



June 24, 2017

BY EMAIL: [Ivan.Morales@state.ma.us](mailto:Ivan.Morales@state.ma.us)

Ivan Morales-Parra, Environmental Analyst III,  
MassDEP Waterways Regulation Program,  
One Winter Street - 5th Floor,  
Boston, MA 02108

RE: Comments on the Chapter 91 Waterways License Application Number W17-4959

Dear Mr. Morales-Parra:

We are writing to comment on the Rivergreen Recreation Area at 0 Tremont St. described in Chapter 91 Waterways License Application Number W17-4959, filed by 68 Tremont Street, LLC and the City of Everett, Massachusetts.

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to the preservation and enhancement of the Mystic River Watershed. The mission of MyRWA is 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. This includes working to improve the water quality in the Mystic River and all of its tributaries, and promoting public access to the Mystic River and its tributaries, especially through the formation of continuous greenways that provide recreation and transportation resources associated with the river.

MyRWA recently launched the Mystic Greenways Initiative to restore, revitalize and connect waterfront parklands. This work is particularly important on 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 communities 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 greenway network along the Malden River – an emerging vision for a seamless network of waterfront paths for active transportation and recreation. A Malden River Greenway with supportive land uses and destinations along the river would increase sustainable mobility and opportunities for recreation, ultimately improving public health, environment, and 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. Sustainable development projects that employ green infrastructure to protect water quality while simultaneously bringing people closer to the river benefit everyone. We provide the comments below to help meet these goals.



## Athletic Fields

The design of the turf 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<sup>1</sup>). 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.

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 applicants for restoring access to the river and providing recreational opportunities for surrounding communities. We are pleased to see native plantings that will improve the environmental quality of the site and provide an amenity for future users. However, the park design could be improved to make this a more attractive and healthy place to be. We are concerned that the large amount of impervious surface in the Rivergreen 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 pleasant for people and may be detrimental to the river environment. In addition to an organic fill for the turf, we encourage the co-applicants to add elements to mitigate the heat island effect, such as additional trees and shrubs, especially native varieties, in and adjacent to the parking lot.

## Ch. 91 License Special Conditions

As part of the Ch.91 License granted to the City of Everett for the original 7-acre park that represents the majority of the area of the 10.5 acre Rivergreen Recreation Area, No. 9887, there were 8 Special Conditions. These Special Conditions require the Licensee to, among other things, maintain the park, make access free of charge, maintain interpretive signage that explains the history of the site, and ensure that passive use by the general public is fully and safely allowed on the site. MyRWA believes that these Special Conditions are an important part of the public benefit provided by Ch. 91 and encourages Mass DEP to include the same or Special Conditions with similar intent and effect in the new Ch.91 License to maintain the public benefit and access called for in the Chapter 91 regulations.

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

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



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 emailing [patrick@mysticriver.org](mailto: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  
Mystic River Watershed Association