path network that extends along the Mystic River. MyRWA is working to create a shared vision for a seamless waterfront park system along both sides of the Mystic River, connecting communities in Medford and Somerville to this important natural resource. Currently, there is significant connectivity both upstream and downstream of the proposed site. MyRWA is also working on connecting neighborhoods to the Mystic Greenway. We commend the developer for including a bike path connection to the Greenway. It will be a valuable amenity for Mystic Village residents and will benefit the surrounding neighborhoods. **We ask that the developer of Mystic Village financially contribute to the completion of the Mystic Greenway adjacent to and upstream of the project site and to assist with its long-term stewardship as a non-motorized pathway and riverfront habitat.**

We urge the developer to not only improve access to the river, but to increase active transportation as well as contribute to a neighborhood-feel rather than one dominated by cars. The project is located in an area that can attract a commuter population with its close proximity to public transportation facilities, including the future Green Line Extension. Four existing bus stops are located adjacent to the site along Mystic Avenue; however, the bus stops are merely signs along the sidewalk. **We ask that the developer contribute to a covered bus stop to encourage use of public transit toward mitigating traffic congestion.**

Green Infrastructure and Stormwater Management

We are encouraged by redevelopment in the area but are concerned about the increase in impervious area of the site by 0.8 acres, increasing the impervious area to 89% of the total area. Considering that Winter Brook itself represents a portion of the total area, there will be essentially no pervious surface in the project other than the brook and its banks. **We ask that the developer instead increase the amount of pervious area to at least 25% of the property, and maximize the amount of trees along the stream bank and buildings in order to lower summer temperatures and increase both stormwater infiltration and aesthetics.**

The stormwater management plan is to collect stormwater from paved surfaces and roof areas throughout the project site and have it treated prior to discharge. **Instead, the Assembly Square Partners HealthCare site provides an excellent example of beautiful, on-site, stormwater infiltration involving below-grade rain gardens, stormwater swales, trees, porous pavement and other strategies that also cool the site and provide other amenities.** We also encourage the developer to use other green building strategies such as green (living) or white (reflective) roofs and/or solar panels.



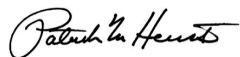
Although the project is not currently in FEMA's 1% flood zone, it is in FEMA's 0.2% (500-year) flood zone. With climate change increasing the intensity and duration of precipitation events, flood resilience must increasingly extend beyond the historical 1% flood zone. The figure above, for example, includes state, federal and academic flood projections for the project site. Clockwise from upper left, the maps represent:

- FEMA's 500-year (0.2% annual) flood zone,
- NOAA's current hurricane flood projections from Mass EOEEA's resilientma.org website,
- Periodic salt water flooding with four feet of sea level rise (projected for 2070+), and
- Chronic salt water flooding with five feet of sea level rise (i.e., the Amelia Earhart Dam is regularly or permanently overtopped)

We ask the developer to build to Cambridge's climate resilience guidelines for sites with similar flood risks.

In closing, we are encouraged to see a development that will redevelop the existing site and bring more people to neighborhoods surrounding the Mystic River. We hope to partner with the city and developer to make connectivity to waterfront parklands a local and regional amenity. If you have any questions or require additional information please contact MyRWA at (781) 316-3438 or by emailing amber.christoffersen@mysticriver.org or julie.wormser@mysticriver.org.

Sincerely,



Patrick Herron
Executive Director