Mystic River Watershed Association
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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 Notification of Project Change for development of Rivergreen (formerly Rivergreen Technology Park), 3 Air Force Rd., Everett

Dear Ms. Canaday:

The Mystic River Watershed Association (MyRWA) is pleased to submit comments on the Notification of Project Change for development of Rivergreen, 3 Air Force Road, Everett, Mass. We believe that this project could be a leading example of a public-private partnership to develop a brownfield site for the benefit of the surrounding community.

MyRWA is a non-profit organization dedicated to the preservation and enhancement of the Mystic River Watershed. This includes working to improve the water quality in the Mystic River and all its tributaries, and to improve public access to these natural resources through parks such as this.

MyRWA recently launched the Mystic Greenways Initiative to restore, revitalize, and connect waterfront parklands. This work is particularly important to the Malden River (a tributary of the Mystic). For decades, this river has been walled off to the public, because commercial and industrial users found it a cheap and convenient place to locate their facilities, giving scant attention to public trust stewardship. At the same time, many of the surrounding residents are environmental justice communities that lack the kinds of high-quality green spaces that have been shown to increase physical health and psychological well-being. The banks of the Malden now present the best opportunity for restoring green space to local residents – we commend the co-proponents, Wynn Development and the City of Everett, for redeveloping the Rivergreen site in a way that will reconnect Everett residents with this beautiful and valuable natural amenity.

Not only will this site provide access to the river, but it will contribute to the larger Malden River Greenway network actively being developed. A contiguous waterfront path with supportive land uses and destinations along the river would increase sustainable mobility and opportunities for recreation – ultimately improving public health, the environment, and the local economy.

MyRWA also values sustainable development in the watershed, supporting projects that redevelop brownfields or other underutilized properties to bring economic activity to communities in need of development. This development project has the additional virtue of employing green infrastructure to protect water quality while

simultaneously bringing people closer to the river. Our more detailed comments below outline ways in which the project could be improved to meet the above goals and the objective of protecting the local environment.

Athletic Fields

The design of the fields should prioritize the health of people and the environment. Artificial turf fields built with crumb rubber fill are known to leach toxic levels of heavy metals, particularly zinc, that pose a significant risk to aquatic life in nearby surface waters after rain events (based on a study conducted by the Connecticut Department of Environmental Protection in 2010[1]). If the design were to include facilities using this type of artificial turf, we strongly advocate for the implementation of stormwater best management practices (BMPs) specifically designed to mitigate the effects of heavy metal contamination that would endanger fish and other aquatic species. We will note that since the Malden River already has elevated levels of metals in the sediments, additional attention should be accorded to mitigate any future inputs that would further elevate concentrations.

Given that rubber fill will contribute to the heat island effect, the best alternative would be to use an organic infill such as GreenPlay (http://greenplayusa.com/), PureFill (http://www.fieldturf.com/it/purefill) or Geofill, which consists of 90% crushed coconut husks and 10% cork and was recently installed at Simmons College's Daly Field on the banks of the Charles River.

Landscape Design

We commend the project proponent for restoring access to the river and providing an amenity to surrounding communities. However, there are several ways that the site design could be improved to make this a more attractive and healthy place for visitors. If a key goal is to connect people visually to the river, we encourage the developer to consider a wide seating area with overhead shading instead of a gazebo - gazebos are better suited to private, small-scale development. A well-designed, large overlook area would serve as a placemaking feature for the site and provide a gathering area that could accommodate more than a few people at a time (Figure 1). The riverwalk should include ample native plantings, trees and benches (ideally every 50 feet) – these should follow the design standard set at the park at the River's Edge development on the west side of the Malden River. Furthermore, we encourage the developer to consider including more than one river overlook in the design - a deck/boardwalk closer to the water would draw people to the river's edge and block growth of invasive species in the future.

