



November 6, 2018

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

Purvi Patel
Massachusetts Environmental Policy Act (MEPA) Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Comments on Environmental Notification Form (ENF) for development of
Montvale Commons, 22 Hill St., Woburn, MA (EEA No. 15923)

Dear Ms. Patel:

The Mystic River Watershed Association (MyRWA) is pleased to submit comments on the Environmental Notification Form for the Montvale Commons project, 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 conserving and 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 transit-oriented, mixed-use 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. Our Mystic Greenways Initiative is a multi-year, multi-stakeholder effort to renew and stimulate more active use in waterfront lands. 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.

Resource Areas

The submitted environmental notice form provided minimal information on the extent of wetland area and riparian areas. In the case of wetlands identified on site, it is not fully articulated how wetlands were delineated or consistency with available state GIS layers. Figures provided in the ENF do not show wetlands on the northern edge of the site although wetlands are documented in the MassGIS Wetland Resource Area. In addition, the southwest portion of maps does not call out the presence of Sunset Stream.



We have concerns about the extent of remediation and cleanup required and the potential impact on natural resources. These natural resources should be catalogued prior to site impacts and would request that the Scope of Work requested for the DEIR include work to delineate wetland, riparian areas and an independent assessment of wildlife on site. During review of the ENF, our organization was concerned that in an effort to produce concepts and schematics of the project, the developer did not communicate enough information on natural resources in the figures to elicit confidence that they have been properly assessed and documented. **We are requesting that much greater specificity, precision and accuracy be provided in the representations of topography and natural resources in the figures provided in the DEIR.**

Connectivity

The site is well located adjacent to the TriCommunity Greenway that provides pedestrian and bicycle access to downtown Stoneham, Winchester, as well as local amenities in Woburn. The greenway is also planned to connect to the Mystic Greenway at the north end of Upper Mystic Lake. MyRWA is working on connecting neighborhoods to the Mystic Greenway. We commend the developer for providing access to the TriCommunity Greenway, which will be a valuable amenity for Montvale Commons residents and also benefits the surrounding neighborhoods. **We ask that the developer of Montvale Commons to support and promote the use of the TriCommunity Greenway and to assist with long-term stewardship of the greenway.**

We urge the developer to increase utilization of public transportation to contribute to a neighborhood-feel rather than one dominated by cars. The project is intended to attract seniors and low income residents who have a greater need for access to public transportation. However, there is only one MBTA bus line that stops near the project site and that bus line provides no access to commuter rail and limited access to the T system. **In addition to an on-site TDM program, we ask that the developer commit to a shuttle bus to the Anderson RTC to provide access to commuter rail and Amtrak to encourage use of public transit to mitigate traffic congestion.**

Green Infrastructure and Stormwater Management

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 10 acres, increasing the impervious area by over 50%. The amount of surface parking spots is contributing significantly to this amount of imperviousness - these spaces could be reduced and more could be incorporated into the proposed parking garages. **We ask that the developer instead significantly limit the impervious area generated by surface parking, and maximize the amount of open space along the stream bank and buildings in order to lower summer temperatures and increase both stormwater infiltration and aesthetics.**

The stormwater management plan is not described in the ENF except to state that the development will comply with the Massachusetts Stormwater Standards and mitigate peak runoff rates up to and including the 100-year storm and treat the first inch of rainfall to address total suspended solids (TSS) removal. We find this description insufficient for a project this size and request the Secretary require a detailed Stormwater Management Plan in the DEIR. In addition, we feel the mitigation stated is insufficient for the site and the 100-



year storm and treatment standard is not stringent enough. The existing manufacturing facility has flooded at least twice in the last 20 years, potentially contaminating the Aberjona River and contributing to downstream flooding in Winchester. **We ask the Secretary to require a more stringent standard for stormwater control and mitigation for this site, i.e. including control of the 500-year storm, and commitment from the developer to meet the MS4 stormwater permit requirements.**

The project claims climate resilience as a Project Related Public Benefit; however, no plan details are presented. **We ask the Secretary to require detailed description of the project elements that contribute to climate resilience in the DEIR.** We encourage the developer to include elements incorporated into properties such as the Assembly Square Partners HealthCare site, which 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 and commit to LEED building standards.

Finally, this site is located along the Aberjona River and upstream of downtown Winchester. This is an area of the watershed that has chronic flooding associated with the urbanization of the area. In an effort to combat the impact that further development has on flooding, the Town of Winchester imposes stormwater rules that govern both peak runoff AND volume control. We would strongly encourage the proponent as a 'good neighbor' of a downstream area to implement volume controls on site that result in development not exacerbating an existing flooding problem.

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

Sincerely,

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

Patrick Herron
Mystic River Watershed Association