



September 20, 2019

Ms. Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900 Boston, MA 02114

By Email: purvi.patel@state.ma.us

Re: Comments on Final Environmental Impact Report (FEIR) for development of "The Vale", 22 Hill St., Woburn, MA (EEA No. 15923)

Dear Secretary Theoharides,

The Mystic River Watershed Association (MyRWA) is pleased to submit comments on the Final Environmental Impact Report for The Vale, 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 remediating the site, improving open space including daylighting of Sweetwater Brook and preserving Whittemore Pond. However, we feel that the development could do more to expand the active transportation network in Woburn and Winchester and has the potential for storing additional amounts of stormwater to mitigate local and downstream 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. MyRWA has active programs in water quality science, anadromous fish monitoring, park planning and advocacy, environmental education and climate resilience planning. 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.

Climate Change Resiliency

As we requested in our comments, the project proponent used Cambridge's Infoworks model to depict the amount of on-site flooding from a projected 1% storm in 2070. The model results indicated that the site would flood considerably, whether it was redeveloped or not (in fact, slightly less due to the proposed stormwater retention design).

The City of Woburn is participating in a \$350,000 regional MVP action grant focused on identifying opportunities to manage stormwater flooding at a watershed scale. Managed by the City of Cambridge, seventeen communities are participating in this project. The result will be a short list of opportunities to slow, infiltrate and/or store stormwater to decrease local and downstream flooding during a projected 2070 10% storm. This work will be completed by spring 2020.

The large scale of the Vale's site provides opportunities to store significant amounts of stormwater to mitigate local and downstream flooding. We recognize that much of the site contains contaminated soils and therefore should not be designed to increase infiltration through these soils. That said, the site design already includes several below-ground storage tanks. We urge the final design to include the maximum feasible volume (e.g., on-site volume of a 4% storm, which is projected to be the equivalent of a 10% storm in 2070) of additional below-ground and surface stormwater storage structures.

Open Space and Transportation

Located along the newly opened Tri-Community Path, this development is well-positioned to attract a high-volume of active transportation users. We would urge the proponent to invest in biking infrastructure such as bike shares, bike storage and requiring showering facilities at future businesses.

We strongly support the idea that the developer design and construct a connector path along the Aberjona River to further develop the local network of off-road paths and to provide recreation and access to nature for local employees and residents. We would ask that the design scope includes evaluating the possibility of extending the Connector to the existing neighborhood south of the site (in the vicinity of Washington St/Sunset Road), not just a dead-end path to the Vale development. During this design process, we would also urge the developer to create a conservation restriction for the open space along the southern/riverside edge of the parcel. This would protect an important habitat corridor and potential natural area for people to relax and view wildlife.

Lastly, we understand that this site is not currently well-served by fixed-rail and will rely heavily on parking. However, we ask that the structured parking be designed in a way that it could be adapted to different uses as vehicular use changes over time. We are also encouraged to see a plan for Transportation Demand Management (TDM) measures and coordinating with local Transportation Management Organizations (TMO) to reduce single-occupancy vehicular use and would again urge that shuttle systems be implemented as early in the phasing process as possible.

Conclusion

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

Thank you for your consideration.



Patrick Herron
Executive Director
Mystic River Watershed Association

CC:

Kyle Greaves kgreaves@vhb.com

John Corey jaycorey@cityofwoburn.com

Beth Rudolph brudolph@winchester.us