The proposed Rivergreen Drive will likely be the main entryway to the riverwalk and overlook for people on foot or bike. Thus, the design of this road should support those modes and make this a pleasant route to the river. Wide sidewalks (6+ feet), street trees and bike lanes (4+ feet) are important design features. For the portion of the road near the river, pavers for the parking area and roundabout section would provide a more welcoming plaza-type feel than the asphalt on the rest of the road.

We would note that the heat island effect is one of the most significant concerns emerging out of climate change for Greater Boston. We are concerned that the large amount of impervious surface in the project design coupled with three turf fields creating hot, exposed landscapes will contribute to the area's heat island effect. This will result in an area that is not inviting and may be detrimental to the river environment and public health. In addition to organic fill for the turf, we encourage the developer to add elements to mitigate the heat island effect, such as additional trees and shrubs, especially native varieties, near the parking lots and the athletic fields.

Parking

[1] **Risk Assessment of Artificial Turf Fields** http://www.ct.gov/deep/cwp/view.asp?A=2690&Q=463624

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From an ecological and human experience perspective, the amount of parking spots and impervious surfaces on the site is concerning. We understand that the office portion of the site will be sold to future developers who could build up to 380,000 SF with 2 parking spots/1,000 SF for a total of 785 parking spaces, as required by existing Everett zoning requirements. We urge the City of Everett, through a future variance, to consider fewer parking spots, particularly surface parking, to reduce the heat island effect and create more greenspace. For properties near urban centers, surface parking is not the most economical model – studies have shown that cities forego tax money by requiring a certain number of parking spots with new developments[2]. In addition, in his address to the city in February 2016, Mayor Carlo DeMaria made a commitment to reducing the amount of asphalt and cement in the city. There are many ways to reduce surface parking on the site, including these: (1) reduce the parking ratio and require TDM incentives like shuttles, transit subsidies and bicycle parking; (2) use multi-story decking structures; and (3) share the office and recreational parking spaces, given highly variable demand at different times (e.g., evenings and weekends for recreational use and weekdays for office use).

Stormwater

The stormwater management plan (SWMP) appears to be an updated version of the original project plan to accommodate the changed project area and to reflect the stormwater management practices in the original plan. One significant change that has occurred since the original project was approved is the issuance of the 2016 Massachusetts Small MS4 General Permit, which was approved in 2016, effective on July 1, 2017. The MS4 permit has enhanced stormwater management requirements for discharges to water quality-limited waters like the Malden River. We note that the Malden River is Category V requiring a TMDL for a variety of contaminants including phosphorus. We request that the Order of Conditions ensure that the SWMP include BMPs that meet these expanded requirements. One specific concern is the discharge from DA-1, which includes the Boston Freightliner facility. The stormwater from this facility is likely to contain oil and grease from heavy trucks. It should therefore meet the enhanced BMPs required under MS4 permit section 2.3 for discharge into waterbodies and their tributaries where solids, oil and grease (hydrocarbons), or metals are the cause of the impairment.

Future Project Phases

We encourage the city of Everett and future developers to maintain transparency and collaboration with advocacy groups and the public throughout the future phases of the project: (1) overlook/riverwalk; (2) recreation area; and (3) commercial development in the interior of the site. Site Plan and Conservation Commission reviews will be important mechanisms to ensure that the designs promote an active and healthy riverfront area.

In closing, we are encouraged to see a development that will remediate the existing site and bring more people to the Mystic River and surrounding neighborhoods. We hope to continue to partner with the city and developer to make this development both a sustainable positive economic force for the community as well as a local and regional amenity. If you have any questions or require additional information, please contact MyRWA at (781) 316-3438 or by email at patrick@mysticriver.org.

Sincerely,

Patrick Herron
Executive Director
Mystic River Watershed Association

[2] **Study: Hartford, New Haven Hurt by Abundance of Parking:**
http://wnpr.org/post/study-hartford-new-haven-hurt-abundance-parking

FIGURE 1

Images of structures that provide seating and shade – and serve as a design feature that attracts users to the waterfront.

Piers Park, Boston (East Boston).

Shrafft Center, Boston (Charlestown).